

## Eli's Rehab Report

### News Brief: New Requirements for Diagnostic Tests and Therapy Students

Two separate program memoranda released in April demonstrate HCFA's supervision requirements for diagnostic testing (such as motor nerve conduction studies) and reimbursement guidelines for therapy students services under Part B.

#### Neuromuscular Testing Supervision Guidelines

Program Memorandum B-01-28 lists revised levels of supervision for Medicare-approved diagnostic tests. The memo defines general supervision as a procedure furnished under the physician's overall direction, but the physician does not have to be present during the procedure. He or she is, however, responsible for training the staff involved and maintaining the testing equipment.

Direct supervision means that the physician must be present in the office suite and immediately available to provide assistance and direction throughout the procedure, but he or she does not have to remain in the room during the testing.

Personal supervision requires that a physician remain in the room during the test. Following is a partial list of codes designated in the memorandum. They represent those most frequently performed in PM&R practices.

The procedures must be personally performed by a physician or a physical therapist certified by the American Board of Physical Therapy Specialties (ABPTS) as a qualified electrophysiologic clinical specialist permitted to provide the service under state law (in addition, an ABPTS-approved PT can supervise another PT, but only the PT with ABPTS certification may bill): 95860-95869 (needle EMG) and [CPT 95870](#) (... limited muscle study).

The following codes must be performed under the personal supervision of a physician: [CPT 95875](#) (ischemic limb exercise with EMG and lactic acid determination) and 95922-95923 (autonomic nervous system tests).

The following codes must be performed either 1) by a PT with ABPTS certification, 2) under the direct supervision of a physician, or 3) by a certified technician under general physician supervision: 95900-95904 (nerve conduction studies), 95933 (blink reflex), 95934-95936 (H-reflex), and 95937 (neuromuscular junction testing).

The full listing of diagnostic testing supervision guidelines can be found at [www.hcfa.gov/pubforms/transmit/B0128.pdf](http://www.hcfa.gov/pubforms/transmit/B0128.pdf).

#### Don't Bill Part B For Therapy Students

Program Memorandum AB-01-56 lists eight questions and answers regarding payment for therapy students. It states that their services are not payable under Part B, whether or not a supervising therapist is in the room. Only the services of the licensed therapist are billable to Part B.

The full text of the program memorandum is available at [www.hcfa.gov/pubforms/transmit/AB0156.pdf](http://www.hcfa.gov/pubforms/transmit/AB0156.pdf).