



110 Centerview Drive
Post Office Box 11329
Columbia, SC 29211-1329
Phone: (803) 896-4655
FAX: (803) 896-4719

South Carolina
Department of Labor, Licensing and Regulation

Board of Physical Therapy Examiners



Henry D. McMaster
Governor

Emily H. Farr
Director

ADVISORY OPINION¹ ON THE USE OF TELEHEALTH

The South Carolina Board of Physical Therapy Examiners (“Board”) supports the use of telehealth as an effective and comparable method of service delivery that is authorized by the South Carolina Physical Therapy Practice Act, as set forth in S.C. Code Ann. § 40-45-5, *et seq.* (“Practice Act”). On March 23, 2020 the Board issued guidance regarding physical therapy telehealth services in response to the onset of the COVID-19 epidemic and the resulting increased use of telehealth as a method of service. In this guidance, the Board noted that it supports the continued provision of physical therapy services by means of telehealth by both licensed physical therapists and licensed physical therapist assistants (subject to supervision requirements). It also established key points for its licensees to consider when utilizing telehealth and incorporated the FSBPT’s Guidelines for the Use of Telehealth in Physical Therapy Practice.

The Board now offers this Advisory Opinion to make clear to its licensees and the public that the Board supports the continued, permanent use of this method of treatment beyond the expiration of the Public Health State of Emergency resulting from COVID-19. Telehealth not only provides access to physical therapy services for patients who are at high risk for contracting COVID-19, but it also expands access to physical therapy services, in general. As such, telehealth is an appropriate method of treatment to be utilized as appropriate by physical therapists and physical therapist assistants (collectively, “physical therapy practitioners”).

Physical therapy practitioners utilizing telehealth should have proven competency, and the services must be offered within their scope of practice. As with traditional practice, all physical therapy practitioners utilizing telehealth *must be licensed in the state in which the client receives the services*. The Board expects physical therapy practitioners utilizing telehealth to be mindful of supervision and other required obligations under the Practice Act and accompanying Regulations.

¹ This Advisory Opinion, as contemplated by S.C. Code Ann. § 1-23-10(4), represents the Board’s current thinking on the topic of telehealth. It is advisory, only, and should not be construed as creating requirements beyond those set forth in the Practice Act and/or Regulations.

As a reminder, the Board generally has no jurisdiction over billing, insurance, or employment matters. Each licensee should individually review policies enacted by sources specific to their practice, such as: reimbursement sources; employers; accreditation agencies; and malpractice insurance carriers to identify any additional requirements. The requirements set forth in the Practice Act and Regulations, of course, take precedence over these additional sources.

Finally, licensees are encouraged to review the FSBPT's Guidelines for the Use of Telehealth in Physical Therapy Practice, available at: <https://www.fsbpt.org/Portals/0/documents/free-resources/TelehealthInPhysicalTherapy2015.pdf>. Relevant provisions from these Guidelines are summarized below. To the extent any of the information contained in this resource conflicts with the requirements of the Practice Act and/or Regulations, the Practice Act and/or Regulations will control.

- The use of telehealth should be determined on a case-by-case basis considering factors such as the client's preference, available technology, risks and benefits, and the applicable standard of care.
- The identity of the physical therapy practitioner(s) and the patient must be verified. A photo ID is the preferred manner of verification.
- Physical therapy practitioners must obtain the patient's consent for the use of telehealth, as opposed to a more traditional in-person visit.
- Physical therapy practitioners treating patients via telehealth must be licensed in the state where the patient is located at the time of treatment.
- Treatment provided via telehealth is subject to the same standard of care as an in-person visit.
- Physical therapy practitioners utilizing telehealth must take steps to ensure that client privacy and confidentiality are maintained.
- Physical therapy practitioners utilizing telehealth must have procedures in place to address technical, medical, or clinical emergencies.

Issued: October 28, 2020