This resource has been developed to assist Occupational Therapists and Physical Therapists working in school settings. Its purpose is to provide helpful, general information to OTs and PTs. The answers provided are based on authority of the Minnesota Department of Human Services (DHS) and Minnesota Department of Education (MDE) joint guidance and resources that are located at the [DHS IEP Services webpage](https://www.state.mn.us/dhs/iep-services). As is customary, if you have legal questions, consult your school district attorney.

**Question 1: What is ICD-10?**

**Answer:** ICD-10 is the 10th revision of the International Statistical Classification of Diseases and Related Health Problems (ICD), a medical classification list by the World Health Organization (WHO). It contains codes for diseases, signs and symptoms, abnormal findings, complaints, social circumstances, and external causes of injury or diseases. The ICD-10-CM is the version used in the United States.

**Question 2: What are the ICD-10-CM codes sets?**

**Answer:** Code sets include:
- Signs and symptoms
- Abnormal findings
- Complaints
- Social circumstances
- External causes of injury or diseases
- Medical diagnoses

**Question 3: What does this mean for school OTs & PTs?**

**Answer:** School OTs & PTs must identify an ICD-10-CM code for each billable IEP health-related service that they provide (e.g. face to face activities, evaluation).

**Question 4: Are school districts required to seek reimbursement and bill health insurers for health-related services?**

**Answer:** Yes, school districts are required to bill health-related, medically necessary services included in a child’s IEP/IFSP according to federal and state law. The ICD-10-CM codes are required of all health care providers in any setting when billing Minnesota Health Care Programs (MHCP) which includes Medical Assistance (MA) and MinnesotaCare.

**Question 5: For school OT & PT services, who determines the ICD-10-CM codes?**

**Answer:** School OTs & PTs may determine the ICD-10-CM code for an IEP health-related service provided by themselves, and their assistants, COTAs and PTAs. If an OT and/or PT is functioning (within their professional scope of practice) as the "qualified
professional" responsible for supervising paraprofessionals providing Personal Care Assistance (PCA services), the code used for billing the PCA service may be the same one used by the OT and/or PT. Similarly, a billing code used by the school OT and/or PT, may be applicable for claims involving Special Transportation Services and Assistive Technology Devices.

Question 6: What are the regulations regarding the supervision of therapy assistants, and how does this affect ICD-10-CM coding practice for third party billing?

Answer: Professional supervision requirements for an Occupational Therapy assistant or a Physical Therapist assistant are defined by Minnesota practice statutes for each therapy profession as follows:

   Occupational Therapy: M.S.148.642, Subd. 2 & 3  
   Physical Therapy: M.S.148.706, Subd. 1, 2, & 3. Supervision of a physical therapy aide is more restrictive and is defined in M.S.148.706, Subd. 4.

These statutes set the minimal legal requirements for supervision of therapy assistants (and physical therapy aides). These statutes must be followed in order for therapists to maintain their professional practice license.

Answer: Health-related services provided to a student in a face-to-face manner by an Occupational Therapy assistant or a Physical Therapist assistant, may be billed using an ICD-10-CM code assigned by the supervising therapist. When the supervising therapist is present during the treatment/intervention session, and interacts in a face-to-face fashion with the therapy assistant and student (i.e. observes/instructs/directs the treatment procedures used by the assistant), the service time of both the supervising therapist and therapy assistant may be considered billable, and each provider uses the same ICD-10-CM code.

Other activities involving supervision of the therapy assistant, that occur without the presence of the student, are not considered covered/billable, and would therefore not require ICD-10-CM coding.

Services provided by a physical therapy aide are not defined by Minnesota Health Care Programs (MHCP) as covered/billable and would therefore not require ICD-10-CM coding.

Question 7: When does ICD-10 become effective and do I need to use all the codes in ICD-10?

Answer: The compliance date for ICD-10 was October 1, 2015. As of the compliance date, CMS and other payers will only accept claims billed with ICD-10 codes.

Answer: No, health care providers will only use a subset of codes based on their specialty for coding. School providers use only codes relevant to children and non-emergency situations.
Question 8: What is the difference between ICD-10-CM and ICD-10-PCS?

Answer: The ICD-10-CM code set is designed to be used by health care providers for health conditions or problems coding. The ICD-10-PCS code set is only used for hospital reporting of inpatient services.

Question 9: Are codes with unspecified in the description be allowed?

Answer: Yes, a codes with unspecified in the description should be used when it are most accurately reflects what is known about the student’s condition.

Question 10: How can I obtain a list of ICD-10-CM codes?

Answer: A list of ICD-10-CM codes is available free of charge on the CMS ICD-10 website. A more user friendly site is www.ICD10data.com, a commercial site that contains advertisements.

6/1/2016: By Metro ECSU agreement with MDE to develop resources to support OT/PT professionals in identifying ICD-10- CM codes to be used in billing MHCP for IEP health-related services.