

PHYSICAL THERAPY PRACTICE SCENARIOS

UTILIZATION OF ASSISTIVE PERSONNEL

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First and foremost, information about how to correctly utilize assistive personnel is difficult to interpret due to a multitude of variables including the type of practice setting (PTPP, Rehab Agency, CORF, in/out-patient hospital) and/or type of insurance (Medicare or Private Payer,) that is paying for the service. The answers to specific scenarios may all be different for each combination of variables or they may all be the same depending on the circumstances. Let's consider the following:

Scenario 1

Mary Jane is a 69-year-old Medicare patient who is receiving outpatient physical therapy services following a total knee replacement. Mary Jane's treatment includes electrical stimulation to the quads followed by therapeutic exercise to enhance ROM and strength. Who can deliver the service???

• **PTPP**

- Physical Therapist – can deliver all aspects of care
- Physical Therapy Assistant – can deliver all aspects of care as long as the supervising PT is able to maintain direct line-of-sight of the ongoing care delivered by the PTA
- Clinic aide / Athletic Trainer – should not deliver any aspect of “billable” care to the patient

• **Hospital Out-patient Facility / Rehab Agency / CORF / Home Health**

- Physical Therapist – can deliver all aspects of care
- Physical Therapy Assistant – can deliver all aspects; supervising PT must be available via telecommunications
- Clinic aide / Athletic Trainer – should not deliver any aspect of “billable” care to the patient

Scenario 2

Little Jake is a 12-year-old football player who suffered a proximal tibia fracture. His fracture is stable and he has been referred for outpatient physical therapy. Little Jake's treatment includes electrical stimulation to the quads followed by therapeutic exercise to enhance ROM and strength. Little Jake's father has insurance coverage via Company XYZ. Company XYZ contracts with physical therapists throughout the state in which Little Jake lives. Within Company XYZ's “Guide to Physical Medicine,” it specifies that that “Procedural Codes” require the following: “One-on-one direct patient contact and attendance by the therapist.” Who can deliver the service???

• **PTPP / Hospital Out-patient Facility / Rehab Agency / CORF / Home Health**

- Physical Therapist – can deliver all aspects of care
- Physical Therapy Assistant – can deliver all aspects of care; line-of-sight issues only relate to the care of the Medicare patient
- Clinic aide / Athletic Trainer – can delivery the modality code; procedural codes, in this case therapeutic exercise, can only be delivered by a licensed provider, i.e., the PT or the PTA

Scenario 3

Billy Bob is a 36-year-old Rock-Star patient who blew-out his ACL while doing the “Chicken Dance” on stage. Billy Bob has no health insurance but is independently wealthy secondary to his record contract. He insists on paying cash for services delivered. These services include electrical stimulation to the quad followed by therapeutic exercise for ROM and strengthening. Who can deliver the service???

• **PTPP / Hospital Out-patient Facility / Rehab Agency / CORF / Home Health**

- Physical Therapist – can deliver all aspects of care
- Physical Therapy Assistant – can deliver all aspects of care; line-of-sight issues only relate to the care of the Medicare patient
- Clinic aide / Athletic Trainer – can deliver all aspects of care; per the Iowa PT/PTA practice act and associated administrative rules, as long as the following issues are satisfied:
 - a. The supervising PT has physical participation in the patient's treatment or evaluation, or both, each treatment day;
 - b. The assistive personnel may provide independent patient care only while under the on-site supervision of the supervising PT;
 - c. Documentation made in the PT records by unlicensed assistive personnel shall be co-signed by the supervising PT; and
 - d. PT provides periodic re-eval of assistive personnel's performance in relation to the patient.

I hope this information assists in understanding how to correctly utilize and bill for treatment provided by assistive personnel in a physical therapy environment. If you have any further comments or questions, please do not hesitate to contact me directly.

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Medicare Supervision Requirements for Physical Therapist Assistants	
Type of Setting	Supervision Ruling
Certified Rehabilitation Agency (CRA)	CRA's are required to have qualified personnel provide initial direction and periodic observation of the actual performance of the function and/or activity. If the person providing services does not meet the assistant-level practitioner qualifications in 485.705, then the physical therapist must be on the premises.
Comprehensive Outpatient Rehabilitation Facility (CORF)	The services must be furnished by qualified personnel. If the personnel do not meet the qualifications in 485.705, then the qualified staff must be on the premises and must instruct these personnel in appropriate patient care service, techniques, and retain responsibility for their activities. A qualified professional representing each service made available at the facility must be either on the premises of the facility or must be available through direct telecommunications for consultation and assistance during the facility's operating hours.
Home Health Agencies (HHA)	Physical therapy services must be performed safely and/or effectively only by or under the general supervision of a skilled therapist. General supervision has been traditionally described in HCFA manuals as requiring the initial direction and periodic inspection of the actual activity. However, the supervisor need not always be physically present or on the premises when the assistant is performing services.
Inpatient Hospital Services	Physical therapy services must be those services that can be safely and effectively performed only by or under the supervision of a qualified physical therapist. Because the regulations do not specifically delineate the type of direction required, the provider must defer to his or her physical therapy state practice act.
Outpatient Hospital Services	Physical therapy services must be those services that can be safely and effectively performed only by or under the supervision of a qualified physical therapist. Because the regulations do not specifically delineate the type of direction required, the provider must defer to his or her physical therapy state practice act.
Physical Therapist in Private Practice (PTPP)	Physical therapy services must be provided by or under the personal supervision of the physical therapist in private practice. HCFA specified that the physical therapist must be in the room when the physical therapist assistant provides a service in the PTPP setting.
Physician's Office	Physical therapy services must be provided by or under the direct supervision of the physician. HCFA has generally defined direct supervision to mean that the physician be in the office suite when an individual procedure is performed by supportive personnel.
Skilled Nursing Facility (SNF)	Skilled rehabilitation services must be provided directly or under the general supervision of skilled rehabilitation personnel. General Supervision is further defined in the manual as requiring the initial direction and periodic inspection of the actual activity. However, the supervisor need not always be physically present or on the premises when the assistant is performing services.

*Please note that physical therapists are licensed providers in all states and physical therapist assistants are licensed providers in the majority of states. As licensed providers, the state practice act governs supervision requirements. Some state practice acts mandate more stringent supervision standards than Medicare laws and regulations. In those cases, the physical therapist and physical therapist assistants must comply with their state practice act. For example, in a skilled nursing facility in New Jersey, a physical therapist must be on the premises when services are furnished by a physical therapist assistant despite the fact that Medicare requires general supervision. New Jersey's state practice act requires direct supervision rather than general supervision, and therefore, the physical therapist and physical therapist assistant would have to comply with this requirement.