

MDS Alert

Centers for Medicare & Medicaid Services Memorandum

"Transition for Implementation of FY 2012 SNF PPS Policies

Change of Therapy (COT) Other Medicare Required Assessment (OMRA)

Policy Summary

For all Medicare Part A SNF residents, a COT OMRA is required if the therapy services a resident receives during the COT observation period do not reflect the RUG-IV classification level given on the patient's most recent PPS assessment used for payment and would instead cause the patient to be classified into a different RUG category. The term "COT observation period" refers to a successive 7-day window beginning the day following the Assessment Reference Date (ARD) of the resident's last PPS assessment used for payment.

Transition Policy

Effective for all assessments with an ARD on or after October 1, 2011.

Allocation of Group Therapy

Policy Summary

Effective for FY 2012, group therapy is defined as therapy provided simultaneously to four patients (regardless of payer source) who are performing the same or similar activities. Additionally, all group therapy time reported on the MDS will be divided by four when determining each resident's appropriate RUG classification.

Transition Policy

On any assessments with an ARD on or after October 1, 2011, group therapy minutes will be allocated regardless of whether the look back period extends prior to October 1, 2011.

Revised MDS Assessment Schedule

Policy Summary

In order to reduce overlap between assessment look-back periods, effective for FY 2012, facilities will utilize the revised MDS assessment schedule in Table 10B in the FY 2012 SNF PPS proposed rule (76 FR 26389), which was finalized in the FY 2012 SNF PPS final rule (76 FR 48517).

Transition Policy

Effective starting in FY 2012, any ARDs set after October 1, 2011 must be in line with the updated assessment schedule.

NOTE: When October 1, 2011 is Day 19, 34, 64, or 94 of the stay, assessments should be completed by September 30 or the assessments will be considered late and payment penalties will apply.

Revised SNF End-of-Therapy (EOT) OMRA Policy

Policy Summary

Prior to FY 2012, a distinction was made between facilities that "regularly" provided therapy services 5 days per week

versus those that "regularly" provided therapy services 7 days per week, for the purpose of setting the ARD for an End-of-Therapy (EOT) OMRA. Beginning in FY 2012, all facilities will be considered 7-day facilities. Effective October 1, 2011, facilities will be considered 7-day facilities for the purposes of setting the ARD for an EOT OMRA. As October 1, 2011 is a Saturday, this day should be counted as a day of missed therapy if a patient does not receive any therapy services on that day.

End of Therapy with Resumption (EOT-R)

Policy Summary

If a resident classified into a RUG-IV Rehabilitation plus Extensive Services or Rehabilitation group has not received any therapy services for three consecutive calendar days, then the facility must complete an EOTOMRA to reclassify the resident into a non-therapy RUG group. Prior to FY 2012, if the facility wanted to resume the resident's therapy program, they would be required to either complete a Start-of-Therapy (SOT) OMRA or wait until the next scheduled PPS assessment.

Beginning in FY 2012, SNFs may choose to complete items O0450A and O0450B on the EOT OMRA, which allow a resident to be reclassified back into the Rehabilitation plus Extensive Services or Rehabilitation RUG group that he/she had been in prior to the discontinuation of therapy services that prompted the EOT OMRA and resume the original therapy program. This option is only available for residents who are able to resume therapy at the same therapy level as prior to the discontinuation of therapy services and must resume no more than five calendar days after the discontinuation occurred

Transition Policy

Effective for all EOT OMRA assessments with an ARD on or after October 1, 2011.

Revised Student Supervision Requirements

Policy Summary

Effective for FY 2012, therapy students providing skilled therapy services within SNFs are no longer required to be under line-of-sight supervision. SNFs are still expected to exercise their discretion regarding the level of supervision a particular student may require.

Transition Policy

Effective October 1, 2011."

Source: The memo above is printed verbatim from the CMS website (www.cms.gov/SNFPPS/Downloads/FY12transpolicymemo.pdf).