



Dear Ms. Kilfoyle-

We are urgently writing for reconsideration of the decision related to non-coverage of physical therapy services provided via telehealth. In short, we are requesting temporary coverage of a limited code set that would be appropriate and effective for audiovisual-based telehealth interactions with a place of service modifier of 02 (telehealth).

97110 Ther Ex
97112 Neuro Re-ed
97116 Gait Training
97530 Therapeutic Functional Activity
97535 Self Care/Home Mgmt

Many of your subscribers have important, pressing, and timely rehabilitation needs that require them to continue their rehabilitation during this pandemic, and permitting them continued access to physical therapy services while maintaining social distancing through the use of telehealth is critically needed.

Telehealth is a well-embedded element of physical therapist practice. Numerous resources from the APTA and the Federation of State Boards of Physical Therapy are available to physical therapists to support the use of telehealth:

<http://www.apta.org/Telehealth/>
http://www.apta.org/uploadedFiles/APTAorg/About_Us/Policies/Practice/TelehealthHODPolicy.pdf#search=%22telehealth%22
<https://www.fsbpt.org/Portals/0/documents/free-resources/TelehealthInPhysicalTherapy2015.pdf>

From a state regulatory scope of practice perspective, telehealth is permitted by physical therapists:

333.16283 Definitions.

Sec. 16283.

As used in this section and sections 16284 to 16288:

- (a) "Health professional" means an individual who is engaging in the practice of a health profession.
- (b) "Prescriber" means that term as defined in section 17708.
- (c) "[Telehealth](#)" means the use of electronic information and telecommunication technologies to support or promote long-distance clinical health care, patient and professional health-related education, public health, or health administration. [Telehealth](#) may include, but is not limited to, telemedicine. As used in this subdivision, "telemedicine" means that term as defined in section 3476 of the insurance code of 1956, 1956 PA 218, MCL 500.3476.
- (d) "[Telehealth](#) service" means a health care service that is provided through [telehealth](#).

Therefore, the MPTA respectfully requests urgent re-consideration of payment for telehealth-based physical therapist services as the State of Michigan moves through this COVID-19 pandemic.

Sincerely,



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