

State Actions Affecting Occupational Therapy in Response to COVID-19—Updated as of April 2, 2020

AOTA is tracking actions being taken by governors, state legislatures, and state agencies in response to the COVID-19 pandemic. Key issues profiled below relate to licensure, telehealth, and payment for occupational therapy services. AOTA is collaborating with state occupational therapy associations to compile and distribute this information. AOTA and state associations are advocating with state governments to ensure that consumers are able to access OT services. Recent updates to this chart are highlighted in gray. For more information, contact AOTA's State Affairs staff at sptd@aota.org.

State	Licensing board updates	Updated Telehealth policies	Medicaid & private Insurance policy updates
AL	No updates at this time	Alabama Medicaid extended temporary telemedicine coverage for speech and occupational therapy providers. Alabama Department of Insurance press release and bulletin on cost-sharing and telehealth	<p>Private Insurance: BCBS of AL allows in-network providers to provide medically necessary services that can be appropriately delivered, including occupational therapy.</p> <p>Medicaid: On March 23, the federal government granted an 1135 waiver</p> <p>Health Issuer's Response to Coronavirus (COVID-19)</p>
AK	Division of Corporations, Business and Professional Licensing Guidance on Telehealth and Licensing During COVID-19	Division of Corporations, Business and Professional Licensing Guidance on Telehealth and Licensing During COVID-19 Department of Health and Human Services updated Temporary Expansion of Medicaid Telehealth Coverage (3/30) which authorizes physical, occupational, and speech therapy services via live interactive modes of delivery.	<p>Private insurance: State-regulated plans are encouraged to liberalize telehealth benefits.</p> <p>Bulletin B 20-11 to all insurers authorized to transact health insurance in the state requires insurers to provide greater flexibility and coverage of telehealth.</p> <p>Medicaid: 1915(c) Appendix K waiver granted allowing flexibilities in the home and community based services (HCBS) waiver.</p> <p>On April 2, the federal government granted an 1135 waiver.</p>
AZ	Notice on Board website: EXECUTIVE ORDER 2020-15 EXPANSION OF TELEMEDICINE	Governor issued Executive Order 2020-07 (pdf) which says Department of Health Services in conjunction with the Department of Insurance	Private insurance: Governor's Executive Order 2020-07 (video links) also requires insurance companies and health plans to cover out of

<p>News Release Executive Order 2020-15</p> <p>Board staff received clarification on this order from the Governor's office on 3/26/2020. This order includes occupational therapy assistants, as item 6 states telehealth services may be provided by "any Arizona licensed healthcare provider type including but not limited to...." Item 9 means that the practice of occupational therapy is the same as it was before telemedicine was allowed. Any treatments you were not authorized to provide before telemedicine are still not authorized.</p> <p>For information regarding the practice of telemedicine, please refer to Arizona Revised Statutes Title 36: Chapter 36.</p> <p>Please do not contact Board members, as they are not able to speak for the Board outside of Board meetings. Questions can be emailed to karen.whiteford@otboard.az.gov, or you can call Karen Whiteford at (602) 284-7433.</p> <p>EXECUTIVE ORDER 2020-17 CONTINUITY OF WORK News Release Executive Order 2020-17 Executive Order 2020-17 helps licensed professionals in the state stay licensed and defers certain requirements for six months.</p> <p>ABOTE is complying with this executive order by:</p> <ul style="list-style-type: none"> - Giving six-month license extensions to those who cannot complete their continuing education in time because of COVID-19 - Issuing six-month provisional licenses to new graduates that cannot take the 	<p>requires that all insurers regulated by the state cover telemedicine visits at a lower cost-sharing point for consumers than the same in-office service to encourage utilization of telemedicine for the duration of the state's public health emergency.</p> <p>Governor issued Executive Order 2020-15 (pdf) which requires all health insurance plans regulated by the Arizona Department of Insurance and all Medicaid plans to provide coverage for all health care services provided through telemedicine if the health care service was covered were it provided in person. Telehealth services may be provided by any Arizona-licensed health care provider type, including occupational therapists.</p>	<p>network providers, including out of plan laboratories and telemedicine providers.</p> <p>Medicaid: On March 23, the federal government granted an 1135 waiver</p>
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	<p>NBCOT exam because the testing centers are closed</p> <ul style="list-style-type: none"> - Issuing six-month provisional licenses to those applying for a new license who cannot obtain fingerprints 		
AR	No updates at this time	<p>Following Executive Order 20-05, the Department of Human Services issued a memorandum with guidance and policy related to physicians' and certain behavioral health providers' use of telemedicine.</p> <p>Arkansas Insurance Department Bulletin 13-2020 regarding required coverage of telehealth and reimbursement on the same basis as in-person care</p> <p>Department of Human Services released a memo to Medicaid providers as an addendum to previous guidance allowing telemedicine services, including services provided by licensed occupational, physical, or speech therapy assistants.</p>	<p>Private Insurance: BCBS of Arkansas and Health Advantage are encouraging members and health care providers to use audio-visual and telephone technology for certain services related to physical and/or behavioral health.</p> <p>Medicaid: On April 2, the federal government granted an 1135 waiver.</p>
CA	<p>Policy to Implement the Emergency Proclamation of the Governor on the Authorization of Out of State Medical Personnel</p> <p>Executive Order N-39-20 authorizing the Dept. of Consumer Affairs to amend scopes of practice and waive any licensing requirements for health care providers, including OTs and OTAs.</p> <p>Department of Consumer Affairs waives regarding continuing education and reinstatement of licensure</p>	<p>California All-Plan Letter directing plans to cover telehealth at the same rate as in-person; pay for telephone at the same rate as video if medically appropriate; and not to charge higher cost sharing for telehealth.</p> <p>Insurance Commissioner directed health insurance companies to provide increased telehealth access during COVID-19 emergency.</p>	<p>Private insurance: Covered California Special Enrollment Period through June 30</p> <p>Medicaid: On March 23, the federal government granted an 1135 waiver</p>
CO	No updates at this time	<p>Health First Colorado temporarily expanded its telemedicine policy to add occupational therapy services (as well as physical therapy and home health hospice and pediatric behavioral therapy</p>	<p>Private insurance: Insurance bulletin directing state-regulated plans to provide coronavirus-related telehealth without cost sharing; testing without cost sharing; and early prescription refills mandated.</p>

