

## Therapy Systems Assessment: Agenda of Events

TSA Full Team	TSA Partial Team	Rehab Operations
Interview the Program Director and/or Rehab Clinical Leader (30 minutes)	Attend daily PPS meeting: observe interaction of MDS coordinator and Program Director or Rehab Clinical Leader (15 minutes)	Review provided information for regulatory adherence (1-2 hours) <ul style="list-style-type: none"> <li>• Therapist licensures</li> <li>• Compliance training</li> </ul>
Interview selected therapy staff members (1-2 hours)	Attend weekly Interdisciplinary Team/Medicare Meeting (1-2 hours)	Ensure ample staffing levels are in place <ul style="list-style-type: none"> <li>• Productivity</li> <li>• Census</li> <li>• Weekend Coverage Percentages</li> </ul>
Day 1: Observe therapists providing treatment (2-4 hours) <ul style="list-style-type: none"> <li>• Are services dynamic and skilled?</li> <li>• Is documentation occurring at POS?</li> <li>• Is the gym a wheelchair free zone unless medically contraindicated</li> </ul>	<ul style="list-style-type: none"> <li>• Observe interaction and efficiency, coach as needed</li> <li>• Completed IDT notes to be accessible to reviewers prior to exit</li> </ul>	Systems Review: <ul style="list-style-type: none"> <li>• How is scheduling completed?</li> <li>• How is Section O completed?</li> </ul>
Day 2: Documentation reviews from treatment observations (1-2 hours) <ul style="list-style-type: none"> <li>• Does the documentation accurately reflect the treatment delivered with primary focus on what the clinician is doing that made the service skilled?</li> <li>• If modalities incorporated into care, is the documentation reflective of what portion of the service required the skills of a clinician?</li> <li>• Is treatment on date of evaluation clearly documented as separate and distinct from the evaluation?</li> <li>• If equipment like an elliptical, recumbent bike or UBE are utilized, does the documentation identify what portion of the service was skilled and how?</li> </ul>	Review support for Speech Language Pathology services (1 hour) <ul style="list-style-type: none"> <li>• Are coverage guidelines met?</li> <li>• Does nursing or other IDT documentation lend support for initiation/ongoing SLP services?</li> </ul>	Observe that policies and procedures are being followed for infection control, privacy, documentation and billing practices during treatment sessions
	Sample MDS reviews <ul style="list-style-type: none"> <li>• Verify diagnosis</li> <li>• Therapy days/minutes</li> <li>• Validate accuracy of therapy-related sections of the MDS: Sections I, G, GG, K</li> <li>• Were there any issues with the latest Triple Check?</li> </ul>	Monthly Service Logs <ul style="list-style-type: none"> <li>• Are there fluctuations noted in minutes from day to day to meet patient needs?</li> <li>• If consistent time delivered, do service codes/times vary?</li> <li>• If daily minutes vary significantly, does daily note accurately reflect minutes billed and rationale for the variation</li> </ul>
	Interdisciplinary process review/interviews (2-4 hours) <ul style="list-style-type: none"> <li>• Are there any IDT barriers to communication or delivery of services?</li> <li>• ARD selection/validation</li> <li>• Process for obtaining referrals for skilled therapy when resident condition changes</li> </ul>	Physical Plan Review <ul style="list-style-type: none"> <li>• Cleanliness</li> <li>• Infection Control</li> <li>• Calibration</li> <li>• Broken/Unused equipment</li> <li>• Space allocation/storage</li> </ul>