

# Report on Medicare Compliance Volume 32, Number 16. April 24, 2023

## Documentation Audit Tool for Pulmonary Rehabilitation Program Requirements

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By Nina Youngstrom

This tool was developed by Georgia Rackley, a senior clinical specialist at SunStone Consulting. Cardiac and pulmonary rehab are on the approved list of audit targets of recovery audit contractors. Contact her at [georgiarackley@sunstoneconsulting.com](mailto:georgiarackley@sunstoneconsulting.com).

### Pulmonary Rehabilitation Program Requirements

Requirement	Detail	Yes	No
Physician referral to admit to pulmonary rehabilitation program			
Patient has moderate to very severe COPD; GOLD Classification II, III or IV; OR patient has confirmed or suspected COVID-19 and experience persistent symptoms that include respiratory dysfunction for at least four weeks	<ul style="list-style-type: none"><li>• Physician documented validation of GOLD Classification; results of PFT should support this.</li><li>• Physician validation of diagnosis and respiratory dysfunction for at least four weeks.</li></ul>		
Supervising physician is immediately available and accessible for medical consultations and emergencies at all times or direct supervision if office based	<ul style="list-style-type: none"><li>• Documentation to support physician availability (hospital based) or direct supervision (office based), e.g. physician daily log.</li><li>• Direct supervision must be furnished by a doctor of medicine or osteopathy; non-physician practitioner cannot provide supervision.</li></ul>		

Individualized treatment plan	<ul style="list-style-type: none"> <li>• Physician signed prior to or on start date of treatment sessions; then physician reviewed and signed every 30 days.</li> <li>• The plan must indicate the type, amount, frequency and duration of PR items and services.</li> <li>• Must include measurable and expected outcomes and estimated timetables to achieve these outcomes.</li> </ul>		
Physician prescribed exercise program	<ul style="list-style-type: none"> <li>• Aerobic exercise must be included in each PR session.</li> <li>• Target intensity (e.g., a specified percentage of the maximum predicted heart rate or number of METs).</li> <li>• Duration of each session (e.g., "20 minutes").</li> <li>• Frequency (number of sessions per week).</li> </ul>		
Patient education and training	<ul style="list-style-type: none"> <li>• Documentation of education and training that assists patient in achievement of individual goals toward independence in activities of daily living, adaptations to limitations and improved quality of life.</li> <li>• Must include information on respiratory problem management and, if appropriate, brief smoking cessation counseling.</li> </ul>		
Psychosocial assessment	<ul style="list-style-type: none"> <li>• Written evaluation of patient's mental and emotional functioning relating to the patient's rehabilitation or respiratory condition.</li> <li>• Includes family and home situation that may affect the individual's rehabilitation treatment.</li> <li>• Psychosocial evaluation of the individual's response to and rate of progress under the treatment plan.</li> </ul>		
Outcomes assessment of patient's progress	<ul style="list-style-type: none"> <li>• Beginning and ending evaluations based on patient-centered outcomes conducted by the physician or staff at start and end of program.</li> <li>• Should include objective clinical measures.</li> </ul>		

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