



Guidelines for Supervision of Students – Medicare Part A, Medicare Part B, and Medicaid

**Information in this document is based on references provided (see links) and does not constitute legal advice. The supervising therapist is responsible for following the requirements of third-party payors. Information is provided to help clinical instructors in planning for student experiences.

Students should receive direct supervision from the supervising physical therapist throughout each clinical experience. Requirements for supervision include:

- PT on site
- Direct supervision: supervising PT readily available
- The supervising PT will determine required proximity based on the following elements:
 - State law
 - Patient acuity/needs
 - Third party payor requirements
 - Clinical judgement regarding student ability
 - Facility policies
 - DPT program policies.

Information is based on information listed on CMS and Arkansas DHS websites accessed 10/10/24 and may be subject to change. Clinical instructors are responsible for providing services for patients with Medicare and Medicaid in compliance with state and federal guidelines so should review requirements periodically.

- 1) Centers for Medicare and Medicaid Services. Billing and Coding: Therapy Students and Aides. CMS website. Accessed 10/10/24. <https://www.cms.gov/medicare-coverage-database/view/article.aspx?articleid=53339> .
- 2) American Physical Therapy Association. Supervision of Students in Skilled Nursing Facilities and Inpatient Rehabilitation Facilities Under Medicare. <https://www.apta.org/your-practice/payment/medicare-payment/supervision-under-medicare/students-snfs-and-irfs-under-medicare>; Accessed 10/10/24.
- 3) Arkansas Department of Health and Human Services. Section II: Occupational Therapy, Physical Therapy, and Speech-Language Pathology Services. <https://humanservices.arkansas.gov/divisions-shared-services/medical-services/helpful-information-for-providers/manuals/therapy-prov/>; Accessed 10-10-24.

Overview—GENERAL GUIDELINES--

Setting	Medicare	Required Supervision
Hospital (Acute)	Medicare Part A	No specific requirements indicated in guidelines. other than the therapist is responsible for determining the level of supervision necessary to comply with state/federal law. (Therapist should be readily available and in close enough proximity to assist student if needed.)

SNF	Medicare Part A	<ul style="list-style-type: none"> • Line of sight not required • Individual minutes may be counted if supervising therapist is not treating another patient or supervising another individual; supervising therapist must be available to immediately assist if needed • Concurrent minutes have specific requirements if they are to be billed; see Reference 1 above
Outpatient (private practice or hospital owned)	Medicare Part B	<ul style="list-style-type: none"> • “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.”² • “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.”² • “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 • <i>See reference provided for additional information</i>
All settings	Medicaid (Arkansas)	<ul style="list-style-type: none"> • “Occupational therapy, physical therapy, and speech-language pathology services carried out by an unlicensed student may be covered only when a licensed provider of the service is present and engaged in student oversight during the entirety of the encounter, such that the licensed provider is considered to be providing the service.”³
All settings	Other third party payors	<ul style="list-style-type: none"> • Check requirements to ensure adherence