

## **Position Statement Concurrent Therapy**

Concurrent therapy occurs when one Respiratory Care Practitioner administers treatments to multiple patients simultaneously. It is the position of the Oklahoma State Board of Medical Licensure and Supervision that concurrent therapy may subject the licensee to a heightened risk of prosecution for unprofessional conduct violations. Potential liability exists for the following reasons.

- 1) **Medical Errors:** The potential exists for jeopardizing patient safety, including inadequate assessment and monitoring of the patient.
- 2) **Billing Errors:** The potential exists for fraud and abuse in reimbursement billing in that the Centers for Medicare and Medicaid Services (CMS) does not recognize services rendered during concurrent therapy.

Any of the above, if proven, would be considered unprofessional conduct under the Respiratory Care Practice Act and rules of the Board.

The Board understands there may be situations where concurrent therapy is a valid treatment method, i.e., in the intensive care unit where simultaneous physiological monitoring and direct supervision of the patient is available. Otherwise, policies and procedures should be in place to ensure adequate assessment and monitoring of patients by appropriate clinicians possessing sufficient knowledge and skill. Further, care should be taken to comply with all local, state and federal regulations when filing for reimbursement to avoid billing errors.