



PRIME REHABILITATION SERVICES

PPS AND FINANCIAL CHALLENGES 2012

PRESENTED BY:
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Agenda Topics



- Financial Implications of SNF 2012 Rule
- RUG IV Classification Highlights
- 2012 Rate Graph
- Late Loss ADLs and Capture
- Key Assessment Review
 - Scheduled Assessment Schedule
 - Short Stay
 - Start of Therapy
 - End of Therapy – Resumption
 - Change of Therapy



2012 SNF Final Rule



- Net reduction in total nursing home rates by 11.1% (\$3.87 billion)
 - Mainly in the recalibration of therapy RUG levels
- CMS had assumed the therapy RUG utilization in 2011 would decrease due to the changes in therapy mode delivery, but their predictions were wrong, resulting in financial expenditure increases
- Therefore, nursing case mix indices were decreased for the RUG IV therapy groups

Increased Cost / Decreased Revenues



- RUG IV recalibration reduces therapy revenue and the spread between nursing/rehab RUGs
- 2012 provisions eliminate “extras” and increases the cost of therapy
- Daily management necessitated
- More therapy needed but there will be decreased revenues
- Capacity is finite



RUG IV Classification System



- 66 categories
 - ▣ Rehabilitation plus extensive services
 - ▣ Rehabilitation
 - ▣ Extensive services
 - ▣ Special care high and low
 - ▣ Clinically complex
 - ▣ Behavior / cognitive performance
 - ▣ Reduced physical function
- ADL index (0 to 16 range)

