Interpretation of Medicare Part A and B regulations
And Physical Therapy Students

Medicare B

As of 4/11/01, physical therapy services provided by students to patients covered by Medicare B were not deemed billable to Medicare. **However, on May 17, 2002** CMS issued Transmittal 1753 which revised the previous carrier manual regarding this issue.

Although physical therapy services continue not to be billable to Medicare Part B, the circumstances by which students can deliver care have been clarified.

Attached is a statement from the APTA Governmental Affairs office regarding this issue.

This program interprets the information from CMS to mean that students can now participate in providing care to patients covered by Medicare B under the following circumstances:

- The clinical instructor (CI) is providing direct supervision of the student during the treatment session.
- The clinical instructor must be in the same room with the student delivering the care.
- The clinical instructor is NOT engaged in any other activity (ie. Writing notes, treating another patient etc.) while the student is delivering care.
- The CI must be responsible for the services delivered to the patient. Therefore, the student may consult with the CI about skilled judgements regarding the care of the patient, but the CI must be ultimately responsible for the skilled judgements made.

Documentation of services regarding student treatment of Medicare B patients continues to be unclear. Therefore, we would recommend **against** having students provide the final documentation for Medicare B patients. However, students could practice documentation with their Medicare B patients while the official documentation was by the CI.

Medicare A

There have been no recent changes with Medicare A patient care in regards to physical therapy students. Care provided by students is billable to Medicare A patients as long as the clinical instructor maintains “line of sight” supervision.

Medicaid

In Minnesota, services provided by physical therapy students to patients covered under Medicaid are not billable to Medicaid. See MN Health Care Program (MHCP) Provider Manual, Ch. 17.

Supervision of Physical Therapy Students

The position statement by the APTA House of Delegates passed in June 2000 (HOD 06-00-18-30) states that PT students must be directly supervised by physical therapists when providing services to patients. Direct supervision means that the PT is physically present and immediately available for direction and supervision; the PT must have direct contact with the patient during each visit (or daily contact for patients seen greater than once a day). Telecommunication does not meet the requirement of direct supervision.

Further Information

For further information about reimbursement and PT students see the APTA website at [www.apta.org](http://www.apta.org) and click on education, PT advocacy/ Medicare.