

Practice Setting	PT Student		PTA Student	
	Part A	Part B	Part A	Part B
Physical Therapist in Private Practice	N/A	X <sup>1</sup>	N/A	X <sup>1</sup>
Certified Rehabilitation Agency	N/A	X <sup>1</sup>	N/A	X <sup>1</sup>
Comprehensive Outpatient Rehabilitation Facility	N/A	X <sup>1</sup>	N/A	X <sup>1</sup>
Skilled Nursing Facility	Y <sup>1</sup>	X <sup>1</sup>	Y <sup>2</sup>	X <sup>1</sup>
Hospital	Y <sup>3</sup>	X <sup>1</sup>	Y <sup>3</sup>	X <sup>1</sup>
Home Health Agency	NAR	X <sup>1</sup>	NAR	X <sup>1</sup>
Inpatient Rehabilitation Facility	Y <sup>4</sup>	N/A	Y <sup>4</sup>	N/A

## Key

**Y:** Reimbursable

**X:** Not Reimbursable

**N/A:** Not Applicable

**NAR:** Not Addressed in Regulation. Please defer to state law.

**Y<sup>1</sup>:** Reimbursable: The minutes of student services count on the Minimum Data Set. However, Medicare requires that the professional therapist (the PT) provide line-of-sight supervision of PT student services. *Federal Register* (Volume 64, Number 213)

Documentation: APTA recommends that the physical therapist co-sign the note of the physical therapist student and state that the PT was providing line-of-sight supervision of the student and was involved in the patient's care.

**Y<sup>2</sup>:** Reimbursable: The minutes of student services count on the Minimum Data Set. However, Medicare requires that the professional therapist (the PT) provide line-of-sight supervision of physical therapist assistant (PTA ) student services. *Federal Register* (Volume 64, Number 213)

Documentation: APTA recommends that the physical therapist should co-sign the note of physical therapist assistant student and state that the PT was providing line of sight supervision of the student and was involved in the patient's care.

**Y<sup>3</sup>:** Although not specifically addressed in the regulations, the Part A hospital diagnosis related group (DRG) payment system is similar to that of a skilled nursing facility (SNF). Because this is not addressed in Medicare regulations, please defer to state law and standards of professional practice. Please refer to **Y<sup>1</sup>** for additional guidance.

Documentation: Please refer to documentation guidance provided under **Y<sup>1</sup>**

**Y<sup>4</sup>:** Although not specifically addressed in the regulations, the inpatient rehabilitation hospital prospective payment system is similar to that of a SNF. Because this is not addressed in Medicare regulations, please

defer to state law and standards of professional practice. Please refer to **Y<sup>1</sup>** for additional guidance.

## **X<sup>1</sup>: B. Therapy Students**

### **1. General**

*Only the services of the therapist can be billed and paid under Medicare Part B. The services performed by a student are not reimbursed even if provided under "line of sight" supervision of the therapist; however, the presence of the student "in the room" does not make the service unbillable.*

#### **EXAMPLES:**

*Therapists may bill and be paid for the provision of services in the following scenarios:*

- *The qualified practitioner is present and in the room for the entire session. The student participates in the delivery of services when the qualified practitioner is directing the service, making the skilled judgment, and is responsible for the assessment and treatment.*
  - *The qualified practitioner is present in the room guiding the student in service delivery when the therapy student and the therapy assistant student are participating in the provision of services, and the practitioner is not engaged in treating another patient or doing other tasks at the same time.*
  - *The qualified practitioner is responsible for the services and as such, signs all documentation. (A student may, of course, also sign but it is not necessary since the Part B payment is for the clinician's service, not for the student's services).*

### **2. Therapy Assistants as Clinical Instructors**

*Physical therapist assistants and occupational therapy assistants are not precluded from serving as clinical instructors for therapy students, while providing services within their scope of work and performed under the direction and supervision of a licensed physical or occupational therapist to a Medicare beneficiary.*

Documentation: APTA recommends that the physical therapist or physical therapist assistant complete documentation.