RUG IV Chart



<div>PRIME REHABILITATION SERVICES, INC. © 2000</div> <div>RUG-IV System (Resource Utilization Groups)</div> <table><tr><td>Rehabilitation plus extensive services</td><td>Rehabilitation</td><td>Extensive services</td><td>Special care high and low</td><td>Clinically complex</td><td>Behavior / cognitive performance</td><td>Reduced physical function</td></tr><tr><td>101-102</td><td>103-104</td><td>105-106</td><td>107-108</td><td>109-110</td><td>111-112</td><td>113-114</td></tr><tr><td>115-116</td><td>117-118</td><td>119-120</td><td>121-122</td><td>123-124</td><td>125-126</td><td>127-128</td></tr><tr><td>129-130</td><td>131-132</td><td>133-134</td><td>135-136</td><td>137-138</td><td>139-140</td><td>141-142</td></tr><tr><td>143-144</td><td>145-146</td><td>147-148</td><td>149-150</td><td>151-152</td><td>153-154</td><td>155-156</td></tr><tr><td>157-158</td><td>159-160</td><td>161-162</td><td>163-164</td><td>165-166</td><td>167-168</td><td>169-170</td></tr><tr><td>171-172</td><td>173-174</td><td>175-176</td><td>177-178</td><td>179-180</td><td>181-182</td><td>183-184</td></tr><tr><td>185-186</td><td>187-188</td><td>189-190</td><td>191-192</td><td>193-194</td><td>195-196</td><td>197-198</td></tr><tr><td>199-200</td><td>201-202</td><td>203-204</td><td>205-206</td><td>207-208</td><td>209-210</td><td>211-212</td></tr><tr><td>213-214</td><td>215-216</td><td>217-218</td><td>219-220</td><td>221-222</td><td>223-224</td><td>225-226</td></tr><tr><td>227-228</td><td>229-230</td><td>231-232</td><td>233-234</td><td>235-236</td><td>237-238</td><td>239-240</td></tr><tr><td>241-242</td><td>243-244</td><td>245-246</td><td>247-248</td><td>249-250</td><td>251-252</td><td>253-254</td></tr><tr><td>255-256</td><td>257-258</td><td>259-260</td><td>261-262</td><td>263-264</td><td>265-266</td><td>267-268</td></tr><tr><td>269-270</td><td>271-272</td><td>273-274</td><td>275-276</td><td>277-278</td><td>279-280</td><td>281-282</td></tr><tr><td>283-284</td><td>285-286</td><td>287-288</td><td>289-290</td><td>291-292</td><td>293-294</td><td>295-296</td></tr><tr><td>297-298</td><td>299-300</td><td>301-302</td><td>303-304</td><td>305-306</td><td>307-308</td><td>309-310</td></tr><tr><td>311-312</td><td>313-314</td><td>315-316</td><td>317-318</td><td>319-320</td><td>321-322</td><td>323-324</td></tr><tr><td>325-326</td><td>327-328</td><td>329-330</td><td>331-332</td><td>333-334</td><td>335-336</td><td>337-338</td></tr><tr><td>339-340</td><td>341-342</td><td>343-344</td><td>345-346</td><td>347-348</td><td>349-350</td><td>351-352</td></tr><tr><td>353-354</td><td>355-356</td><td>357-358</td><td>359-360</td><td>361-362</td><td>363-364</td><td>365-366</td></tr><tr><td>367-368</td><td>369-370</td><td>371-372</td><td>373-374</td><td>375-376</td><td>377-378</td><td>379-380</td></tr><tr><td>381-382</td><td>383-384</td><td>385-386</td><td>387-388</td><td>389-390</td><td>391-392</td><td>393-394</td></tr><tr><td>395-396</td><td>397-398</td><td>399-400</td><td>401-402</td><td>403-404</td><td>405-406</td><td>407-408</td></tr><tr><td>409-410</td><td>411-412</td><td>413-414</td><td>415-416</td><td>417-418</td><td>419-420</td><td>421-422</td></tr><tr><td>423-424</td><td>425-426</td><td>427-428</td><td>429-430</td><td>431-432</td><td>433-434</td><td>435-436</td></tr><tr><td>437-438</td><td>439-440</td><td>441-442</td><td>443-444</td><td>445-446</td><td>447-448</td><td>449-450</td></tr><tr><td>451-452</td><td>453-454</td><td>455-456</td><td>457-458</td><td>459-460</td><td>461-462</td><td>463-464</td></tr><tr><td>465-466</td><td>467-468</td><td>469-470</td><td>471-472</td><td>473-474</td><td>475-476</td><td>477-478</td></tr><tr><td>479-480</td><td>481-482</td><td>483-484</td><td>485-486</td><td>487-488</td><td>489-490</td><td>491-492</td></tr><tr><td>493-494</td><td>495-496</td><td>497-498</td><td>499-500</td><td>501-502</td><td>503-504</td><td>505-506</td></tr><tr><td>507-508</td><td>509-510</td><td>511-512</td><td>513-514</td><td>515-516</td><td>517-518</td><td>519-520</td></tr><tr><td>521-522</td><td>523-524</td><td>525-526</td><td>527-528</td><td>529-530</td><td>531-532</td><td>533-534</td></tr><tr><td>535-536</td><td>537-538</td><td>539-540</td><td>541-542</td><td>543-544</td><td>545-546</td><td>547-548</td></tr><tr><td>549-550</td><td>551-552</td><td>553-554</td><td>555-556</td><td>557-558</td><td>559-560</td><td>561-562</td></tr><tr><td>563-564</td><td>565-566</td><td>567-568</td><td>569-570</td><td>571-572</td><td>573-574</td><td>575-576</td></tr><tr><td>577-578</td><td>579-580</td><td>581-582</td><td>583-584</td><td>585-586</td><td>587-588</td><td>589-590</td></tr><tr><td>591-592</td><td>593-594</td><td>595-596</td><td>597-598</td><td>599-600</td><td>601-602</td><td>603-604</td></tr><tr><td>605-606</td><td>607-608</td><td>609-610</td><td>611-612</td><td>613-614</td><td>615-616</td><td>617-618</td></tr><tr><td>619-620</td><td>621-622</td><td>623-624</td><td>625-626</td><td>627-628</td><td>629-630</td><td>631-632</td></tr><tr><td>633-634</td><td>635-636</td><td>637-638</td><td>639-640</td><td>641-642</td><td>643-644</td><td>645-646</td></tr><tr><td>647-648</td><td>649-650</td><td>651-652</td><td>653-654</td><td>655-656</td><td>657-658</td><td>659-660</td></tr><tr><td>661-662</td><td>663-664</td><td>665-666</td><td>667-668</td><td>669-670</td><td>671-672</td><td>673-674</td></tr><tr><td>675-676</td><td>677-678</td><td>679-680</td><td>681-682</td><td>683-684</td><td>685-686</td><td>687-688</td></tr><tr><td>689-690</td><td>691-692</td><td>693-694</td><td>695-696</td><td>697-698</td><td>699-700</td><td>701-702</td></tr><tr><td>703-704</td><td>705-706</td><td>707-708</td><td>709-710</td><td>711-712</td><td>713-714</td><td>715-716</td></tr><tr><td>717-718</td><td>719-720</td><td>721-722</td><td>723-724</td><td>725-726</td><td>727-728</td><td>729-730</td></tr><tr><td>731-732</td><td>733-734</td><td>735-736</td><td>737-738</td><td>739-740</td><td>741-742</td><td>743-744</td></tr><tr><td>745-746</td><td>747-748</td><td>749-750</td><td>751-752</td><td>753-754</td><td>755-756</td><td>757-758</td></tr><tr><td>759-760</td><td>761-762</td><td>763-764</td><td>765-766</td><td>767-768</td><td>769-770</td><td>771-772</td></tr><tr><td>773-774</td><td>775-776</td><td>777-778</td><td>779-780</td><td>781-782</td><td>783-784</td><td>785-786</td></tr><tr><td>787-788</td><td>789-790</td><td>791-792</td><td>793-794</td><td>795-796</td><td>797-798</td><td>799-800</td></tr><tr><td>801-802</td><td>803-804</td><td>805-806</td><td>807-808</td><td>809-810</td><td>811-812</td><td>813-814</td></tr><tr><td>815-816</td><td>817-818</td><td>819-820</td><td>821-822</td><td>823-824</td><td>825-826</td><td>827-828</td></tr><tr><td>829-830</td><td>831-832</td><td>833-834</td><td>835-836</td><td>837-838</td><td>839-840</td><td>841-842</td></tr><tr><td>843-844</td><td>845-