		services) to the list of eligible interactive audiovisual telemedicine services.	<p>Connect for Health Colorado Special Enrollment Period through April 3</p> <p>Medicaid: On March 26, the federal government granted an 1135 waiver</p> <p>1915(c) Appendix K waiver granted allowing flexibilities in the home and community based services (HCBS) waiver.</p>
CT	<p>COVID-19 FAQs: Professional Licenses that require recertification</p> <p>Question: I have a license to practice my profession, and it is expiring soon. Will I have an automatic extension for recertification?</p> <p>Answer: The Department of Consumer Protection is handling it on a case-by-case basis. If the licensing renewal requirements for a particular profession or occupation can be met through continuing education online by the expiration date, there will be no extension. Since most licenses can be renewed online or by mail, this should not present an issue for most licensed professionals. Please contact the Department of Consumer Protection or the regulatory authority for your license if you have any questions.</p> <p>The Department of Public Health is also reviewing the requirements to extend certain certifications and licenses, including for EMTs and others—expect more news in the coming days.</p>	Executive Order No. 7G allows telehealth providers enrolled in Medicaid or in-network in fully insured commercial plans to provide covered telehealth services via audio-only telephone to established patients.	<p>Private insurance: Access Health CT Special Enrollment Period through April 2</p> <p>Medicaid: On March 27, the federal government granted an 1135 waiver</p> <p>1915(c) Appendix K waiver granted allowing flexibilities in the home and community based services (HCBS) waiver.</p>
DC	<p>Mayor's Administrative Order 2020-02</p> <p>Waives licensure fees for health care providers appointed as temporary agents of DC; a temporary agent has a license in their home jurisdiction and is only providing services at a</p>	The Mayor issued guidance on the use of telehealth in the District of Columbia stating that telehealth services are currently permissible in the District of Columbia pursuant to a few caveats.	Medicaid: A public notice to COVID-19 Medicaid providers regarding where to get information, coverage of testing, telemedicine coverage, and how beneficiaries can receive extra medicine or supplies.

	<p>licensed health care facility (including telehealth) or has an existing relationship with a patient who has returned to DC and continues to require the health care provider's services.</p> <p>Notice on Board website: Licensure Waivers In response to COVID-19, DC Health has waived all licensure requirements for practitioners who are licensed in good standing in another jurisdiction. You can read more about the waiver process here.</p>		<p>Private insurance: DC Health Link Special Enrollment Period through June 15</p> <p>Department of Insurance, Securities, and Banking order directing insurers to cover screening, testing, <i>and treatment</i> without cost sharing; cover a vaccine without cost sharing when available; provide robust telehealth with cost sharing that is not greater than for in-person services; and other requirements.</p>
DE	<p>Letter from Division of Professional Regulation to licensees regarding continuing education and licensure renewal</p>	<p>DMMA is revising telehealth policies to remove barriers created by requirements that patients present in-person before telehealth services may be provided and allow out-of-state health care providers to provide services if they hold an active license in another jurisdiction.</p>	<p>Private insurance: The Department of Insurance issued a bulletin to all insurance carriers in the state related to testing, telemedicine and telehealth, network adequacy and out of network services, utilization review, surprise medical bills, etc.</p> <p>Department of Insurance Bulletin No. 116: Additional Guidance Relating to COVID-19, specifically suspension of cancellations and nonrenewals, telehealth, and waiver of pre-authorization requirements.</p> <p>Medicaid: On March 27, the federal government granted an 1135 waiver</p>
FL	<p>Notice on Board website regarding NBCOT exam and closing of Prometric testing centers.</p>	<p>Surgeon General issued an Emergency Order that allows certain out-of-state health care professionals to temporarily provide telehealth services to persons in Florida. The order also allows certain Florida-licensed physicians to use telehealth services instead of in-person examination.</p> <p>Florida Medicaid has expanded telemedicine/telehealth services to behavior analysis services, therapy services, specified behavioral health services, and early intervention services.</p>	<p>Medicaid: On March 17, the federal government granted an 1135 waiver, allowing the state to waive prior authorization requirements to remove barriers to needed services, streamline provider enrollment processes to ensure access to care for beneficiaries, allow care to be provided in alternative settings in the event a facility is evacuated to an unlicensed facility, suspend certain nursing home screening requirements to provide necessary administrative relief, and extend deadlines for appeals and state fair-hearing requests.</p>

		<p>Governor issued Executive Order 20-85 to ensure that all state employees have access to telehealth services.</p>	
GA	<p>At its public meeting on March 19, 2020, the Board voted to submit an emergency rule to the Governor’s office extending the licensure renewal deadline for the current renewal period only. Text is forthcoming.</p> <p>Board Notice: IMPORTANT LICENSE RENEWAL NOTICE The Georgia State Board of Occupational Therapy does not have the legal authority to extend the license renewal period as the period for renewal is established by law and Joint Secretary Rules and therefore cannot be waived or amended by the Board. Licensees must meet the requirements presently outlined within the Board rules.</p> <p>Licensees will need to renew your license prior to the deadline date and answer all questions honestly, including those questions related to meeting the CE requirements. In addition, licensees are encouraged to review the Board rules as it relates to in-person requirements as the rules do allow for real-time interactive webinars to meet this requirement.</p> <p>As stated in the Board FAQs, licensees may submit a Petition for Rule Variance or Waiver for the Board to consider if rule requirements pose a substantial hardship. Not only will licensees need to substantiate the hardship, but they must present the Board with an alternate method for accomplishing that which is currently required by Board rules. As the law requires that such petitions be posted on the registry for a minimum of 15 days, it is important that the</p>	<p>The Department of Community Health is waiving certain policies related to telehealth/telemedicine to support the use of telehealth in diagnosis and treatment. Policies include waiving the telehealth services originating site limitations and allowing telehealth services to be provided by certain modalities. All services must be medically necessary.</p> <p>Insurance and Safety Fire Commissioner News Release regarding telehealth resources from private insurers</p>	<p>Medicaid: On April 1, the federal government granted an 1135 waiver</p>

