



Payment for Consumer Direct Access is **HERE!** *CPTA Payment Policy Committee*

Consumer Direct Access has created great opportunities for individuals to access their physical therapists directly without a referral or diagnosis. However, the implementation of the law has created some misperception for physical therapists in the area of documentation and billing. Currently, California law does not prohibit diagnosis by a physical therapist; it only prohibits diagnosis of disease (medical diagnosis). ICD-10 codes are used to describe not only diagnosis of disease (medical diagnosis) but also impairments, injuries and other health conditions. This has been a regular part of practice for years in California; as physical therapists commonly include a more descriptive functional diagnosis, in addition to that provided by a physician, in their billing and documentation following their evaluation.

The ICD-10 codes that are placed on the claim forms submitted to payers not only describe diagnosis of disease but, in fact, are far more expansive. Specifically, ICD-10 CM: International Classification of Diseases, 9th Edition, Clinical Modification, Volumes 1 & 2 (including the Official ICD-10-CM Guidelines for Coding and Reporting), as maintained by HHS includes the following:

- Diseases
- Injuries
- Impairments
- Other health problems and their manifestations
- Causes of injury, disease, impairment, or other health problems

Currently, physical therapists are required to append ICD-10 codes for functional impairments or other health problems and their manifestations. This is illustrated by the fact that the CMS 1500 claim form allows physical therapists to submit a claim with an ICD-10 code that they select (Box 21). The title of the box is “Diagnosis or Nature of Illness or Injury,” indicating that this field does **not** require a “diagnosis of disease” or “medical diagnosis.” For example, the physical therapist may use ICD-10 code 783.1 abnormality of gait if a diagnosis of an underlying disease process was not previously diagnosed by a licensed diagnostician. Insurers can establish their own criteria for payment and generally do not require the inclusion of a medical diagnosis descriptor. In fact, Medicare’s Administrative Contractor, Noridian recently retired the diagnostic limitations formerly imposed by Palmetto GBA, which restricted payment to a specified list of ICD-10 codes.

With the implementation of AB 1000, some have expressed a fear that a physical therapist that includes ICD-10 codes on a claim form without having a diagnosis of disease from a licensed diagnostician may be in violation of the Physical Therapy Practice Act. **It is the opinion of CPTA, APTA, and PTBC that this is not the case.** However, if a physical therapist is uncomfortable with assigning an ICD-10 code in a direct access situation, then it is advised that the patient be referred to a diagnostician before initiating treatment. Keep in mind, practicing in a direct access environment is a choice, not a mandate!

Insurers are gradually changing their internal clinical policies to incorporate payment for direct by eliminating the referral requirement. Physical therapists can influence these changes by communicating with both large and small employers to promote the benefits of accessing a physical therapist without a referral and the resulting delay in care. As has been the case in other states with direct access, policies change gradually over time. CPTA is actively communicating with all major insurers to influence these policies.

The revision to the practice act is the first step in achieving unrestricted direct access to physical therapists services. There will be numerous changes that will need to occur over time to fully appreciate the significance and impact of the new law. CPTA will be working on educating the medical community and consumers on importance of direct access to rehabilitation, as well as wellness/preventive services.

CPTA is here to offer assistance and address your questions. Please stay tuned for upcoming webinars on direct access implementation and marketing. In addition, please visit CPTA’s website for further information and practice enhancement materials.