



Therapy Reassessment

Effective April 2011, qualified therapists must document therapy reassessments for their Medicare home health patients at key intervals during the patient's course of treatment. This means these assessments must be completed by a physical therapist, an occupational therapist, or a speech-language pathologist during a regularly scheduled visit. Therapy assistants are **not permitted** to complete the reassessments. Since speech-language assistants are not allowed to provide services, all home health speech-language pathology visits will be provided by the speech-language pathologist. These assessments will help ensure the effectiveness of the patient's treatment. While some agencies do not utilize therapy assistants, many do.

It is expected that therapists and therapy assistants assess the patient somewhat during each visit. A thorough reassessment is required **at least every 30 days** for each discipline treating the patient. The Centers for Medicare & Medicaid Services (CMS) Internet-Only Manual (IOM) Publication 100-02, **Medicare Benefit Policy Manual**, Chapter 7, Section 40.2.1 states: *The 30-day clock begins with the first therapy service (of that discipline) and the clock resets with each therapist's visit/assessment/measurement/documentation (of that discipline).*

CMS provides this guidance regarding counting the days in the Therapy Questions and Answers- Revised February 28, 2013, Answer 7: For example, if a therapist conducted and documented an assessment of a patient during a visit on April 1, the count would begin on April 2. In this case, to meet the requirement of making at least one visit every 30 days, the therapist rather than an assistant would need to return by May 1. The therapist then conducted and documented an assessment of the patient during a visit on May 1, the clock resets and the next 30-day count would begin May 2.

Additionally, a reassessment must be completed at visit 13 and again at visit 19. Additional flexibility exists for patients receiving multiple disciplines of therapy as well as for patients living in rural areas or when there are exceptional circumstances. There has been much discussion about this requirement. This article shows a few examples of when the reassessment is needed. These are only examples.

Example 1 - One Therapy Discipline

A patient is receiving only physical therapy (PT) 3 times a week for 3 weeks and then 2 times a week for 5 weeks. Some visits are provided by a physical therapy assistant (PTA). The schedule may look like this:

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TMP-EDO-0066 V 2.0 Release date: 04/16/2013

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May

Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit
1		2	PT	3		4		5	PTA	6	PT	7	
8		9	PTA	10		11		12	PT	13	PTA	14	
15		16	PTA	17		18		19	PT	20	PTA	21	
22		23	PT	24		25		26	PTA	27		28	
29		30	PTA	31									

June

Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit
						1		2	PT	3		4	
5		6	PTA	7		8		9	PTA	10		11	
12		13	PT	14		15		16	PTA	17		18	
19		20	PTA	21		22		23	PT	24		25	
26		27		28		29		30					

By day 30, **June 1**, 12 PT visits have been provided. A therapy reassessment must be completed by a physical therapist by that day. Since no visit is scheduled for that day, it must have been completed prior to **June 1**. The agency could choose to have the physical therapist provide services and a reassessment earlier than visit 12 but it must occur **at least every 30 days**. This provider decided to have the therapy reassessment performed on May 23. Visit 13 will occur on the second of June. A therapy reassessment **must** be completed on visit 13.

Another reassessment must be completed on visit 19 which occurs on the 23rd of June.

Example 2- Two Therapy Disciplines

A second patient is receiving PT 3 times a week. Occupational therapy (OT) twice a week was added 3 weeks into the episode. Some visits were provided by PTA and occupational therapy assistants (OTA). This is a possible **example** of the first month:



May

Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit
1		2	PT	3		4	PTA	5		6	PTA	7	
8		9	PTA	10		11	PTA	12		13	PTA	14	
15		16	PT	17		18	PTA OT	19		20	PTA OTA	21	
22		23	PT	24		25	PTA OT	26		27	PTA OT	28	
29		30	PTA	31									

Reassessment is needed by the 25th of May by both the occupational therapist and the physical therapist as visits 13 and 14 occur that day. One of the reassessments must be completed prior to this date. In this example, the PT reassessment was done on visit 12 on the 23rd of May. The occupational therapist performed the OT reassessment on May 25 at visit 13. Treatment is continued by both disciplines into June. This **example** calendar is below.

June

Date	Visit	Date	Visit	Date	Visit	Date	Visits	Date	Visit	Date	Visits	Date	Visits
						1	PT OT	2		3	PTA OTA	4	
5		6	PTA	7		8	PTA OT	9		10	PT OTA	11	
12		13	PT	14		15	PTA OT	16		17	PTA OTA	18	
19		20	PTA	21		22	PTA OTA	23		24	PT OT	25	
26		27	PTA	28		29	PTA OTA	30					

A reassessment for both PT and OT must be done by the 19th visit which occurs on June 1. This provider chose to have both the PT and the OT reassessment performed on that date. If treatment continues into the next episode, a therapy reassessment must be completed by the first of July, 30 days following the reassessment for visit 19. Additionally, a reassessment will be needed by visit 13 and 19 of that episode as well as at least every 30 days.