	petitions are submitted as soon as possible. If you wish to utilize this option, please review the FAQs and the Petition for Rule Variance or Waiver Instructions and Forms (located in the Application/Form Downloads section) carefully and complete it in its entirety prior to submitting it to the Board.		
Guam	Executive Order regarding temporary appointment of health care personnel	No updates at this time	No updates at this time
HI	No updates at this time	Department of Human Services released Memo providing guidance on telehealth billing during public health emergency related to COVID-19.	Medicaid: On March 26, the federal government granted an 1135 waiver 1915(c) Appendix K waiver granted
ID	No updates at this time	Idaho Department of Health and Welfare guidance on telehealth for occupational therapy providers	Medicaid: On March 26, the federal government granted an 1135 waiver 1915(c) Appendix K waiver granted allowing flexibilities in the home and community based services (HCBS) waiver.
IL	Dept. of Financial and Professional Regulation announcement of regulatory variances including waiver of requirement for live continuing education and allowance of interactive webinars and online distance education courses.	The Illinois Department of Healthcare and Family Services has expanded telehealth services for claims billed for fee-for-service and a HealthChoice Illinois managed care plan. Reimbursement for telehealth services will continue to be made at the same rate paid for face-to-face services provided on site. Governor Executive Order 2020-09 requires all health insurance issuers regulated by the Department of Insurance to cover the costs of all Telehealth services rendered by in-network providers Department of Insurance Bulletin 2020-04: Requirements for Telehealth Services Under Executive Order 2020-09.	Medicaid: On March 23, the federal government granted an 1135 waiver
IN	Notice on Professional Licensing Agency website: Extension of Licenses—All licenses issued by the State which are set to expire in the next 60	Indiana Health Coverage Programs (IHCP) enrolled providers may use specific billing guidance for providing services through medicine. This policy applies to both in- and out-	Medicaid: Executive Order 02-05 requires the Family and Social Services Administration (FSS) to:

	<p>days will instead expire on May 22nd. This means that any license which is currently active will remain active until at least May 22nd, which is when the license will be designated as 'Expired'. If you wish to prevent your license from expiring on May 22nd, you may still renew your license prior to that date to ensure no disruption of service.</p> <p>Healthcare Licensing Requirements—Various code cites: Pursuant to Executive Order 20-05, all healthcare professionals that hold a valid license to practice in another state are not required to attain an Indiana license to practice their equivalent profession in Indiana. The individual cannot be suspended or barred from practicing in any State.</p>	<p>of-state providers and all IHCP-covered services, and it includes both fee-for-service Medicaid as well as all managed care benefits.</p> <p>Governor's Executive Order 20-13 authorizing OTs to practice via telemedicine and authorizing temporary licensure to certain retired, inactive, or out-of-state licensees,</p>	<ul style="list-style-type: none"> • Waive all premium payment requirements for the Healthy Indiana Program (HIP) and the Children's Health Insurance Program (CHIP) • Delay renewal processing for all Medicaid and HIP recipients • Suspend all Telehealth restrictions. <p>On March 25, the federal government granted an 1135 waiver</p>
IA	<p>Iowa Board of Physical and Occupational Therapy Guidance Related to Governor Reynold's Proclamations & COVID-19 related to license renewal, continuing education, background checks, and telehealth</p>	<p>The Iowa Medicaid Enterprise (IME) allows telehealth services to be provided for all Medicaid-covered benefits and provides guidance on billing.</p>	<p>Medicaid: DHS is waiving all co-pays, premiums, and contributions for Iowa Health and Wellness Plan (IHWP), Medicaid for Employed People with Disabilities, Healthy and Well Kids in Iowa, and Dental Wellness Plan.</p> <p>On March 25, the federal government granted an 1135 waiver</p> <p>1915(c) Appendix K waiver granted allowing flexibilities in the home and community based services (HCBS) waiver.</p>
KS	<p>KSBHA emergency actions and guidance statements including temporary licensure for OTs and OTAs and temporary waiver of licensure requirements for qualified telemedicine services.</p> <p>Governor's Executive Order 20-08 authorizing temporary licensure for occupational therapists</p>	<p>Kansas Insurance Department COVID-19 FAQ (updated March 23, 2020): Are health insurers covering telehealth services due to COVID-19?</p> <p>The Commissioner of Insurance does not have the authority to mandate expansion of telehealth services or modifications in reimbursement amounts. However, we know many health insurers, but not all, are voluntarily making changes to allow telehealth services and to modify their payment practices to reimburse</p>	<p>Medicaid: On March 25, the federal government granted an 1135 waiver.</p> <p>1915(c) Appendix K waiver granted allowing flexibilities in the home and community based services (HCBS) waiver.</p>

