

MDS Alert

Medicare Part A: Need a Quick Review of EOT and COT OMRA Definitions & Rules?

CMS provided the following information in its PowerPoint slides for the Nov. 3 national provider call.

EOT OMRA

- "EOT OMRA must be completed when a beneficiary classified in a RUG-IV Rehabilitation Plus Extensive Services or Rehabilitation group did not receive any therapy services for three or more consecutive calendar days for any reason.
- ARD for EOT OMRA must be set for day 1, 2, or 3 after the date of the resident's last therapy session.
- For purposes of this policy, an EOT OMRA is expected to be completed for missed therapy days regardless of whether therapy is missed on a weekday, weekend, or holiday."

COT OMRA

- "... a COT OMRA is required if the therapy received during the COT observation period does not reflect the RUG-IV classification level on the patient's most recent PPS assessment used for payment.

May be used to classify a patient into a higher or lower RUG category

- "COT Observation Period: A successive 7-day window beginning the day following the ARD of the resident's last PPS assessment used for payment."

Source: Excerpted verbatim from CMS' PowerPoint slides

(www.cms.gov/SNFPPS/Downloads/SNFPPS_NPC_presentation_11032011.pdf).