

## MDS Alert

### Medicare Compliance: Avoid Payment Recoupments: Keep Your Rehab Group Therapy Minutes In Line

To ensure you're following the rules, use this formula.

Part A group rehab therapy can be a real boon for residents, but if you provide too much of it, you'll jeopardize your SNF's fiscal status.

The iron rule: Group therapy minutes can't exceed 25 percent of the total treatment time per therapy discipline.

Beware: FI auditors have been known to check. Chicago-based consultant **Joan McCarthy** knows of a group of nursing facilities that ended up on focused review for providing too much group therapy as part of residents' overall rehab therapy minutes under Part A.

Play It Safe: Use This Double Check

"To calculate the maximum number of group minutes ... permitted for a Part A resident, use the following formula based on the number of individual minutes delivered," advises **Rena Shephard, RN, MHA, FACDONA**, president of **RRS Healthcare Consulting** in San Diego.

Step 1: Take the individual therapy minutes delivered to the resident and divide by 3. This equals the maximum permitted group minutes for the resident.

Step 2: The individual therapy minutes delivered plus the group minutes

delivered (up to the maximum allowable for this resident from Step 1 below) equals the total allowable minutes for P1b. Calculate this separately for each of the disciplines, Shephard advises.

Remember: For Medicare A, four residents equal a group per therapist or therapist assistant, says **Katy O'Connor**, a physical therapist and consultant for **Zimmet Healthcare Services Group** in Morganville, NJ. "Once you have five residents, you need a second clinician."