		<p>those services at the same level as in-person services. We encourage everyone to check with their health insurer regarding the coverage of telehealth services.</p>	
<p>KY</p>	<p>Board of Licensure for Occupational Therapy statement regarding telehealth authorization and relaxing of face-to-face supervision requirements for OTAs and temporary license holders</p>	<p>Memo from Kentucky Cabinet for Health and Family Services—Office of Inspector General:</p> <p>Dear Therapeutic Association Members, In accordance with Governor Beshear’s press conference on 3/18/20 regarding physical therapy and occupational therapy services:</p> <ul style="list-style-type: none"> • Skilled rehabilitation professionals (physical therapists, occupational therapists, speech language therapists, and respiratory therapists) shall continue to work in acute care, inpatient rehabilitative settings, and skilled nursing facilities. Their work will allow patients to heal sooner and return home to their preferred setting. All CDC recommended protective measures shall be in place when providing services to patients. • All outpatient rehabilitative settings shall close and transition to a telehealth platform in accordance with DMS guidance immediately. • Home health rehabilitation professionals shall use best clinical judgment to determine best practice for the implementation of community-based rehabilitative services in light of the COVID19 pandemic. In-home rehabilitative services shall be extremely limited and medically necessary to prevent readmission to an acute care or long-term-care setting. • Rehabilitative telehealth services shall be maximized to the fullest extent possible for patients receiving community-based rehabilitative skilled therapy services. 	<p>Medicaid: The Department of Medicaid Services will waive all cost sharing associated with COVID-19, encourage the use of telehealth when possible, add specific codes related to telehealth on a temporary basis, and eliminate prior authorization for COVID-19 related services.</p> <p>On March 25, the federal government granted an 1135 waiver</p> <p>1915(c) Appendix K waiver granted allowing flexibilities in the home and community based services (HCBS) waiver.</p> <p>Private insurance: Executive Order 2020-220 states that all insurers shall ensure that provider networks are adequate to handle an increase in the need for health care services, including offering access to out-of-network services where appropriate.</p>

LA	<p>Please note the “Louisiana Telehealth Act,” La. R.S. 40:1223.1 through 40:1223.5 for reference (see Telehealth Act link on first page of www.lsbme.la.gov).</p> <p>To be sure you are acting in compliance with the telehealth law, please review La. R.S. 40:1223.1 through 1223.5 (see Telehealth Act on first page of www.lsbme.la.gov).</p>	<p>Louisiana Medicaid encourages the use of telemedicine/telehealth for rendering physical therapy, occupational therapy, and speech therapy to members. Claims processing systems will be updated by March 24, 2020—before that date, providers should continue to submit claims and they will be recycled with no action needed by the provider.</p> <p>During State Board of Medical Examiners’ Emergency Board Meeting (3/30), Board approved a recommendation to allow OTAs to utilize telehealth in the provision of services to the patients managed by OT and OTAs.</p>	<p>Medicaid: Louisiana Medicaid encourages the use of telemedicine/telehealth for rendering physical therapy, occupational therapy, and speech therapy to members. Claims processing systems will be updated by March 24, 2020 – before that date, providers should continue to submit claims and they will be recycled with no action needed by the provider.</p> <p>On March 23, the federal government granted an 1135 waiver</p>
ME	<p>No updates at this time</p>	<p>MaineCare providers are being encouraged to consider utilizing telehealth for the delivery of MaineCare-covered services when appropriate and necessary.</p>	<p>Medicaid: MaineCare providers are being encouraged to consider utilizing telehealth for the delivery of MaineCare-covered services when appropriate and necessary.</p> <p>MaineCare Guidance Relating to Telehealth and Telephone Services During COVID-19 Emergency Period (last updated March 24, 2020)</p> <p>Private insurance: Bureau of Insurance Supplementary Order authorizing the provision of remote health care services via telephonic communication and requiring parity in reimbursement for services provided in-person and via telephone</p>
MD	<p>Governor’s Executive Order regarding interstate licensure reciprocity and inactive practitioners</p>	<p>Governor Hogan signed the COVID-19 Public Health Emergency Act of 2020, which, among other things, establishes or waives telehealth protocols.</p> <p>Maryland Department of Health memorandum #1: temporary expansion of Medicaid Regulations to Permit Delivery of Telehealth Services to the Home.</p>	<p>Private Insurance: Insurance bulletin for state-regulated plans with information about testing and prior authorization; and encouraging telehealth.</p> <p>Maryland Health Connection Special Enrollment Period through June 15</p>

		<p>Department of Health memorandum #4a: authorizing telephone services during State of Emergency</p> <p>Governor's Executive Order expanding authorized telehealth services to include asynchronous services such as email and making such service reimbursable by Medicaid</p>	<p>Medicaid: On March 26, the federal government granted an 1135 waiver</p>
MA	<p>Governor's Executive Order Extending the Registration of Certain Health Care Professionals</p>	<p>MassHealth will permit qualified providers to deliver appropriate, medically necessary covered services to recipients via telehealth.</p> <p>As per Governor's order, the Group Insurance Commission, all Commercial Health Insurers, Blue Cross and Blue Shield of MA, and Health Maintenance Organizations regulated by the Division of Insurance are required to allow all in-network providers to deliver clinically appropriate, medically necessary covered services to members via telehealth.</p>	<p>Private insurance: State-regulated plans must offer testing and treatment without cost sharing; relax prior-authorization and out of network requirements; and promote telehealth. Federal law requires testing without cost sharing, but does not waive cost sharing for coronavirus treatment. State-regulated plans are expected to expedite provider credentialing and suspend prior authorization requirements that delay patients moving out of acute care.</p> <p>Massachusetts Health Connector Special Enrollment Period through May 25</p> <p>Medicaid: On March 26, the federal government granted an 1135 waiver</p>
MI	No updates at this time	<p>Governor Whitmer's administration expanded telemedicine by allowing Medicaid beneficiaries to receive services in their home. Additionally, insurance plans announced they will cover and encourage virtual care and telemedicine, as well as waive cost sharing for COVID-19 testing.</p>	No updates at this time
MN	<p>Governor's Executive Order 20-23 authorizes all health-related licensing boards to defer CE requirements until the first reporting cycle following termination of the emergency as well as to accept and process applications for licensure without submission of a full set of fingerprints, provided all information as part of a</p>	<p>Memo to Health Insurance Carriers from the Department of Commerce and Department of Health urged health carriers to take necessary steps to expand the availability of telemedicine services for their enrollees and eliminate barriers to its use.</p>	<p>Private Insurance: BCBS of MN has revised their "televideo consultations/telehealth/telemedicine services" and "telephone calls" reimbursement policies for Commercial and Medicare lines of business to add occupational therapy services.</p>

