


# PPS Therapy Changes



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- 30 year Home Health clinician/contractor
  - 30 years Geriatric Rehab
  - Home Health consultant, author, speaker
  - Progressive programming/clinical delivery
  - Progressive management systems
  - Home Health coach/educator
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# Medicare Home Health



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## CMS Contractors

- Fiscal Intermediaries
- Recovery Audit Contractors
- Program Safety Contractors
- Zone Program Integrity Contractors



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## AUDIT / DENIAL FINDINGS



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## Audit / Denial Findings

- Improper med management
- Lack of objective OASIS ADL deficits for therapy
- Incomplete visit care delivery
- Early goal achievement
- Poor potential programs
- Orthopedic protocols



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## Audit / Denial Findings

- Plateau in progress
- Contradictory documentation
- Lack of post-SNF clinical needs
- Lack of OT focus
- Reasonable & Necessary
- Previous episodes
- Unnecessary Programming



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## 2011 PPS FINAL RULE



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## FINAL 2011 CHANGES

- \$960 Million Funding Reduction
- Case Mix Changes
- Hypertension Change Rescinded
- Market Basket Update Reduction
- LUPA Alterations/Rural Add-ons
- Face to Face Requirements



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## FINAL 2011 CHANGES

- Enrollment/Ownership Limitations
- Quality Data Reporting
- Non-routine Medical Supplies
- Physician Certification
- Outlier Limits
- Therapy Coverage Requirements



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## THERAPY SERVICES



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## THERAPY CHANGES - 2011

- Objective Eval Findings
- Objective Documentation Requirements
- Re-eval Requirements
- Transient Decline Non-coverage



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### OBJECTIVE EVAL FINDINGS

- Objective Tests & Measures
- Established At Evaluation
- Related to Functional Decline
- Easily Measurable



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### OBJECTIVE DOCUMENTATION

- In-episode Objective Documentation
- Measurable Progress Referenced to Evaluation Findings
- Focused Care Delivery



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### DOCUMENTATION STRATEGIES

- HEP w compliance & progression
- Caregiver involvement
- Skilled progression – esp. gait
- Eliminate high-level endurance
- Focus on function



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### RE-EVAL REQUIREMENTS

- Various re-evals during Episode
- 13<sup>th</sup> and 19<sup>th</sup> Visits
- 30-day Requirement
- Must re-establish Clinical Program and Potential



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### RE-EVAL STRATEGIES

- Weekly schedules in advance
- Scheduler responsible for count
- Therapists must validate schedule
- Continuation must address compliance, HEP, skilled program



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### TRANSIENT DECLINE NON-COVERAGE

- Non-covered short term Declines
- Expected Return of Function
- May reference hospital admission
- May reference bed-rest
- Post-surgical gall bladder case



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## Future Changes?

- 2012 PPS Reforms
- Post-Acute Bundling
- Accountable Care Organizations
- Increased populations
- Shorter programs
- Emphasis on efficiency



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## Home Health as a Commodity



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## CLINICAL MANAGEMENT SYSTEMS FOR 2011



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**SERVICE  
UTILIZATION  
REVIEW for CARE  
in the HOME  
(S.U.R.C.H.)**



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**OBQI CASE  
CONFERENCE**



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**SERVICE  
UTILIZATION  
REVIEW for CARE  
in the HOME  
(S.U.R.C.H.)**



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**S.U.R.C.H.**  
**PLAN OF CARE**  
Create clinical expectations for programming based on QA identified clinical concerns or deficits – share expectations with front line clinical staff prior to care initiation.



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**SURCH  
PROTOCOL**



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**SURCH PROTOCOL**  
Clinical Profile  
-Start of Care date  
-Age  
-Diagnosis



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## SURCH PROTOCOL

- M1000 – Inpatient Facilities
- M1100 – Patient Living Situation
- M1810-1860 – ADL/IADLs



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## SURCH PROTOCOL

- M1240 – Pain Assess
- M1400 – Short of Breath
- M1610 – Incontinence



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## SURCH PROTOCOL

- M1300 – Pressure Ulcer
- M1342 – Surgical Wound
- M2020 – Oral Medications
- M2030 – Injectable Meds



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**FUNCTIONAL DOMAIN**

M1810	DRESSING UPPER - OT
M1820	DRESSING LOWER - OT
M1830	BATHING - OT
M1840	TOILETING - OT/PT
M1845	TOILETING/HYGIENE - OT
M1850	TRANSFERRING - OT/PT
M1860	AMBULATION - PT