846</td><td>847-848</td><td>849-850</td><td>851-852</td><td>853-854</td><td>855-856</td></tr><tr><td>857-858</td><td>859-860</td><td>861-862</td><td>863-864</td><td>865-866</td><td>867-868</td><td>869-870</td></tr><tr><td>871-872</td><td>873-874</td><td>875-876</td><td>877-878</td><td>879-880</td><td>881-882</td><td>883-884</td></tr><tr><td>885-886</td><td>887-888</td><td>889-890</td><td>891-892</td><td>893-894</td><td>895-896</td><td>897-898</td></tr><tr><td>899-900</td><td>901-902</td><td>903-904</td><td>905-906</td><td>907-908</td><td>909-910</td><td>911-912</td></tr><tr><td>913-914</td><td>915-916</td><td>917-918</td><td>919-920</td><td>921-922</td><td>923-924</td><td>925-926</td></tr><tr><td>927-928</td><td>929-930</td><td>931-932</td><td>933-934</td><td>935-936</td><td>937-938</td><td>939-940</td></tr><tr><td>941-942</td><td>943-944</td><td>945-946</td><td>947-948</td><td>949-950</td><td>951-952</td><td>953-954</td></tr><tr><td>955-956</td><td>957-958</td><td>959-960</td><td>961-962</td><td>963-964</td><td>965-966</td><td>967-968</td></tr><tr><td>969-970</td><td>971-972</td><td>973-974</td><td>975-976</td><td>977-978</td><td>979-980</td><td>981-982</td></tr><tr><td>983-984</td><td>985-986</td><td>987-988</td><td>989-990</td><td>991-992</td><td>993-994</td><td>995-996</td></tr><tr><td>997-998</td><td>999-1000</td><td>1001-1002</td><td>1003-1004</td><td>1005-1006</td><td>1007-1008</td><td>1009-1010</td></tr><tr><td>1011-1012</td><td>1013-1014</td><td>1015-1016</td><td>1017-1018</td><td>1019-1020</td><td>1021-1022</td><td>1023-1024</td></tr><tr><td>1025-1026</td><td>1027-1028</td><td>1029-1030</td><td>1031-1032</td><td>1033-1034</td><td>1035-1036</td><td>1037-1038</td></tr><tr><td>1039-1040</td><td>1041-1042</td><td>1043-1044</td><td>1045-1046</td><td>1047-1048</td><td>1049-1050</td><td>1051-1052</td></tr><tr><td>1053-1054</td><td>1055-1056</td><td>1057-1058</td><td>1059-1060</td><td>1061-1062</td><td>1063-1064</td><td>1065-1066</td></tr><tr><td>1067-1068</td><td>1069-1070</td><td>1071-1072</td><td>1073-1074</td><td>1075-1076</td><td>1077-1078</td><td>1079-1080</td></tr><tr><td>1081-1082</td><td>1083-1084</td><td>1085-1086</td><td>1087-1088</td><td>1089-1090</td><td>1091-1092</td><td>1093-1094</td></tr><tr><td>1095-1096</td><td>1097-1098</td><td>1099-1100</td><td>1101-1102</td><td>1103-1104</td><td>1105-1106</td><td>1107-1108</td></tr><tr><td>1109-1110</td><td>1111-1112</td><td>1113-1114</td><td>1115-1116</td><td>1117-1118</td><td>1119-1120</td><td>1121-1122</td></tr><tr><td>1123-1124</td><td>1125-1126</td><td>1127-1128</td><td>1129-1130</td><td>1131-1132</td><td>1133-1134</td><td>1135-1136</td></tr><tr><td>1137-1138</td><td>1139-1140</td><td>1141-1142</td><td>1143-1144</td><td>1145-1146</td><td>1147-1148</td><td>1149-1150</td></tr><tr><td>1151-1152</td><td>1153-1154</td><td>1155-1156</td><td>1157-1158</td><td>1159-1160</td><td>1161-1162</td><td>1163-1164</td></tr><tr><td>1165-1166</td><td>1167-1168</td><td>1169-1170</td><td>1171-1172</td><td>1173-1174</td><td>1175-1176</td><td>1177-1178</td></tr><tr><td>1179-1180</td><td>1181-1182</td><td>1183-1184</td><td>1185-1186</td><td>1187-1188</td><td>1189-1190</td><td>1191-1192</td></tr><tr><td>1193-1194</td><td>1195-1196</td><td>1197-1198</td><td>1199-1200</td><td>1201-1202</td><td>1203-1204</td><td>1205-1206</td></tr><tr><td>1207-1208</td><td>1209-1210</td><td>1211-1212</td><td>1213-1214</td><td>1215-1216</td><td>1217-1218</td><td>1219-1220</td></tr><tr><td>1221-1222</td><td>1223-1224</td><td>1225-1226</td><td>1227-1228</td><td>1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748</td><td>1749-1750</td><td>1751-1752</td></tr><tr><td>1753-1754</td><td>1755-1756</td><td>1757-1758</td><td>1759-1760</td><td>1761-1762</td><td>1763-1764</td><td>1765-1766</td></tr><tr><td>1767-1768</td><td>1769-1770</td><td>1771-1772</td><td>1773-1774</td><td>1775-1776</td><td>1777-1778</td><td>1779-1780</td></tr><tr><td>1781-1782</td><td>1783-1784</td><td>1785-1786</td><td>1787-1788</td><td>1789-1790</td><td>1791-1792</td><td>1793-1794</td></tr><tr><td>1795-1796</td><td>1797-1798</td><td>1799-1800</td><td>1801-1802</td><td>1803-1804</td><td>1805-1806</td><td>1807-1808</td></tr><tr><td>1809-1810</td><td>1811-1812</td><td>1813-1814</td><td>1815-1816</td><td>1817-1818</td><td>1819-1820</td><td>1821-1822</td></tr><tr><td>1823-1824</td><td>1825-1826</td><td>1827-1828</td><td>1829-1830</td><td>1831-1832</td><td>1833-1834</td><td>1835-1836</td></tr><tr><td>1837-1838</td><td>1839-1840</td><td>1841-1842</td><td>1843-1844</td><td>1845-1846</td><td>1847-1848</td><td>1849-1850</td></tr><tr><td>1851-1852</td><td>1853-1854</td><td>1855-1856</td><td>1857-1858</td><td>1859-1860</td><td>1861-1862</td><td>1863-1864</td></tr><tr><td>1865-1866</td><td>1867-1868</td><td>1869-1870</td><td>1871-1872</td><td>1873-1874</td><td>1875-1876</td><td>1877-1878</td></tr><tr><td>1879-1880</td><td>1881-1882</td><td>1883-1884</td><td>1885-1886</td><td>1887-1888</td><td>1889-1890</td><td>1891-1892</td></tr><tr><td>1893-1894</td><td>1</td></tr></table>	Rehabilitation plus extensive services	Rehabilitation	Extensive services	Special care high and low	Clinically complex	Behavior / cognitive performance	Reduced physical function	101-102	103-104	105-106	107-108	109-110	111-112	113-114	115-116	117-118	119-120	121-122	123-124	125-126	127-128	129-130	131-132	133-134	135-136	137-138	139-140	141-142	143-144	145-146	147-148	149-150	151-152	153-154	155-156	157-158	159-160	161-162	163-164	165-166	167-168	169-170	171-172	173-174	175-176	177-178	179-180	181-182	183-184	185-186	187-188	189-190	191-192	193-194	195-196	197-198	199-200	201-202	203-204	205-206	207-208	209-210	211-212	213-214	215-216	217-218	219-220	221-222	223-224	225-226	227-228	229-230	231-232	233-234	235-236	237-238	239-240	241-242	243-244	245-246	247-248	249-250	251-252	253-254	255-256	257-258	259-260	261-262	263-264	265-266	267-268	269-270	271-272	273-274	275-276	277-278	279-280	281-282	283-284	285-286	287-288	289-290	291-292	293-294	295-296	297-298	299-300	301-302	303-304	305-306	307-308	309-310	311-312	313-314	315-316	317-318	319-320	321-322	323-324	325-326	327-328	329-330	331-332	333-334	335-336	337-338	339-340	341-342	343-344	345-346	347-348	349-350	351-352	353-354	355-356	357-358	359-360	361-362	363-364	365-366	367-368	369-370	371-372	373-374	375-376	377-378	379-380	381-382	383-384	385-386	387-388	389-390	391-392	393-394	395-396	397-398	399-400	401-402	403-404	405-406	407-408	409-410	411-412	413-414	415-416	417-418	419-420	421-422	423-424	425-426	427-428	429-430	431-432	433-434	435-436	437-438	439-440	441-442	443-444	445-446	447-448	449-450	451-452	453-454	455-456	457-458	459-460	461-462	463-464	465-466	467-468	469-470	471-472	473-474	475-476	477-478	479-480	481-482	483-484	485-486	487-488	489-490	491-492	493-494	495-496	497-498	499-500	