	<p>criminal background check process is submitted.</p> <p>Minnesota Board of Occupational Therapy Practice notice: Attention Full License Applicants! April 1, 2020 New information is available about the current state of the Criminal Background Check process. Please thoroughly review the information sent to the email address the board has on file.</p>	<p>SF 4334 signed into law provides coverage for telemedicine services and includes a patient's residence as an originating site.</p>	<p>MNsure Special Enrollment Period through April 23</p> <p>Medicaid: On March 27, the federal government granted an 1135 waiver</p> <p>1915(c) Appendix K waiver granted allowing flexibilities in the home and community based services (HCBS) waiver.</p>
MS	<p>From the Mississippi OT Association (not verified with the Advisory Committee):</p> <ol style="list-style-type: none"> Using FaceTime for supervisory visits will be allowed during this time; The renewal period will not be extended at this time; For allowable CE sources, live webinars are not face-to-face. The face-to-face is 6 hours or 30%, Internet is 7 hours, the other 7 can be non live which is where the webinars come in; Any licensed OT in Mississippi can perform telehealth. Payment for those services is dependent on each third-party payor's individual policies. <p><i>AOTA is reaching out to the Professional Licensure Division for confirmation and additional information.</i></p>	<p>The Mississippi Division of Medicaid will expand its coverage of telehealth services.</p> <p>Insurance bulletin directing insurers to take action to increase the use of telemedicine; suspending limits on audio-only consultations; suspending in-network requirements; and covering telehealth on the same basis as in-person services.</p>	<p>Medicaid: On March 23, the federal government granted an 1135 waiver</p>
MO	<p>The Missouri Board of Occupational Therapy has requested a waiver from its required continuing competency regulations.</p>	<p>The Missouri HealthNet Division stated that they will allow any licensed health care provider, enrolled as a MO HealthNet provider, to provide telehealth services if the services are within the scope of practice for which the provider is licensed.</p>	<p>Medicaid: The Department of Social Services has issued an order allowing any licensed healthcare provider in the United States to provide telemedicine or telehealth services.</p> <p>On March 25, the federal government granted an 1135 waiver</p>
MT	<p>Application information for interstate licensure registration</p> <p>Governor's directive expanding telehealth</p>	<p>All Montana Medicaid covered services delivered via telemedicine/telehealth are reimbursable so long as such services are (a) medically necessary and clinically appropriate for delivery via telemedicine/telehealth, (b)</p>	<p>Private Insurance: BCBS of Montana, Pacific Source Health Plans, Montana Health CO-OP, and Allegiance Life & Health Insurance Company have voluntarily expanded their telehealth services.</p>

	AOTA staff have confirmed that under this order licensed OTs and OTAs are able to provide services via telehealth in Montana while the directive is in effect.	comport with the guidelines set forth in the applicable Montana Medicaid provider manual, and (c) are not a service specifically required to be face-to-face as defined in the provider manual. Governor Bullock is encouraging private insurance providers to enact the same policies for their customers.	Medicaid: On March 30, the federal government granted an 1135 waiver.
NE	No updates at this time	Department of Health and Human Services released FAQs on Medicaid and Long term care services during the COVID-19 emergency, including FAQs clarifying providing occupational therapy services. Department of Insurance Notice that health care providers are not required to obtain a patient's signature on a written agreement prior to providing telehealth services for the duration of the Governor's declared State of Emergency.	Medicaid: Nebraska Medicaid is temporarily modifying certain policies and expanding coverage to include additional forms of clinical services. On April 2, the federal government granted an 1135 waiver. Private Insurance: BCBS NE will allow for physical, speech, and occupational therapy services to be provided via telehealth.
NV	OT Board announcement that telehealth practice is allowable by a licensed practitioner. COVID-19 and license renewal (4/1/2020) Governor Sisolak's Emergency Directive 009 regarding the extension of the license renewal period during the State of Emergency will not impact your requirement to renew your license timely as license renewal is available on-line and the Board is fully operational with telephone and email access to address any questions or concerns. The Board will be considering options to alleviate the financial burden of license renewal through deferral of license renewal fees at their meeting on April 4, 2020.	OT Board announcement that telehealth practice is allowable by a licensed practitioner. Department of Health and Human Services released an update to their telehealth services amid COVID-19 allowing for physical therapy, occupational therapy, and speech therapy via telehealth.	Nevada Health Link Special Enrollment Period through April 15 Medicaid: NV Medicaid has released guidelines on telehealth billing.
NH	Office of Professional Licensure and Certification COVID-19 resources	Emergency Order #8 pursuant to Executive Order 2020-04 requires all health insurance carriers regulated by the state Insurance Department and Medicaid coverage to allow all in-network providers to deliver appropriate,	Medicaid: On March 23, the federal government granted an 1135 waiver

