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OT/OTA Student Services

Historically, OT and OTA students have participated in the delivery of occupational therapy services under the supervision of occupational therapy personnel in a variety of fieldwork sites. The changes to Medicare payment systems over the last few years have brought concurrent changes to the way in which the Centers for Medicare and Medicaid Services (CMS), formerly the Health Care Financing Administration (HCFA), interprets how and whether the Medicare program should provide payment for services provided by students. In the article, "**Strategies for Creative Fieldwork Opportunities**," AOTA's Academic Affairs, Federal Affairs, Practice, and Reimbursement and Regulatory Policy staff provide guidance to help occupational therapy programs, fieldwork sites, and facilities understand and adapt to these changes.

For those settings that serve Medicare patients, it is important to be aware of both new and existing Medicare payment policies. Although Medicare does not state that students cannot provide services, CMS has published specific criteria relating to how and when the program will pay for services provided by students. When developing fieldwork plans for sites that serve Medicare patients, two issues must be considered:

1. Whether Medicare payment rules specifically allow or restrict coverage of services provided by students, and
2. What type and level of supervision are required to raise those services provided by students to the level of covered "skilled" occupational therapy as defined by the Medicare program.

All relevant Medicare coverage criteria must be reviewed if reimbursement is sought for services. In addition, many State practice acts and regulations provide requirements (legal statutes) and guidance for occupational therapy services provided by students. You can find the regulatory board contact information on the **State-by-State OT Law Database** located in the Licensure section of this Web site.

The following chart sets out for each Medicare setting whether Medicare payment rules specifically allow or restrict coverage of services provided by students and what type and level of supervision Medicare requires to raise the services provided by students to the level of covered "skilled" occupational therapy. Practitioners should take care to assure an appropriate level of supervision, whether or not a specific CMS rule regarding students has been issued.

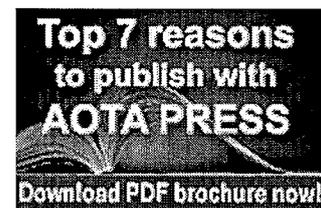
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Setting/Payer

Medicare Coverage of Services Provided by Therapy Students	Type and Level of Supervision of Student Required	
Medicare Part A <i>Hospital and Inpatient Rehabilitation</i>	CMS has not issued specific rules.	CMS has not issued specific rules. See relevant state law for further guidance on supervision for the services to be considered occupational therapy.
Medicare Part A <i>SNF</i>	The minutes of therapy services provided by OT and OTA students may be recorded on the MDS as minutes of therapy received by the beneficiary.	Services of OT and OTA students must be provided in the "line of sight" of the OT. OTAs can provide clinical supervision to OTA students; however, if the services are to be recorded for payment purposes, they must be performed in "line of sight" of an OT
Medicare Part A <i>Hospice</i>	CMS has not issued specific rules.	CMS has not issued specific rules. See relevant state law for further guidance on supervision for the services to be considered occupational therapy.
Medicare Part B <i>Partial Hospitalization</i>	CMS has not issued specific rules.	CMS has not issued specific rules. See relevant state law for further

		guidance on supervision for the services to be considered occupational therapy.
Medicare Part A <i>Home health</i>	Regulations (§484.115) specifically cite definitions for "qualified personnel", which do not include students. However, CMS has not issued specific restrictions regarding students providing services in conjunction with a qualified OT or OTA.	Services by students can be provided (as allowed by state law) as part of a home health visit, when the student is supervised by an OT or OTA in the home
Medicare Part B <i>Private Practice, Hospital Outpatient, SNF, CORF, ORF, Rehabilitation agency, and other Part B providers including home health agencies when providing Part B services</i>	Under the Medicare Part B outpatient benefit, the services of students directly assisting a qualified practitioner (OT) are covered when the type and level of supervision requirements are met.	Students can participate in the delivery of services when the qualified practitioner (OT) is directing the service, making the skilled judgement, responsible for the assessment and treatment in the same room as the student, and not simultaneously treating another patient. The qualified practitioner is solely responsible and must sign all documentation.

AOTA continues to work with a coalition of practitioner organizations to advocate for additional government support for education of allied health providers and to develop long-term solutions to the problems caused by Medicare's limitations on reimbursement for student services.