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*Editors: [Leslie Demaree Goldsmith](#) and [Carel T. Hedlund](#)*

## Rehabilitation Agencies - Service Expansion No Longer Limited by Tier 4 Survey Status

By: [Donna J. Senft](#)

Rehabilitation agencies are no longer limited by CMS' low survey priority — option available to begin operations or expand into new jurisdictions. In an [April 22, 2011 final notice \[PDF\]](#), CMS announced its approval of the American Association for Accreditation of Ambulatory Surgery Facilities (AAAASF), commonly referred to as the QuadASF, to perform deemed status accreditation surveys for “organizations that provide outpatient physical therapy and speech-language pathology services” in accordance with the regulations in 42 C.F.R. part 485. These are the regulations applicable to rehabilitation agencies.

In a November 5, 2007 [Survey and Certification Letter \[PDF\]](#), CMS included Medicare-certified rehabilitation agencies among the lowest level, or Tier 4, priority for being surveyed, which significantly affected the ability to begin operations or expand into new geographic areas. In response to the S&C Letter, many states either did not perform any Tier 4 surveys or the wait list was so long that there was limited possibility that a survey would be conducted. Providers now have the option to obtain a new enrollment by seeking approval via a deemed status accreditation survey. Information on the accreditation process is available on the [AAAASF website](#).

In response to the proposed notice to approve AAAASF to provide deemed status accreditations for rehabilitation agencies, a comment was submitted to CMS expressing concern that AAAASF's accreditation process did not include a review of occupational therapy services. CMS replied that, since occupational therapy services are not required to be provided under the regulations, “it was not necessary for occupational therapy services to be addressed in AAAASF's application.” The AAAASF accreditation materials do, however, address the delivery of occupational therapy services when such services are provided.

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## **Ober|Kaler's Comments**

For providers that have patiently waited to expand into areas where Tier 4 surveys did not occur or were not timely, deemed status accreditation provides an option to reach that business development goal. Due to the newness of the accreditation option, we would advise having frequent and comprehensive communication with both the accrediting organization and the state survey agency.

*[Donna Senft](#) is author of the blog [MedicareforGeeks.com](#), which provides information relating to the requirements and new initiatives with respect to PECOS (Provider Enrollment, Chain, and Ownership System), the national electronic database for recording and retaining data on Medicare-enrolled providers and suppliers.*