		medically necessary covered services to members via telehealth.	
NJ	<p>Division of Consumer Affairs announcement of expedited licensure reciprocity for health care professionals, including OTs.</p> <p>Announcement of waiver of criminal background check and fee requirement for licensure for occupational therapists</p>	<p>Governor Murphy signed legislation to expand access to telehealth services.</p> <p>Insurance Bulletin 20-07: Use of Telemedicine and Telehealth to Respond to the COVID-19 Pandemic</p>	<p>Medicaid: On March 23, the federal government granted an 1135 waiver</p>
NM	<p>Regulation and Licensing Department Boards and Commissions Procedures During COVID-19</p> <p>Governor's Executive Order 2020-004 authorizing credentialing of out-of-state professionals who can render aid</p> <p>The Board of Examiners for Occupational Therapy issued guidance for occupational therapy practitioners to utilize telehealth.</p>	<p>State Medicaid Department and the Superintendent of Insurance issued requirements for telehealth.</p> <p>Superintendent of Insurance Bulletin 2020-005: Utilization and Reimbursement of Telemedicine during the COVID-19 Public Health Emergency</p>	<p>Private insurance: State-regulated plans must waive cost sharing for testing and treatment of coronavirus, pneumonia, and influenza. Federal law requires testing without cost sharing, but does not waive cost sharing for coronavirus treatment.</p> <p>BCBS of NM allows for telehealth services without copays, deductibles, or coinsurance on in-network covered telemedicine services.</p> <p>Medicaid: On March 23, the federal government granted an 1135 waiver</p> <p>1915(c) Appendix K waiver granted allowing flexibilities in the home and community based services (HCBS) waiver.</p>
NY	<p>NYSED Department of the Professions FAQs on Continuing Education (CE) Requirements: Are CE requirements being waived? Answer: Not at this time. The New York State Education Department (NYSED) is working closely with other New York State agencies and the Governor's Office to tackle issues relating to COVID-19. Please continue to monitor the Department's website for updated guidance.</p> <p>Can a licensee complete 100% of the required continuing education through self-</p>	<p>Department of Financial Services announced it adopted emergency regulations under the New York Insurance Law stating that New Yorkers do not have to pay copayments, coinsurance, or annual deductibles for in-network telehealth services. State Health agencies issued guidance to providers for consistent regulatory requirements for telehealth services to ensure that there are no regulatory barriers to telehealth visits.</p> <p>New York Department of Health put out a comprehensive guidance regarding use of</p>	<p>Private insurance: Insurance circular letter to plans regulated by the state regarding testing; instructing plans to develop robust telehealth programs; directing them to verify that their provider networks are appropriate and offer out-of-network care when they are not; to provide a vaccine without cost sharing when available; and several other measures to promote access to care.</p> <p>New York State of Health Special Enrollment Period through April 15</p>

	<p>study activities offered by approved providers for their profession? Some regulations restrict licensees to a certain percentage of self-study for continuing education requirements. In response to the evolving situation with the Novel Coronavirus (COVID-19), and for those licensees whose registrations are due to renew March 1–June 1, 2020, the Department will grant an adjustment to all licensees to complete up to 100% of the continuing education as self-study, so long as it is taken from a Department-approved provider and is in an acceptable subject area for the specific profession. SED is working closely with other New York State agencies and the Governor’s Office to tackle issues relating to COVID-19. Please continue to monitor the Department’s website for updated guidance.</p> <p>Executive Order authorizing students in programs to become a licensed health care professional in the state to practice in a health care facility as a volunteer for educational credit and waiving certain documentation requirements for certain health care providers</p>	<p>telehealth including telephonic services during the COVID-19 state of emergency—the guidance is intended to provide broad expansion for the ability of all Medicaid providers in all situations to use a wide variety of communication methods.</p> <p>Department of Health Bureau of Early Intervention stated that OTAs can provide telehealth services during the declared state of emergency.</p>	<p>Medicaid: On March 26, the federal government granted an 1135 waiver</p>
NC	<p>OT Board announcement on continuing education: for the renewal period ending June 30, 2020, all OT practitioners may renew based on the continuing competence activities he or she has completed; renewal deadline has not been extended.</p>	<p>NC Medicaid is offering reimbursement for virtual patient communication and telephonic evaluation and management for the following beneficiaries seeking care where they are already an established patient: 1) beneficiaries actively experiencing mild symptoms of COVID-19; 2) beneficiaries who need routine, uncomplicated follow up and are not experiencing symptoms; 3) beneficiaries requiring behavioral health assessment and management.</p> <p>NC Medicaid temporarily modified its Telemedicine and Telepsychiatry Clinical Coverage Policy to provide guidance for</p>	<p>Medicaid: Certain policy conditions have been modified, and coverage has expanded to include additional forms of clinical services.</p> <p>Press release from NC Medicaid announcing temporary 5% increase in fee-for-service reimbursement rates for occupational therapists and other providers</p> <p>On March 23, the federal government granted an 1135 waiver</p>

		outpatient specialized therapies (physical therapy, occupational therapy, speech language therapy, and audiology) that can be now be delivered via telehealth.	
ND	<p>Governor's Executive Order 2020-05.1: Temporarily suspends licensure requirements for licensed health care providers in the state, including OTs and OTAs, and OTs and OTAs licensed in good standing in other states seeking to provide service via telehealth to residents of the state.</p>	<p>Governor's Executive Order 2020-05.1: In order to expand health care and behavioral health services, the order states that insurance carriers cannot subject telehealth coverage to deductible, coinsurance, copayment, or other cost-sharing provisions. Carriers are also prevented from imposing any specific requirements on the technologies used to deliver telehealth. The order allows the North Dakota Insurance Commissioner to issue guidance on implementing the requirements.</p> <p>Insurance Department released Bulletin 2020-3 in response to Executive Order 2020-05.1 requiring health insurers to relax guidelines under HIPPA consistent with CMS guidance and requires insurance carriers to start or continue to provide covered services via telehealth visits, including occupational therapy plan evaluation.</p>	<p>On March 24, the federal government granted an 1135 waiver</p> <p>Medicaid: North Dakota Medicaid COVID-19 temporary telehealth policy (3/25) guidance</p>
OH	<p>Ohio OTPTAT Board statement on telehealth</p> <p>Board Notice on website: OTA licensure renewals Recent legislation, House Bill 197, has extended the deadline for expiration of all licenses issued by the state of Ohio until either 90 days after the expiration of the emergency declared by Governor Mike DeWine's Executive Order 2020-01D or December 1, 2020—whichever date is earlier. As a result, the expiration date for all OTA licenses has been adjusted to December 1, 2020 in the Ohio e-license system. Please note that this date will change when the emergency order is lifted.</p>	<p>Ohio OTPTAT Board statement on telehealth</p> <p>Adopted emergency rule on Medicaid reimbursement of telehealth services</p> <p>Ohio Department of Medicaid FAQs on telehealth emergency rule</p>	<p>Department of Insurance Bulletin on coverage of COVID-19 testing and treatment as an emergency medical condition</p>

