



Florida Occupational Therapy Association

COVID-19 Update and Resources

March 22, 2020

FOTA recognizes the impact of Covid-19 (coronavirus) on individuals, families, the nation, and our world as we all adapt to these uncertain times. OT Practitioners across the state of Florida have all been challenged to remain healthy and ensure safe practices to prevent further community spread. As many of you have worked in various sectors or continue to be on the front lines, the influx of executive orders at the local, state, and national level can cause confusion as to what steps to take next. Of the utmost importance is to ensure your safety and that of your family, while following orders to reduce and prevent community spread.

As we embark on a new week, there have been numerous questions and discussions around helping practitioners determine whether they can continue to practice, in what capacity, and whether their establishments can and will remain open. Various executive orders that impact professional practice, including related guidance and resources, have been disseminated at the federal, state, and local level. FOTA would like to provide you with a means to access those in efforts to help you stay safe, as well as continue providing services, if applicable.

Below are brief statements and resources that have been compiled to help you find personal and professional guidance to stay safe and remain abreast of developments during this time. The information contained here is not to be taken as legal advice and FOTA recommends that you make decisions that are best for you and in accordance with your respective establishments. Also, keep in mind that things continue to change by the moment and we aim to provide you with information as we receive it. It is recommended that you revisit the respective resources frequently for any updates.

Throughout this time, please continue to visit trusted websites and social media sites for further information. We recommend that everyone continue to listen to the guidance provided by your local, state, and national leaders to remain healthy and safe. Establish a support network and please reach out and connect with organizations that might be able to provide you with additional support and resources. Find a way to engage in those routines and occupations to get you and your family through this, practice social distancing, and above all else, try to stay safe and healthy while addressing your social-emotional well-being.

Sincerely,

Douglene Jackson, PhD, OTR/L, LMT, ATP (*electronically signed*)
President, Florida Occupational Therapy Association

All resources below are current as of March 22, 2020

Center for Disease Control (CDC) Recommendations

- The CDC has released multiple resources to promote proper hygiene and precautionary measures
 - <https://www.cdc.gov/coronavirus/2019-ncov/index.html>

Florida Department of Health

- The Florida Department of Health has posted resources for health care providers, as well as the public
 - <https://floridahealthcovid19.gov/>
 - (866) 779-6121 or email COVID-19@flhealth.gov

The American Occupational Therapy Association (AOTA)

- AOTA has compiled resources related to professional practice, with recommendations to visit frequently for updates
 - https://www.aota.org/coronavirus?utm_source=Virus%20Update%20031920&utm_medium=email&utm_campaign=AOTA%20Response%20to%20COVID%2D19

Services Delivery: Executive Order 20-72

- There are many efforts being taken to prevent community spread and preserve the limited supply of personal protective equipment. This includes the prohibition of public gatherings, resulting in the closure of public spaces and professional establishments. Licensed health care practitioners are tasked with exercising reasonable and appropriate professional judgment in evaluating their patients/clients' specific circumstances, overall health, and the medical necessity of any procedures performed.
- Governor DeSantis released an executive order on March 20, 2020 prohibiting health care practitioners from
 - “providing any medically unnecessary, non-urgent or non-emergency procedure or surgery which, if delayed, does not place a patient's immediate health, safety, or wellbeing at risk, or will, if delayed, not contribute to the worsening of a serious or life-threatening medical condition.”
- The Executive Order explicitly leaves total discretion on proceeding with procedures to the healthcare professional, based on expertise and the specific factual situation of each patient.

- Therefore, the determination as to whether to see the client/patient in-person remains with the healthcare professional and establishment. A direct link to the executive order is below.
 - https://www.flgov.com/wp-content/uploads/orders/2020/EO_20-72.pdf

AHCA Centralized Website

- AHCA has compiled a compendium of resources regarding Covid-19 in one location for ease of access and keeping updated. The link is below:
 - https://ahca.myflorida.com/covid-19_alerts.shtml

