

Eli's Rehab Report

Inpatient Rehab: Stay Tuned, Inpatient Rehab Folks

You're not off the hook with CMS transmittal 88

If you provide therapy in inpatient settings, don't write off CMS transmittal 88 (CR 5921) as applying only to outpatient therapy. Although the certification and documentation requirements are specifically for Part B settings, CMS has been working on expanding these requirements to Part A settings, experts say. So it won't hurt to keep an eye on these requirements to be prepared for what may come your way very soon.

More: Transmittal 88 also includes a whole section on personnel and education qualifications that apply to therapists in ALL settings. Stay tuned to the next issue of Physical Medicine & Rehab Coding Alert for more on those.

The transmittal also includes some language at the very beginning that addresses certain Part A settings. "Changes to regulations in 42CFR409.17 concerning inpatient hospital therapy services and inpatient critical access hospital services and 42CFR409.23 concerning posthospital SNF care are effective July 1, 2008." This refers to language in the Physician Fee Schedule Final Rule clarifying that when a physician signs a certificate of medical necessity for Part A care, that includes therapy -- so an additional physician-signed therapy plan of care is not needed, says **Ellen Strunk, PT, MS, GCS**, owner of Rehab Resources and Consulting in Birmingham, Ala.

This language also refers to who can provide and call it therapy services in those settings, Gawenda says. Beginning July 1, 2008, aides and techs can't provide services and call them therapy services in the inpatient hospital setting and SNF Part A setting.