

MDS Alert

Rehabilitation Therapy: To Project Or Not To Project Therapy Minutes In Section T

CMS addresses the issue in the FY 2009 proposed SNF PPS rule.

The **Centers for Medicare & Medicaid Services'** proposed FY 2009 SNF PPS and consolidated billing rule clarifies that SNFs should have an evaluation and treatment plan before recording therapy minutes delivered in Section P or estimated in Section T.

The treatment plan must be based upon an initial evaluation performed by a qualified therapist (after SNF admission and before the start of rehabilitation services in the SNF) and must be approved by the physician after any needed consultation with the qualified therapist, the proposed rule clarifies.

What if the Medicare beneficiary is discharged during the SNF stay and later readmitted? "An initial evaluation must be performed upon readmission to the SNF" before starting rehab services in the SNF, the proposed rule states.

A problematic practice? Consultant **Ron Orth, RN, NHA, CPC, RAC-CT**, in Milwaukee notes that some therapy companies have held that you can project therapy minutes in Section T based on physician orders alone.

Not so fast: The reg requiring the evaluation to be in place prior to projecting therapy minutes on the MDS has been in place for a while, says **Pauline Franko, PT**, a consultant in Tamarac, FL. And CMS reiterated it in a transmittal in June 2007 (Change Request 5532, Transmittal No. 73) and added the clarification to the proposed SNF PPS rule, Franko points out.

"Absolutely," a therapy evaluation must be completed prior to projecting therapy in Section T1c and T1d, says physical therapist **Shehla Rooney**, a consultant in Cookeville, TN. The RAI manual clearly states on page 3-215: "If orders exist, consult with the therapists involved to determine if the initial evaluation is completed and therapy treatment(s) has been scheduled. If therapy treatment(s) will not be scheduled, skip to item T2."

Rooney notes that "the plan of treatment includes the intensity, frequency, and duration [of therapy], all of which are required to accurately estimate therapy days and minutes for Section T projection."