

OASIS Alert

Reader Question: What Counts As 'Close To' For Therapy Reevals?

Question: The **Centers for Medicare & Medicaid Services** says in episodes with multiple therapy disciplines, therapists can conduct their reevaluation visits "close to" the 13th and 19th visit. What counts as "close to"?

Answer: Therapists in multiple-discipline cases must perform the reassessment visits "close to but no later than the 13th and 19th therapy visit," CMS says in the Medicare Benefit Policy Manual update issued April 15. Manual guidance for counting therapy visits in multi-discipline episodes grants much-needed flexibility to the reassessment visit scheduling process, but it's also sowing confusion amongst home health agencies, reports therapist and consultant **Cindy Krafft** with **Fazzi Associates**.

Debunk This Myth Common pitfall: Without concrete guidelines of what "close to" includes, many HHAs are making up their own visit ranges, Krafft has found. Often they mirror the 11- to-13 and 17-to-19 ranges that are the requirement for the exception for singlediscipline episodes. CMS requires no such visits ranges for multi-discipline episodes, Krafft emphasizes. HHAs and their therapists must use their clinical judgment to decide what qualifies as "close to," she tells **Eli**. For example, HHAs might have a case where physical therapy and occupational therapy are involved, then the OT gets put on hold at visit #8 while waiting for equipment and doesn't expect to resume before the PT's visit #13. In that case, the agency can stay in compliance by having the OT do her reassessment visit on #8, Krafft says. There's no reason to have the OT go back in for a non-billable reassessment visit with no clinical goals when the PT gets close to visit #13.

"Think of the language as saying 'closest to' instead of 'close to'" for multi-discipline cases, and that may help, Krafft suggests. Just be sure to document why the OT did her assessment at that time. "It always goes back to the 'D' word," Krafft reminds providers.

Resource: To download free 15- and 18- minute podcasts presented by Krafft explaining G codes & maintenance therapy and reassessment visits, respectively, go to the website for the **American Physical Therapy Association's** Home Health Section at www.homehealthsection.org.