

Inpatient Rehabilitation Facility Review Choice Demonstration (IRF RCD) 2025 UDSMR® Virtual User Group Conference

August 6, 2025



Madeleine Collins, RN
Senior Provider Education
Consultant

Caitlin Hutchison, MD
Officer, Chief Medical
Palmetto GBA

Phabian E. Barrett
Senior Provider Relations
Representative



Disclaimer

The content in this presentation is intended for Jurisdiction J Alabama providers and is current as of August 6, 2025. Any changes or new information superseding this information is provided in articles with publication dates after August 6, 2025, at www.palmettogba.com.

CPT® codes, descriptions and other coding data,
copyright © 2024 American Medical Association.
All rights reserved. UDSMR is a trademark of Netsmart Technologies, Inc.

IRF RCD Leadership Team

- Chief Medical Director: Caitlin Hutchison, M.D.
- Medical Review Director: Cassie Mills, RN
- Medical Review Manager: Carly Zelinsky, RN

3

Frequently Used Acronyms

Acronym	Description
ADR	Additional Documentation Request
CERT	Comprehensive Error Rate Testing
CMS	Centers for Medicare & Medicaid Services
IDT	Interdisciplinary Team
IOM	Internet Only Manual
IRF	Inpatient Rehabilitation Facility
MAC	Medicare Administrative Contractor
MLN	Medicare Learning Network
MR	Medical Review
PCR	Pre-Claim Review
POC	Plan of Care
RCD	Review Choice Demonstration
UTN	Unique Tracking Number

4

IRF RCD Webinars

Date	Time	Register
Wednesday, August 27, 2025	11 a.m. ET	August
Wednesday, Sept. 24, 2025	11 a.m. ET	September
Wednesday, October 29, 2025	11 a.m. ET	October

