

Long-Term Care Survey Alert

Clear Up Confusion Over O0500 and O0400

Tip: Restorative interventions are nursing services, not therapy services.

If you are uncertain whether or not the criteria for O0500 □ Restorative Nursing Programs □ has been met, check out the recently released **Centers for Medicare & Medicaid Services (CMS)** MDS 3.0 training video on Section O. There is a scenario presented in it to guide you.

Scenario: Mrs. J. had a CVA within the past year, resulting in a left-sided hemiplegia. She has a strong desire to participate in her own care and complete as many Activities of Daily Living (ADLs) as she can as independently as possible. Mrs. J. cannot dress herself independently, but she is capable of participating in the dressing activity.

Mrs. J. and the restorative nursing program staff developed an individualized care plan to help her reach her goals. The staff is concentrating on assisting Mrs. J. in putting on and taking off her blouse with little to no physical assistance from the staff. To help Mrs. J., the staff have adapted all of her blouses with front closures with hook-and-eye fasteners.

The restorative nursing assistants verbally guide Mrs. J. as she puts on and takes off her blouse. Completing this task takes approximately 20 minutes per day on each day of the week. How should we code item O0500 for this scenario?

Make Sure You Meet the Onerous O0500 Requirements

Answer: You must meet several criteria to code for restorative nursing programs, said **Cheryl Wiseman** of **CMS's Quality Measurement and Health Assessment Group** in the training video. You must have:

- Measurable objectives and interventions documented in the care plan and in the medical record;
- Evidence of periodic evaluation by a licensed nurse in the resident's medical record;
- A progress note written by the restorative aide and counter-signed by a licensed nurse (when not contraindicated by state practice act provisions);
- Training for nursing assistance aides in the techniques that promote resident involvement in the activity; and
- Supervision of the activities in the restorative nursing program by a registered nurse or a licensed practical vocational nurse.

"An important thing to remember is that restorative nursing does not require a physician's order," Wiseman noted.

Don't Code for O0400 in This Case

If you have licensed rehabilitation professionals performing repetitive exercises and other maintenance treatments, or supervising aides performing these maintenance services, you cannot code these services in item O0400 □ Therapies, Wiseman reminded.

This is because restorative interventions are nursing services, not therapy services, says **Marilyn Mines**, senior manager of clinical services for **FR&R Healthcare Consulting**, in Deerfield, IL.

So you can include the therapist's time actually providing the maintenance service when counting restorative nursing minutes, Wiseman said. "Although therapists may participate, members of the nursing staff are still responsible for overall coordination and supervision of restorative nursing programs."

Remember: If the therapy is developing maintenance services, this is skilled therapy services. But nursing maintenance is not "therapy delivered," Mines notes.

Additionally, you cannot include in restorative nursing situations where you have groups of more than four residents per supervising helper or caregiver, Wiseman cautioned.

Bottom line: This scenario meets the criteria for coding restorative nursing programs in the MDS, Wiseman stated. You would code seven days for O0500G □ Dressing and/or grooming, because this was the number of calendar days that the staff provided at least 15 minutes each day of restorative nursing training and skill practice for dressing.