	<p>Although the deadline to renew has been extended, we encourage you to move forward with renewal based on the previous expiration date of June 30, 2020. The deadline for completion of your required twenty hours of continuing education is unchanged. You must have completed twenty hours between July 1, 2018–June 30, 2020, including one hour of ethics, jurisprudence, or cultural competence. You do not need to submit your certificates during your renewal, but please retain them in case you are selected for audit. First time renewals do not have to complete continuing education.</p> <p>If you do not wish to renew your license, no further action is required from you at this time. However, you will continue to receive renewal reminders since your expiration date is approaching. Simply ignore these reminders if you do NOT wish to renew. Please note, the Board no longer offers an option to place your license in escrow.</p>		
OK	<p>Governor's Executive Order 2020-07 regarding waiver of out-of-state licensure requirements by the Board of Medical Licensure and Supervision</p>	<p>Effective immediately and only as long as the national emergency surrounding COVID-19 exists, OHCA will allow certain PT and OT services to be rendered via telehealth when appropriate. Providers are encouraged to create internal policies and procedures regarding the use of telehealth.</p>	<p>On March 24, the federal government granted an 1135 waiver</p>
OR	<p>Occupational Therapy Licensing Board COVID-19 Updates and Information with links to information about telehealth</p>	<p>Oregon Health Authority filed an emergency rule related to telemedicine services.</p> <p>Oregon Health Authority temporary emergency rule directing contracted Coordinated Care Organizations to reimburse their contracted physical and behavioral health providers at the same rate for telemedicine and telehealth services as they would for in-person.</p>	<p>On March 25, the federal government granted an 1135 waiver</p>

PA	<p>Department of State announcement of regulatory suspensions, including issuance of temporary licenses to out-of-state licensed health care providers and authorization of licensed health care providers to provide services via telehealth</p> <p>BPOA COVID-19 licensing FAQs, including regarding renewal deadlines and background checks</p>	<p>Department of State announcement of regulatory suspensions, including authorization of licensed health care providers to provide services via telehealth</p>	<p>Medicaid: On March 27, the federal government granted an 1135 waiver</p> <p>1915(c) Appendix K waiver granted allowing flexibilities in the home and community based services (HCBS) waiver.</p>
RI	<p>No updates at this time</p>	<p>Executive Order 20-06 requires clinically appropriate medically necessary telemedicine services delivered by in-network providers to be reimbursed at rates not lower than services delivered through in-person methods. Requires insurance carriers to establish reasonable requirements for the coverage of such services.</p>	<p>Medicaid: On March 25, the federal government issued an 1135 waiver</p> <p>1915(c) Appendix K waiver granted allowing flexibilities in the home and community based services (HCBS) waiver.</p> <p>Private insurance: HealthSource RI Special Enrollment Period through April 19</p> <p>The Office of the Health Insurance Commissioner and the Medicaid program are notifying health insurers issuing policies in the state to take some specific measures around telemedicine, removing barriers to accessing services, ensuring network adequacy, etc.</p>
SC	<p>Statement from South Carolina OT Board regarding telepractice</p>	<p>Statement from South Carolina OT Board regarding telepractice</p> <p>SCDHHS announced temporary modifications to policies related to telehealth coverage, which includes reimbursement for occupational therapy services.</p>	<p>Medicaid: On March 31, the federal government granted an 1135 waiver.</p>
SD	<p>No updates at this time</p>	<p>South Dakota Medicaid has added temporary coverage of occupational therapy services via telemedicine for patients at high risk for COVID-19 or under quarantine or social distancing during a declared emergency for COVID-19. Therapy services may only utilize telemedicine if</p>	<p>On March 24, the federal government granted an 1135 waiver.</p>

		the patient and provider have previously met for in-person services. Use of telemedicine for the convenience of the provider or recipient is not covered.	
TN	Governor's Executive Order extends the expiration date by 3 months of any license of a health care provider that would expire between March 12, 2020, and the expiration date of the order.	Governor's executive order No. 15 loosens regulations of telehealth, expands the use of telemedicine, and urges insurance providers to cover more telemedicine services. Memo from TennCare announced MCOs are reimbursing for physical, speech, and occupational therapy that are appropriate to be delivered via telehealth.	Medicaid: On March 31, the federal government granted an 1135 waiver.
TX	Press Release: Governor Abbott Waives Certain Regulations for Telemedicine Care Board website notice: If you are unable to renew your OT or OTA or PT or PTA license due to COVID-19, please contact the board by calling 512-305-6900.	Press Release: Governor Abbott Waives Certain Regulations for Telemedicine Care Texas Department of Insurance adopted emergency rule on telemedicine and telehealth services. This rule is in effect for 120 days, with the possibility of being extended for another 60 days.	Private Insurance: Links to private insurers policies regarding waiver of cost-sharing and telemedicine Medicaid: On March 30, the federal government granted an 1135 waiver.
UT	Dept. of Professional Licensing announcement of waiver of "live" continuing education requirements	Governor issued Executive Order 2020-1 suspending sections of state statute that make it difficult for health providers to provide telehealth.	Private Insurance: Several Utah health insurers are taking action on telehealth and copays.
VT	Office of Professional Regulation policy on continuing education: Online courses may be taken in lieu of required formal continuing education, and a continuing education renewal extension of up to 180 days is allowed if certain criteria are met. Office of Professional Regulation COVID-19 FAQs	Department of Vermont Health Access sent a memo to all Vermont Medicaid-participating providers regarding telehealth. COVID-19 emergency response legislation, HB 742 , enacted in the state expands telehealth. Department of Financial Regulation emergency rule instructing insurance companies to cover services through telehealth or audio-only telephone on the same basis as in-person.	Private insurance: Vermont Health Connect Special Enrollment Period through April 19 Medicaid: On March 30, the federal government granted an 1135 waiver.
VA	Department of Health Professions letter extending renewal deadlines for 6 months for any renewal currently due through June 30,	DMAS is expanding coverage of telehealth as a method of service delivery, with more guidance to follow.	Medicaid: Memo was sent to all providers participating in Medicaid outlining provider flexibilities related to COVID-19, including expanded telehealth coverage, as well as the

