



Center for Medicaid and State Operations/Survey and Certification Group

Ref: S&C-05-45

DATE: September 22, 2005

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: Updates to the State Operations Manual (SOM) for Outpatient Rehabilitation Therapy Services (OPTs) and Comprehensive Outpatient Rehabilitation Facilities (CORFs)

Letter Summary

Several sections of the SOM pertaining to providers of OPTs and CORFs have been updated. This letter briefly explains those changes.

In an effort to address the current practices of providers of OPT rehabilitation services, the following sections of the SOM have been updated and should be reviewed by state surveyors as well as regional office staff as they prepare to survey CORFs and providers of OPTs and Speech-Language Pathology (SLP) services.

SOM Sections Affected

- **Appendix E** (Providers of Outpatient Physical Therapy and Speech-Language Pathology Services) and SOM Section 2290 (Providers of Outpatient Physical Therapy and Speech-Language Pathology Services) were updated to address challenging issues such as documentation for the provision of social services in OPTs, what constitutes OPT extension locations, and what to look for if surveying community facilities such as a pool for the provision of aquatic therapy. These issues have generated much discussion over the last several years and we've attempted to clarify instructions. We've also added deficiency tags and regulation language to Appendix E.

- **Appendix K** (Comprehensive Outpatient Rehabilitation Facilities) and SOM Section 2360 (Comprehensive Outpatient Rehabilitation Facilities) were updated to include deficiency tags and regulation language. In addition, some of the issues that have been addressed are:
 - facility physician and physician services;
 - rehabilitation services (mandatory and optional services); and
 - discussion regarding hyperbaric oxygen (HBO) therapy.

Hyperbaric Oxygen Therapy

HBO therapy has been the object of abuse by some CORFs, as they have been specializing in the provision of HBO therapy, almost to the exclusion of mandatory services they must provide. HBO is not a CORF outpatient therapy benefit and therefore cannot be counted as either a mandatory or optional service. Surveyors should bear this in mind when they review medical records to determine what services are being provided at the CORF and if the CORF patients are actually receiving a coordinated, comprehensive, skilled rehabilitation program.

The revised sections of the SOM are expected to be placed on the CMS Web site by October 30, 2005. These same sections will be included in the Rehabilitation Reference Manual that will be soon be available in both hard copy and on CD for use by surveyors while conducting surveys.

For questions on this memo, please contact Georgia Johnson at (410) 786-6859 or e-mail at gjohnson4@cms.hhs.gov

Effective Date: Expected October 2005. An alert will be sent upon release of these changes. Please ensure that all appropriate staff is fully informed within 30 days of the date of this memorandum

Training: The information contained in this announcement should be shared with all survey and certification staff, their managers, the state/RO training coordinators.

/s/

Thomas E. Hamilton

cc: Survey and Certification Regional Office Management (G-5)