

Eli's Rehab Report

Home Health Therapy: CMS Ditches Visit-Based Reassessment Timeline

Therapists and HHAs rejoice in the streamlining of therapy reassessment standards in the Final Rule.

The **Centers for Medicare & Medicaid Services** (CMS) released its 2015 home health prospective payment system final rule on Oct. 30 to make it a happy Halloween for home health agencies and therapists by ditching its visit-based reassessment timeline, and lengthening the calendar-based deadline.

CMS showed that it listened to the bevy of commenters who asked CMS for more time. In perhaps the most commented-upon provision of the proposed rule, numerous therapists and other HHA reps lauded CMS for dumping the byzantine 10th -13th visit/16th -19th visit reassessment timeline. But they also asked CMS for more than 14 days.

New requirement: "At least every 30 days a qualified therapist (instead of an assistant) must provide the needed therapy service and functionally reassess the patient," CMS finalizes in the rule released Oct. 30. "Where more than one discipline of therapy is being provided, a qualified therapist from each of the disciplines must provide the needed therapy service and functionally reassess the patient at least every 30 days."

"We applaud CMS for accepting the recommendations of therapists and home health agencies nationwide to streamline the therapy reassessment standards in a manner that achieves quality of care, efficiencies, and program integrity," says **Val Halamandaris** with the **National Association for Home Care & Hospice** (NAHC) in a release about the final rule.

The change is "a huge move away from the 'quantity' of therapy to the 'quality' of therapy being the focus," cheers consultant **Cindy Krafft** with **Kornetti & Krafft Health Care Solutions**.

Krafft credits the change at least partially to the large volume of comment letters addressing this topic. "It was exciting to see it work," she tells **Eli**.

CMS also reviews the content of the reassessments. "Therapy reassessments are to be performed using a method that would include objective measurement, in accordance with accepted professional standards of clinical practice, which enables comparison of successive measurements to determine the effectiveness of therapy goals," CMS spells out in the final rule published in the Nov. 6 Federal Register. "Such objective measurements would be made by the qualified therapist using measurements which assess activities of daily living that may include but are not limited to eating, swallowing, bathing, dressing, toileting, walking, climbing stairs, or using assistive devices, and mental and cognitive factors. The measurement results and corresponding effectiveness of the therapy, or lack thereof, must be documented in the clinical record."

Wrinkle: The 30-day clock begins with the first therapist visit, CMS clarifies. When multiple therapies are involved, each therapy will have its own start date based on its therapist's first visit. The new timeframe applies to episodes beginning Jan. 1 or later.