Telehealth: Overview

- Occupational therapy services are covered during this time, with some provisions in place for up to 90 days and to be revisited. There are continuous changes being made and you are recommended to visit these resources frequently for the most updated information.
- AOTA has resources regarding telehealth on their website. Visit below for the most recent information:
 - <https://www.aota.org/Advocacy-Policy/Congressional-Affairs/Legislative-Issues-Update/2020/New-Changes-To-Unemployment-and-leave-support-during-COVID-19>
- AHCA continues to update information regarding concerns related to telehealth service delivery. Visit this resource for updated information:
 - https://ahca.myflorida.com/Medicaid/alerts_90-day.shtml
- The Center for Connected Health Policy (CCHPCA) has created a chart of state actions taken to remove policy barriers to telehealth utilization
 - <https://www.cchpca.org/resources/covid-19-related-state-actions>
- Health Insurance Portability and Accountability Act (HIPAA) will exercise enforcement discretion and waive penalties for violations against health care providers that serve patients in good faith through everyday communications technologies, such as FaceTime or Skype, during the COVID-19 nationwide public health emergency. Where possible, you should consider those platforms that are HIPAA compliant
 - <https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/index.html>

- Reimbursement
 - Contact the health plan(s) directly to inquire about their telemedicine requirements, as well as reimbursement procedures and rates
 - Florida Medicaid does not reimburse for the acquisition, installation, and maintenance of telecommunication devices or systems

Telemedicine Guidance for Therapy Services and Early Intervention Services

- AHCA has provided an update on guidance for the use of telehealth for therapy and early intervention services
 - https://ahca.myflorida.com/Medicaid/pdf/files/provider_alerts/2020_03/Telemedicine_Guidance_Therapy_Services-EIS_20200320.pdf
- Therapy Services
 - “Florida Medicaid will reimburse for evaluation, diagnostic, and treatment recommendations for services included on the respective therapy services fee schedule to the extent services can be delivered in a manner that is consistent with the standard of care and all service components designated in the American Medical Association’s Current Procedural Terminology and the Florida Medicaid coverage policy is provided. Providers must append the GT modifier to the procedure code in the fee-for-service delivery system.”
 - Fee Schedule
 - https://ahca.myflorida.com/medicaid/review/fee_schedules.shtml
 - Use the following place of service and required modifier when billing for telehealth services

Place of Service	Required Modifier
02	GT

- Early Intervention
 - “Florida Medicaid will reimburse for the delivery of early intervention sessions via telemedicine when performed by an eligible EIS provider (as defined in the Medicaid coverage policy) to provide family training designed to support the caregiver in the delivery of care. The provider must guide the caregiver in the implementation of certain components of the recipient’s individualized family support plan to promote carryover of treatment gains. Providers are required to ensure caregivers can perform the tasks.”

- Early intervention services are covered, as described below:

Service	Procedure Code	Required Modifier	Limits
Early Intervention Individual Session: Family Training	T1027 SC	GT	Four 15-minute units per day

- **Prior Authorization Requirements**
 - You are encouraged to reach out to the respective insurance representatives to determine how to proceed with prior authorizations during this period. There was conflicting information provided from two different updates and providers should exercise due diligence in decision making, always verifying what is appropriate for service provision.
 - Information provided in the March 20, 2020 update did not relieve the provider of any existing prior authorization requirements that currently exist for therapy or early intervention services.
 - https://ahca.myflorida.com/Medicaid/pdffiles/provider_alerts/2020_03/Tel_emedicine_Guidance_Therapy_Services-EIS_20200320.pdf
 - The update provided on March 16, 2020 did not include occupational therapy in the list of providers where prior authorization requirements were waived, as treatment referred specifically to Covid-19.
 - https://ahca.myflorida.com/Medicaid/pdffiles/provider_alerts/2020_03/Medicaid_Coverage_During_SOE_COVID-19_20200316.pdf

Medicare

- General information related to Medicare during this time can be accessed here:
 - <https://www.medicare.gov/medicare-coronavirus>
- E-Visit services have been expanded by CMS
 - https://www.aota.org/coronavirus?utm_source=Virus%20Update%20031920&utm_medium=email&utm_campaign=AOTA%20Response%20to%20COVID%2D19

