



MLN ConnectsTM

National Provider Call

IRF PPS: New IRF-PAI Items Effective October 1, 2015

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Agenda

- Discussion on the new Arthritis Attestation Item: 24A (Effective October 1, 2015)
- Discussion on the new Therapy Information Section, Items: O0401 and O0402 (Effective October 1, 2015)
- Discussion on the updated Signature Page Item: Z0400A
- Questions (related to the topics on this agenda)

FY 2015 IRF PPS Final Rule

In the FY 2015 Inpatient Rehabilitation Facility (IRF) Prospective Payment System (PPS) [final rule](#), CMS finalized two new IRF-PAI items:

- Arthritis Attestation (Item 24A)
- Therapy Information Section (Items O0401 and O0402)

Arthritis Attestation (Item 24A)

- Effective for all IRF-PAI assessments of patients who are discharged from IRFs on or after October 1, 2015.

24A. Are there any arthritis conditions recorded in items #21, #22, or #24 that meet all of the regulatory requirements for IRF classification (in 42 CFR 412.29(b)(2)(x), (xi), and (xii))?

(0 - No; 1 - Yes)

Arthritis Attestation (Item 24A)

- If a provider codes 1- YES for this item, then this claim may be selected by the Medicare Administrative Contractor (MAC) for review of the documentation in the IRF medical record to verify that the patient has met all of the applicable regulatory requirements for IRF classification (in 42 CFR 412.29(b)(2)), including that the patient has completed an appropriate, aggressive, and sustained course of outpatient therapy services or services in other less intensive rehabilitation settings immediately preceding the IRF admission.
- CMS expects that the IRF will obtain copies of the therapy notes from the outpatient therapy or from the therapy services provided in other less intensive settings by including them in the patient's medical record at the IRF (in a section for prior records). These prior records will be available to the MAC staff responsible for reviewing the medical records for compliance with the applicable regulatory requirements.

Therapy Information (Items O0401 and O0402)

- Effective for all IRF- Patient Assessment Instrument (PAI) assessments of patients who are discharged from IRFs on or after October 1, 2015, IRFs will be required to report on the amount and mode (that is individual, concurrent, group, and co-treatment) of therapy minutes provided to each IRF patient for each therapy discipline (that is physical, occupational, and speech-language pathology).
- This information will be reported on the patient's *discharge assessment* for two time periods during the IRF stay: Week 1 and Week 2.

Therapy Information (Items O0401 and O0402)

- **Please Note:** The therapy items on the IRF-PAI are strictly a *data collection exercise only* for weeks 1 and 2 of the IRF stay and should not be used as a way of documenting the amount of therapy provided. While these therapy data collection items are not being used as verification to ensure providers are meeting the intensive therapy coverage requirements, providers should continue to ensure they are satisfying all IRF coverage requirements regarding intensive therapy.

Therapy Information (Items O0401 and O0402)

