

## Eli's Rehab Report

### Therapy Caps ~ Say Goodbye to the Manual Exceptions Process -- for Now

#### And check out a brand-new list of applicable ICD-9 codes

Although CMS released updates to the therapy cap exceptions process last November, the agency turned around a month later and put a new spin on things: the manual exceptions process no longer exists. On Dec. 29, 2006, CMS released Transmittal 1145 mandating that the exceptions process would, instead, be "entirely automatic" starting Jan. 1, 2007.

#### Know the Pros and Cons

The good news: The automatic process hasn't changed, so you don't need to learn any new steps. Other good news is, if you truly believe a patient requires further skilled therapy and that the patient will be able to show significant improvements, you no longer have to go through all the work of submitting records, writing a justification letter, etc., says **Rick Gawenda, PT**, director of physical medicine and rehabilitation at Detroit Receiving Hospital.

**The bad news:** "This puts more onus on the therapy provider to make sure the documentation is there to support his or her reasoning for saying the patient qualifies for an automatic exception," Gawenda adds. But that's exactly why CMS released Transmittal 63 along with the therapy cap transmittal to really spell out what therapists need to include in their documentation, he says.

#### Automatic-Only Could Be Temporary

The reason CMS nixed this manual exceptions process this year is because not many therapy providers appeared to be using it. If the agency finds that therapists really need the manual process, however, CMS might bring it back.

"We're still trying to inquire of our members how often they used the manual exceptions process and whether the automatic exceptions process has been enough to satisfy their needs," says **Chris Metzler**, chief public affairs officer for the American Occupational Therapy Association (AOTA).

**For now:** Take another look at the latest list of acceptable ICD-9 codes for the automatic exception. Because it did away with the manual process, CMS updated the ICD-9s and complexities to a more comprehensive list. To see the transmittal, visit the site [www.cms.hhs.gov/transmittals/downloads/R1145CP.pdf](http://www.cms.hhs.gov/transmittals/downloads/R1145CP.pdf).