501-502	503-504	505-506	507-508	509-510	511-512	513-514	515-516	517-518	519-520	521-522	523-524	525-526	527-528	529-530	531-532	533-534	535-536	537-538	539-540	541-542	543-544	545-546	547-548	549-550	551-552	553-554	555-556	557-558	559-560	561-562	563-564	565-566	567-568	569-570	571-572	573-574	575-576	577-578	579-580	581-582	583-584	585-586	587-588	589-590	591-592	593-594	595-596	597-598	599-600	601-602	603-604	605-606	607-608	609-610	611-612	613-614	615-616	617-618	619-620	621-622	623-624	625-626	627-628	629-630	631-632	633-634	635-636	637-638	639-640	641-642	643-644	645-646	647-648	649-650	651-652	653-654	655-656	657-658	659-660	661-662	663-664	665-666	667-668	669-670	671-672	673-674	675-676	677-678	679-680	681-682	683-684	685-686	687-688	689-690	691-692	693-694	695-696	697-698	699-700	701-702	703-704	705-706	707-708	709-710	711-712	713-714	715-716	717-718	719-720	721-722	723-724	725-726	727-728	729-730	731-732	733-734	735-736	737-738	739-740	741-742	743-744	745-746	747-748	749-750	751-752	753-754	755-756	757-758	759-760	761-762	763-764	765-766	767-768	769-770	771-772	773-774	775-776	777-778	779-780	781-782	783-784	785-786	787-788	789-790	791-792	793-794	795-796	797-798	799-800	801-802	803-804	805-806	807-808	809-810	811-812	813-814	815-816	817-818	819-820	821-822	823-824	825-826	827-828	829-830	831-832	833-834	835-836	837-838	839-840	841-842	843-844	845-846	847-848	849-850	851-852	853-854	855-856	857-858	859-860	861-862	863-864	865-866	867-868	869-870	871-872	873-874	875-876	877-878	879-880	881-882	883-884	885-886	887-888	889-890	891-892	893-894	895-896	897-898	899-900	901-902	903-904	905-906	907-908	909-910	911-912	913-914	915-916	917-918	919-920	921-922	923-924	925-926	927-928	929-930	931-932	933-934	935-936	937-938	939-940	941-942	943-944	945-946	947-948	949-950	951-952	953-954	955-956	957-958	959-960	961-962	963-964	965-966	967-968	969-970	971-972	973-974	975-976	977-978	979-980	981-982	983-984	985-986	987-988	989-990	991-992	993-994	995-996	997-998	999-1000	1001-1002	1003-1004	1005-1006	1007-1008	1009-1010	1011-1012	1013-1014	1015-1016	1017-1018	1019-1020	1021-1022	1023-1024	1025-1026	1027-1028	1029-1030	1031-1032	1033-1034	1035-1036	1037-1038	1039-1040	1041-1042	1043-1044	1045-1046	1047-1048	1049-1050	1051-1052	1053-1054	1055-1056	1057-1058	1059-1060	1061-1062	1063-1064	1065-1066	1067-1068	1069-1070	1071-1072	1073-1074	1075-1076	1077-1078	1079-1080	1081-1082	1083-1084	1085-1086	1087-1088	1089-1090	1091-1092	1093-1094	1095-1096	1097-1098	1099-1100	1101-1102	1103-1104	1105-1106	1107-1108	1109-1110	1111-1112	1113-1114	1115-1116	1117-1118	1119-1120	1121-1122	1123-1124	1125-1126	1127-1128	1129-1130	1131-1132	1133-1134	1135-1136	1137-1138	1139-1140	1141-1142	1143-1144	1145-1146	1147-1148	1149-1150	1151-1152	1153-1154	1155-1156	1157-1158	1159-1160	1161-1162	1163-1164	1165-1166	1167-1168	1169-1170	1171-1172	1173-1174	1175-1176	1177-1178	1179-1180	1181-1182	1183-1184	1185-1186	1187-1188	1189-1190	1191-1192	1193-1194	1195-1196	1197-1198	1199-1200	1201-1202	1203-1204	1205-1206	1207-1208	1209-1210	1211-1212	1213-1214	1215-1216	1217-1218	1219-1220	1221-1222	1223-1224	1225-1226	1227-1228	1229-1230	1231-1232	1233-1234	1235-1236	1237-1238	1239-1240	1241-1242	1243-1244	1245-1246	1247-1248	1249-1250	1251-1252	1253-1254	1255-1256	1257-1258	1259-1260	1261-1262	1263-1264	1265-1266	1267-1268	1269-1270	1271-1272	1273-1274	1275-1276	1277-1278	1279-1280	1281-1282	1283-1284	1285-1286	1287-1288	1289-1290	1291-1292	1293-1294	1295-1296	1297-1298	1299-1300	1301-1302	1303-1304	1305-1306	1307-1308	1309-1310	1311-1312	1313-1314	1315-1316	1317-1318	1319-1320	1321-1322	1323-1324	1325-1326	1327-1328	1329-1330	1331-1332	1333-1334	1335-1336	1337-1338	1339-1340	1341-1342	1343-1344	1345-1346	1347-1348	1349-1350	1351-1352	1353-1354	1355-1356	1357-1358	1359-1360	1361-1362	1363-1364	1365-1366	1367-1368	1369-1370	1371-1372	1373-1374	1375-1376	1377-1378	1379-1380	1381-1382	1383-1384	1385-1386	1387-1388	1389-1390	1391-1392	1393-1394	1395-1396	1397-1398	1399-1400	1401-1402	1403-1404	1405-1406	1407-1408	1409-1410	1411-1412	1413-1414	1415-1416	1417-1418	1419-1420	1421-1422	1423-1424	1425-1426	1427-1428	1429-1430	1431-1432	1433-1434	1435-1436	1437-1438	1439-1440	1441-1442	1443-1444	1445-1446	1447-1448	1449-1450	1451-1452	1453-1454	1455-1456	1457-1458	1459-1460	1461-1462	1463-1464	1465-1466	1467-1468	1469-1470	1471-1472	1473-1474	1475-1476	1477-1478	1479-1480	1481-1482	1483-1484	1485-1486	1487-1488	1489-1490	1491-1492	1493-1494	1495-1496	1497-1498	1499-1500	1501-1502	1503-1504	1505-1506	1507-1508	1509-1510	1511-1512	1513-1514	1515-1516	1517-1518	1519-1520	1521-1522	1523-1524	1525-1526	1527-1528	1529-1530	1531-1532	1533-1534	1535-1536	1537-1538	1539-1540	1541-1542	1543-1544	1545-1546	1547-1548	1549-1550	1551-1552	1553-1554	1555-1556	1557-1558	1559-1560	1561-1562	1563-1564	1565-1566	1567-1568	1569-1570	1571-1572	1573-1574	1575-1576	1577-1578	1579-1580	1581-1582	1583-1584	1585-1586	1587-1588	1589-1590	1591-1592	1593-1594	1595-1596	1597-1598	1599-1600	1601-1602	1603-1604	1605-1606	1607-1608	1609-1610	1611-1612	1613-1614	1615-1616	1617-1618	1619-1620	1621-1622	1623-1624	1625-1626	1627-1628	1629-1630	1631-1632	1633-1634	1635-1636	1637-1638	1639-1640	1641-1642	1643-1644	1645-1646	1647-1648	1649-1650	1651-1652	1653-1654	1655-1656	1657-1658	1659-1660	1661-1662	1663-1664	1665-1666	1667-1668	1669-1670	1671-1672	1673-1674	1675-1676	1677-1678	1679-1680	1681-1682	1683-1684	1685-1686	1687-1688	1689-1690	1691-1692	1693-1694	1695-1696	1697-1698	1699-1700	1701-1702	1703-1704	1705-1706	1707-1708	1709-1710	1711-1712	1713-1714	1715-1716	1717-1718	1719-1720	1721-1722	1723-1724	1725-1726	1727-1728	1729-1730	1731-1732	1733-1734	1735-1736	1737-1738	1739-1740	1741-1742	1743-1744	1745-1746	1747-1748	1749-1750	1751-1752	1753-1754	1755-1756	1757-1758	1759-1760	1761-1762	1763-1764	1765-1766	1767-1768	1769-1770	1771-1772	1773-1774	1775-1776	1777-1778	1779-1780	1781-1782	1783-1784	1785-1786	1787-1788	1789-1790	1791-1792	1793-1794	1795-1796	1797-1798	1799-1800	1801-1802	1803-1804	1805-1806	1807-1808	1809-1810	1811-1812	1813-1814	1815-1816	1817-1818	1819-1820	1821-1822	1823-1824	1825-1826	1827-1828	1829-1830	1831-1832	1833-1834	1835-1836	1837-1838	1839-1840	1841-1842	1843-1844	1845-1846	1847-1848	1849-1850	1851-1852	1853-1854	1855-1856	1857-1858	1859-1860	1861-1862	1863-1864	1865-1866	1867-1868	1869-1870	1871-1872	1873-1874	1875-1876	1877-1878	1879-1880	1881-1882	1883-1884	1885-1886	1887-1888	1889-1890	1891-1892	1893-1894	1
Rehabilitation plus extensive services	Rehabilitation	Extensive services	Special care high and low	Clinically complex	Behavior / cognitive performance	Reduced physical function																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																			
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Rehabilitation RUGs



