

**From:** [Melissa Johnson](#)  
**To:** [OIC Rules Coordinator](#)  
**Subject:** Telemedicine and audio-only telemedicine services (R 2021-06)  
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External Email

Good afternoon,

On behalf of APTA Washington, and our physical therapist and physical therapist assistant members, thank you for the opportunity to comment on the rulemaking to implement ESHB 1196 related to coverage of telemedicine and audio-only telemedicine services. APTA Washington was a strong proponent of ESHB 1196 during the legislative process.

This new law requires some insurance companies to reimburse health care providers, including physical therapists, for telehealth services delivered by phone. Both video and audio telehealth have been a critical lifeline to patients during the pandemic. They have ensured continued access to care to patients who are unable to have in-person treatment.

Additionally, audio-only telemedicine has become a reliable way for people to contact their health care providers, especially for patients in rural areas of our state, and others, who have broadband access challenges. Oftentimes, the telephone is the only reliable mode of communication for these patients. Quality, appropriate care can be provided through audio-only telehealth.

In reviewing the law, we identified two items that may need clarification in rule: the definition of patient consent; and the definition of “pattern of unresolved violations”.

We look forward to working with the OIC as this rulemaking process moves forward.

Thanks,  
Melissa

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