

Eli's Rehab Report

Inpatient Insights: Nail the 3-Hour Rule Without Cheating the System

Tip: Create a 30-minute buffer to allow for patient breaks

Squeezing in those three required hours of therapy five days a week in your inpatient rehab facility can be a tough task, especially after the latest CMS regs regarding aide use. (See Physical Medicine & Rehab Coding Alert Vol. 8, No. 4.)

This leaves many therapists wondering if they can fall a few minutes short of three hours (180 minutes) and still be in compliance. But instead of walking this fine line, check out your colleagues' tried-and-true methods that strive to prevent this discrepancy.

Build a Buffer

Your best bet to prevent yourself from coming up short of three hours a day is to schedule your patients for more than three hours a day. "In my former facility, we added a 30-minute buffer to make sure we met the strictest compliance," says **Nick Kagal, MBA**, southwest regional vice president for MediServe Information Systems in Plano, Texas. This allows for nonbillable time that may have cut into your therapy minutes, such as nursing care or bathroom breaks.

Try this: If you don't have the time or staff to schedule every patient 30 extra minutes of therapy each day, "extend the last session to eight minutes more," says **Jennifer Weiss, PT**, inpatient rehab coordinator for Ingalls Memorial Hospital in Harvey, Ill. If the patient misses the session or a portion of one that the extra 30 minutes won't cover, "immediately look to reschedule the patient for an additional session later in the day," she adds.

Optimize Your Weekend Time

Two key reasons suggest that the weekend is a key time to keep therapy sessions running -- and that it could be your saving grace.

1. Late-week admissions: Patients admitted on a Thursday, for example, will probably need to have therapy on a Saturday or Sunday to comfortably meet the therapy requirement within a week -- especially if the patient was admitted on a Thursday night and didn't receive therapy that day, Kagal says.

2. Make-up sessions: "We see patients who have missed one of their days during the week for three hours on Saturday if we couldn't make it up," Weiss says. If a patient got three hours on four weekdays and only 2.5 hours on Friday, however, Weiss still schedules the patient for the full three hours on Saturday to maintain the "five out of seven days" compliance.

The reasons speak for themselves, but just remember that if you don't already have a strong weekend schedule, you'll need to balance out your labor costs from an operational standpoint, Kagal says.

Be Flexible With Therapy Plans

Think creatively and be ready to document unexpected encounters that could turn into therapy sessions. For example, a patient who needs work on toileting may need to use the restroom during a therapy session. "The therapists should make sure that they provide appropriate education and incorporate this into the patient's therapy as a therapeutic activity when possible," Kagal says.

Try this: To make sure you're documenting every last therapy encounter, you may consider investing in handheld documentation technology. "We experimented with some palm technology in our SNF division and had discussed bringing it back to the IRF setting to actually allow therapists to generate a real-time monitor of the time spent with the patients," Kagal says.

Helpful: You also want to be open to the possibility of substituting multiple disciplines if appropriate. If a patient must reschedule a therapy session for later in the day or a weekend, "it doesn't have to be the same therapy that was missed," Weiss says. "If a patient missed 30 minutes of PT, but an OT has a free half-hour, we'll schedule the patient there."

Check In With Your FI

Whatever questions you have about remaining compliant, your fiscal intermediary (FI) has the final say -- and keep in mind that their policies can differ widely. For example, "some FIs start [counting therapy minutes] at the first 'full day' on the unit, and some count the day of admit," Weiss says.

You may also find that some FIs are more strict about counting down to the exact minute, while others tell you not to sweat coming up two minutes short as long as you don't make it a habit.