Medicaid

- General information related to Medicaid can be found here:
 - AHCA Updates
 - https://ahca.myflorida.com/Medicaid/pdffiles/provider_alerts/2020_03/Telmedicine_Guidance_Therapy_Services-EIS_20200320.pdf
 - AHCA: Medicaid Coverage of Services (3/16/2020)
 - https://ahca.myflorida.com/Medicaid/pdffiles/provider_alerts/2020_03/Medicaid_Coverage_During_SOE_COVID-19_20200316.pdf
 - Florida Medicaid Health Plan Resources Webpage
 - https://ahca.myflorida.com/Medicaid/Policy_and_Quality/Policy/health_plan_resources.shtml

Department of Education

- The U.S. Department of Education (USDOE) released guidance on how to continue providing services to children with disabilities. Waivers for all student assessment requirements for the 2019-2020 school year can be applied for by states. Specific guidance for providing services for students with disabilities was communicated through a webinar and Fact Sheet. Below is information on various resource, including webinars and fact sheets from the USDOE:
 - <https://www.ed.gov/coronavirus>
 - Fact Sheet
 - <https://www2.ed.gov/about/offices/list/ocr/docs/ocr-coronavirus-fact-sheet.pdf>
 - Webinar
 - https://www.youtube.com/watch?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term=&v=DCMLk4cES6A
- The Florida Department of Education has also released resources and guidance, with distance learning plans already implemented. A document with frequently asked questions and other resources are below:
 - <http://www.fldoe.org/core/fileparse.php/19861/urlt/FDOE-COVID-QAI.pdf>
 - <http://www.fldoe.org/em-response/>

Educators and Students

- University faculty and students have all made adjustments to address continued learning and fieldwork during this time. Refer to your respective universities for guidance. AOTA has prepared a list of Frequently Asked Questions and you can access that below:
 - <https://www.aota.org/coronavirus>

Unemployment and Small Business Resources

- The federal and local governments have discussed the impact Covid-19 has had on unemployment, with a significant projected rate of increase. Stimulus packages and financial assistance have been proposed, and individuals can find more information and applications at the links provided below:
 - Frequently asked questions regarding Covid-19 related employment concerns
 - http://www.floridajobs.org/docs/default-source/ra-dua-documentation/dua-faqs-3-17-20-updates.pdf?sfvrsn=805543b0_4
 - Note: Unemployment compensation is now referred to as reemployment assistance benefits
 - Application for reemployment assistance
 - <http://www.floridajobs.org/Reemployment-Assistance-Service-Center/reemployment-assistance/claimants/apply-for-benefits>
- AOTA has compiled information on unemployment, as some OT practitioners might be independent contractors or find themselves with a change in employment status. You can access their resources here:
 - <https://www.aota.org/Advocacy-Policy/Congressional-Affairs/Legislative-Issues-Update/2020/New-Changes-To-Unemployment-and-leave-support-during-COVID-19>
- The Small Business Administration is taking efforts to assist with financial hardships by offering loans. This is a decision that each individual must consider regarding their business and information is below:
 - <https://www.sba.gov/about-sba/sba-newsroom/press-releases-media-advisories/sba-provide-disaster-assistance-loans-small-businesses-impacted-coronavirus-covid-19>

Student Loans

- There have been measures implemented for student loan relief. All borrowers with federally held student loans will automatically have their interest rates set to 0% for a period of at least 60 days. In addition, each of these borrowers will have the option to suspend their payments for at least two months to allow them greater flexibility during the national emergency. Additionally, any borrower who has experienced a change in income can contact their loan servicer to discuss lowering their monthly payment. You can find resources for borrowers and students below:

- <https://www.ed.gov/news/press-releases/delivering-president-trumps-promise-secretary-devos-suspends-federal-student-loan-payments-waives-interest-during-national-emergency>
- <https://studentaid.gov/announcements-events/coronavirus>


Taxes

- The deadline for filing federal income taxes has been extended from April 15, 2020 until July 15, 2020.
 - <https://home.treasury.gov/news/press-releases/sm948>

If you have any additional questions, concerns, or resources you would like to share, please get in touch with FOTA by email or visiting our website, and follow us on social media!

Website: www.flota.org

Email: info@flota.org

 **Florida Occupational Therapy Association**
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