



Department of Health Care Policy & Financing Spinal Cord Injury Waiver and Physical Therapy Benefits

January 30, 2020

The purpose of this document is to provide the Department's response to stakeholder comments, regarding physical therapy benefits for those who access services through the Home and Community-Based Services (HCBS) Spinal Cord Injury (SCI) Waiver, shared at an August 22, 2019 meeting. Responses in this document represent a snapshot of the Department's position as of January 30, 2020 and should not be read as policy determination.

Summary of current physical therapy benefits for Health First Colorado, Colorado's Medicaid program, members and SCI Waiver participants.

Health First Colorado covers outpatient physical therapy services for all members. Services can take place in the office, hospital, home, and other settings. Rehabilitative physical therapy is also available through the Home Health Program. Members aged 20 or younger can access habilitative physical therapy benefits through the [Home Health Program](#) and the [School Health Services Program](#) (eligibility requirements apply).

Item 1

Physical therapy performed by licensed physical therapists is one form of beneficial movement for persons with a spinal cord injury. Movement therapies performed by or with exercise physiologists are also beneficial. Exercise physiologists are not eligible providers under Health First Colorado.

- Services provided by licensed physical therapists and licensed physical therapy assistants are covered by Health First Colorado. Services provided by exercise physiologists are not covered because they are not eligible providers.

Item 2

It would benefit SCI waiver participants if there were expanded physical therapy or movement benefits in the waiver.

- The Department acknowledges members' feedback of the positive effects physical therapy and other movement services had on their overall health and wellbeing. The Department may not expand waiver benefits without state budgetary and legislative approval, and the Centers for Medicare and Medicaid Services (CMS) approval.

Item 3

There is difficulty finding therapy equipment adapted for those with a spinal cord injury. Beneficial physical therapy equipment is accessible in adaptive gyms. Many people who participate in the SCI waiver pay out-of-pocket for use of adaptive gym equipment and staff assistance because these services are not a covered benefit.

- Gym memberships are not a covered benefit.

Item 4

Website language (specifically acute episode language) contributes to confusion on how to obtain long-term physical therapy benefits.

- Acute therapies are rehabilitative therapies that help regain a skill or function that was lost as a result of injury or illness. Adult Health First Colorado members have rehabilitative physical therapy as a covered benefit through both outpatient physical therapy and home health services. There is not a limit to the amount of outpatient physical therapy that can be obtained.
- Long-term physical therapy refers to habilitative therapies, which are therapies that help individuals to retain skills or functions for daily living. Habilitative therapy is a covered benefit through outpatient physical therapy services; however, it is not a covered benefit for adults through home health services.

Item 5

There may be some confusion between home health benefits and outpatient physical therapy benefits.

- See Item 6 coverage chart below.
- Home Health benefits are those delivered by a Home Health Agency, while outpatient physical therapy benefits are not. More detail is available at: <https://www.colorado.gov/pacific/hcpf/outpatient-ptot-benefits>



Item 6

There seems to be an administrative burden for physical therapists submitting prior authorization requests (PARs), which may contribute to delays in obtaining long-term physical therapy benefits.

- A PAR is required for authorization of outpatient physical therapy services exceeding 12 hours per year.

Coverage chart

Adult Physical Therapy Coverage	Home Health	Outpatient
Rehabilitative / Acute	Acute Home Health services are allowed without prior authorization for up to 60 calendar days or until the acute condition is resolved, whichever comes first. (If the member is on a Health First Colorado Managed Care Program, prior authorization for acute Home Health may be required by the Managed Care Organization.)	Covered without prior authorization for less than 12 hours per year; covered with prior authorization for more than 12 hours per year.
Habilitative / Long-term	Home Health Therapy Services are not covered beyond the 60-day acute episode for adults, ages 21 and older.	Covered without prior authorization for less than 12 hours per year; covered with prior authorization for more than 12 hours per year.

Item 7

Providers seem to be unclear on how physical therapy benefits work (12 units before a PAR is required, an approved PAR allows for unlimited therapy during 6-month time period).

- Providers can find detailed information in the [Outpatient Physical Therapy/Occupational Therapy \(PT/OT\) Billing Manual](#).



Item 8

Getting a physician order for physical therapy and a subsequent PAR through the physical therapist presents a burden to accessing benefits. Stakeholders would like to see some mitigation of this process: possibly in utilizing the annual case manager assessment for the SCI waiver.

- Federal regulation [42 CFR 440.110\(a\)](#) requires a prescription (order) for Medicaid coverage of physical therapy.
- Case managers at either a member's Single-Entry Point (SEP) or Regional Accountable Entity (RAE) can assist in obtaining the necessary documentation from medical professionals for both the member's annual reassessment for waiver services, and a prescription for physical therapy.

Item 9

Colorado physical therapists practice independently so the federal requirement for having a physician order for physical therapy contributes to confusion on how to obtain long term physical therapy benefits.

- See Item 8 response above.
- The Department published [policy](#), last revised in October 2019, details which providers can provide a physical therapy prescription.

Item 10

There is difficulty finding physical therapists who accept Health First Colorado.

- Provider enrollment data show an upward trend of physical therapists providing services to Health First Colorado members. Since January 2017, the number of unique outpatient licensed physical therapists providing services to Health First Colorado members has increased from 769 to 1,159 (51% increase).
- Members may contact their [Regional Accountable Entity](#) for assistance finding a provider.

Item 11

Some providers only offer rehabilitation services and not habilitation services.

- See Item 10 response for help finding a physical therapist.

