

Eli's Rehab Report

Practice Pointers: 6 Ways to Point Your Compass toward IMPACT ACT Changes

Proving the value of therapy in your setting will be key.

Think there's nothing you can do but wait until the **Centers for Medicare & Medicaid Services** (CMS) spells out the IMPACT Act details in its rulemaking? Think again. Get the ball rolling in the right direction now with the following tips.

1) Plan ahead. "The law requires that PAC settings begin reporting on standardized patient assessment data, quality measures, and resource use as early as Oct. 1, 2016, so it will be important for these settings to begin considering how they might integrate new data collection items and/or methodologies into daily practice, with a focus on outcomes and quality of care," says **Sharmila Sandhu, JD**, director of regulatory affairs for the **American Occupational Therapy Association** (AOTA).

"Of the four post-acute care settings, certain provisions appear to apply to the skilled nursing facility and inpatient rehabilitation facility settings sooner than other settings," Sandhu says. "We also know that the contractor activity and research in those two settings has been significant in past years."

- 2) Be a documentation machine. "Make sure individual therapists are keeping complete and accurate documentation stating why items meet medical necessity criteria and why the PT services have great value," says Roshunda Drummond-Dye, JD, director of regulatory affairs for the American Physical Therapy Association (APTA).
- **3)** Read summaries of the legislation to get a sense of where Congress is going with the law, suggests **Tim Nanof**, **MSW**, director of health care policy and advocacy for the **American Speech-Language-Hearing Association** (ASHA). Along with that, be tuned into your respective professional associations to stay current on CMS' rulemaking process and the dialogue between the agency and your discipline's representatives.

For starters, check out the following summary from the Senate Finance Committee on the IMPACT Act and its timeline: http://www.finance.senate.gov/imo/media/doc/IMPACT Summary.pdf.

- **4) Be a team player.** "Therapists play a great role in transitions of care, so as much as possible be at the table with administrators and other providers helping to manage the patient," Drummond-Dye stresses. "You want to add that value of transitioning patients throughout the spectrum of care" [] and further show your value as a therapist.
- **5) Tune into your resource use.** This factor will eventually play into both patient placement and reimbursement, Nanof says. "It's not only how effectively are you treating the patient, but also how efficiently? Resource use is an important concept for the future of healthcare, and rehab managers need to get ready for that concept."
- **6) Keep risk adjustment in mind.** Differentiating between the needs and abilities of the patient to make progress is a critical and complex concept as this new patient assessment and payment system is born. The IMPACT Act includes a section on risk adjustment, which could lead to differentiation among the quality of providers. Getting a clear picture of the patient, not just the diagnosis, will be essential, Nanof says.