

MDS Alert

PPS Management Tip: MDS Expert Explains Challenge to Keeping Up With Change of Therapy Observation Periods

Find out why this task isn't so simple.

Rena Shephard, MHA, RN, RAC-MT, C-NE, notes that the problem with coming up with a systematic way to know when to do the COT OMRA is that "people all want some kind of form -- an Excel spreadsheet or some other tool -- that will provide an automatic update to reset the COT observation period."

Quick review: "The COT observation periods are successive 7-day windows with the first observation period beginning on the day following the ARD set for the most recent scheduled or unscheduled PPS assessment, except for an EOT-R assessment," states the RAI manual. For an EOT-R, "the resumption of therapy date is counted as day 1 when determining Day 7 of the COT observation period."

The COT OMRA is "required when the resident was receiving any amount of skilled therapy services and when the intensity of therapy (as indicated by the total reimbursable therapy minutes (RTM) delivered, and other therapy qualifiers such as number of therapy days and disciplines providing therapy) changes to such a degree that it would no longer reflect the RUG-IV classification and payment assigned for a given SNF resident based on the most recent assessment used for Medicare payment," says the manual. (Review the instructions in full on page 107 of this issue.)

Shephard notes that "you can use an Excel spreadsheet to plug in the ARD of the most recent PPS assessment and have it tell you the ARD plus seven days, which would be days one through seven after the ARD." Then you could "have it tell you days one through seven following the previous day seven," adds Shephard, president and CEO of RRS Healthcare Consulting Services in San Diego. "But as soon as you do another PPS assessment, the start of the COT observation period resets ..."

Thus, "until software vendors come up with more sophisticated specs, people are going to have to do the COT evaluation schedule manually," Shephard says. "The other issue is how to accomplish the COT evaluation itself, finding a convenient method for collecting information about the number of reimbursable therapy minutes, days, disciplines, and restorative nursing over each COT observation period so you can determine whether a COT OMRA is needed," she adds.