



DIVISION OF DISABILITY AND ELDER SERVICES

BUREAU OF QUALITY ASSURANCE  
2917 INTERNATIONAL LANE, SUITE 300  
MADISON WI 53704Jim Doyle  
GovernorHelene Nelson  
Secretary

State of Wisconsin

Department of Health and Family Services

Telephone: 608-243-2024

FAX: 608-243-2045

www.dhfs.state.wi.us

September 30, 2005

Tenuta & Associates  
14 W Mifflin, Ste 206  
Madison, WI 53703

Dear Mr. Johns:

Following is a response to your questions about the role of physical therapists in hospitals. Hospitals could implement policies that would designate physical therapists as "allied health personnel" who could order outpatient physical therapy for non-Medicare/Medicaid patients. HFS 124.21(4) Rehabilitation services Orders states: "Physical therapy, occupational therapy, speech therapy and audiology services shall be given in accordance with orders of a physician, a podiatrist or any allied health staff member who is authorized by the medical staff to order the service. The orders shall be incorporated into the patient's medical record." Please note that, in addition, HFS 124.23(1) Outpatient services Direction requires that: "If outpatient services are offered by the hospital, the service shall be under the direction of a qualified member of the medical staff."

However, federal regulations at 42 CFR 482.12(c)(1) state that every Medicare or Medicaid patient must be under the care of a licensed practitioner, and the categories of specified licensed practitioners does not include physical therapists.

Sincerely,

A handwritten signature in cursive script that reads "Jane Walters".

Jane Walters, Chief  
Health Services Section

JW/hb