Y: Reimbursable  
X: Not Reimbursable  
N/A: Not Applicable  
NAR: Not Addressed in Regulation. Please defer to state law.

Y^1: Reimbursable: The minutes of student services count on the Minimum Data Set. However, Medicare requires that the professional therapist (the PT) provides skilled services and direction to a student who is participating in the service under line-of-sight supervision. Federal Register (July 30, 1999). In addition, effective October 1, CMS implemented additional rules regarding the student services based on PT/PTA supervision and whether minutes can be recorded as individual, concurrent, or group therapy minutes (RAI Version 3.0 Manual, September 2010)

Examples:

In order to record the minutes as individual therapy when a therapy student is involved in the treatment of a resident, only one resident can be treated by the therapy student and the supervising therapist or assistant (for Medicare Part A and Part B). Under Medicare Part A, the supervising therapist or assistant cannot be treating or supervising other individuals and the therapist or assistant must be able to immediately intervene or assist the student as needed while the student and resident are both within line of sight supervision. The therapist or assistant could be attending to paperwork while supervising the student and resident.

Under Medicare Part A, when a therapy student is involved with the treatment, and one of the following occurs, the minutes may be coded as concurrent therapy:

- The therapy student is treating one resident and the supervising therapist or assistant is
trea
ting another resident and the therapy student and the resident the student is treating are in line of sight of the supervising therapist or assistant; or
• The therapy student is treating two residents, both of whom are in line of sight of the therapy student and the supervising therapist or assistant, and the therapist is not treating any residents and not supervising other individuals; or
• The therapy student is not treating any residents and the supervising therapist or assistant is treating two residents at the same time, regardless of payer source, both of whom are in line of sight.

Under Medicare Part A, when a therapy student is involved with group therapy treatment, and one of the following occurs, the minutes may be coded as group therapy:

• The therapy student is providing the group treatment and all the residents participating in the group and the therapy student are in line of sight of the supervising therapist or assistant who is not treating any residents and is not supervising other individuals (students or residents); or
• The supervising therapist/assistant is providing the group treatment and the therapy student is not providing treatment to any resident.

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.

Y²: 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 (July 30, 1999)

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.

Y³: This is not specifically addressed in the regulations, therefore, please defer to state law and standards of professional practice. Additionally, the Part A hospital diagnosis related group (DRG) payment system is similar to that of a skilled nursing facility (SNF) and Medicare has indicated very limited and restrictive requirements for student services in the SNF setting.

Documentation: Please refer to documentation guidance provided under Y¹

Y⁴: This is not specifically addressed in the regulations, therefore, please defer to state law and standards of professional practice. Additionally, the inpatient rehabilitation facility payment system is similar to that of a skilled nursing facility (SNF) and Medicare has indicated very limited and restrictive requirements for student services in the SNF setting.

X¹: 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.