- Rehabilitation RUG category
 - 5 levels of intensity (RU, RV, RH, RM, RL)
- Rehabilitation PLUS Extensive Services remain an option but extensive services utilization limited
- X/L utilization has been dramatically reduced
- Reimbursable Therapy Minutes (RTM)
 - Minutes that count toward capturing a RUG category
- Therapy mode delivery
 - Individual = 100% of the minutes billed
 - Concurrent = 50% of the minutes billed
 - Group = 25% of the minutes billed

Rehabilitation RUG Category



RUG Group	Minutes of therapy	Hours of therapy	3 of therapies	Freq Therapy 1	Freq Therapy 2	Restorative Nursing
Ultra High	720	12	At least 2	At least 5 days	At least 3 days	XXX
Very High	500	8.3	At least 1	At least 5 days	XXX	XXX
High	325	5.4	At least 1	At least 5 days	XXX	XXX
Medium	150	2.5	Any (or all) 3	At least 5 days	XXX	XXX
Low	45	0.75	Any (or all) 3	At least 3 days	XXX	2 services per RAI days/wk



RUG IV Extensive Services



- ADL ≥ 2
- All qualifiers must occur “while a resident”
 - ES3: Ventilator AND Trache
 - ES2: Ventilator OR Trache
 - ES1: Isolation due to active infection
 - Can code for “strict isolation” **ONLY WHEN ALL** met:
 - Resident has active infection with highly transmissible or epidemiologically significant pathogens acquired by physical contact or airborne or droplet transmission
 - Precautions are over and above standard precautions
 - Resident in a room ALONE because of active infection and cannot have a roommate
 - Resident must remain in his/her room. All services brought to the resident

RUG IV Special Care High



- Residents receiving the following complex clinical care or with a following medical condition:
 - Comatose and completely ADL dependent; septicemia; diabetes with daily injections requiring physician order changes on 2 or more days; quadriplegia and ADL score ≥ 5 ; chronic obstructive pulmonary disease and shortness of breath when lying flat; fever with pneumonia, or vomiting, or tube feeding, or weight loss; parenteral/IV feedings; respiratory therapy for 7 days; AND
- ADL ≥ 2
- Signs of depression PHQ score ≥ 9.5



RUG IV Special Care Low



- Residents receiving the following complex clinical care or with a following medical condition:
 - Cerebral palsy and ADL score ≥ 5 ; multiple sclerosis and ADL score ≥ 5 ; parkinson's disease and ADL score ≥ 5 ; feeding tube (calories $\geq 51\%$ or calories = 26-50% and fluid ≥ 501 cc); ulcers (2 or more stage II or 1 or more stage III or IV pressure ulcers; or 2 or more venous/arterial ulcers; or 1 stage II pressure ulcer and 1 venous/arterial ulcer) with 2 or more skin care treatments; foot infection, diabetic foot ulcer or open lesions on the foot with treatment; radiation therapy while a resident; respiratory failure and oxygen therapy while a resident; dialysis while a resident; AND
- ADL score ≥ 2
- Signs of depression PHQ score ≥ 9.5

RUG IV Clinically Complex



- Residents with Extensive Services, Special Care High or Special Care Low qualifier AND
- ADL score = 0-1 OR
- Residents with any of the following clinically complex qualifiers:
 - Pneumonia; hemiplegia and ADL score ≥ 5 ; surgical wounds or open lesions with treatment; burns; chemotherapy while a resident; oxygen while a resident; IV medications while a resident; transfusions while a resident.
- Signs of depression PHQ score ≥ 9.5



Depression – Financial Driver



- Depression is a major financial driver
- MDS 3.0 Section D
- End splits for Special Care High/Low and Clinically Complex
- Financial Impact:
 - HE2 (Special Care High *with* Depression – highest ADL score)
 - HE1 (Special Care high *without* Depression – highest ADL score)
 - Substantial financial difference per day

Behavior & Cognition



- Residents having cognitive impairment BIMS score ≤ 9 or CPS ≥ 3 OR
- Hallucinations or delusions OR
- Physical or verbal behavioral symptoms toward others; other behavioral symptoms; rejection of care; or wandering exhibited 4+ days over the past 7 days AND
- ADL score ≤ 5
- Nursing Rehab Services (end splits):
 - Urinary and/or bowel training program; passive and/or active ROM; amputation/prosthesis care training; splint or brace assistance; dressing or grooming training; eating or swallowing training; transfer training; bed mobility and/or walking training; communication training.



Reduced Physical Functioning



- Residents whose needs are primarily for activities of daily living and general supervision.
- Residents not qualifying for other categories.
- Nursing Rehab Services (end splits):
 - Urinary and/or bowel training program; passive and/or active ROM; amputation/prosthesis care training; splint or brace assistance; dressing or grooming training; eating or swallowing training; transfer training; bed mobility and/or walking training; communication training.

