

MEMORANDUM

TO: School Administrators
FROM: Dr. Nancy J. Holsapple, State Director of Special Education
CC: Tracy Brunner, Medicaid and Part B Specialist
DATE: September 1, 2020
SUBJECT: Therapy Telemedicine Services

Governor Holcomb's COVID-19 related [Executive Order 20-13](#) clarified that physical, occupational, and speech therapists may provide telemedicine services. The governor recently extended this order, which is now effective until October 2, 2020.

Executive Order 20-13 does not address telemedicine service provision by therapy assistants and speech-language pathology (SLP) clinical fellows. Because their state practice acts are silent about telemedicine, therapy assistants and SLP clinical fellows may provide on-site (but not telemedicine) services within their scope of practice when working under the professional supervision of a licensed therapist. However, each therapy practice act does include options for licensed therapists to supervise assistants and SLP clinical fellows remotely (e.g., by phone, pager, etc.).

Depending how many therapy assistants and SLP clinical fellows they employ, schools that choose to operate on a virtual-only or hybrid model may want to consider possible options for providing a mix of on-site and telemedicine delivery of IEP-required therapy services.

Indiana Medicaid's expanded telemedicine coverage during the COVID-19 outbreak allows schools to claim reimbursement for IEP-required telemedicine services provided by physical, occupational, and speech therapists using interactive audio-visual telecommunications (but not audio-only or paper-based). However, Medicaid-covered IEP services furnished by therapy assistants and SLP clinical fellows can be reimbursed only when provided in an on-site service (not telemedicine) delivery mode.

For more information, see the online *Medicaid Billing Tool Kit*, under Manuals, at <https://www.doe.in.gov/specialed/school-based-medicaid>.