

NCCEC Medicare B Documentation Recommendations:

Medicare Part B policy states [in Medicare Benefits Policy Manual, (Pub. 100-02, Chapter 15, Section 230)] that “the qualified practitioner (*in this case the PT or PTA*) 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”.

Whenever treatments involve Medicare B patients, in any setting, the NCCEC recommends that:

- A) If the PT/PTA documents, and the student does NOT document, the note may include a statement such as: “PT/PTA Student name participated in delivery of services under my direction and supervision”.
- B) If the student also documents, the student note may be included in the medical record, although Medicare only requires the documentation completed by the PT/PTA. PT/PTA may co-sign the student note **and** document a separate statement such as “Student name participated in delivery of services under my direction and supervision”
- C) If a student observed session, the student should NOT document, and the PT/PTA note may include a statement such as: “Student name observed PT/PTA treatment”

The Physical Therapy Regulations in the California Code of Regulations, Title 16, Division 13.2 state:

1398.13 Patient Records

- (c) With respect to any care provided to the patient, the patient record shall indicate:
 - (1) the date and nature of the service provided and
 - (2) the name and title of any individual who provided such service, including the individual’s role in that service. As used in this section, the term “service” does not include “non-patient related tasks” as defined in section 1399.

Medicare Benefit Policy Manual

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. Pay for the direct (one-to-one) patient contact services of the physician or therapist provided to Medicare Part B patients. Group therapy services performed by a therapist or physician may be billed when a student is also present “in the room”.

EXAMPLES:

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

III *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.