



NCBPTE Updates

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THE NORTH CAROLINA BOARD OF PHYSICAL THERAPY EXAMINERS

PTBoard@NCPTBoard.org



Regulatory Spotlight

Physical Therapy Fees and Reimbursement Structures

This newsletter highlights the NC Physical Therapy Practice Act [G.S.90-270.90 - 90.270.106](#) and Board Rules [21 NCAC Chapter 48](#) related to billing and reimbursement of physical therapy services. The [April 2024 Board Newsletter](#) also contains associated content.

When seeking to understand physical therapy fees and reimbursement structures, licensees often remember to consider the NC PT Practice Act and Board Rules, but may not consider the compliance requirements of PT services by payers along with other entities and associated ethical requirements. The Board regularly responds to questions and complaints surrounding this topic.

This month's highlighted Board Rule is:

21 NCAC 48C .0102 RESPONSIBILITIES

(g) A physical therapist's responsibility for patient care management includes first-hand knowledge of the health status of each patient and oversight of all documentation for services rendered to each patient, **including awareness of fees and reimbursement structures.**

Given the highlighted Board Rule requires "awareness of fees and reimbursement structures," licensees should ensure they comply with applicable local, state, and federal laws and regulations as well as payer policies.

A requirement of NC PT/PTA licensure is graduation from an educational program accredited by The Commission on Accreditation in Physical Therapy Education (CAPTE). CAPTE program requirements include standards that call for graduates to "practice in a manner consistent with all principles of the [APTA Code of Ethics for the Physical Therapist](#) and [Standards of Ethical Conduct for the Physical Therapist Assistant](#)" (see Standard 7 for details [2024 CAPTE PT and PTA Standards and Required Elements](#)). Both documents detail professional standards surrounding billing and reimbursement.

Consequences of a licensee's lack of awareness may include financial hardship to the patient, fraudulent billing to the payer, inadequate physical therapy services to the patient, and damaged professional reputation of the licensee, the physical therapy practice, the employer, and the physical therapy profession. To avoid potential violations of the highlighted Board Rule, licensees should seek to gain knowledge in the following areas:

- Documentation
- Coding
- Billing

- Payer requirements/payer policies
- Self-pay legal considerations
- Federal and state laws that apply to healthcare providers and practices
- Ethical considerations

The following resources may be useful:

- Create a free account to read APTA information regarding coding and billing [link](#).
- Visit the APTA Learning Center and Search by Category (i.e. Regulatory Topics; Ethics) or by Keyword (i.e. documentation; coding) [link](#).
- Consult Cash-Based, Out-Of-Network resources through the APTA [link](#).
- Review specific payer policies by whom your PT services are being reimbursed. Examples may include third-party private payers, Medicare, and state-based insurances such as Medicaid and Workers Compensation. Look for key components such as covered services, non-covered services, medical necessity, qualified providers, billing guidelines, documentation guidelines, coding guidelines, timely filing, etc.
- Consult Medicare Internet-Only Manuals (IOMs) [link](#) that are regularly updated. The Medicare Benefit Policy Manual and Medicare Claims Processing Manual may be of particular interest. Both have chapters dedicated to a variety of practice settings that include physical therapy services.

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Regulatory Spotlight (continued)

The Board does not have the authority to enforce payer or employer policies or to address specific questions on coding, billing and reimbursement under payer and employer policies; however, it is an expected standard of practice to have knowledge regarding fees and reimbursement structures. As always, reach out to the Board PTBoard@ncptboard.org with any questions or further clarification.

Continuing Competence Random Audit - Documentation Advice

Per Board Rule 21 NCAC 48G .0110, the Board conducts random audits at the end of each continuing competence reporting period. In wrapping up the most recent audit, here are some of the takeaways to keep in mind when maintaining your compliance records:

- If you choose to document clinical practice hours, remember to keep supporting documentation on file. The documentation requirements are listed in Board Rule 21 NCAC 48G .0109 (g). The [clinical practice certification form](#) found on the Board website that may be used to satisfy the documentation requirement.
- Retain documentation to support any activities used for carry-over.
- Record CPR/BLS training in “workplace education-general patient safety, emergency procedures, or governmental regulatory requirements.”
- Most often, employer-required annual training does not meet the category requirements for “approved provider.” Verify the course provider is “approved” per Board Rule 21 NCAC 48G .0108 (c) before recording the activities. These activities may be more appropriately recorded in 21 NCAC 48G .0109 (a)(3) “Activities related to PT for which no assessment is received” or (i)(1-2) “Workplace Education.”
- Before submitting documentation to support a random audit request, consult [Board Rule 21 NCAC 48G .0109](#) for documentation requirements for each category/activity.

Did you know?

Letter of Good Standing

If you are applying for a license in another state and need a License Verification or Letter of Good Standing from the NC Board of PT Examiners, that state should visit the home page of the Board website and follow the prompts within the Licensee Lookup/License Verification button to print the required document.

The Board does not accept or complete any external forms for verification. All license information that may be disclosed is included in the Lookup/License Verification document on the Board website. No additional information will be provided.

As of July 1, 2024, NC Board of PT Examiners offers Self-Service License Verification - at no charge to the licensee.

Name Changes on your NC PT/PTA license

Name changes require legal documentation showing the name change. Send an email to PTBOARD@ncptboard.org with "Name Change" in the subject line. Include your full name as it currently appears on your NC PT/PTA license, your NC PT/PTA license number, your new name, and date of birth. Attach **ONE** of the following supporting documents as a PDF:

- Copy of a government-issued photo ID card, military identification, passport, or driver’s license.
- Copy of official receipt of social security change of name. (DO NOT SEND copy of Social Security card.)
- Copy of an official divorce decree noting the change of name.
- Copy of a court order noting the change of name (adoption, legal name change, federal identity change, etc.).

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SCAM ALERT

Last year, the FSBPT issued an alert for a scam targeting PT/PTA licensees across the country. The NC Board of PT Examiners has received reports from licensees of scammers spoofing the Board phone number and stating they are being disciplined by the Board. These types of scams are not coming from the Board or through Board information. Licensees should be vigilant and contact the Board office (PTBoard@ncptboard.org) before divulging any personal information.

Board office staff hours are 7:30 am – 4 pm, Monday–Friday, to respond to calls and email inquiries. Please schedule office appointments in advance, Tuesday through Thursday, 10 am – 2 pm, by emailing PTBoard@NCPTBoard.org. Provide name, email address, best contact number, and a brief description of appointment needs.