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**SURCH Functional Domain**

M1810	M1840/45
M1820	M1850
M1830	M1860



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**SURCH Functional Domain**

DUB	TT/TH
DLB	TRANS
BATH	GAIT



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**SURCH PROTOCOL**

- Self Care \_\_\_\_\_
- Ambulation \_\_\_\_\_
- Transfers \_\_\_\_\_
- Household Tasks \_\_\_\_\_

(M1900)



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**S.U.R.C.H.  
DEMO CASE**



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**Clinical Profile SURCH**

-SOC date: 1/17/10

-Age: 68 y/o

-Diagnosis: Tibial Plateau Fx



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## SURCH

- M1000 – SNF
- M1100 – Caregiver
- M1810-1860 – See ADL



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## SURCH

- M1240 – Severe Pain
- M1400 – No SOB
- M1610 – Continent



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## SURCH

- M1300 – NA
- M1342 – NA
- M2020 – IND
- M2030 – NA



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### SURCH Functional Domain

<u>1</u>	<u>2/1</u>
<u>2</u>	<u>1</u>
<u>3</u>	<u>3 (NWB)</u>

hksm

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### PRIOR ADL/IADL – SURCH

- Self Care IND
- Ambulation IND
- Transfers IND
- Household Tasks IND

(M1900)

hksm

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### SURCH

- RN – 2X9
- PT – 3X9
- OT – 1X2
- HHA – 3X9

hksm

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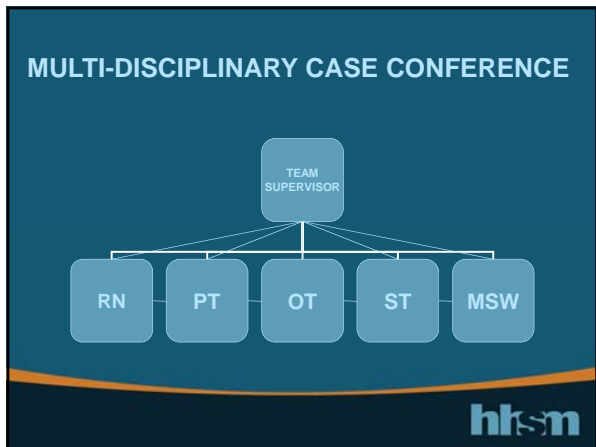
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- ### CONFERENCE DIALOGUE
- Objective Findings/Programing
  - Skilled Care Plan
  - Skilled Programming
  - Home Program/Compliance/Caregiver
  - Clinical Education
  - Skilled Progression/Documentation
  - Skilled Discharge/Care completion
- hksm

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- ### OBQI Case Conference
- M1000 – Inpatient Facilities
  - M1100 – Patient Living Situation
  - M1810-1860 – ADL/IADLs
- hksm

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## OBQI Case Conference

- M1240 – Pain Assess
- M1400 – Short of Breath
- M1610 – Incontinence



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## OBQI Case Conference

- M1300 – Pressure Ulcer
- M1342 – Surgical Wound
- M2020 – Oral Medications
- M2030 – Injectable Meds



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## SURCH

- Self Care \_\_\_\_\_
- Ambulation \_\_\_\_\_
- Transfers \_\_\_\_\_
- Household Tasks \_\_\_\_\_

(M1900)



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# HOME HEALTH THERAPY MANAGEMENT

2011 & BEYOND



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## Therapy Management

- Programming Content
- Therapy Utilization
- Care Delivery
- In-episode Management
- Schedule Control
- Productivity



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## Programming Content

- OASIS ADL-based Therapy
- Function-based Programs
- Objective tests/measures
- Clinical/Functional goals
- Expected and reasonable clinical outcomes



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## Therapy Utilization

- Progressive/skilled evaluations
- Home Program first visit
- OBQI-focused care
- Contemporary therapy frequency/duration orders
- Re-evaluation requirement awareness



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## Care Delivery

- Skilled progression
- Caregiver involvement
- Mandatory compliance
- Documentation for coverage
- Flexible program volumes



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## In-episode Management

- Weekly clinical rounds
- Programming content
- Ongoing skill/OBQI-focus
- Re-evaluation compliance
- CMS coverage content
- Therapy grid



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## Schedule Control

- Weekly schedules – prior Friday
- Productivity
- Assertive scheduling
- Clinical responsibility to maintain current schedule in office
- Ongoing caseload management



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## Productivity

- Major concern in most agencies
- Travel, SOC vs Routine visits
- Missed visits/delayed care
- Patient cancellations
- Co-morbidities
- Traditional therapy habits



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## VISUALIZE WHAT'S OVER THE HORIZON



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**WHAT IF THE  
PATIENT WAS  
YOUR AUNT?**



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Home Health Strategic Management

**1-877-449-HHSM**

[www.HomeHealthStrategicManagement.com](http://www.HomeHealthStrategicManagement.com)



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