DEPARTMENT OF HEALTH AND HUMAN SERVICES
CENTER FOR MEDICARE & MEDICAID SERVICES

OMB No. 0938-0842

Discharge Information*	Therapy Information
40. Discharge Date MM / DD / YYYY	O0401. Week 1: Total Number of Minutes Provided
41. Patient discharged against medical advice? (0 - No; 1 - Yes)	O0401A: Physical Therapy
42. Program Interruption(s) (0 - No; 1 - Yes)	a. Total minutes of individual therapy _____
43. Program Interruption Dates (Code only if item 42 is 1 - Yes)	b. Total minutes of concurrent therapy _____
A. 1 st Interruption Date MM / DD / YYYY	c. Total minutes of group therapy _____
B. 1 st Return Date MM / DD / YYYY	d. Total minutes of co-treatment therapy _____
C. 2 nd Interruption Date MM / DD / YYYY	O0401B: Occupational Therapy
D. 2 nd Return Date MM / DD / YYYY	a. Total minutes of individual therapy _____
E. 3 rd Interruption Date MM / DD / YYYY	b. Total minutes of concurrent therapy _____
F. 3 rd Return Date MM / DD / YYYY	c. Total minutes of group therapy _____
44C. Was the patient discharged alive? (0 - No; 1 - Yes)	d. Total minutes of co-treatment therapy _____
44D. Patient's discharge destination/living setting, using codes below: (answer only if 44C = 1; if 44C = 0, skip to item 46)	O0401C: Speech-Language Pathology
<i>(01 - Home (private home/apt., board/care, assisted living, group home, transitional living); 02 - Short-term General Hospital; 03 - Skilled Nursing Facility (SNF); 04 - Intermediate care; 06 - Home under care of organized home health service organization; 50 - Hospice (home); 51 - Hospice (institutional facility); 61 - Swing bed; 62 - Another Inpatient Rehabilitation Facility; 63 - Long-Term Care Hospital (LTCH); 64 - Medicaid Nursing Facility; 65 - Inpatient Psychiatric Facility; 66 - Critical Access Hospital; 99 - Not Listed)</i>	a. Total minutes of individual therapy _____
45. Discharge to Living With (Code only if item 44C is 1 - Yes and 44D is 01 - Home; Code using 1 - Alone; 2 - Family / Relatives; 3 - Friends; 4 - Attendant; 5 - Other)	b. Total minutes of concurrent therapy _____
46. Diagnosis for Interruption or Death (Code using ICD code)	c. Total minutes of group therapy _____
47. Complications during rehabilitation stay (Use ICD codes to specify up to six conditions that began with this rehabilitation stay)	d. Total minutes of co-treatment therapy _____
A. _____ B. _____	O0402. Week 2: Total Number of Minutes Provided
C. _____ D. _____	O0402A: Physical Therapy
E. _____ F. _____	a. Total minutes of individual therapy _____
	b. Total minutes of concurrent therapy _____
	c. Total minutes of group therapy _____
	d. Total minutes of co-treatment therapy _____
	O0402B: Occupational Therapy
	a. Total minutes of individual therapy _____
	b. Total minutes of concurrent therapy _____
	c. Total minutes of group therapy _____
	d. Total minutes of co-treatment therapy _____
	O0402C: Speech-Language Pathology
	a. Total minutes of individual therapy _____
	b. Total minutes of concurrent therapy _____
	c. Total minutes of group therapy _____
	d. Total minutes of co-treatment therapy _____

Therapy Information (Item O0401)

O0401. Week 1: Total Number of Minutes Provided: This item will be completed as part of the *discharge assessment*. In this section, the IRF will record the total minutes of Individual, Concurrent, Group, and Co-Treatment therapy the patient received, according to each therapy discipline during week one of the IRF stay.

- **Note:** Week one is a 7 consecutive calendar day period starting with the day of admission to the IRF. This item should be completed regardless of whether the patient stays a full 7 days.
- **Example:** Mr. W is admitted to the IRF on 11/1/2015 and is discharged on 11/5/2015. Week one will include total therapy minutes (by mode and discipline) provided beginning 11/1/2015 (Day 1 of the IRF stay) through 11/5/2015 (Day 5 of the IRF stay).

Therapy Information (Item O0402)

O0402. Week 2: Total Number of Minutes Provided: This item will be completed as part of the patient's *discharge assessment*. In this section, the IRF will record the total minutes of Individual, Concurrent, Group, and Co-Treatment therapy the patient received, according to each therapy discipline, during the second week of the IRF stay.

- **Note:** Week 2 is a 7 consecutive calendar day period starting with Day 8 of the IRF stay. This item should be completed regardless if the patient stays all 7 days of week two.

Therapy Information (Item O0402)

Examples of Week 2 (Item O0402):

- **Example 1:** Mrs. C is admitted to the IRF on 11/1/2015 and is discharged on 11/14/2015. **Week 1** should include the total therapy minutes provided by mode and discipline beginning 11/1/2015 (Day 1 of the IRF stay) through 11/7/2015 (Day 7 of the IRF stay). **Week 2** should include the total therapy minutes provided by mode and discipline beginning on 11/8/2015 (Day 8 of the IRF stay) through 11/14/2015 (Day 14 of the IRF stay).
- **Example 2:** Mr. T is admitted to the IRF on 11/1/2015 and is discharged on 11/11/2015. **Week 1** should include therapy minutes provided by mode and discipline beginning 11/1/2015 (Day 1 of the IRF stay) through 11/7/2015 (Day 7 of the IRF stay). **Week 2** should include therapy minutes provided by mode and discipline beginning on 11/8/2015 (Day 8 of the IRF stay) through 11/11/2015 (Day 11 of the IRF stay).

Therapy Information: Definitions

Individual Therapy: The provision of therapy services by one licensed or certified therapist (or licensed therapy assistant, under the appropriate direction of a licensed or certified therapist) to one patient at a time (this is sometimes referred to as “one-on-one” therapy).

