

Med A Skilled Nursing Student Supervision

The Centers for Medicare and Medicaid Services (CMS) published its final rule for Skilled Nursing Facilities (SNFs) for fiscal year 2012 which included an update in the language for student supervision. This provision, 'Medicare Skilled Nursing Facility Prospective Payment System Fiscal Year 2012' becomes effective October 1, 2011.

Final Rule:

- CMS ***discontinues*** policy of line of sight supervision requirement for therapy students.
- The time the student spends with the patient will continue to be billed as if the supervising therapist alone was providing the services.
- The student is treated as an extension of the therapist rather than being counted as an individual practitioner.
- Every student clinician should meet guidelines set forth by professional associations, state and local licensing boards and facilities – it is the authority of the supervising therapist to determine the appropriate level of supervision for the student.

As per MDS 3.0: Use of Therapy Students, the concurrent therapy language still exists, just no longer has the ***line of site*** requirement. Below is the original language for MDS 3.0 for your reference.

Implementing MDS 3.0: Use of Therapy Students

As facilities continue to change their current practices to implement the Minimum Data Set Version 3.0 (better known as MDS 3.0), one of the emerging issues is the manner in which they document and utilize therapy students. Under the new rules, 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). In addition, the supervising therapist or assistant cannot engage in any other activity or treatment when the resident is receiving treatment under Medicare Part B. However, for those residents whose stay is covered 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. For example under Part A, 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 treating 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.

Under Medicare Part B, 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 group treatment and the supervising therapist or assistant is present and in the room and is not engaged in any other activity or treatment; or
- The supervising therapist or assistant is providing group treatment and the therapy student is not providing treatment to any resident.

These changes as well as other changes regarding MDS 3.0 will take effect October 1, 2010. If you have questions regarding this provision or other provisions within MDS 3.0, please contact the APTA at advocacy@apta.org or at 800.999.2782 ext. 8533.

For information about clinical education updates and upcoming clinical education workshops in Wisconsin, please go to the CE SIG link on the WPTA website.

<http://www.wpta.org/special-interest-groups/index.cfm>

You can also find workshop dates under Clinical Education Workshops in each PT Connections.