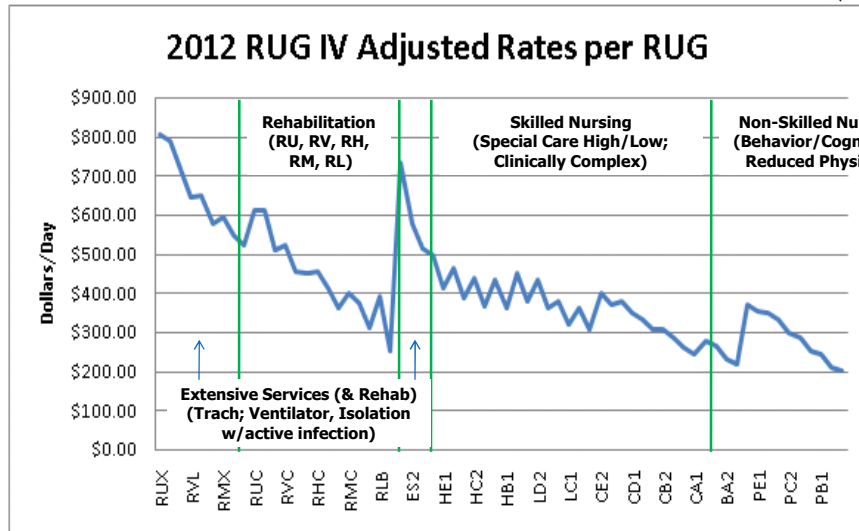
Restorative Nursing Program



- Refers to nursing interventions that promote the resident's ability to adapt and adjust to living as independently and safely as possible.
- Actively focuses on achieving and maintaining optimal physical, mental and psychosocial functioning.
- Technique, training or skill practice must take place a least 15 minutes during the 24 hours period.



RUG IV – 2012 Adjusted Rates



Rehab RUG “Key” Financials



- RUC = RUB rate (no differential for ADL dependence)
- RUB \$\$\$ >>> RUA \$
 - \$122 per day difference
- RUB \$\$\$ >>> RVB \$
 - \$167 per day difference
- RLB \$\$\$ >>> RLA \$
 - \$172 per day difference



Under Coding = Lost Revenues



- ADLs
 - ▣ Significant financial impact
 - ▣ BETT on it (bed mobility, eating, transfers, toileting)
 - 4 key late-loss ADLs
 - ▣ Code for *most extensive support* on 24 hour nursing observation
- Depression
 - ▣ Actual capture significantly below projections
 - ▣ Review completion of interviews (PHQ-9), processes and education

Four Key ADLs – BETT on it!



- Four Key ADLs:
 - ▣ **B**ed Mobility (G0110A)
 - ▣ **E**ating (G0110H)
 - ▣ **T**oileting (G0110I)
 - ▣ **T**ransfers (G0110B)
- Also known as “late loss” ADLs
- ADL index is the sum of the four late loss ADLs
- ADL coding increases in importance
- Major financial impact



ADL Self-Performance & Support



- ADL Self Performance
 - Measure what the resident **actually did** (not what he or she might be capable of doing) within each ADL category over the last 7 days according to a performance-based scale.
- ADL Support Provided
 - Measures the highest level of support **provided by the staff** over the last 7 days, even if that level of support only occurred once.
- Coded at the most dependent state

ADL Self Performance Algorithm



- Utilize for assistance in coding ADL self performance items.
- Consider each episode of the activity that occurred during the 7 day look-back period.
- Code based on the resident's level of assistance when using special adaptive devices (walker, dressing stick, etc.)



G0110 – Coding

ADL Self Performance – Column 1



- ☐ 0 – Independent
 - ☐ No help or staff oversight at any time
- ☐ 1 – Supervision
 - ☐ Oversight, encouragement, or cueing provided 3+ times
- ☐ 2 – Limited Assistance
 - ☐ Resident highly involved in activity; staff provide guided maneuvering of limbs or other non-weight bearing assist 3+ times
- ☐ 3 – Extensive Assistance
 - ☐ Resident involved in activity; staff provide weight bearing support 3+ times

G0110 – Coding

ADL Self Performance – Column 1



- ☐ 4 – Total Dependence
 - ☐ Full staff performance of an activity with no participation by resident for any aspect of the ADL activity.
- ☐ 7 – Activity occurred only once or twice
 - ☐ Activity occurred but not 3+ times
- ☐ 8 – Activity did not occur
 - ☐ ADL activity was not performed by the resident or staff



G0110 – Coding

ADL Support – Column 2



- ☐ 0 – No setup or physical help from staff
 - ☐ No help or oversight
- ☐ 1 – Setup help only
 - ☐ Resident provided with materials or devices
- ☐ 2 – One person physical assist
- ☐ 3 – Two+ person physical assist
- ☐ 8 – ADL activity itself did not occur during the entire period

Functional ADL Status



SECTION G Functional Status

G0110. Activities of Daily Living (ADL) Assistance

Refer to the ADL flow chart in the RAI manual to facilitate accurate coding

Instructions for Rule of 3

- When an activity occurs three times at any one given level, code that level.
 - When an activity occurs three times at multiple levels, code the most dependent, exceptions are total dependence (4), activity must require full assist every time, and activity did not occur (8), activity must not have occurred at all. Example, three times extensive assistance (3) and three times limited assistance (2), code extensive assistance (3).
 - When an activity occurs at various levels, but not three times at any given level, apply the following:
 - When there is a combination of full staff performance, and extensive assistance, code extensive assistance.
 - When there is a combination of full staff performance, weight bearing assistance and/or non-weight bearing assistance code limited assistance (2).
- If none of the above are met, code supervision.

1. ADL Self-Performance

Code for resident's performance over all shifts - not including setup. If the ADL activity occurred 3 or more times at various levels of assistance, code the most dependent - except for total dependence, which requires full staff performance every time

Coding:

Activity Occurred 3 or More Times

0. Independent - no help or staff oversight at any time
1. **Supervision** - oversight, encouragement or cueing
2. **Limited assistance** - resident highly involved in activity; staff provide guided maneuvering of limbs or other non-weight-bearing assistance
3. **Extensive assistance** - resident involved in activity, staff provide weight-bearing support
4. **Total dependence** - full staff performance every time during entire 7-day period

Activity Occurred 2 or Fewer Times

7. **Activity occurred only once or twice** - activity did occur but only once or twice
8. **Activity did not occur** - activity (or any part of the ADL) was not performed by resident or staff at all over the entire 7-day period

2. ADL Support Provided

Code for most support provided over all shifts; code regardless of resident's self-performance classification

Coding:

0. No setup or physical help from staff
1. **Setup help only**
2. **One person physical assist**
3. **Two+ persons physical assist**
8. **ADL activity itself did not occur during entire period**



