

Crosswalk for Changes to Rehabilitation Hospital Worksheet and Rehabilitation Unit  
Worksheet for the 60 day Federal Register Notice

Form CMS 437A and Form CMS 437B

*All changes correlate to CMS-437A and -437B, unless indicated otherwise.*

<b>TYPE OF CHANGE</b>	<b>RATIONAL FOR CHANGE</b>
1. New information added to first row under guidance column.	Clarified responsible parties for verification of hospital attestations.
2. Added new column titled “The Hospital Representative Who Completes this Entire Form” to both the CMS 437A and CMS 437B.	These forms are utilized by both the State Agencies and the Hospital Representative. A column was added to offer guidance to the hospital representative to accurately complete the form.
3. Moved the “YES” and “NO” columns to the right hand side of the form.	Both the SA and the Hospital Representative are expected to verify that the rehabilitation hospital or the rehabilitation unit meet the payment requirements of § 412 listed on the forms. The forms is more user friendly with the “YES”/”NO” columns at the end of the forms.
4. Deleted language at 412.23	Language deleted as updated regulations were placed under §412.29.
5. Deleted Tag M75 thru M86	Language was moved to § 412.29
6. Renumbered all tags on the CMS 437A	These new tag numbers, A3500-A3525, will correspond with the A Tags for hospital surveys. The new Tags don’t correspond with the old ones due to updated regulation language.
7. Tags A3500-3525 -Updated guidance to surveyors.	Updated guidance for surveyors throughout the document to increase understanding of the revised regulations and improve the survey process.
8. Renumbered all tags on the CMS 437B	These new tag numbers A3600-A3617 will correspond with the A Tags for hospital surveys. The new Tags don’t correspond with the old ones due to updated regulation language.
9. Revised §412.23 Excluded hospitals: Classifications. on Form CMS 437B.	§412.23 Excluded hospitals: Classifications was updated by regulation.
10. Revised § 412.25 Excluded hospital units: Common requirements	§ 412.25 Excluded hospital units: Common requirements were updated in regulations.
11. Deleted § 412.30 section from Form CMS-437A.	Regulations were updated and that regulation was deleted.
12. CMS-437B, Tags A-3601 through A-3606, A-3609 and A-3617 contain new regulation language	Regulations were updated. Therefore there is new guidance as well.
13. CMS-437A, Tag 3508 contains new regulation language.	Added new guidance.
14. In regulation column, § 412.29 Classification criteria for payment contains new language.	
15. CMS-437A, Tags 3509 through 3518 contains new language.	Added new guidance.

Worksheet for the 30 day Federal Register Notice  
Form CMS 437A and Form CMS 437B

*All changes correlate to CMS-437A and -437B, unless indicated otherwise.*

TYPE OF CHANGE	RATIONAL FOR CHANGE
Added “Not Applicable” column	Commenters requested the addition of this column
Shaded boxes that don’t require a response	Commenters requested the change.
Fixed typographical error on CMS-437A, under the column for Hospital Representative	Commenters noted the error.
TAG 3500 (CMS-437A) Added word “information” at the end of the regulation. Inserted the word “beds” to 2 <sup>nd</sup> bullet under Guidance.	Commenters recommended the additions.
TAG 3506 (CMS-437A) Changed the word “unified” to “notified” under 3 <sup>rd</sup> bullet under Guidance column.	Commenters recommended the change.
TAG 3508 (CMS-437A) Added Explanatory Statement page at end of form	Commenters recommended the addition.
TAG A3602 (CMS-437B) Changed the form number from “437A” to “437B” under the 2 <sup>nd</sup> bullet under the Guidance column.	Commenters recommended the change.
Created “Not Applicable” column.	Commenters requested the addition.
TAGs A3512 (CMS437-A) and A3603 (CMS 436-B) Added the sentence, “Hospital (or rehabilitation unit) has not been paid under the IRFPPS for at least 5 calendar years under the Hospital Representative column.	Commenters recommended the change.
TAGs A3513 (CMS 437-A) and 3604 (CMS 437-B) Changed the language for these tags under the Guidance column to read:  <ul style="list-style-type: none"> <li>•If the rehabilitation hospital added beds, the surveyor or CMS will verify that the hospital had approval (certificate of need or State license ) before adding beds, if such approval is required.</li> <li>•The surveyor must verify that the hospital received written CMS RO approval before adding any new beds.</li> <li>•The surveyor will verify that the hospital didn't have more than one increase in beds during a single cost reporting period.</li> <li>•Surveyors must verify that if the rehabilitation hospital decreased beds, it didn't thereafter add beds unless a full 12 month cost reporting period had elapsed.</li> </ul>	Commenters suggested rewriting the guidance under these TAGs.
TAGs A3516 (CMS- 437A) and A3607 (437B) Revised narrative in the Guidance column to read:  <ul style="list-style-type: none"> <li>•Review the hospital's procedures, or other alternative documents or records, to verify the hospital has a preadmission screening procedure in place.</li> <li>•A review of the clinical records should indicate</li> </ul>	Commenters recommended the revisions.

