Professional therapy organizations continue to receive many requests for clarification on the role that physical therapist assistants (PTA) and occupational therapist assistant (OTA) can play within TRICARE, the health care program of the U.S. Department of Defense. These questions are regarding reimbursement for services provided by a PTA or OTA.

The misperception has been understandable, as neither TRICARE itself, nor contractor provider manuals have been crystal clear in their communications. To address these concerns, the American Physical Therapy Association (APTA), as well as expert consultants in the area of outpatient therapy, have issued guidance as they continue to advocate for policy changes.

This guidance indicates that TRICARE does not pay for services provided by a PTA or OTA in any therapy setting.
TRICARE: The U.S. Military's Health Care Program
(Continued)

APTA’s rationale is contained in the Code of Federal Regulations (CFR) and TRICARE’s Policy Manual. Section 32 CFR 199.6 addresses authorized providers for TRICARE beneficiaries. On page 190, it states the following:

Other individual paramedical providers: The services of the following individual professional providers of care to be considered for benefits on a fee-for-service basis may be provided only if the beneficiary is referred by a physician for the treatment of a medically diagnosed condition. A physician must also provide continuing and ongoing oversight and supervision of the program, or episode of treatment provided by these individual para-medical providers.

(1) Licensed Registered Nurses.
(2) Licensed Registered Physical Therapists.
(3) Licensed Registered Occupational Therapists.
(4) Audiologists.
(5) Speech Therapists (Speech Pathologists).

The list of providers above does not mention PTAs or OTAs so it’s the Department of Justice’s interpretation that since it does not specifically mention them, they are not an authorized provider of therapy services in any setting.

Despite advocacy efforts, TRICARE officials have defended the exclusion. They maintain that under TRICARE, overall care of the patient receiving physical therapy and occupational therapy services is the responsibility of the physician or other “independent professional provider,” requiring ongoing supervision by that independent provider of “other paramedical professional providers” identified under TRICARE Policy. Because PTAs and OTAs are not listed by TRICARE among para-medical providers, officials say, services rendered by PTAs and OTAs cannot be covered.

“We must become the change we want to see in the world.”
-Mahatma Gandhi
Impact/Provider Awareness:

• TRICARE as Primary Insurance: PTs and OTs should not use PTAs and OTAs when providing services to patients under TRICARE. (TMC is educating all therapists and assistants on the coverage limitations of TRICARE for scheduling). It is prudent; therefore, for the provider to use a tracking system to flag TRICARE patients and then create, educate and implement a process to effectively communicate with the rehab team on how to handle delivery of care/billing for therapy services.

• TRICARE as Secondary Insurance: Often TRICARE provides supplemental (secondary) insurance coverage. It is prudent, therefore, for providers to use a tracking system to flag TRICARE patients and then create, educate, and implement a process to effectively communicate with the rehab team on how to handle delivery of care/billing for therapy services.

TRICARE and TriWest: Are They the Same?

• Does TriWest follow the same policies as TRICARE for therapy services? The answer is no they do not. Under the TriWest Program, PTAs and OTAs can treat TriWest beneficiaries under the supervision of the therapist and have their services billed to TriWest.

Advocacy Efforts:

• We recognize the burden that TRICARE’s policy on PTA and OTA services places on both PTs and OTs who serve a large number of TRICARE beneficiaries. PTAs and OTAs are licensed individuals who provide quality care under the supervision of the PT and OT and are recognized as eligible for reimbursement by Medicare, Medicaid and most private insurance companies. We will continue to rally with our professional organization’s advocacy efforts for policy changes that allows PTAs and OTAs to provide reimbursable services under TRICARE.