



March 13, 2020

Dear Dr. Keshishian,

In light of the rapidly evolving COVID-19 pandemic, and in the interest of the health and safety of patients we serve, the Michigan Physical Therapy Association respectfully submits this urgent request for policy clarification (and if necessary, policy change) regarding payment for telehealth/telemedicine services provided by physical therapists.

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 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.

Further, the Insurance Code (MCL 500.3476) offers additional guidance:

(1) An insurer that delivers, issues for delivery, or renews in this state a health insurance policy shall not require face-to-face contact between a health care professional and a patient for services appropriately provided through telemedicine, as determined by the insurer. Telemedicine services must be provided by a health care professional who is licensed, registered, or otherwise



authorized to engage in his or her health care profession in the state where the patient is located. Telemedicine services are subject to all terms and conditions of the health insurance policy agreed upon between the policy holder and the insurer, including, but not limited to, required copayments, coinsurances, deductibles, and approved amounts.

(2) As used in this section:

(a) After December 31, 2017, "insurer" includes a nonprofit dental care corporation operating under 1963 PA 125, MCL 550.351 to 550.373.

(b) "Telemedicine" means the use of an electronic media to link patients with health care professionals in different locations. To be considered telemedicine under this section, the health care professional must be able to examine the patient via a real-time, interactive audio or video, or both, telecommunications system and the patient must be able to interact with the off-site health care professional at the time the services are provided.

Additionally, because BCBSM currently requires a physician prescription for its subscribers accessing physical therapist services, we also request expedited consideration of our previous request for allowing your subscribers to directly access physical therapist services consistent with Michigan state law. Minimizing burden on primary care physician practices at this time is essential for helping our healthcare system manage the present pandemic. Although we are not proposing to replace the initial evaluation with telehealth, telehealth-based interventions for follow-up would be a feasible and effective option for a variety of patient types.

Therefore, the MPTA respectfully requests consideration of payment for telehealth-based physical therapist services, even if only for a 6 month period of time as the State of Michigan moves through this COVID-19 pandemic.

Sincerely,

A handwritten signature in black ink that reads "Michael Shoemaker". The signature is written in a cursive style with a large, prominent "M" and "S".

Michael J. Shoemaker, PT, DPT, PhD
President
Michigan Physical Therapy Association