whether the IRF is using the screening procedure.	
<p>TAGs A3517 (CMS- 437A) and A 3608 (CMS-437B) Revised the guidance under these two tags to read:</p> <ul style="list-style-type: none"> <li>•As part of the clinical record review, look for documentation supporting the physician visits.</li> <li>•Review the hospital's procedures or other alternative documents or records to verify the hospital has a procedure detailing close medical supervision for patients.</li> </ul>	Commenters recommended changes to the Guidance.
<p>TAGS A3518 (CMS-437A) and A3609 (CMS-437B) Revised the language under the 1<sup>st</sup> Guidance bullet to read:</p> <ul style="list-style-type: none"> <li>•Review the licenses of all qualified personnel, that are required by the State to be licensed, to verify the licenses are up-to-date.</li> <li>•Qualified personnel would include either personnel that are licensed in the State in which the services are provided or those personnel that are recognized under reciprocity by the State in which the services are provided.</li> <li>•Determine if the hospital has and follows a procedure to evaluate and document that personnel are qualified and that those personnel maintain their qualifications.</li> <li>•Determine if the hospital has and follows a procedure to evaluate and document that personnel are qualified and that those personnel maintain their qualifications.</li> </ul>	Commenters suggested a revision of the language.
<p>TAGS A3524 (CMS-437A) and A3615 (CMS-437B) Revised 2<sup>nd</sup> bullet under guidance and added 3<sup>rd</sup> bullet to read:</p> <ul style="list-style-type: none"> <li>•The plan of treatment should include the patient's medical prognosis and the anticipated interventions, functional outcomes, and discharge destination from the IRF stay.</li> <li>•The anticipated interventions detailed in the overall plan of care should include the expected intensity (meaning number of hours per day), frequency (meaning number of days per week), and duration (meaning total number of days during the IRF stay) of physical, occupational, speech-language pathology, and prosthetic/orthotic therapies required by the patient during the IRF stay.</li> </ul>	CMS revised the 2 <sup>nd</sup> bullet and added the 3 <sup>rd</sup> bullet for improved clarification of the regulation associated with these Tags.
<p>TAG 3602 (CMS-437B) Removed the words “written certification letter” from the 1<sup>st</sup> bullet under Guidance column.</p>	CMS revised the bullet to avoid confusion between “written certification letter” and “attestation statement”. Attestation statement is the term the industry has been using.
<p>TAG 3616 (CMS-437B) Inserted the following language under the Hospital Representative column to read:</p>	Commenters recommended adding the language.

The representative will determine whether interdisciplinary teams are meeting once weekly to review patient progress and that documentation is in the medical records.	
TAG 3604 (CMS-437B) Added the following language that was omitted from the end of the regulation: “added to the IRF”.	Commenter recommended the insertion of the language.