

## Compliance Today – April 2020

### The best of times, the worst of times: Compliance opportunities

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By Nancy J. Beckley, MS, MBA, CHC

Nancy J. Beckley ([nancy@nancybeckley.com](mailto:nancy@nancybeckley.com)) is President of Nancy Beckley & Associates LLC, a rehab compliance consulting firm in Milwaukee, WI.

- [linkedin.com/in/nancybeckley/](https://www.linkedin.com/in/nancybeckley/)
- [twitter.com/nancybeckley](https://twitter.com/nancybeckley)

“It was the best of times, it was the worst of times, it was the age of wisdom, it was the age of foolishness, it was the epoch of belief, it was the epoch of incredulity, it was the season of Light, it was the season of Darkness, it was the spring of hope, it was the winter of despair....”<sup>[1]</sup>

The industry is settling into the changes in payments made under the Skilled Nursing Facility Prospective Payment System following the October 1, 2019, implementation date of the new system of the Patient Driven Payment Model (PDPM) that toppled therapy as the top intervention (read: “moneymaking”) in determining payment.<sup>[2]</sup> Not far behind, on January 1, 2020, the new Patient Driven Groupings Model (PDGM) payment system for home health was implemented, also with a change in therapy incentives.<sup>[3]</sup>

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