

Recommended Skilled Nursing Facility Therapy Student Supervision Guidelines
Submitted to CMS by the American Occupational Therapy Association (AOTA)
during the comment period for the FY 2012 SNF PPS Final Rule

Please note, these suggested guidelines would be in addition to the student supervision guidelines outlined in the RAI MDS 3.0 Manual and all relevant Federal Regulations

- The amount and type of supervision as determined by the supervising therapist/assistant must be appropriate to the student's documented level of knowledge, experience, and competence.
- Students who have been approved by the supervising therapist or assistant to practice independently in selected patient/client situations can perform those selected patient/client services without line-of-sight supervision by the supervising therapist/assistant.
- The supervising therapist/assistant must be physically present in the facility and immediately available to provide observation, guidance, and feedback as needed when the student is providing services at all levels of supervision.
- When the supervising therapist/assistant has approved the student to perform medically necessary patient/client services and the student provides the appropriate services, the services will be counted on the MDS as skilled therapy minutes.
- The supervising therapist/assistant is required to review and sign all students' patient/client documentation for all levels of clinical experience and retains full responsibility for the care of the patient/client.
- The supervising therapist/assistant is required to have one year of practice experience prior to supervising any students.
- Students who have not been approved by the supervising therapist/assistant to practice independently require line-of-sight supervision by the qualified therapist/assistant during all services. In addition, under these circumstances the supervising therapist/assistant will have direct contact with the patient/client during each visit.