ADL Coding – MDS 3.0

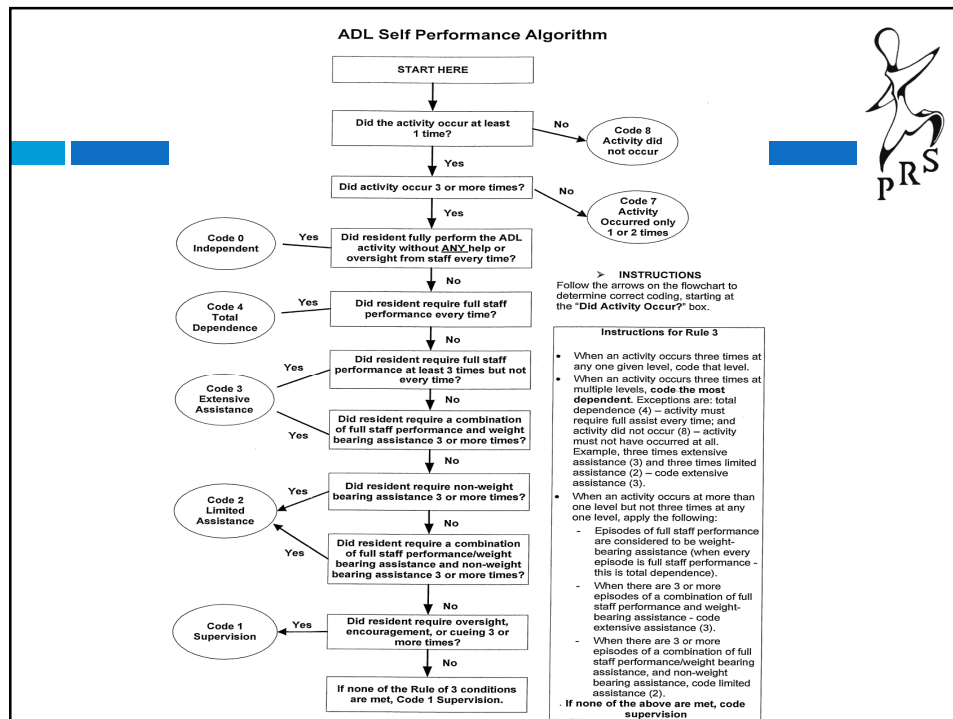


1. Self-Performance	2. Support	
Enter Codes in Boxes		
<input type="checkbox"/>	<input type="checkbox"/>	A. Bed mobility - how resident moves to and from lying position, turns side to side, and positions body while in bed or alternate sleep furniture 1, 2, 3, 4 = 05 1, 2, 3, 4, 7, 8 = 16
<input type="checkbox"/>	<input type="checkbox"/>	B. Transfer - how resident moves between surfaces including to or from: bed, chair, wheelchair, standing position (excludes to/from bath/toilet) 1, 2, 3, 4 = 05
<input type="checkbox"/>	<input type="checkbox"/>	C. Walk in room - how resident walks between locations in his/her room 1, 2, 3, 4 = 05
<input type="checkbox"/>	<input type="checkbox"/>	D. Walk in corridor - how resident walks in corridor on unit 1, 2, 3, 4 = 05
<input type="checkbox"/>	<input type="checkbox"/>	E. Locomotion on unit - how resident moves between locations in his/her room and adjacent corridor on same floor. If in wheelchair, self-sufficiency once in chair 1, 2, 3, 4 = 05
<input type="checkbox"/>	<input type="checkbox"/>	F. Locomotion off unit - how resident moves to and returns from off-unit locations (e.g., areas set aside for dining, activities or treatments). If facility has only one floor, how resident moves to and from distant areas on the floor. If in wheelchair, self-sufficiency once in chair 1, 2, 3, 4 = 05
<input type="checkbox"/>	<input type="checkbox"/>	G. Dressing - how resident puts on, fastens and takes off all items of clothing, including donning/removing a prosthesis or TED hose. Dressing includes putting on and changing pajamas and housedresses 1, 2, 3, 4 = 05
<input type="checkbox"/>	<input type="checkbox"/>	H. Eating - how resident eats and drinks, regardless of skill. Do not include eating/drinking during medication pass. Includes intake of nourishment by other means (e.g., tube feeding, total parenteral nutrition, IV fluids administered for nutrition or hydration) 1, 2, 3, 4 = 05
<input type="checkbox"/>	<input type="checkbox"/>	I. Toilet use - how resident uses the toilet room, commode, bedpan, or urinal; transfers on/off toilet; cleanses self after elimination; changes pad; manages ostomy or catheter; and adjusts clothes. Do not include emptying of bedpan, urinal, bedside commode, catheter bag or ostomy bag 1, 2, 3, 4 = 05 2, 3, 4 = 6
<input type="checkbox"/>	<input type="checkbox"/>	J. Personal hygiene - how resident maintains personal hygiene, including combing hair, brushing teeth, shaving, applying makeup, washing/drying face and hands (excludes baths and showers) 1, 2, 3, 4 = 05

B
T

E
T

BETT on It!





Key Assessments



- **Scheduled Assessments**
 - 5, 14, 30, 60, 90
- **Off Cycle Assessments**
 - Significant Change in Status Assessment (SCSA)
 - Short Stay Assessment (SSA)
 - Other Medicare Required Assessments (OMRA)
 - Start of Therapy (SOT)
 - End of Therapy (EOT) and End of Therapy Resumption (EOT-R)
 - Change of Therapy (COT)
 - Discharge Assessment

New MDS Assessment Schedule



Medicare MDS Assessment Type	Reason for Assessment (A0310B code)	Assessment Reference Day (ARD) Window	Assessment Reference Date Grace Days	Applicable Medicare Payment Days
5 Day	01	Days 1 - 5	6 - 8	Days 1 - 14
14 Day	02	Days 13 - 14	15 - 18	Days 15 - 30
30 Day	03	Days 27 - 29	30 - 33	Days 31 - 60
60 Day	04	Days 57 - 59	60 - 63	Days 61 - 90
90 Day	05	Days 87 - 89	90 - 93	Days 91 - 100



Short Stay Designation (SSA)



- Purpose: The special RUG IV short stay therapy classification is designed to allow for some if not all of the days of a short stay to be paid at a Rehab RUG
- This special category is for shorter stay resident who received therapy but did not achieve a Rehab RUG from the 5 day PPS MDS because the resident did not receive 5 days of therapy during their short stay (therapy start date through end of therapy is not 5 days)
- For residents discharged on or before day 8 who received less than 5 days of therapy, payment will be based on average daily minutes actually provided

Short Stay Designation



- Used if therapy was only able to be provided 1-4 days and a therapy RUG was not achievable
- If the 5 day PPS MDS achieves a rehab RUG no special short stay classification is requires. All days are paid at the rehab RUG even if therapy did not start the first day.