Example 3-Three Therapy Disciplines

A third patient requires PT and OT twice a week. Speech-Language Pathology (SLP) is needed twice a week for two weeks and then once a week for two weeks. Visit 13 occurs on the 16th of October. The physical therapist, occupational therapist and the speech-language pathologist must all have completed their reassessment during a scheduled visit by this date. In this example, the SLP completed a reassessment on the 11th. The occupational therapist completed a reassessment on the 13th. The physical therapist completed a reassessment on the 16th. This is only an example.

October

Date	Visit	Date	Visits	Date	Visit	Date	Visits	Date	Visit	Date	Visit	Date	Visit
1		2	PT SLP	3	OT	4	PTA SLP	5		6	OTA		
8		9	PTA SLP	10	OTA	11	PT SLP	12		13	OT		
15		16	PT	17	OTA	18	PT SLP	19		20	OTA		
22		23	PT	24	OT	25	PT SLP	26		27	OTA		
29		30	PTA	31	OTA								

Visit 19 occurs on the 24th of October. Again the physical therapist, occupational therapist and the speech-language pathologist must have completed another reassessment by that date. In this example, the SLP reassessment was completed on October 18, the PT reassessment was on October 23, and the OT reassessment was completed on October 24.

For any disciplines continuing treatment into November, a reassessment must be completed within 30 days of the reassessment performed by visit 19. In this example, SLP will be ending services so no reassessment will be required. The PT reassessment must be completed by November 22.

The OT reassessment must be completed by November 23.



Example 4- Hospitalization during Treatment

A patient is scheduled to have PT 2 times a week. As day 30 approaches, the patient unexpectedly becomes ill and therapy is held due to the illness. The physician is notified and an order is obtained to hold therapy. The patient is then hospitalized for several days. The 30 day reassessment would have been due to be completed by May 3 in this example. The patient was hospitalized at that time. This is only an example.

April

Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit
1		2		3	PT	4		5	PT	6		7	
8		9	PTA	10		11		12	PT	13		14	
15		16	PT	17		18		19	PT	20		21	
22		23	PTA	24		25		26	PT held	27		28	
29	Hospit- alized	30	Hospit- alized										

Following discharge, the physician orders PT to resume as previously ordered. The patient resumes home care therapy services on May 7. The PT must complete their reassessment on their first visit following the resumption. Therapy continues and a reassessment is required at visit 13, which occurs on May 23.

May

Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit
				1	Hosp ital	2	Hosp ital	3	Dis- char ged	4		5	
6		7	PT	8		9	PTA	10		11		12	
13		14	PTA	15		16	PTA	17		18		19	
20		21	PT	22		23	PT	24		25		26	
27		28	PTA	29		30	PT	31					

In another agency, the PT may have chosen to do a reassessment early at visit 6 rather than waiting for day 30 of treatment. In this situation, the requirement would already have been met prior to the patient's illness.



Therapy Hold

Questions have been asked about when the physician may order a therapy hold other than due to illness as is explained in example 4. In some instances, a patient may need to have therapy for a period of time, perhaps prior to a surgery. Therapy will be held while the patient recovers from the surgery. Then when adequate healing has occurred, therapy may be resumed. In this instance, the agency would most likely be aware that therapy will be held. In this instance, a reassessment should be performed prior to the therapy hold so the reassessment will be timely.

Example 5-Therapy Hold

A patient is ordered to have PT twice a week for 3 weeks. The patient will then have surgery and therapy will be held until the patient has recovered sufficiently. The 30 day reassessment would normally be required by October 3. However, the PT will be on hold at that time. Because the agency was aware that the reassessment will be required during the period of the hold, the therapist should complete the reassessment prior to the hold. In this instance, the reassessment was performed on September 19, the last PT visit prior to the therapy hold. This is only an example.

September

Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit
		1		2		3	PT	4		5	PT	6	
7		8		9	PTA	10		11		12	PT	13	
14		15		16	PTA	17		18		19	PT	20	
21		22		23	HOLD	24		25		26	HOLD	27	
28		29		30	HOLD								

October

Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit	Date	Visit
						1		2		3	HOLD	4	
5		6		7	HOLD	8		9		10	HOLD	11	
12		13		14	HOLD	15		16		17	HOLD	18	
19		20		21	PT	22		23		24	PT	25	
26		27		28	PTA	29		30		31	PT		

On October 21, the patient resumes PT. It would be reasonable for the PT to do a reassessment on that date to update the care plan if needed. In this example, 10 PT visits have occurred. If treatment continues into a second episode, a reassessment will be required **by 30 days from**

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TMP-EDO-0066 V 2.0 Release date: 04/16/2013

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the **October 21 reassessment, that is November 20**. Additionally, a reassessment will be required at visit 13 and visit 19 of the episode.

Resources

The manual instructions regarding the therapy reassessment are found in the [CMS Internet-Only Manual, Publication 100-02, Medicare Benefit Policy Manual, Chapter 7, Section 40.2.1](#).

The [Therapy Questions and Answers](#) can be found on the CMS Web site.

Published: February 9, 2012
Revised: July 18, 2013

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