







Speaker Disclosure

Relevant Financial Relationship

Dawn Greaves and Shannon Liem have no Relevant Financial Relationships to disclose

Relevant Non-Financial Relationships

Dawn Greaves and Shannon Liem have no Relevant Non-Financial Relationships to disclose. They are employees of a NARA Member organization.



3

3





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4

4





Overview

- Review the regulatory differences among the SNF, HH and outpatient settings
- Describe the differences in treatment approaches that may exist in SNF settings, HH and outpatient
- Explain the required documentation elements for SNF, HH and outpatient settings



5





Regulatory Oversight

- Centers for Medicare and Medicaid Services (CMS)
 - Conditions of Participation
 - Medicare Benefit Policy Manuals
- Private insurers
- State practice acts and administrative codes
- Surveyors



6

6









Conditions of Participation - HH

- Requires skilled care
 - Intermittent SN/PT/SLP or OT to continue
- Homebound
- 60-day cert
- Medication review



9

9





Conditions of Participation - Outpatient

- Up to 90-day cert
- Rehab Agency vs Group Practice vs Facility based outpatient



10

10





Reimbursement Structure

SNF

- Medicare/Medicare-Like
 - Patient Driven Payment Model (PDPM) Payment based on patient characteristics
- Other
 - Per diem
 - · Patient condition levels

Home Health

- Medicare/Medicare-Like
 CPT code
 - Patient Driven **Groupings Model** (PDGM) Payment based on patient characteristics
- Other
 - Pay per visit

Outpatient

- - Timed vs service based

11



11





PDPM Reimbursement Structure

- PT/OT component
- SLP component



- Clinical Category/Functional Score
 - Neuro condition, Cog Imp, Altered diet, Swallowing disorder

- Nursing component
- NTA (Non-Therapy Ancillary) component
- Non-Case Mix component



12





PDGM Reimbursement Structure

- Admission source/Timing
 - Institutional/Community
 - Early/Late
- Clinical grouping (12 categories)
- Functional impairment level
 - Based on OASIS M scores
- Comorbidity adjustment
- LUPA threshold



13

13





Outpatient Reimbursement Structure

- CPT codes
 - Timed codes
 - Service based
- Medicare/Insurance fee schedule
- Prior authorizations
 - In or out of network
- MMPR
- Assistant modifier rates



14

14





Qualifying Criteria

SNF

- 3-day hospital stay
- 100 day maximum
- Skilled need

Home Health

- No hospitalization criteria
- No maximum stay benefit
- Skilled need
- homebound

Outpatient

- No hospitalization criteria
- KX modifier for cap dollar
 - 2022: \$2110 PT/SLP, and OT



15





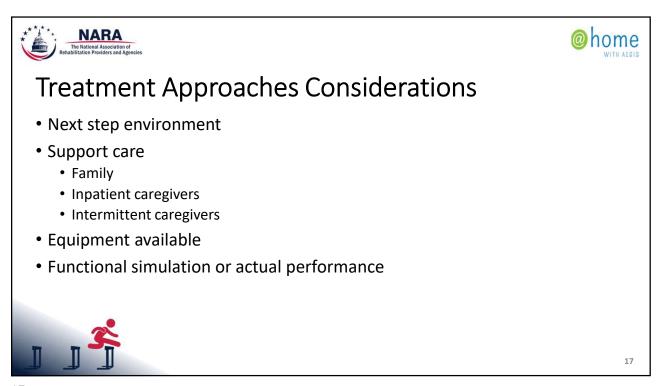


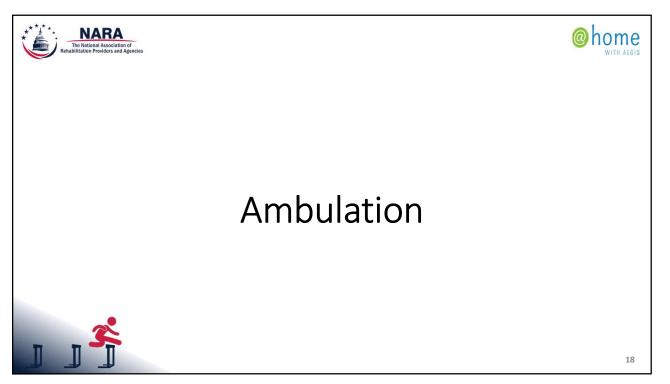
Survey Elements Unique to HH

- Medication reconciliation drug regimen review
- Infection control
- Patient communication conduit

