

# **NJ/EPA TRA- May/June 2009 - Email Blast**

## **NJ/EPA TRA Update:**

### **President's Message:**

Hello members,

The weather is getting warmer out and summer is almost here. We have had a few changes to our board of directors. Deanna Guarnaccio recently began a new position in the western part of Pennsylvania, and has resigned her position as Pennsylvania member-at-large. We wish Deanna the best of luck at her new job. The board is delighted to welcome Amelia Heese, who has been appointed to the vacant PA member-at-large position.

Unfortunately, we received very low registration numbers for our spring ropes course workshop this year. We were forced to cancel the workshop due to the expense of reserving the course for the day and not having our minimum number of registrants to proceed. Please take a moment to fill out the short survey about our Spring Workshop by clicking on the link below. We would like feedback from everyone, especially if you did not sign up for the workshop.

[http://www.surveymonkey.com/s.aspx?sm=bOG8Dy\\_2bRszWLMkZKnUr\\_2frg\\_3d\\_3d](http://www.surveymonkey.com/s.aspx?sm=bOG8Dy_2bRszWLMkZKnUr_2frg_3d_3d)

Don't forget that our Fall Conference is now approaching! Please watch your e-mails for the call for papers that will be sent out soon. If anyone is interested in helping out with the conference by participating in the education committee please contact Sarah at [stelthorster@yahoo.com](mailto:stelthorster@yahoo.com).

Finally, ATRA has just sent out another Action Alert. This one is different from last month's so please take a moment to act accordingly and advocate for our profession. This time, letters should be sent directly to the Centers for Medicare and Medicaid Services. There are some proposed changes to the Inpatient Rehabilitation Facility manuals which may limit the amount of coverage for recreation therapy. Please take some time to review and respond to this information.

Erin Moore, CTRS

NJ/EPA TRA President

### **Spring Workshop Information:**

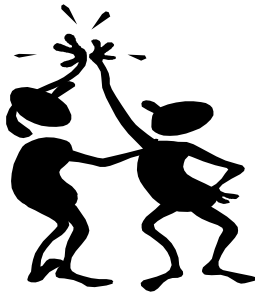
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## Fall Conference Call for Papers

### NJ/EPA TRA Fall Conference

# “RECOgnize Each Other”



at NJ Hospital Association Conference Center

**November 9, 2009 and November 10, 2009**

#### **PROPOSAL MUST INCLUDE:**

1. Title of session (please limit to 10 words)
2. Speaker's name, address, daytime telephone number, fax and email
3. Brief description of the program (limited to 30 words)
4. Learning outcomes: outcomes must be measurable and indicate what the audience will learn by participating in the session (limit 3)
5. Outline of session
6. Mode of presentation: Lecture, discussion, panel, interactive activities
7. Resource list: books, articles, web sites
8. NCTRC Job Analysis code
  - a. Background information
  - b. Diagnostic information
  - c. Assessment
  - d. Planning the program
  - e. Implementing the program/treatment
  - f. Documentation/evaluation
  - g. Organizing and managing services
  - h. Advancement of the profession
9. Relevant audience (please be specific): entry level therapist, advanced therapist, student, educator, entry level supervisor, advanced supervisor, etc.
10. Identify AV equipment needed. We can provide: slide projector, TV/VCR, overhead projector, power point projection (speaker must provide own computer), and white dry mark board or flipchart.

**IN ADDITION:** Please include: ☼ Professional resume/vitae ☼ 100 word introductory bio

**SEND PROPOSALS** (Microsoft Word format appreciated) **by Monday September 7, 2009**

**TO:** Dr. Susanne Lesnik-Emas, CTRS at [slesnik@temple.edu](mailto:slesnik@temple.edu)

## Send in your additions/suggestions

If you have any questions, suggestions, articles or information for future Email Blasts please contact Lucy Orr Tomczynski at [lucyctrs@msn.com](mailto:lucyctrs@msn.com).

