

## Eli's Rehab Report

### Reader Questions: Double-Check Your Group Therapy Documentation

Question: We provide therapy services in the SNF Part A setting, and we recently had a probe in North Carolina. The big issue in this probe was documentation of the number of patients in group therapy. Reviewers were denying lots of claims because we didn't have the specific number of people that were in a group. Have you heard anything about that in other parts of the country? And where is it written that we must document the number of people in a group? I'm wondering if there are other group therapy requirements we are missing.

North Carolina Subscriber

Answer: I haven't heard of this particular probe in other states, but that doesn't mean it can't happen. When the subject of group therapy arises for most payers, including Medicare, insurance companies like to see the number of people in the group documented. The problem right now is that not many documentation requirements are written down in the Medicare manual for skilled nursing Part A or inpatient rehab facilities -- so it may be tough to find something in writing. CMS, however, is addressing this matter, and sometime this year or the beginning of next year, you'll see a lot of the outpatient therapy documentation requirements (which are in writing) be applicable to inpatient settings.

**For now, do this:** Along with documenting the number of people in a group therapy session, be sure to also document what the therapist is doing with the group, in terms of interventions and the treatment goals you're hoping to achieve with each of the patients.

Another thing you should always consider is whether you are truly doing group therapy. In other words, are the patients all doing the same activity? If not, you really can't count it as group therapy in the SNF Part A setting, which is paid under PPS. CMS would consider it one-on-one therapy. For CMS to consider it group therapy in the SNF Part A setting, the patients must be performing the same activity.

-- Reader Questions were answered by **Rick Gawenda, PT**, director of PM&R at Detroit Receiving Hospital and owner of Gawenda Seminars.