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## OHIO PHYSICAL THERAPIST ASSISTANT EDUCATORS CONSORTIUM

### *Laws, rules, and Regulations Governing the Supervision of Physical Therapist Assistant Students in the State of Ohio.*

#### ***State law***

***Relevant Web Link:*** <http://otptat.ohio.gov/>

The definitions of *student physical therapist assistant*, *supervising physical therapist assistant* and *direct supervision* are found in the Ohio revised code: 4755-27-01 in section 6, 8, and 9 on pages 26 and 27.

All physical therapist assistant program students and clinical instructors must follow state laws governing supervision in a physical therapy setting, as outlined in the state practice act where the clinical experience is taking place. The *student PT Assistant* is an unlicensed person, by definition, who shall at all times function only under the on-site supervision of a physical therapist or a physical therapist assistant. See Ohio Revised Code 4755-27-04, section E (2) page 29.

“Student physical therapist assistant” means a student enrolled in an accredited or candidacy status entry level physical therapist assistant education program who is completing a required clinical education course. 4755-27-01 A (6)

“Unlicensed personnel” means any person who is on the job trained and supports the delivery of physical therapy services by personally assisting the physical therapist, physical therapist assistant, student physical therapist, and/or student physical therapist assistant while the physical therapist, physical therapist assistant, student physical therapist, and/or student physical therapist assistant is concurrently providing services to the same patient. 4755-27-01 A (4)

The supervising physical therapist is accountable and responsible at all times for the direction of the actions of the person(s) supervised, including the physical therapist assistant student. Likewise, the supervising physical therapist assistant is accountable and responsible at all times for the direction of the actions of the person(s) supervised, including the student physical therapist assistant.

Delegation in physical therapy is the sole responsibility of the physical therapist. Personally assisting the physical therapist, physical therapist assistant student physical therapist and/or student physical therapist assistant while the physical therapist, physical therapist assistant, student physical therapist, and/or student physical therapist assistant is concurrently providing services to the same patient. See Ohio Revised Code 4755-27-03, Sections A and G, pages 27 and 28.

Students may document only their involvement in components of the patient care and they shall sign their name as *Student PTA or SPTA*. It is the position of the Ohio Physical Therapy Section that students may use the credential “Student PT” or “Student PTA”, as well as “SPT” or SPTA”, while completing a required clinical education course in an accredited or candidacy-status entry-level physical therapist or physical therapist assistant education program. If signing just the initials, a written policy documenting that these initials are defined as “Student PT” and “Student PTA” satisfies the current rules on legal signatures. Simply signing documentation with “Student” following the name does not identify their course of study and is not acceptable. (11/2008)

**Medicare Guidelines Relevant Web link: [www.cms.hhs.gov/therapyservices/](http://www.cms.hhs.gov/therapyservices/) (See Chapter 15, sections 220 and 230 of the current Benefit Policy Manual)**

The Centers for Medicare and Medicaid Services (CMS) have published the following regulations for reimbursement of physical therapy services provided by students.

- **Medicare Part A:** to include client services provided by the student on the M.D.S., C. M. S. requires in the line of sight supervision **by the supervising therapist or assistant. (See below. This is changing 10/1/2011.)** A PTA is not precluded from serving as the C. I. (Clinical Instructor) for a PTA student. All documentation should be co-signed by the qualified PT.
- **Medicare Part B:** to bill and be reimbursed by CMS, all services must be provided by practitioners who are acting within the scope of their state licensure.

CMS clarifies this statement with the following:

“The qualified practitioner is recognized by the Medicare Part B beneficiary as a responsible professional with any session when services are delivered.” “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 responsible for the services, and as such signs all documentation.”

- 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 APTA has interpreted the statements by C. M.S. in the following way:

“The students are not barred from participating in providing physical therapy services, but only physical therapist services can be billed to Medicare and paid under the Medicare B policy, as previously established by CMS Program Memorandum AB-01-56.” *Source: PTeam Alert Newsletter January 2002.*

**Revised Student Supervision Requirements:  
Transition for Implementation of FY 2012 SNF PPS Policies**

<http://www.cms.gov/SNFPPS/Downloads/fy12transpolicymemo.pdf>

*Policy Summary*

Effective for FY 2012, therapy students providing skilled therapy services within SNFs are no longer required to be under line-of-sight supervision. SNFs are still expected to exercise their discretion regarding the level of supervision a particular student may require.

*Transition Policy*

**Effective October 1, 2011.**