



APTA FAL Call Briefing Memo

May 2020

SEQUESTRATION: Staff are directly sending or working with chapters to send letters to ten payers who implemented the 2% sequestration requesting they lift the policy until 12/31/2020 in alignment with the CARES Act.

PTAs: During COVID-19 declared emergency, CMS will allow Medicare reimbursement for therapist assistants who provide “maintenance therapy services” in the outpatient setting.

HOME HEALTH: During the COVID declared emergency, CMS will allow PTs to also perform initial and comprehensive assessments for home health patients when both nursing and therapy are ordered. This temporary blanket modification allows any rehabilitation professional (OT, PT, or SLP) to perform the initial and comprehensive assessment for all patients receiving therapy services as part of the plan of care, to the extent permitted under state law, regardless of whether or not the service establishes eligibility for the patient to be receiving home care

NCCI edits: Advocacy efforts by APTA and its members helped reverse changes that complicated (and sometimes thwarted) efficient, effective care. For more details, click [HERE](#).

TELEHEALTH:

- **United Healthcare:** UHC updated their [temporary telehealth policy](#) on May 5 to read United Healthcare will reimburse claims including the CPT® codes from [their code list](#), as long as claims are submitted on a CMS 1500 form using the place of service that would have been reported had the services been furnished in person along with a 95 modifier, or on a UB04 form with revenue code 780. These coding rules apply to all lines of business until June 18, 2020. In addition, cost -sharing will be waived for in-network telehealth services for PT/OT/ST services from March 31, 2020 until June 18, 2020 for Medicare Advantage, Medicaid, Individual and fully insured Group Market health plan members, with opt-in available for self-funded employers.
- **Humana:** Staff is continuing to advocate for telehealth coverage furnished by physical therapists/PTAs for all lines of business with Humana.
- **Request for Continuation of Telehealth Coverage:** APTA has submitted letters to the national payers recommending the permanent adoption of telehealth policies.
- [CMS will now allow physical and occupational therapists to bill telehealth therapy codes](#). CMS provided clarification during the May 5 office hours call that PTAs and OTAs also can furnish telehealth services under the supervision of the PT or OT. CMS will [allow hospital-based outpatient](#) departments to furnish remote care to registered hospital outpatients if their location has been added as a temporary expansion location. APTA is continuing to advocate for the recognition of institutional providers, including SNFs, HHAs, and rehabilitation agencies to be able to furnish and bill for telehealth under Medicare Part B. APTA conducted a [Facebook Live Q&A](#) on Thursday March 7 to discuss the Medicare telehealth policy changes.
- **PTA Supervision:** CMS has stated that "direct supervision" includes real-time interactive audio and visual communications "when use of such technology is indicated to reduce exposure risks for the beneficiary or health care provider" (that's the language from the April 6 interim final rule). During the May 5 conference call, CMS said this flexibility could be applied in the context of the PT directly supervising the PTA in private practice. For more guidance, please see page 32 of this [CMS FAQ](#).

APTA COMMENT LETTERS

- APTA submitted a comment letter to AHRQ in response to its RFI on opioid management in older adults.
- Disability Rehab Research Coalition (DRRC) sign-on letter signed on to by APTA to HHS and OCR for urgent support for the Department's Office for Civil Rights to issue additional guidance to ensure that schemes to ration scarce health care resources during the coronavirus disease 2019 (COVID-19) pandemic comply with federal nondiscrimination laws.
- APTA submitted a comment letter to Office of Science Technology and Policy in response to their request for information regarding public access to peer-reviewed scholarly publications, data and code resulting from federally funded research.
- Consortium for Citizens with Disabilities (CCD) Education Task Force initiated a sign-on letter Congress opposing waivers to IDEA. APTA and Academy of Pediatric Physical Therapy signed onto this letter.
- APTA submitted a second comment letter to CMS responding to its interim final rule; the asks focused on expanding telehealth coverage to include institutional settings; inconsistencies with the MACs processing e-visits and other CTBS; and eliminate POC certification.
- PARCA Coalition letter to Capitol Hill: *Essential Worker Pandemic Compensation Act of 2020* - legislation introduced by Reps. Speier, Neguse and Rose aimed at supporting the families of essential healthcare workers.