- **Example:** A speech-language pathologist treats only Mr. A for 30 minutes for aphasia therapy following a stroke. Mr. A’s speech-language therapy would be coded as 30 minutes of individual therapy on the IRF-PAI.

Therapy Information: Definitions

Concurrent Therapy: The provision of therapy services by one licensed or certified therapist (or licensed therapy assistant, under the appropriate direction of a licensed or certified therapist) treating 2 patients at the same time who are performing *different* activities.

- **Example:** One physical therapist is treating Mr. F who is working on lower extremity strengthening exercises. The same physical therapist is also treating Ms. A who is working on upper extremity strengthening exercises. Both patients begin the therapy session at 9am and end at 10am. Both Mr. F and Ms. A's physical therapy would be coded as 60 minutes of concurrent therapy on the IRF-PAI.

Note: *Concurrent therapy sessions must begin and end at the same time for both patients involved.*

Therapy Information: Definitions

Group Therapy: The provision of therapy services by one licensed or certified therapist (or licensed therapy assistant, under the appropriate direction of a licensed or certified therapist) treating 2-6 patients at the same time who are performing the *same or similar* activities.

- **Example:** One physical therapist is working on a group balance activity with 5 IRF patients for 55 minutes. All patients begin and end the group therapy session at the same time. A total of 55 minutes of group physical therapy would be coded (on the IRF-PAI) for each patient present in the group.

Note: *The therapist may only provide therapy to one group at a time. Example: One therapist is not allowed to provide therapy to two groups of 6 patients. This will not meet the definition of group therapy.*

Therapy Information: Definitions

Co-Treatment Therapy: The provision of therapy services by more than one licensed or certified therapist (or licensed therapy assistant, under the appropriate direction of a licensed therapist) from different therapy disciplines to 1 patient at the same time.

- **Example:** A physical therapist and occupational therapist do a transfer exercise with Mr. D for 30 minutes. A total of 30 minutes of co-treatment time would be coded for each discipline (PT and OT) on the IRF-PAI for this session assuming each discipline is treating for the full treatment time.

Therapy Information (Items O0401 and O0402)

Important note regarding co-treatment:

Co-treatment is appropriate for specific clinical circumstances and would not be suitable for all patients; therefore, its use should be limited. Co-treatment may not be used for the accommodation of staffing schedules. The specific benefit to the patient of the co-treatment must be well-documented in the IRF medical record.

Therapy Information (Items O0401 and O0402)

Coding Tips:

- Therapy minutes cannot be rounded for the purposes of documenting therapy provided in an IRF.
- Therapy evaluations do count as the initiation of therapy services.
- The time spent in family conferences does not count towards counting therapy minutes on the IRF-PAI.

Therapy Information (Items O0401 and O0402)

Coding Tips continued:

- “Therapy time” is time spent in direct contact with the patient. Time spent documenting in the patient’s medical record, unsupervised modalities, and significant periods of rest are examples of time not spent in direct contact with the patient and, therefore, may not be documented in this section of the IRF-PAI.
- If the patient has an interrupted stay, record the total number of minutes of therapy the patient received in the IRF for that week the same as if the interrupted stay did not occur. As long as the IRF records the interrupted stay in items 42 and 43 of the IRF-PAI those days will be subtracted and the data will be compared to the data of for the same length of stay.

Signature Page Update

- The signature page was added for providers to have a uniform place to sign the IRF-PAI in order to meet the hospital Conditions of Participation (CoPs) located in the Code of Federal Regulations at 482.24(c)(1).
- Any staff member of the IRF that completes any items on the IRF-PAI is responsible for signing the signature page.
- The signature page is ***not*** transmitted to CMS. It is kept in the patient's medical record for documentation purposes.

Signature Page Update

- Providers may use electronic signatures for the IRF-PAI when permitted to do so by state and local law and when authorized by the providers policy. Providers must have written policies in place that meet any and all state and federal privacy and security requirements to ensure proper security measures to protect the use of an electronic signatures by anyone other than the person to whom the electronic signature belongs.

Question & Answer Session

Additional Questions?

For IRF Medicare Policy questions:

IRFcoverage@cms.hhs.gov

For IRF Quality Reporting Program questions:

IRF.questions@cms.hhs.gov

[IRF PPS](#) website

Acronyms in this Presentation

- CoPs - Conditions of Participation
- IRF - Inpatient Rehabilitation Facility
- PAI – Patient Assessment Instrument
- PPS – Prospective Payment System
- MAC – Medicare Administrative Contractor

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