

## Eli's Rehab Report

### Qualifications: Do You and Your Therapists Make the Grade? See What CMS Has to Say

PTs, PTAs, OTs and OTAs have a slew of new standards.

You weren't alone if you worried about the 2008 Medicare Physician Fee Schedule's restrictive statements on therapist qualifications. From foreign-trained therapists to therapy assistants who became full-fledged therapists without going back to school, therapy providers across the nation who received their credentials via non-traditional routes have been worried for their jobs.

The good news: In CMS Transmittal 88 (CR 5921), the agency spells out more detailed requirements for PTs, PTAs, OTs and OTAs -- and experts agree that the requirements are actually quite inclusive.

Make Sure Your up-and-Coming Therapists Measure up

January 1, 2010, may seem like a long way off, but after that date, anyone who becomes a PT, PTA, OT, or OTA must follow new standards. You can find all guidelines starting on page 38 of Transmittal 88 at [www.cms.hhs.gov/Transmittals/downloads/R88BP.pdf](http://www.cms.hhs.gov/Transmittals/downloads/R88BP.pdf). In a nutshell ...

PTs must be licensed in their state (if licensure applies). This may include temporary licensure, CMS clarified. In addition, PTs must have graduated from a PT education program accredited by the Commission on Accreditation in Physical Therapy Education (CAPTE) and have passed a national exam that's approved by the state where the PT will be practicing.

PTAs must be licensed (if applicable) and be registered or certified (if applicable) by their state. Licensure may include temporary licensure. In addition, they must have graduated from a CAPTE-accredited program and have passed a national exam for PTAs.

OTs must be licensed as an OT (if applicable) in their state and have graduated from a program accredited by the Accreditation Council for Occupational Therapy Education (ACOTE). Licensure may be temporary. In addition, they must be eligible to take or have passed the OT exam administered by the National Board for Certification in Occupational Therapy Inc. (NBCOT).

OTAs must be licensed (if applicable) or otherwise regulated (if applicable) as an OTA in their state. They must have graduated from an OTA program that's ACOTE-accredited and either be eligible to take or have successfully completed the NBCOT exam for OTAs.

If these regs seem overwhelming, remember the basics: the new standards require therapists to 1) be licensed if their state offers licenses, 2) have graduated from an accredited program, and 3) have taken their national exam.

CMS Gets Grandfathering-Happy

If you know you have current therapists and assistants who fall short of the above standards, rest assured that they're probably in the clear. First of all, the above standards go into effect for new grads after Jan. 1, 2010, so anyone who's currently practicing is likely covered by one of many grandfathering clauses CMS included in Transmittal 88.

Example: In the late 70s, OTAs with experience could participate in a Career Mobility Program that would allow them to become OTs if they passed the national OT exam. "Those people did not attend OT school, but we worked with CMS to craft language in Transmittal 88 that would prevent them from being denied Medicare payment," points out **Chuck**

**Willmarth**, director of state affairs for the American Occupational Therapy Association.

As another example, CMS was "... a little more permissive to make sure those who are currently practicing as internationally educated therapists don't get cut out," says **Dave Mason**, vice president of government affairs for the American Physical Therapy Association (APTA).

But if you plan on hiring internationally educated PTs on or after January 1, 2010, take note. Their curricula must be approved by a credentials evaluation organization either approved APTA or "identified in 8 CFR 212.15(e) as it relates to PTs," according to CMS. As of 2007, approved organizations in CFR 212.15 (e) included the Federation of State Boards of Physical Therapy and the Foreign Credentialing Commission on Physical Therapy.

For internationally-educated or military-trained PTAs, their curricula must be approved by a credentialing body that either the APTA or 8 CFR 212/15 (e) endorses.

SLPs: Just Stick to Your CCCs

Transmittal 88 did not include any new education standards or professional qualifications for SLPs. As usual, SLPs must meet the education and experience requirements for their Certificate of Clinical Competence (CCC) granted by the American Speech-Language Hearing Association. SLPs may also meet the educational requirements for the certification and be in the process of getting their supervised experience required for their CCC.