

UPDATE to Board Statement Regarding Occupational Therapy Telehealth Services

April 24, 2020

The Board clarifies that its previous statement, set out below, supporting the continued provision of Occupational Therapy services by means of telehealth pertains to the delivery of telehealth OT services by licensed Occupational Therapists and licensed Occupational Therapy Assistants. As with all methods of service delivery, licensees should provide telehealth OT services with maintained supervision, competency, ethics, and within the licensee's scope of practice.

The South Carolina Occupational Therapy Board wants you to know that the safety of the public and our licensees is our top priority. In light of the coronavirus pandemic, the Board is providing you with the federal and state COVID-19 resources below. The Board would like to inform you that we do support continued service provision through any method of practice, including telehealth, within your scope of practice and that complies with the applicable standard of care.

The Board continues to study telehealth and will discuss the issue at future meetings. In the meantime, if you elect to utilize telehealth, the Board suggests that you review the AOTA resources provided below and be mindful of these key points:

- **Telehealth.** This provision of health care allows evaluation, assessment, intervention, etc. to occur without requiring both individuals to be physically located in the same place, regardless of whether that distance is across the street, across a city, state or continents.
- **Practitioner Qualifications.** In addition to adhering to standard South Carolina licensing qualifications, occupational therapy practitioners using telehealth as a method of service delivery should maintain appropriate education and training; best practice; related competences for the patient populations served and practice settings. The practitioner must be licensed in the state in which the client receives those services.
- **Billing and Reimbursement.** The Board of Occupational Therapy does not control billing issues, insurance issues or employment contracts. Each licensee should individually investigate the policies, which relate to their practice/learning environments from multiple perspectives such as reimbursement sources, employers, accreditation agencies and malpractice insurance providers to identify any additional requirements or concerns, which may be germane to practice and reimbursement.
- **Ethical Considerations.** Occupational Therapy personnel should be mindful of their obligations under the Occupational Therapy Practice Act as set forth in S.C. Code Ann. §§ 40-36-5, et seq. and S.C. Code Ann. Regs. 94-2, et seq., including the Code of Ethics for Occupational Therapy Personnel set forth in S.C. Code Ann. Regs. 94-10. These resources are available on the Board's website at: <https://llr.sc.gov/ot/>. In addition, the Board recommends that its licensees review:

- AOTA Code of Ethics (2015)
<https://www.aota.org/ExternalLinks/AJOTlinks/Official/ethics/OT-code-of-ethics.aspx>
- NBCOT Certificant Code of Conduct (2018)
<https://www.nbcot.org/en/Regulators/Professional-Conduct> for additional ethical considerations for their practice.

Resources

CDC: What Healthcare Providers Should Know Caring for Patients with Confirmed or Possible COVID-19 Infection?

<https://www.cdc.gov/coronavirus/2019-ncov/hcp/caring-for-patients.html>

South Carolina Department of Health COVID-19 Information:

<https://scdhec.gov/health/infectious-diseases/viruses/coronavirus-disease-2019-covid-19>

AOTA Ethics Advisory: Telehealth

<https://www.aota.org/~media/Corporate/Files/Practice/Ethics/Advisory/telehealth-advisory.pdf>

AOTA's Telerehabilitation Position Paper

https://ajot.aota.org/article.aspx?articleid=2719223&_ga=2.65321390.1410013960.1584107902-1529676874.1573784254

AOTA's Telehealth Resource Page:

<https://www.aota.org/Practice/Manage/telehealth.aspx>