



Definitions

- ▶ **Student:** As part of their clinical training, a person who is enrolled and participating in an accredited educational program to become a physical therapist, physical therapist assistant, occupational therapist, or occupational therapy assistant. Interim permitted students who have already completed their training but aren't yet licensed can also act as students for the purposes of this chapter.
- ▶ **Supervising therapist:** a licensed physical or occupational therapist with an active L&I provider number who has entered into a private agreement with a student and their educational institution to provide hands on training, instruction and supervision during the clinical phase of the student's course work. A supervising therapist can only supervise a student within their discipline. They are responsible for all services provided to injured workers by their students. Physical therapist assistants and occupational therapy assistants must not act as supervising therapists.
- ▶ **Supervision:** the supervising therapist can only supervise one student at a time and won't treat another patient while supervising the student. The supervising therapist must maintain line-of-sight and be physically present for the entire session during treatment to provide direct instruction to the student, oversee the work, and adjust the treatment or change other patient-centered tasks while the service is being provided. Services may be single patient (student therapist to patient) or group services (student therapist to a group of patients).



Payment policy: Therapy student and therapy assistant student supervision

L&I has adopted a modified version of Medicare Part B's policy on physical and occupational therapy students. L&I considers supervised students an extension of their supervising therapist.

Please refer to the **Definitions** section at the beginning of this chapter to see the definitions of **student**, **supervising therapist** and **supervision**.

▶ Services that can be billed

Supervising therapists will direct all care provided by their students to injured workers and must bill for these services under the supervising therapist's provider number.

All billed services must meet the billing and documentation requirements applicable to the supervising therapist.

▶ Services that aren't covered

Any service provided by a student that is unsupervised (including skilled nursing facilities) aren't payable.

Students can't independently:

- Make clinical judgements;
- Provide evaluations, re-evaluations or assessments;
- Develop, manage or deliver services.

Any service that deviates from the requirements outlined in Medical Aid Rules and Fee Schedules isn't covered.

▶ Requirements for billing

All documentation must identify both the supervising therapist and the student and must be signed by both parties.

All services must be billed by the supervising therapist under their provider number and must comply with the documentation requirements for physical medicine services.

Supervising therapist responsibilities

(See definition of **Supervising therapist** in **Definitions** at the beginning of this chapter.)

Supervising therapists are responsible for:

- All services provided to injured workers by their students.
- Ensuring that the work students perform does not exceed their education, skills and abilities nor the supervising therapist's scope of practice.
- Providing supervision (reference **Definitions**) to the student regardless of what setting care is being rendered in (clinic, hospital or skilled nursing facility).
- Signing all documentation for services rendered to injured workers
- Keep a copy of the private agreement between them and the student in accordance with [WAC 296-20-02005 Keeping of records.](#)

▶ Payment limits

Students won't be directly reimbursed for their time or services. (Refer to [WAC 296-20-015 \(3\) Who may treat.](#))