




Rehab Provider Leaders Conference - October 5-7, 2022



THE ERA OF AGILITY

STRATEGIES FOR YOUR BUSINESS

Bally's Las Vegas




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Cross Training Therapists for the Care Continuum

What's the Same? What's Different?



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Relevant Financial Relationship

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

Relevant Non-Financial Relationships

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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




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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




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Site Specific

- Conditions of Participation
- Qualification requirements
- Reimbursement structure
- Documentation requirements




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Conditions of Participation - SNF

- Requires skilled care
 - 5 x week therapy or
 - 6 x week nursing
- 30-day cert
- Under a doctor's care




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Conditions of Participation - HH

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




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Conditions of Participation - Outpatient

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




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Reimbursement Structure

SNF	Home Health	Outpatient
<ul style="list-style-type: none"> • Medicare/Medicare-Like <ul style="list-style-type: none"> • Patient Driven Payment Model (PDPM) Payment based on patient characteristics • Other <ul style="list-style-type: none"> • Per diem • Patient condition levels 	<ul style="list-style-type: none"> • Medicare/Medicare-Like <ul style="list-style-type: none"> • Patient Driven Groupings Model (PDGM) Payment based on patient characteristics • Other <ul style="list-style-type: none"> • Pay per visit 	<ul style="list-style-type: none"> • CPT code <ul style="list-style-type: none"> • Timed vs service based




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PDPM Reimbursement Structure

- PT/OT component ➔ • Clinical Category/Functional Score
- SLP component ➔ • Neuro condition, Cog Imp, Altered diet, Swallowing disorder
- Nursing component
- NTA (Non-Therapy Ancillary) component
- Non-Case Mix component




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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




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Outpatient Reimbursement Structure

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




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Qualifying Criteria

SNF	Home Health	Outpatient
<ul style="list-style-type: none">• 3-day hospital stay• 100 day maximum• Skilled need	<ul style="list-style-type: none">• No hospitalization criteria• No maximum stay benefit• Skilled need• homebound	<ul style="list-style-type: none">• No hospitalization criteria• KX modifier for cap dollar<ul style="list-style-type: none">• 2022: \$2110 PT/SLP, and OT




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Survey Elements Unique to HH

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




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Treatment Approaches Considerations

- Next step environment
- Support care
 - Family
 - Inpatient caregivers
 - Intermittent caregivers
- Equipment available
- Functional simulation or actual performance




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Ambulation




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Transfers




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Bathing




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Swallowing




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Stairs




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Medication Routine




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Pain




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Treatment Planning

- Frequency
- Duration
- Intensity
- Goals




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SNF Documentation Requirements

- Skilled justification
- Medical necessity
- Care Plan
- Support for primary dx
- MDS collaboration
- Plan for next week/cert period
- Weekly Progress Notes/UPOC




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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




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OP Documentation Requirements

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



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Session Resources

CMS Outpatient Rehabilitation Providers:
<https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/CertificationandCompliance/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



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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



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