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OPT Policy for Survey Clinical Record Review

Effective upon approval.

Definition

Case: The term “case” in this policy is used interchangeably with the term record, and is defined as unique patient admissions, including all of the treatments, visits, and diagnosis across all services between a single admission and discharge. Even if an admission includes treatments in multiple services that are stored in separate files, they are considered one case for the record review process. However, if the same patient has been treated as part of multiple admissions, each separate admission is considered a case.

Policy

Clinical record review is conducted at each site as part of the Medicare survey process. The surveyor will ensure that a random sample of clinical records is reviewed.

All clinics must have begun treating patients and be currently treating patients in order to enroll in the program. The clinic is required to produce a log or other record of closed cases for the previous six month period. The surveyor will select a sample of clinical records to review. A sample of both open and closed cases should be reviewed and should include a sample from each therapist and discipline (SLP, OT, PT) as offered at the site. The sample selected should represent a cross section of the cases performed at the site and include both Medicare beneficiaries and non-Medicare patients.

A minimum of 20 total clinical records must be reviewed for an established organization and a minimum of 10 total for a new start-up organization. The records must represent the organization’s current roster of patients as well as records from discharged patients from the past six months.

Please note: The number of records reviewed should be determined by case volume not patient visits. The total number of records within the six month case period must be noted on the review form to establish the monthly average. If deficient practices are noted during the records review, the surveyor may request additional records to substantiate the findings documented from the initial sample.