## Post with NJ/EPA TRA

Job postings and educational opportunities can be sent to Lucy Orr Tomczynski at [lucyctrs@msn.com](mailto:lucyctrs@msn.com). These postings are sent out via email to all members of NJ/EPA TRA with in a few days of being received. This is a free service we offer to our members.

## **ATRA Update:**

# ATRA Action Alert Please read and act now!

**Don't delay. Please  
act now!**

## **ATRA ACTION ALERT Inpatient Medical Rehabilitation**

On April 29th, 2009, the Centers for Medicare and Medicaid Services (CMS) issued its 2010 proposed rule for the inpatient rehabilitation facility (IRF) prospective payment system (PPS). CMS has also proposed to revise the Medicare Benefits Policy Manual (MBPM) provisions on coverage of IRF services and has established a separate comment period and process for these changes.

Taken together, the proposals represent one of the most comprehensive sets of rule changes governing access to inpatient rehabilitation services in years and will set the stage for IRF care for the foreseeable future.

Proposed CMS Change:

In reference to the "3-hour Rule," the removal of the phrase "other skilled rehabilitative modalities" and insertion of "... active and ongoing therapeutic intervention of at least two therapy disciplines (physical therapy, occupational therapy, speech-language pathology, or prosthetics/orthotics therapy)..." in both the IRF-PPS final rule for 2010 and the Medicare Benefits Policy Manual.

### **Proposed ATRA Member Actions:**

Given the impact such a change will have for years to come, ATRA needs all RT professionals to:

- 1) Submit two comment letters to CMS (Note: Because CMS will make changes to two different rules and regulations, comments need to be submitted to two different sources); and
- 2) Solicit similar comments to CMS from your colleagues in your IRF setting including Physicians, Physical Therapists, Occupational Therapists, Nurses and other providers. You can share the draft letter with them.

### **Drafting a Comment Letter:**

- 1) Please review the draft letter below. Add your personal information in the beginning paragraph.
- 2) Your comments addressing the proposed rule change must be submitted to CMS as soon as possible. While the deadline may be June 29th, we need to demonstrate an influx of responses well before that date so PLEASE DO NOT DELAY in drafting and sending your comment letter. The final deadline is no later than June 29th, 2009 at [www.regulations.gov](http://www.regulations.gov) under file "CMS-1538-P".
- 3) Your comments addressing the proposed MBPM changes are due no later than June 30th, 2009 at [mbpmcomments@cms.hhs.gov](mailto:mbpmcomments@cms.hhs.gov). Please send as soon as possible.
- 4) If you can fax or email ATRA a copy we would appreciate tracking the responses (email [national@atra-tr.org](mailto:national@atra-tr.org) or fax 601-582-3354).

### **DRAFT LETTER**

**[Please use your personal or agency stationary for your response. Also, please ask your administrators to submit a letter on our behalf using facility letterhead. Delete this instruction in your final letter]**

Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Attention: CMS-1538-P  
P.O. Box 8012

Baltimore, MD 21244-8012

Re: Proposed Rule for Medicare Program; Inpatient Rehabilitation Facility Prospective Payment System for Federal Fiscal Year 2010 (42 CFR, parts 412, May 6, 2009)

To Whom It May Concern:

I am a recreational therapist practicing in XX city and XX state.

I would like to take this opportunity to respond to the Proposed Rule for the Inpatient Rehabilitation Facility (IRF) Prospective Payment System for Fiscal Year 2010. My principal concern relates to the proposed changes to the so-called "Three Hour Rule" that is used as a guideline for determining a patient's need for a relatively intense level of therapy services.

