



Health Care Professions with Authority to Provide Telehealth Services

Last update: March 12, 2021

A health care provider licensed in Washington State may provide health care services using telehealth technologies to patients in Washington provided:

- Services are within their profession’s scope of practice,
- There is no statute or rule prohibiting the use of telehealth technologies, and
- There is no statute or rule limiting the types of services that may be provided remotely, such as requirements for face to face or in-person services.

When providing telehealth services, a licensed health care provider should consider:

- Their scope of practice,
- All applicable data confidentiality laws,
- All laws applicable to their employer when their employer is a licensed health care facility, and
- Which services are amenable to the use of telehealth, keeping in mind patient health and safety. The hands-on nature of some professions may limit services provided via telehealth.

A Washington State license is required to provide health care to patients in Washington unless the provider is operating under the Uniform Emergency Volunteer Health Practitioners Act under chapter [70.15 RCW](#) (which does not allow independent or private practice outside the need and jurisdiction of a state approved host entity¹ – even if there is a pre-existing relationship with the out-of-state provider) or an interstate compact that allows practice in Washington with a Washington compact privilege.

The health care professions listed below have authority to provide services through telehealth technologies. Our analysis of profession telehealth authority is ongoing, so the list below is not comprehensive. Additional professions may be added to this list when our analysis is complete.

- Acupuncturists
- Agency affiliated counselors
- Allopathic physicians (PA)
- Allopathic PA
- Athletic trainers
- Audiologists
- Behavior analysts
- Certified counselors
- Chiropractors
- Marriage and family therapists
- Medical assistants
- Mental health counselors
- Midwives
- Naturopathic physicians
- Nursing professions (ARNP, RN, LPN)
- Occupational therapists and assistants
- Optometrists
- Physical therapists and assistant
- Podiatrists
- Psychologists
- Respiratory therapists
- Sex offender treatment providers
- Social workers

¹ "Host entity" means an entity operating in this state which uses volunteer health practitioners to respond to an emergency.

- Dentists
- Dietitians and nutritionists
- Genetic counselors
- Hearing aid specialists
- Hypnotherapists
- Osteopathic physicians (PA)
- Osteopathic PA
- Pharmacists/pharmacist interns
- Speech-language pathologists
- Substance use disorder professionals
- Veterinarians

The table below identifies profession-specific limitations, rules, policy, and guidelines regarding the use of telehealth technologies:

Acupuncture and eastern medicine practitioner	No profession-specific guidance
Agency affiliated counselors	No profession-specific guidance
Allopathic physicians and physician assistants	FAQs on telemedicine during COVID and guidance documents Telemedicine Policy Telemedicine Guideline Current telemedicine rules in progress
Athletic trainers	No profession-specific guidance
Audiologists	Telepractice Guidelines
Behavior analysts	No profession-specific guidance
Certified counselors	No profession-specific guidance
Chiropractors	Telehealth policy
Dentists	Teledentistry policy
Dietitians and nutritionists	Policy statement – Dietitians Providing Telehealth for Established Patients During the COVID-19 Declared Emergency
Genetic counselors	No profession-specific guidance
Hearing aid specialists	Telepractice Guidelines
Hypnotherapists	No profession-specific guidance
Marriage and family therapists	No profession-specific guidance
Medical assistants	Can provide limited telehealth services, provided they are properly supervised. <ul style="list-style-type: none"> • Must practice under the supervision of a health care practitioner • Supervision is to mean a health care practitioner is physically present and is immediately available in the facility • Since hemodialysis technicians and phlebotomists must be physically present with a patient to perform services, it is unlikely these categories of medical assistant would be able to provide telehealth services to a patient.
Mental health counselors	No profession-specific guidance

Midwives	Midwives have a duty to consult with a physician but the rules are silent on whether this can be done via telehealth. The standard of care appears to have evolved to permit midwifery to be practiced using telehealth.
Naturopathic physicians	Telemedicine Guidelines
Nursing professions (ARNP, RN, LPN)	Guidance document under development
Occupational therapists and occupational therapy assistants	WAC 246-847-176 provides a definition and direction for providing telehealth.
Optometrists	Telehealth Guidelines set out the standard of care that may specifically apply for practitioners using telehealth.
Osteopathic physicians and physician assistants	Telemedicine policy and rulemaking in progress in collaboration with the Washington Medical Commission.
Pharmacists and pharmacist interns	A pharmacist can provide pharmacy services via telehealth as long as the services provided fit within an element of the practice of pharmacy as defined in RCW 18.64.011(28) and the pharmacist complies with the Pharmacy Commission's (PQAC) rules in chapter 246-945 WAC . WAC 246-945-430(5) requires the physical presence of a pharmacist to perform the monthly self-inspection requirement for pharmacies that store, dispense, and deliver drugs without a pharmacist on-site. WAC 246-945-001(44) requires the intern to practice under the immediate supervision of a pharmacist.
Physical therapists and physical therapy assistants	WAC 246-915-187 states physical therapists and physical therapy assistants must follow all standard of care requirements and note in the patient's record that therapy occurred via telehealth. There may be limitations for physical therapy assistants since they must work under direct or indirect supervision.
Podiatrists	No profession-specific guidance
Psychologists	Telepsychology guidelines
Respiratory therapists	No rules/guidelines/policy (may be limitations due the necessary equipment for treatment and requirement for supervision and "qualified medical direction" of a health care provider who would have to oversee telehealth services).
Sex offender treatment providers	WAC 246-930-010 defines "treatment" as "face-to-face individual, group, or family therapy, provided by an affiliate or provider, to a client. Treatment is focused on the client's offending behavior." <ul style="list-style-type: none"> • With "face-to-face" as part of the definition of treatment, this definition could exclude telehealth as a means of delivering treatment.

	<ul style="list-style-type: none"> The department adopted an emergency rule, WSR 20-15-057, on July 9, 2020 to address this issue during the COVID-19 pandemic. The emergency rule simply removed “face-to-face” from the definition of “treatment” in WAC 246-930-010. The emergency rule expires on November 6, 2020.
Social workers	No profession-specific guidance
Speech-language pathologists	Telepractice Guidelines
Substance use disorder professionals	<ul style="list-style-type: none"> SUDP employer/facility rules may restrict telehealth. For example, a significant number of SUDPs work in licensed behavioral health agencies (BHA). BHAs are subject to a number of rules requiring “in-person” or “face-to-face” interactions with clients. WAC 246-341-0610(1)(a), WAC 246-341-0200, WAC 246-341-0712(3), WAC 246-341-0820(2)(a), WAC 246-341-0910, WAC 246-341-0915, and WAC 246-341-1110(2)(b). These rules are currently waived in response to the COVID-19 pandemic. WSR 20-07-0105.
Substance use disorder trainees	Limitations based on the authority to only work in certain practice settings.
Veterinarians	<p>WAC 246-933-200 states a veterinarian shall not establish a veterinary-client-patient relationship solely by telephonic or other electronic means.</p> <p>Policy statement - Veterinary-Client-Patient Relationship Requirements During the COVID-19 Response.</p>