5

Agenda

Program Milestones — **CYCLE 4**

Cycle Choice Selections

Top 3 Non-Affirmations

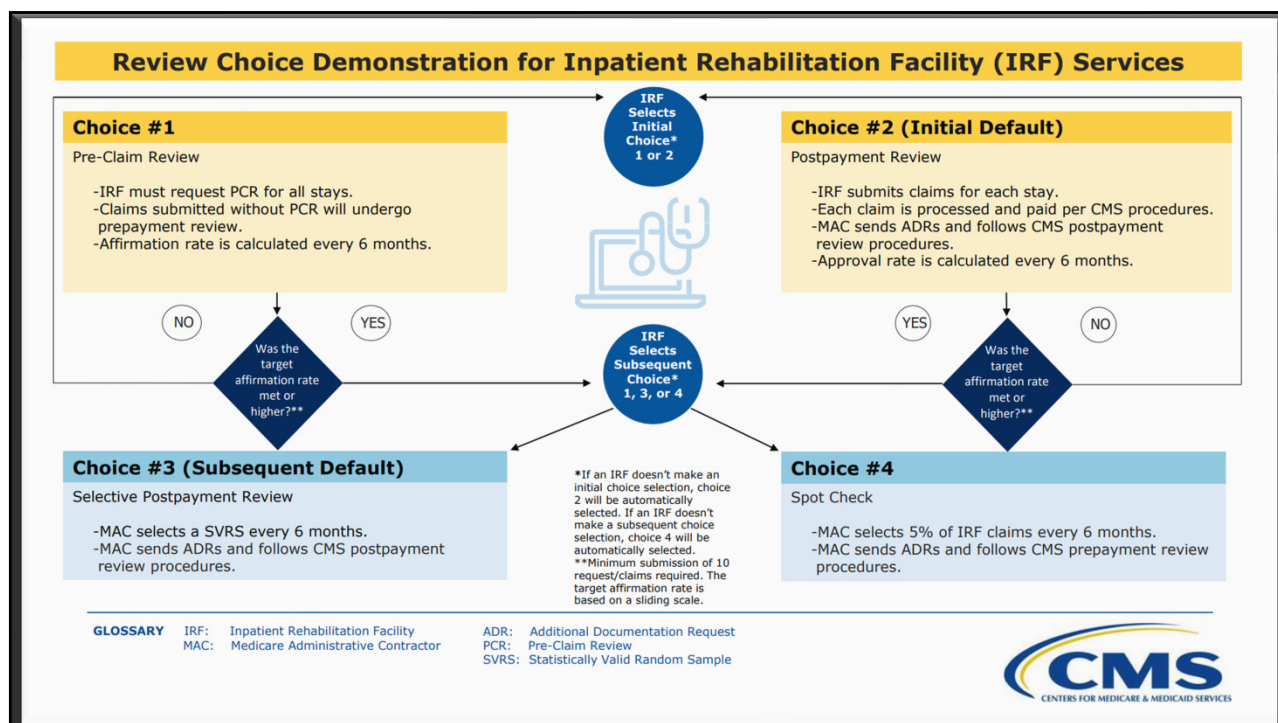
Documentation Reminders

Q & A

6



<ul style="list-style-type: none">• Cycle 3 ENDED<ul style="list-style-type: none">• June 30, 2025• End of Cycle Rate Calculations<ul style="list-style-type: none">• July 1–15, 2025• Results Sent to Providers<ul style="list-style-type: none">• July 16–31, 2025• Begin Cycle 4 Choice Selection<ul style="list-style-type: none">• August 1, 2025• Last Day for Cycle 4 Selection<ul style="list-style-type: none">• August 17, 2025• Cycle 4 begins<ul style="list-style-type: none">• September 1, 2025	<p>8</p>
---	----------





PALMETTO GBA
A CELERIAN GROUP COMPANY

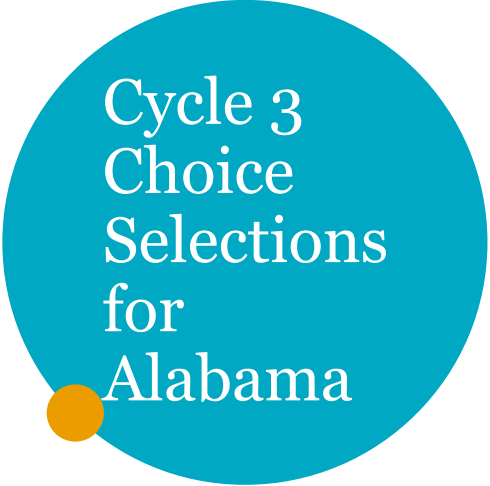


RCD
Inpatient Rehabilitation Facilities

Cycle Target Affirmation Rate

90%

10

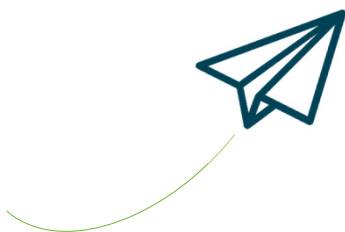


Cycle 3 Choice Selections for Alabama

- 87.5% of our providers selected Pre-Claim Review
- 12.5% of our providers selected Spot Check

11

Choice 1: 100% Pre-Claim Review (PCR)



- PCR is a process through which a request for provisional affirmation of coverage is submitted for review before a final claim is submitted for payment
- The provider submits the PCR request with complete documentation as appropriate
- The provider will receive a Unique Tracking Number (UTN) that must be submitted on the claim

12

Choice 4: Spot Check

The MAC will randomly select 5% of the submitted claims based on the previous six months' claim volume.

The MAC will stop the claim and send an Additional Documentation Request (ADR) through the US Postal Service or MAC Provider Portal.

The IRF will have 45 days to respond to the ADR with all requested documentation. Claims will be denied for non-response on day 46.

