



Florida Occupational Therapy Association

## COVID-19 Update and Resources

April 1, 2020

Amidst the continuing changes as a result of COVID-19 (coronavirus), I wanted to reach out and update everyone on the most current resources, supports, and activities. As it stands, Governor DeSantis has issued a stay-at-home order for the next 30 days. With April being Occupational Therapy month, FOTA wants to continue and support occupational therapy practitioners and establish a sense of community.

In efforts to provide occupational therapy practitioners across the state with opportunities to be informed of best practice and professional information, *FOTA Connect* has been launched on various social media platforms. As a member benefit, we will be hosting webinars throughout the month of April on Thursday evenings at 7:00pm. Follow us on social media and be sure to join us on these platforms:

- Facebook group: FOTA Connect
- Instagram, Twitter: @FOTACONnect

Also, continuous updates to policies that impact occupational therapy practice are difficult to keep up with and FOTA has compiled the most current resources as of today. Please find various links below, referring to them and our website frequently for the most current information.

Please continue to be safe, practice proper precautions, and engage in self-care activities for your well-being. Continue to abide by the guidance provided by your local, state, and national leaders and practice physical distancing while remaining socially connected.

Sincerely,

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

## *All resources below are current as of April 1, 2020*

### **Student Loans**

- Due to COVID-19, borrowers have the option to suspend their payments without interest accruing and should contact their loan servicer to determine if they are eligible. Payments may be placed in administrative forbearance and you may also be able to discuss lowering monthly payments. You can find resources for borrowers and students below:
  - <https://studentaid.gov/announcements-events/coronavirus>
  - <https://www.ed.gov/news/press-releases/delivering-president-trumps-promise-secretary-devos-suspends-federal-student-loan-payments-waives-interest-during-national-emergency>

### **The CARES Act**

- The Coronavirus Aid, Relief, and Economic Security (CARES) Act provides economic support to small businesses, including independent contractors, impacted by COVID-19. The program includes loans that can convert into grants for businesses: 1) Paycheck Protection Program and 2) Economic Injury Disaster Loans and Loan Advance
  - Paycheck Protection Program information
    - <https://www.sba.gov/funding-programs/loans/paycheck-protection-program>
  - Economic Injury Disaster Loans and Loan Advance
    - <https://covid19relief.sba.gov/#/>
- AOTA has compiled a handout with detailed information on the CARES Act and what it means to occupational therapy practitioners. This includes details on obtaining a small business loan to cover a variety of expenses, including payroll.
  - <https://www.aota.org/~media/Corporate/Files/Advocacy/Federal/Fact-Sheets/Small-Business-Loan-Program-McManus-Group.pdf>
- Although the CARES Act does cover telehealth services, it does not appear to be clear on how that relates to occupational therapy at this time. Stay tuned for timely updates regarding coverage of occupational therapy telehealth services through Medicare
  - AOTA interpretation
    - <https://www.ama-assn.org/system/files/2020-03/COVID-19-coding-advice.pdf>

## Unemployment, Taxes, and Other Small Business Resources

- The Division of Corporations has extended the annual report filing deadline until June 30, 2020
  - <https://dos.myflorida.com/sunbiz/manage-business/efile/annual-report/>
- 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>
- The federal and local governments have discussed the impact of COVID-19 on unemployment, with a significant projected rate of increase. Stimulus packages and financial assistance resources have been implemented. 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](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>

## 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>

## Medicare

- Medicare coverage, as stated above, remains unclear. At the moment, guidance regarding Medicare is still uncertain for telehealth reimbursement. You and your clients can advocate to help this move forward.
  - <https://www.aota.org/Advocacy-Policy/Federal-Reg-Affairs/News/2020/CMS-Interim-Final-Rule-Analysis.aspx>
- 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%2019](https://www.aota.org/coronavirus?utm_source=Virus%20Update%20031920&utm_medium=email&utm_campaign=AOTA%20Response%20to%20COVID%2019)

## Medicaid

- The page to find all updates for all Florida Medicaid alerts from AHCA can be found here:
  - [https://ahca.myflorida.com/COVID-19\\_alerts.shtml](https://ahca.myflorida.com/COVID-19_alerts.shtml)
- The COVID-19 Medicaid FAQ
  - AHCA has provided an updated frequently asked questions document
    - [https://ahca.myflorida.com/docs/COVID-19\\_Medicaid\\_FAQs\\_3-22-2020.pdf](https://ahca.myflorida.com/docs/COVID-19_Medicaid_FAQs_3-22-2020.pdf)
- 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](https://ahca.myflorida.com/COVID-19_alerts.shtml)
- General information related to Medicaid can be found here:
  - AHCA: Therapy Services
    - [https://ahca.myflorida.com/Medicaid/pdffiles/provider\\_alerts/2020\\_03/Tel\\_emedicine\\_Guidance\\_Therapy\\_Services-EIS\\_20200320.pdf](https://ahca.myflorida.com/Medicaid/pdffiles/provider_alerts/2020_03/Tel_emedicine_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](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](https://ahca.myflorida.com/Medicaid/Policy_and_Quality/Policy/health_plan_resources.shtml)

## 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 <https://dos.myflorida.com/sunbiz/manage-business/efile/annual-report/>

## 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](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 (March 20, 2020)

- 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](https://www.flgov.com/wp-content/uploads/orders/2020/EO_20-72.pdf)

## 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](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](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](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/pdf/files/provider\\_alerts/2020\\_03/Tel\\_emedicine\\_Guidance\\_Therapy\\_Services-EIS\\_20200320.pdf](https://ahca.myflorida.com/Medicaid/pdf/files/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/pdf/files/provider\\_alerts/2020\\_03/Medicaid\\_Coverage\\_During\\_SOE\\_COVID-19\\_20200316.pdf](https://ahca.myflorida.com/Medicaid/pdf/files/provider_alerts/2020_03/Medicaid_Coverage_During_SOE_COVID-19_20200316.pdf)

## 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](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>



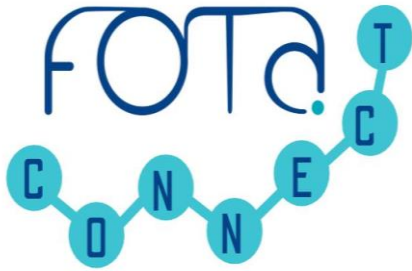
## Timely Topics with FREE CEUs for Members

**FOTA announces *free* webinars during OT Month**

Each **Thursday** In April at 7pm

**LIVE on Facebook at FOTA Connect!**

\* Telehealth \* Entrepreneurship \* Policy & Advocacy \*  
\* OT Education \* Leadership Development \*



#FOTACoconnect #OTMonth



**Join the group on Facebook at FOTA Connect**

*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](http://www.flota.org)

Email: [info@flota.org](mailto:info@flota.org)



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