

## Eli's Rehab Report

### Reader Question: Put Initial Assessment First

Question: I have a question about the order of visits in a new episode when there are physician's orders for both physical therapy and nursing. Suppose we have a patient referred to our agency on a Monday for nursing and physical therapy visits. The nurse scheduled the admission visit for Tuesday morning, and PT scheduled a first visit for Tuesday afternoon.

The nurse calls and reschedules the admission visit for Wednesday, but the therapist still arrives at the patient's home on Tuesday afternoon. Can the PT have the patient sign a consent form and then conduct the PT evaluation and initiate treatment? Or must the PT reschedule the Tuesday visit, even after arriving at the patient's home, if the RN has not yet provided the start of care assessment visit.

Answer: The key to handling this situation lies in understanding who may conduct the initial assessment visit in this scenario.

Important: The initial assessment is not the same as the comprehensive assessment, although they can be done at the same visit. The comprehensive assessment containing the OASIS items must be completed "in a timely manner," CMS says. But the clinician has up to five days to complete that assessment. The rules about the initial assessment for a patient being admitted to home health care are found in the Code of Federal Regulations (CFR).

Requirement: In 42 CFR 484.55(a)(1), the regulation says, "A registered nurse must conduct the initial assessment visit to determine the immediate care and support needs of the patient; and, for Medicare patients, to determine the eligibility for the Medicare home health benefit, including homebound status." The only exception to this requirement is when a rehabilitation service is the only service ordered by the physician.

Surveyor expectation: Another source agencies should be familiar with is the State Operations Manual. This is the manual surveyors use. In section 2202.1 of this manual, which defines OASIS terms, the initial assessment is defined as the agency's first visit to the patient after the referral. Besides reviewing the regulations about when the first visit must occur, section 2202.1 says, "In accordance with the regulations, the initial visit must be made by a registered nurse or, for therapy-only cases, a qualified therapist."

Bottom line: The PT has to reschedule.

Note: The State Operations Manual is at [www.cms.hhs.gov/manuals/downloads/som107c02.pdf](http://www.cms.hhs.gov/manuals/downloads/som107c02.pdf). The Code of Federal Regulations is at [www.access.gpo.gov/nara/cfr/waisidx\\_04/42cfr484\\_04.html](http://www.access.gpo.gov/nara/cfr/waisidx_04/42cfr484_04.html).