

Eli's Rehab Report

Skilled Nursing Facilities: Rehab Could Land New Opportunity With COT OMRA Proposal

SNF PPS changes small for now, but big plans on the horizon.

The **Centers for Medicare & Medicaid Services** (CMS) has rolled out its proposal for 2015 SNF payments (<http://tinyurl.com/mrunem8>).

Along with a 2 percent payment update, CMS has suggested tweaking change of therapy (COT) policies. The change would allow patients who were previously under a therapy resource utilization group (RUG) to be re-classified into a therapy RUG via a COT other Medicare required assessment (OMRA).

Good news: This change would be positive, according to **Mark Kander, MPH**, director of regulatory analysis for the **American Speech-Language Hearing Association**. "The COT OMRA would allow a patient to get switched back into rehab status more quickly." Currently the wait can be up to a week.

This situation, however, is not a regular occurrence. "Therapy is very conscious of its time, and usually when a COT is done, it is because of patients that are more medically challenged and miss therapy because of doctor visits, not feeling up to therapy, etc.," says **Pauline M. Franko, PT, CEEAA**, owner of **Encompass Consulting & Education, LLC** in Tamarac, FL. "I believe that CMS is back to tweaking the regulations."

Quiet changes, however, for PPS for 2015 could be the calm before the storm. A report released alongside the proposed rule (<http://tinyurl.com/jw7pg2d>) speaks in detail of new payment alternatives. Watch for more on these payment models in the next issue of Eli's Rehab Report.