

Eli's Rehab Report

Reader Question: Billing PT Services Incident to

Question: Our practice has one physiatrist and three physical therapists (PT), and we now bill everything (including physical therapy) under the doctors identification number as incident to. In your November 2000 issue, you stated that all therapy sessions should be billed under each therapists individual identification number. We have never done this. Does this means that our PTs have to apply and be credentialed by every carrier we bill?

New Jersey Subscriber

Answer: Incident to billing is a complex issue and has been identified by the Office of Inspector General (OIG) as a target for investigation in 2001, which means the OIG will be monitoring incident to billing carefully to ensure it is being used correctly.

Your physical therapists would have to be credentialed by your carriers already if you are billing for PT evaluations and re-evaluations (97001 and 97002) because most states do not allow physicians to bill for PT evaluations. Therefore, your claims for these services are probably already being rejected if you are billing them under the doctors identification number. Getting an identification number for each therapist in the office would be a wise move if you want to collect for these therapy evaluations (as well as occupational therapy evaluations [97003 and 97004], for which these same rules apply).

In addition, billing incident to for PT services varies by state, which can make the coding rules very complex. When billing incident to, the physician must be in the office and available if needed. Different carriers, however, have varying rules on which physician must be available. Although some payers only state that a physician who is part of the practice must be available, others require that the PT bill under the name of the physician who initiated the treatment. This can get complicated because the doctor who initiated treatment may not always be in the office when the therapy is performed. The physician could be on vacation or at the hospital.

Because of these reasons, billing your therapists claims under the therapists own identification numbers is a good idea.