

Eli's Rehab Report

READER QUESTIONS: Juggle Disciplines Wisely With the 3-Hour Rule

Question: Can I count speech therapy toward the 3-hour rule in my inpatient rehab unit? If so, what if I have a patient receiving PT, OT, and speech, and the patient meets his PT goals mid-stay but has not met his OT and speech goals? Can we still keep the patient even though he isn't receiving PT anymore?

-- Illinois subscriber

Answer: CMS says you must admit people with PT and OT needs. But if the patient gets into her stay and really needs an SLP's attention, then yes, you can count speech toward the 3-hour rule. In CMS's own words, speech is OK to count as needed. Do, however, check with your local coverage determination to see if it has any further stipulations on speech.

As for your other question, yes, you can keep the patient even if he's met his PT goals. You can keep the patient because you still have two disciplines serving him, and they still have very specific goals. But remember that you can change your goals during the stay.

So, for example, if PT wants to discontinue, are there higher-level goals they could set to continue PT? For instance, if PT wants to discharge because the person can walk 150 feet, have they considered community ambulation and locomotion? Have they taken the person outside, on uneven surfaces, or to the cafeteria so they have to manage a tray and walk? Have they looked at some of those higher-level skills?

These are good questions to ask so that you don't even have to deal with dropping to OT and speech only -- even though that's perfectly acceptable.

Key: Whatever you decide, the patient still must receive three hours of therapy five out of seven days per week.

-- Reader Question was answered by **Denese Estep, OTR**, senior consultant at DE Consulting LLC in Sherwood, Ark.