	<p>2020 and waiving renewal late fees starting with March renewals.</p>		<p>waiver of certain program requirements, including specified service authorizations and prescription drug limitations. Specific provider requirements are also being waived.</p> <p>Governor Northam is increasing access to health care by: 1) eliminating co-payments for services covered by Medicaid and FAMIS, including COVID-19 related treatment and others; 2) ensuring current Medicaid members do not inadvertently lose coverage due to lapse in paperwork or change in circumstances; and 3) waiving pre-approval requirements for many critical medical services, among other things.</p> <p>On March 23, the federal government granted an 1134 waiver</p>
WA	<p>Governor's Executive Order 20-32 Health Care Worker Licensing temporarily waives and suspends, until April 25, 2020, certain laws and regulations related to health care licensure, including required suicide prevention training for OTs and OTAs, continuing education required to convert a license from inactive to active, and continuing education requirements generally.</p> <p>Board website notice: License expiration date extension</p> <p>The Secretary of Health has extended health profession license expiration dates for licenses up for renewal between April 1 and September 30, 2020.</p> <p>This extension will allow health professionals to focus on patient care and promote continued patient safety during the COVID-19 outbreak. Because renewal payment won't be required until September 30, 2020, it will also reduce the economic burden on those providers not able to work during this emergency.</p>	<p>Washington Health Care Authority news release on steps taken to support telehealth including Medicaid reimbursement, guidance for use by public school employees, and provider support.</p> <p>Apple Health has issued new guidance for providers on coverage for telehealth.</p> <p>Apple Health clinical policy and billing for COVID-19.</p> <p>Governor Inslee signed SB 5385 which requires telemedicine claims to be reimbursed at the same level as care delivered face to face. Telemedicine claims also cannot be denied by insurance carriers. This legislation will go into effect immediately to help increase access to care during the COVID-19 outbreak.</p>	<p>Medicaid: On March 19, the federal government approved an 1135 waiver, allowing the state to waive prior authorization requirements to remove barriers to needed services, streamline provider enrollment processes to ensure access to care for beneficiaries, allow care to be provided in alternative settings in the event a facility is evacuated to an unlicensed facility, suspend certain nursing home screening requirements to provide necessary administrative relief, and extend deadlines for appeals and state fair hearing requests.</p> <p>1915(c) Appendix K waiver granted allowing flexibilities in the home and community based services (HCBS) waiver.</p> <p>Private Insurance: Insurance Commissioner's emergency order waiving cost sharing for testing; suspending prior authorization for testing and treatment; allowing early prescription refills; and allowing out-of-network care with no</p>

	<p>Washington law allows the Secretary of Health to grant an administrative modification for the duration of any license, certification, or registration period to address unusual circumstances. Governor's Proclamation 20-32 provides authority for the action without agency rule making. More information is available on our License Expiration Extension FAQ webpage.</p> <p>Application and FAQs on Emergency Volunteer Health Practitioners</p>		<p>cost sharing if networks are insufficient. Applies to all state-regulated plans, <i>including short-term plans</i>. Other states' coronavirus-related mandates do not apply to short-term plans.</p> <p>Washington Healthplanfinder Special Enrollment Period through May 8</p>
WV	<p>Board Position on TeleHealth</p> <p>The Board's position on Telehealth has always been that there is nothing in our Code or Legislative Rules that prohibits telehealth as a method of providing services, as long as all provisions of the Code are complied with and the same standard of care is exercised. Our Rules do, however, require the OT be directly involved through a face-to-face visit with the patient during the initial evaluation. The Board has determined that in light of the current situation, video-conferencing could be considered face-to-face. Otherwise, it is up to the therapist to determine if in-person intervention is necessary, or if providing OT services by means of telehealth is in the best interest of the client.</p> <p>Also, in order to provide OT services to consumers in WV, practitioners must hold a current, valid WV OT or OTA license.</p>	<p>Department of Health and Human Services released a memo to WV Medicaid providers allowing non-emergent services to be rendered through Telehealth modality.</p>	<p>Medicaid: 1915(c) Appendix K waiver granted allowing flexibilities in the home and community based services (HCBS) waiver.</p> <p>On March 30, the federal government granted an 1135 waiver.</p>
WI	<p>Governor's Emergency Order 16 regarding interstate licensure reciprocity and temporary licenses for health care providers, including OTs and OTAs, and fees related to health care provider credentialing.</p>	<p>Bulletin From Office of the Commissioner of Insurance to Insurers, Agents, and Interested Parties states that some insureds may be using telehealth services, if offered, instead of in-person health care services. Health Plan issuers are reminded to review provisions in current policies regarding the delivery of health care</p>	<p>No updates at this time</p>

	Dept. of Safety and Professional Services guidance on telehealth	<p>services via telehealth and ensure their telehealth programs can meet demands.</p> <p>ForwardHealth Update 2020-15 regarding additional services to be provided via telehealth, including occupational therapy, provided the service is a covered service that can be delivered with functional equivalency to the face-to-face services.</p>	
WY	Board website notice regarding telehealth	<p>No updates at this time</p>	<p>Medicaid: On March 27, the federal government granted an 1135 waiver</p> <p>1915(c) Appendix K waiver granted allowing flexibilities in the home and community based services (HCBS) waiver.</p>