

Eli's Rehab Report

READER QUESTIONS: Watch Out for This Incident-to Snafu

Question: If one of my therapists is supervising an assistant doing treatment, how do I bill for it in a private practice setting? If incident-to billing requirements are met, can I have the assistant bill her work incident-to the therapist?

-- New Jersey subscriber

Answer: CMS does not allow therapists to use incident-to billing for their assistants. Services an assistant provides should be billed under the supervising therapists NPI number in a private practice setting. Under the Medicare program, the therapist must be on the premises when the assistant is providing therapy services to a Medicare beneficiary. At this time, assistants are unable to obtain their own NPI number.

However, therapists under physician supervision can bill incident-to the physician. Of course, the therapist and physician would have to meet all incident-to billing requirements. Those are:

- 1) the physician must do the initial visit for new patients;
- 2) the physician must see the patient first if its regarding any new condition and establish a clear plan of care; and
- 3) the physician must be present in the immediate office suite if the therapist is billing incident-to the physician.

For additional information regarding incident-to billing, read CMS Pub 100-02, Chapter 15, Section 230.5 at www.cms.gov/manuals/Downloads/bp102c15.pdf.

-- Reader Question was reviewed by **Rick Gawenda,PT**, director of PM&R at Detroit Receiving Hospital and President/CEO of Gawenda Seminars.