

Summary of Final PTA Differential Policy

Under the PTA Differential policy, PTs or PTAs apply the CQ modifier to timed codes by:

- Following the usual process to identify all procedure codes for 15-minute timed services furnished to a beneficiary on the date of service.
- Adding up all the minutes of the timed codes furnished to the beneficiary on the date of service.
- Determining how many total units of timed services are billable for the beneficiary on the date of service (based on time ranges in the chart in the manual) and assigning billable units to each billable procedure code.
- Determining for each billed procedure code whether the CQ modifier applies. A service is considered furnished in whole or in part by a PTA when more than 10% of the service is independently furnished by that individual. Only the minutes that the PTA spends with the patient independent of the PT count toward the 10% standard.
- Applying the 10% standard to each billed unit of a timed code rather than to all billed units of a timed code.
- Allowing for the billing on two separate claim lines of the units of a timed code to distinguish between minutes to which the CQ modifier does and does not apply.
- The CQ modifier does not apply if all units of a procedure code were furnished entirely by the PT.
- If all units of the procedure code were furnished entirely by the PTA, the CQ modifier applies.
- Time spent by a PTA furnishing a therapeutic service to a patient jointly with the PT does not count toward the 10% threshold.
- The CQ modifier must be affixed to the claim line of the service alongside the GP therapy modifier to identify services furnished under a physical therapy plan of care.

APTA resources:

<https://www.apta.org/advocacy/issues/medicare-physician-fee-schedule/position-paper-pta-differential>

<https://www.apta.org/article/2020/02/10/the-pta-differential-how-we-got-here-and-whats-next>

<https://www.apta.org/article/2021/08/20/differential-explainer>