



Q: Regarding reporting positive cases to the State department of health. When in a state that does not require reporting from non-testing agency what should a rehab agency do to satisfy the AAAASF requirement?

A: Per AAASF Communication to NARA (Monda Shaver, 2/1/2021) "I would also like to point out that the worksheet indicates that documentation of reporting positive cases to the State Departments of Health and AAAASF must be present. We want to make sure it is understood that if a facility operates in a State that does not require mandatory reporting, the facility will not be cited as deficient. However, AAAASF does request that facilities report such encounters to their Accreditation Specialist, here at AAAASF. This can be a simple email stating that the facility has had [any number] of patients with COVID and will be used to assist in our scheduling process."

Q: For a small PT clinic renting a space inside a senior center, is that considered a rehab agency?

A: The existence of a small PT clinic in a senior does not infer Rehab Agency privileges on its own.

A small PT clinic that is leasing space in a senior center for the purpose of providing therapy services should update their Medicare enrollment record (adding a location) in accordance with CMS policy. If the small PT clinic is currently enrolled as a PT/OT Group Practice, the location should be added to the CMS enrollment record via CMS 855b.

For a small PT clinic that is currently certified as a Rehab Agency, the addition of a location as an "extension location" to the Rehab Agency should be in accordance with CMS policy and guidance. This includes a 90-day prior approval of the CMS Regional Office.

A small PT clinic that is leasing space in a senior center that wishes to be certified as a Rehab Agency should follow CMS guidance for enrollment, survey & certification (including accreditation) and use the 855a enrollment form.

If an entity applies, is surveyed, either by a State Agency (SA) or the Accreditation Organization (AO), meets the Standards, and remains in compliance, it may become an Outpatient Rehabilitation Agency.

Q: What do you mean by "hotwash"?

A: Hotwash is the immediate "after-action" discussion and evaluation of a Rehab Agency's (or multiple agencies') performance following an exercise, training session, or major event.

For Emergency Preparedness purposes, "hotwash" as defined by FEMA (Federal Emergency Management Agency) is a facilitated discussion held immediately following an exercise among exercise players ... designed to capture feedback about any issues, concerns, or proposed improvements participants may have about the exercise.

In the past, an After-Action Report consisted of "What went right? What went wrong?" That morphed into "If we were to do this over, what would we do again? What would we do differently?" More recently, people ask about the opportunities and challenges which were



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presented and discuss "Lessons learned." This concept dates back to the military and was adopted by Emergency Managers to improve the way that we respond to the myriad emergencies that society encounters.

Q: I heard a rumor that ORF/RA payment is not being released CY2021 for some issue with discrepancy in fee schedule something on CMS side, is this true?

A: While not related to this webinar, Rehab Agency providers billing under "repetitive billing" would not expect to be paid until/about the 4th week of February. Rehab Agencies that have not been billing under "repetitive billing" should consult their Medicare Administrative Contractor (MAC) if they have received a claim error message.

We note that the Noridian JE MAC has posted the following: Provider/Supplier Type(s) Impacted: Outpatient claims; Reason Codes: 36136 and 36381; Claim Coding Impact: Therapy codes. Description of Issue: Therapy codes are receiving Reason Codes 36136 and 36381 in error. Claims with the reason codes are being suspended until the issue is resolved. Noridian Action Required: Noridian is suspending claims until a resolution is implemented. Provider/Supplier Action Required: No action at this time. Proposed Resolution/Solution: A fix has been identified and is tentatively scheduled to be loaded on 04/19/21. Noridian is working with CMS and the Shared System Maintainer (FISS) to determine if resolution can be escalated. Noridian will provide updates as they are available.

Q: Did the NCCI edit changes in effect recently do away with the new edit on Therapeutic Activities and Evaluation on the same day?

A: NARA has updated resources on the NCCI Procedure to Procedure (PTP) edits that are current in 2021. They can be found in the member resource page.