

Physical Therapy via Telehealth FAQs

TX PT Rules §322.5 addresses the provision of physical therapy services via telehealth. As long as a PT or PTA under the supervision of a PT abide by not only the telehealth rules but also all of the provisions of the PT Practice Act/Rules, they will be compliant with the licensure rules and regulations when providing physical therapy services via telehealth.

A pdf of the current PT Rules is available online at <https://www.ptot.texas.gov/page/act-and-rules>.

In response to recent phone calls/emails, the PT Board has developed the following FAQs in order to provide clarification of the telehealth rules:

Revised Can a PT/PTA who is licensed in TX provide physical therapy services via telehealth to a patient in another state/country?

The TX PT Rules pertain to physical therapy services via telehealth provided to a patient who is physically located in Texas. Physical therapy services provided to a patient located in another state/country are governed by the physical therapy statutes and rules of that state/country.

Can a PT/PTA located in another state provide physical therapy services via telehealth to a patient who is physically located in Texas?

As long as the PT/PTA has either an unrestricted Texas license or a Compact Privilege to practice in Texas, they can provide physical therapy services via telehealth to a patient who is physically located in Texas regardless of their location.

Can the informed consent be obtained verbally?

Verbal consent is acceptable as long as you document that you are receiving verbal consent for patient/student name and the date the verbal consent is given. If the responsible party of the patient/student provides the consent, include the name and relationship to the patient/student in the documentation. The informed consent can be broad in nature to cover multiple sessions during the episode of care instead of obtaining consent for each session.

New Can the informed consent be included in the Individualized Education Program (IEP) for school-based physical therapy services or the Individualized Family Service Plan (IFSP) for Early Childhood Intervention physical therapy services?

Yes, if the parent/guardian understands that the informed consent covers physical therapy services provided via telehealth, this meets the intent of PT Rules §322.5(e).

Can an evaluation (reevaluation) be performed via telehealth?

The PT is responsible for determining whether an evaluation (reevaluation) or intervention may be conducted via telehealth or must be conducted in an in-person setting.

Does a reevaluation need to be performed to transition a patient's physical therapy services to telehealth?

Transitioning the physical therapy services of a patient to telehealth is just a change in the delivery mode for the continuation of the episode of care and would not necessarily require a reevaluation.

New Is there any special rules for supervising a PTA who is providing physical therapy services via telehealth?

No, PT Rules §322.5(d)(1) states that the PT or PTA is subject to the same standard of care that would apply to the provision of the same physical therapy service in an in-person setting. This includes the supervision of PTAs as set forth in PT Rules §322.3(b).

Is FaceTime and non-encrypted video permissible at this time per PT rules and regulations?

Since the Office of Civil Rights (OCR) of the U.S. Department of Health & Human Services has temporarily relaxed the requirements for HIPAA compliant telehealth platforms, it would not be a violation of the PT Practice Act/Rules to use those platforms during the COVID-19 nationwide public health emergency. More information on OCR enforcement discretion and HIPAA compliant telehealth platforms is available at <https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html>.

Is physical therapy services via telehealth reimbursable? What are the telehealth codes for billing?

The PT Practice Act/Rules do not address billing/coding/reimbursement, and licensure authorization does not guarantee that a payer source will reimburse for the telehealth services. You should contact your payer source(s) for clarification on billing/reimbursement of physical therapy services provided via telehealth.

Additional information and resources are available through both the state and national physical therapy professional associations.

Texas Physical Therapy Association (TPTA) - <https://tpta.memberclicks.net/covid-19-resources>

American Physical Therapy Association (APTA) - <http://www.apta.org/Telehealth/>