Under the current Three Hour Rule, the physician and rehabilitation team are given flexibility to determine, on a priority basis, which skilled modalities are appropriate for each patient in the IRF setting. A number of specific therapies are explicitly identified as "skilled modalities," including but not limited to physical therapy (PT), occupational therapy (OT), speech language pathology (ST), and orthotics and prosthetics (O&P). Until recently, over half the fiscal intermediaries permitted recreational therapy services to be counted as a skilled modality for purposes of qualifying under the Three

Hour Rule.

The proposed changes restrict the current language of the Three Hour Rule by limiting the therapies that may be counted toward the total amount of therapy time to PT, OT, ST and O&P only, leaving no discretion for clinicians to determine the appropriate mix of therapy services for each patient. The modification, as proposed, excludes recreational therapy, despite the fact that recreational therapy provided in an IRF must be medically necessary and ordered by a physician as part of the patient's treatment plan.

Elimination of recreational therapy as counting toward the Three Hour Rule will have a negative impact on access to this important therapy and is not reflective of current practices in inpatient rehabilitation. Furthermore, such an exclusion is not consistent with CMS policy on medical necessity and deference to the judgment of the treating physician. Recreational therapy, when provided by a qualified recreational therapy professional (nationally certified and/or state licensed), has proven to have a statistically positive effect on Functional Independence Measure (FIM) score gains for both stroke and spinal cord injury patients (See Williams, R., et al, 2007 and Hawkins, B., 2009) and is commonly utilized with a variety of other patient populations.

I am therefore requesting that CMS explicitly include recreational therapy in the list of therapy services that may be counted under the Three Hour Rule when ordered by a physician as part of a patient's plan of care and provided by a qualified recreational therapy professional (nationally certified and/or state licensed). This should be reflected in both the regulations and the Medicare Benefits Policy Manual. Furthermore, I would like to offer my support to the position and request made by Congresswoman Tauscher and Congressman Thompson in their letter to Ms. Charlene M. Frizzera, Acting Administrator for CMS dated May 4, 2009.

Thank you for your consideration of my views.

Sincerely,

Your name  
Title  
Mailing Address  
City, State, Zip  
Telephone number

cc: ATRA National Office

### **Peg Connolly Scholarship – Application Deadline has been extended to June 10, 2009**

The application deadline for the Peg Connolly Scholarship has been extended to June 10, 2009. The Peg Connolly Scholarship is given to 8 students across the country who show strong interest in developing themselves both personally and professionally as Therapeutic Recreation Specialists. This is a working scholarship giving you the opportunity to attend ATRA's Annual conference (held this October in Minneapolis) and to be a part of the process. Conference registration and hotel are included as recipient of the scholarship. Please visit [www.atra-tr.org](http://www.atra-tr.org) for details. It is a great opportunity to network and learn more about your profession!

## Save the Dates:

*Therapeutic Recreation Week* – July 12-18, 2009

*The ATRA Annual Conference* will be held at the Hyatt Regency in Minneapolis, MN on October 3-6, 2009. (***Please note date Correction***) Visit [www.atra-online.com](http://www.atra-online.com) for more information.

*The NJ/EPA TRA Annual Conference* will be held at the NJ Hospital Association in Princeton, NJ on November 9-10, 2009. PLEASE NOTE THE CHANGE IN DATE. This is later than it was held in past years.

## Helpful Websites

**Provides resources for dealing with grief and loss**

<http://www.centering.org/>

**Pennsylvania assistive technology lending library**

<http://disabilities.temple.edu/programs/assistive/atlend/>

**Wheelchair sports promotion**

<http://www.newdisability.com/videos.htm>

**Directory of programs for people with disabilities**

<http://www.ncpad.org/programs/>

Please send any suggestions for additional websites to be included in the upcoming newsletters to [moore.erin.k@gmail.com](mailto:moore.erin.k@gmail.com)

## Helping Each Other

An inpatient physical rehabilitation unit in NJ is looking to enhance its community re-integration follow-up. If anyone knows a way to connect with CTRS' in the NJ community that offer programs post accidents or CVA's please contact Diane Bromirski at 973-971-4435.