

Supervision of Students in SNFs and IRFs Under Medicare

CMS supports clinical training as a crucial component of professional development but can sometimes take differing approaches to requirements around that training, depending on setting.

Use of Students in SNFs

The [MDS RAI Manual](#) is the guidebook that lays out exactly what CMS requires around many facets of SNF care, including use of students and "clarifications and scenarios concerning complex areas."

Use of Students in IRFs

Talks between APTA, the American Occupational Therapy Association, the American Speech-Language Hearing Association and CMS in 2018 resulted in the agency [creating a definitive statement](#) around its views related to therapy students in hospitals.

Highlights of the letter:

- CMS believes that clinical training in hospitals is essential for educating future therapists and other health care professionals.
- CMS has not changed its policy regarding the Medicare Hospital Conditions of Participation and the provision of services by students in hospitals, including therapy students providing rehabilitative services in hospitals and IRFs.
- There is no Medicare Hospital Condition of Participation, specifically 42 CFR 482.56, or interpretive guidance that prohibits therapy students from providing therapy services as part of their training program.
- CMS notes that per 42 CFR 482.56, the director of a hospital's rehabilitation services must have the necessary knowledge and expertise to supervise and administer the services, and must ensure the services are organized and staffed to ensure the health and safety of patients. The director's responsibilities extend to all therapy students providing services in the hospital as part of their training program.
- Therapy student services furnished under the supervision of a qualified therapist or therapy assistant may count toward the intensive rehabilitation therapy program requirement.
- The Medicare Conditions of Participation require hospitals to comply with all federal, state, and local laws related to the health and safety of patients, ensure medical staff is accountable to the governing body for the quality of care provided to patients, and have an organized medical staff responsible for the quality of care provided to patients by the hospital. Students that provide services and care to patients in the hospital as part of the training program, their supervisory faculty, and any hospital staff acting as student preceptors are subject to these levels of oversight as well as any standards and

requirements established by their training programs and by any national organizations, such as American Physical Therapy Association, American Occupational Therapy Association, and American Speech-Language-Hearing Association.