Short Stay Requirements (must meet all 8)

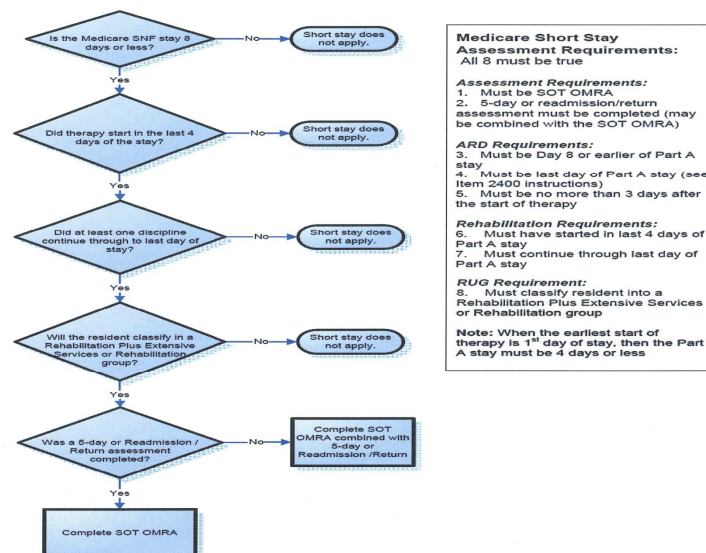


1. SOT OMRA
2. PPS 5 day or readmission/return assessment combined with SOT OMRA or prior to SOT OMRA
3. ARD SOT OMRA must be day 8 or earlier
4. ARD must be last day of Medicare stay
5. ARD may not be more than 3 days after start of therapy
6. PT/OT/SLP started during last 4 days
7. At least one therapy continued through last day of part A stay
8. RUG must be Rehab +ES or Rehab group

Short Stay Assessment Algorithm



Medicare Short Stay Assessment Algorithm





Start of Therapy (SOT) OMRA



- SOT OMRA
 - Used to obtain therapy RUG any time during a stay
 - Rejected if non-therapy RUG
 - ARD 5-7 days after start of first therapy
 - Day 1 = day therapy started
 - Payment starts first day of therapy
 - Be attentive when combining
- Anytime therapy starts off cycle (or even “late” - a few days after admission) this should be considered and reviewed to capture care provided

End of Therapy (EOT) OMRA



- “Three Day” Policy
 - EOT OMRA must be completed when a Medicare A patient classified in a Rehab RUG did not receive any therapy sessions for three or more consecutive days for any reason (temporary, unplanned and planned discontinuations)
 - An EOT OMRA needs to be completed for missed therapy days regardless of whether therapy is missed on a weekday, weekend or holiday
 - Eliminates the distinction between a 5 or 7 day facility
 - Non-rehab RUG is paid during lull in treatment



EOT OMRA Completion



- ARD for the EOT OMRA must be set for day 1, 2, 3 from the date of the resident's last therapy session
 - Financial changes effective on the first day without therapy
- Needs to be completed if:
 - Planned EOT
 - Patient is discharged from the *skilled therapy program* (therapy RUG) and continuing under a *skilled nursing program* (skilled nursing RUG)
 - Unplanned EOT
 - Patient did not receive skilled therapy services for three consecutive days for any reason

End of Therapy with Resumption (EOT-R)



- May be used when the patient will resume at the *same therapy level* as prior to the discontinuation of therapy (no new therapy evaluation needed).
- Resumption of therapy must occur no more than five days after the last day of therapy provided.
- Also applies to a RL category
 - Must see a patient Monday/Wednesday/Friday
- EOT-R criteria:
 - Therapy expected to resume at the same RUG level
 - Therapy must resume within five days
 - EOT ARD must be day 1 – 3



EOT-R MDS



- Complete an EOT MDS with ARD of days 1, 2, or 3 after the last day therapy was provided
- Adding items O0450A/B to MDS requesting you enter “date on which therapy regimen resumed”
 - The resumption of therapy date may not be within the ARD period of the EOT (i.e. EOT ARD is day 2 after last day of therapy and the resumption date is day 4)
- No new therapy evaluation needed
- Recommend not submitting an EOT until you verify that the patient would not qualify for the EOT-R

EOT and EOT-R Billing



- Clear communication by MDS coordinator with the therapy department and billing office
 - Therapy RUG billed until the last day of therapy
 - Medical RUG billed starting first day after therapy ended
 - Prior therapy RUG starts on day of resumption



EOT and EOT-R Example



5+ days without therapy



- If *more than* five consecutive days without a therapy service elapse and therapy starts again (patient skilled by nursing in the meantime):
 - ▣ Optional SOT OMRA
 - ▣ New therapy evaluation



Change of Therapy (COT) OMRA



- Required when the level (RUG) of therapy *changes*, using rolling 7 day average after the last ARD
- If the therapy received during the COT observation period does not reflect the RUG IV classification level on the patient's most recent PPS assessment used for payment then an assessment must be done
 - COT Observation period – A successive 7 day window beginning the day following the ARD of the resident's last PPS assessment used for payment
- Patients will NEVER be OUT of an assessment on a Medicare A stay

COT OMRA - Dates



- The COT OMRA retroactively establishes a new RUG beginning the day following the ARD of the resident's last PPS assessment until the next scheduled or unscheduled Medicare PPS assessment
- Daily monitoring of days/minutes a MUST
- May be combined with on-cycle assessments
- COT = Same MDS item set as EOT
- Default rate applied for late COT OMRA
 - DENIAL OF ALL ASSESSMENT DATES IF MISSED



The “Need” for Therapy Minutes



CMS Resources



- **FY 2012 RUG-IV Education & Training**
- **Government website**
- **August 23, 2011 National provider call transcript and slides**
- http://www.cms.gov/SNFPPS/03_RUGIVEDu12.asp



Upcoming National Provider Call



- **National Provider Call: Skilled Nursing Facility Prospective Payment System Minimum Data Set 3.0 and Resource Utilization Group-Version 4 Policies and Clarifications – Registration Now Open** [1]
- *Thu Nov 3; 1:30-3pm ET*
- CMS will host a National Provider Call on “Skilled Nursing Facility (SNF) Prospective Payment System (PPS) Minimum Data Set (MDS) 3.0 and Resource Utilization Group-Version 4 (RUG-IV) Policies and Clarifications.” CMS subject matter experts will provide a brief overview of the policies, along with clarifications on the SNF PPS FY2012 policies related to the MDS 3.0. A question and answer session will follow the presentations.
- *Target Audience: SNF providers, facility Resident Assessment Instrument (RAI) coordinators, state RAI coordinators, rehabilitation therapists, Recovery Audit Contractors, and Medicare Administrative Contractors*
- *Agenda:*
 - Allocation of group therapy
 - Changes to the MDS Assessment Schedule
 - End of Therapy (EOT) Other Medicare Required Assessment (OMRA) Clarifications
 - End Of Therapy with Resumption (EOT-R)
 - Change of Therapy (COT) OMRA
- *Registration Information: In order to receive the call-in information, you must register for the call. Registration will close at 12pm on Thu Nov 3 or when available space has been filled. No exceptions will be made. Please register early. For more details, including instructions on registering for the call, please visit <http://www.eventsvc.com/blhtechnologies>.*

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