

Outpatient Therapy at a Skilled Nursing Facility/Nursing Facility (SNF/NF) and Assisted Living Facilities (update 8/2016)

Currently if outpatient therapy services provided in a Skilled Nursing Facility/Nursing Facility (SNF/NF) are completed by the SNF/NF staff, Medicare is not requiring additional certification as an Outpatient Physical Therapy and/or Speech-Language Pathology Services (OPT/OSP) Rehabilitation Agency for the therapy performed. If treatment is provided in non-SNF/NF certified areas that is set aside for services to non-SNF residence then this area must be certified as an Outpatient Physical Therapy and/or Speech-Language Pathology Services (OPT/OSP) Rehabilitation Agency, either as a main location, or as an extension location. If the outpatient therapy services are contracted to an outside organization this organization must be certified as an Outpatient Physical Therapy and/or Speech-Language Pathology Services (OPT/OSP) Rehabilitation agency.

Please see "[Initial Certification](#)" or "[Adding an Extension Site](#)" on the home page for more information on becoming certified or adding an extension site.

Additional information on requirements:

In Chapter 2 of the State Operations Manual (SOM) section 2300 Outpatient Physical Therapy and/or Speech-Language Pathology Services at Other Locations such as a Patient's Private Residence, Assisted Living or Independent Living facility effective 10-3-15: "In addition to the primary site and any extension locations, the organization may provide therapy services in the patient's private residence or in a patient's room in a SNF/NF, in an assisted living facility, or in an independent living facility. *These are services that are provided on an intermittent basis where there is no ongoing or permanent presence of the OPT. Examples of an ongoing or permanent presence may be indicated by a dedicated therapy gym; storing of equipment, supplies, or medical records at the facility; or having OPT staff regularly assigned to work at that facility directing a coordinated and ongoing rehabilitation program at the facility. These situations are examples that would require the OPT to have the other location become separately certified or become approved as an extension location.*

The agency must provide an adequate therapy program whenever and wherever it provides services at locations away from the primary site. The agency must have adequate equipment and modalities available, at any location, to treat the patients accepted for service. If the agency is providing services at more than one location each day, the agency must have infection control policies in place that set forth the techniques the agency employees will use at all locations."

In Chapter 2 of the State Operations Manual (SOM) section 2292 B Rehabilitation Agency, Clinic and Public Health Agency effective 10-30-2015 requires under Contracts: "**Contracts:** An organization may provide services with direct hire employees (i.e., salaried personnel) and with those employees under arrangement (or contract) (§485.719). The employees hired under contract may provide services wherever the organization provides therapy services.

Rehabilitation agencies may contract to provide outpatient therapy services at assisted living facilities (ALFs). In this instance, the rehabilitation agency has the administrative responsibility and supervisory oversight for the delivery of services in these facilities. In addition, the rehabilitation agency is responsible for maintaining clinical records for therapy services provided to the ALF patients.

In situations when the OPT is seeing patients in an ALF or ILF, where there is no ongoing or permanent presence of the OPT, common areas do not need to be closed off when an individual therapy session extends beyond the patient's room. However, OPTs must afford patients the opportunity for privacy at the patient's request or when clinical situations warrant privacy.

Any space leased, rented, or dedicated for the provision of OPT services, including space within an ALF or ILF that is designated for therapy service, must meet the two person on duty requirement and become a separately certified OPT or become approved as an extension location of a currently certified OPT. Leased or rented space that is dedicated to therapy services must be closed to non-therapy participants when services are being provided. See Section 3100 for additional guidance for situations and when a location must be approved as an extension site or separately certified.”