

# Use of Physical Therapist Assistants (PTAs) Under Medicare

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.

## Certified Rehabilitation Agency (CRA)

CRAs 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.

## Private Practice

Physical therapy services must be provided by or under the **direct** supervision of the physical therapist in private practice. CMS has generally defined direct supervision to mean that the supervising private practice therapist must be present in the office suite at the time the service is performed.

## Physician's Office

Services must be provided under the **direct** supervision of a physical therapist who is enrolled as a provider under Medicare. A physician cannot bill for the services provided by a PTA. The services must be billed under the provider number of the supervising physical therapist. CMS has generally defined direct supervision to mean that the physical therapist must 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. A 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.

- Last Updated: 10/15/2013
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