

Clarification of Medicare Questions from the Clinical Education SIG meeting at CSM

There were several questions posed by attendees during the Clinical Education SIG meeting seeking clarification about students and Medicare. In following up on the issue of Medicare Part-B, the most current language found in the **Medicare Benefit Policy Manual (Publication 100-02), chapter 15, section 230 B 1**. <http://www.cms.hhs.gov/manuals/Downloads/bp102c15.pdf> is provided below. In addition, staff are also seeking additional clarification about students and Inpatient Rehabilitation Facilities with Medicare. Once clarification has been obtained, we will be updating information on the APTA website and will provide notification on the Education list serve where this information can be specifically accessed, when available. Thank you kindly for your patience as we seek clarification through Medicare and provide you with revised documentation for your reference.

Medicare Benefit Policy Manual (Publication 100-02), chapter 15, section 230 B 1.
(<http://www.cms.hhs.gov/manuals/Downloads/bp102c15.pdf>)

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.