



AMERICAN  
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HEARING  
ASSOCIATION

November 16, 2018

### **Joint Statement on Use of Students in Hospitals**

#### **AOTA, APTA, ASHA**

On a Medicare Learning Network event entitled *Inpatient Rehab Facilities (IRF) Payment and Coverage Policies: FY 2019 Final Rule* hosted on Thursday, November 15 by the Centers for Medicare & Medicaid Services (CMS), a number of questions were posed to CMS officials about whether student services can count towards the three-hour rule/intensity of therapy services requirement in the IRF setting. CMS clarified that students are not qualified providers of skilled rehabilitation services; however, CMS did not offer additional details on student supervision requirements that allow students to participate in clinical education and training.

AOTA, APTA and ASHA [have requested](#) an in-person meeting with CMS officials to discuss this issue in more detail. To ensure the continued development of a highly trained and well-qualified therapy workforce, AOTA, APTA, and ASHA strongly believe CMS must collaborate with therapy stakeholders to develop guidance that allows therapy students to receive the quality clinical training and experience they require while also maintaining patient quality standards and ensuring the integrity of the Medicare program. The therapy organizations will provide additional guidance as soon as it becomes available.