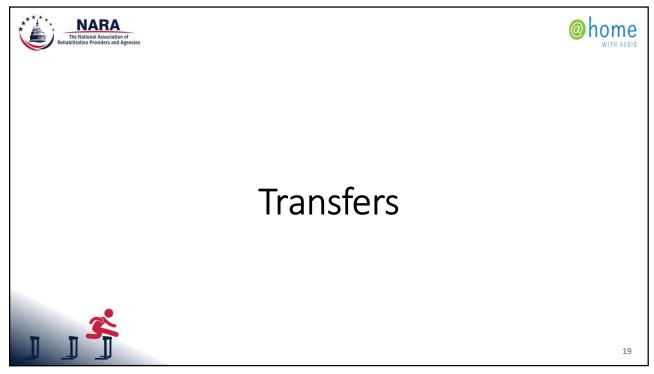


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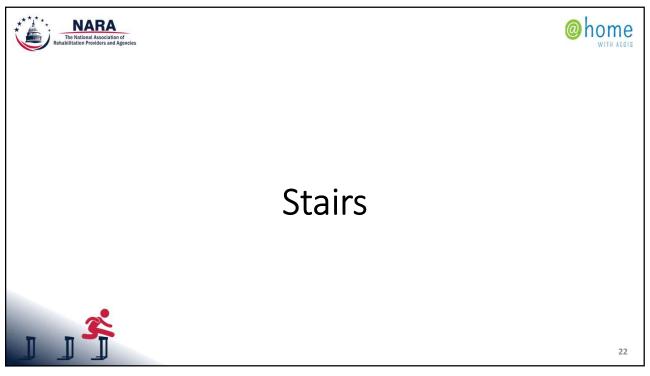
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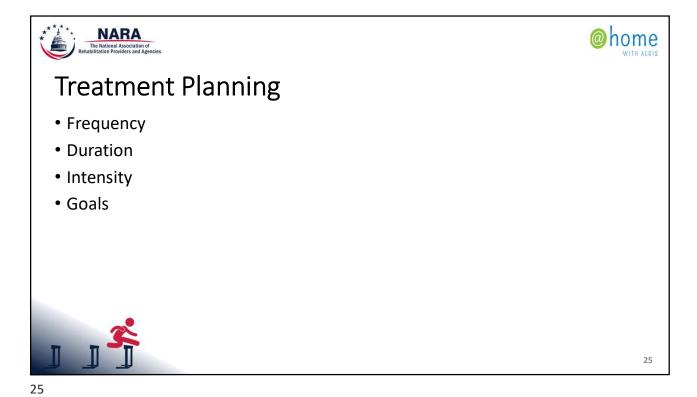


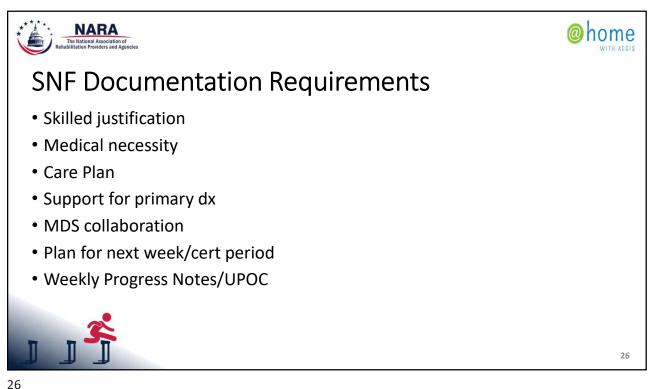
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24









HH Documentation Requirements

- Skilled justification
- Medical necessity
- Plan of Care (485)
- OASIS performance and collaboration
- Homebound
- Medication/Drug regimen review
- Support for primary dx
- Plan for next visit/daily visit notes
- Functional Reassessment/Re-eval/Re-cert



27

27





OP Documentation Requirements

- Skilled justification
- Medical necessity
- Support for medical dx
- CPT code quantity justification
- POC/UPOC/Progress notes



28

28





Session Resources

CMS Outpatient Rehabilitation Providers:

https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/CertificationandComplianc/OutpatientRehab

HH Conditions of Participation:

https://www.federalregister.gov/documents/2017/01/13/2017-00283/medicare-and-medicaid-program-conditions-of-participation-for-home-health-agencies

State Operations Manual SNF:

https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/som107ap pp guidelines ltcf.pdf



29

29





Session Resources

State Operations Manual: HH

https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/som107ap b hha.pdf

APTA: HH toolbox for tests and measure in the home

https://www.homehealthsection.org/practice-publications

AOTA: Home Health Care: A Guide for Occupational Therapy Practice

https://myaota.aota.org/shop_aota/product/900436U



30

30





Speaker Contact Information

• Dawn Greaves: <u>Dawn.Greaves@aegistherapies.com</u>

• Shannon Liem: <u>Shannon.Liem@aegistherapies.com</u>

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31

31