13

Cycle Statistics

Cycle 1

✓	Affirmed	4,083
⊘	Non-Affirmed	758
»»»	Total Completed	4,841

Cycle 2

✓	Affirmed	4,463
⊘	Non-Affirmed	2,670
»»»	Total Completed	7,133

Claims Reviewed (ADR)

✓	Paid	17
⊘	Denied	15
»»»	Total Completed	32

14



Top 3 Non-Affirmations for Palmetto GBA

Cycle 2 Top Non-Affirmation Codes

IRF5A

Medical Necessity

- The documentation does not support the beneficiary required supervision by a rehabilitation physician. Refer to 42 CFR 412.622(a)(3)(iv), Medicare Benefit Policy Manual Chapter 1, Section 110.2

IRF5D

Medical Necessity

- The documentation does not support the patient is sufficiently stable at the time of admission to the IRF to be able to actively participate in and benefit significantly from the intensive rehabilitation therapy program. Refer to 42 CFR 412.622(a)(3)(iii), Medicare Benefit Policy Manual Chapter 1, Section 110.2

IRF5B

Insufficient Documentation Pre-Admission Screening

- Documentation does not support that upon admission to the IRF the patient generally required the intensive rehabilitation therapy services that are uniquely provided in IRFs. Refer to 42 CFR 412.622(a)(3)(i), Medicare Benefit Policy Manual Chapter 1, Section 110.2

Spotlight Non-Affirmation:

- Insufficient Documentation Pre-Admission Screening
 - Documentation does not support the preadmission screen was completed or updated within the 48 hours immediately preceding the IRF admission. Refer to 42 CFR 412.622(a)(4)(i)(A), Medicare Benefit Policy Manual Chapter 1, Section 110.1.1.

17

Pre-Submitted Questions and Open Discussion

18

IRF RCD Clarification for IDT Meetings

- **Same-Day Admissions and IDT Meetings:** If a patient is admitted to the IRF on the same day the facility holds its regularly scheduled IDT meeting, CMS expects that the patient will be included in that day's discussion.
- **Post-Meeting Admissions:** If a patient is admitted after the IDT meeting has occurred on that day, it is acceptable for the patient's first IDT discussion to take place during the next scheduled weekly meeting, even if that falls on day eight of the patient's stay.
- **Example:** If the IRF holds its IDT meetings every Wednesday at 2 p.m., and a patient is admitted on Wednesday at 5 p.m., the patient's first IDT meeting may occur the following Wednesday at 2 p.m.—on the eighth day of their stay.
- **Documentation Requirement:** In the patient's medical record, IRFs must clearly document the specific reason for conducting the initial IDT meeting on day eight. This justification must align with CMS guidelines.
- **Compliance Deadline:** Under no circumstances may the initial IDT meeting occur later than day eight of the patient's stay.

19

<https://palmettogba.com/jja/did/3tu0bq8ebi>

Inpatient Rehabilitation Facility Review Choice Demonstration

- [Appeal Process](#)
- [Educational Information](#)
- [Frequently Asked Questions](#)
- [New to IRF RCD](#)
- [Operational Guide](#)
- [Submitting Pre-Claim Review Requests](#)

Inpatient Rehabilitation Facility Services Review Choice Demonstration Clarification for Interdisciplinary Team Meetings

Published 06/10/2025

   A- A+

An Inpatient Rehabilitation Facility (IRF) stay will only be considered reasonable and necessary if, at the time of admission to the IRF, the documentation in the patient's IRF medical record indicates a reasonable expectation that the complexity of the patient's nursing, medical management and rehabilitation needs requires an inpatient stay and an interdisciplinary team (IDT) approach to the delivery of rehabilitation care.

Per [42 Code of Federal Regulations 412.622\(a\)\(5\)\(ii\)](#), the team meetings occur at least once per week throughout the duration of the patient's stay to implement appropriate treatment services; review the patient's progress toward stated rehabilitation goals; identify any problems that could impede progress toward those goals; and, where necessary, reassess previously established goals in light of impediments, revise the treatment plan in light of new goals and monitor continued progress toward those goals.

The Centers for Medicare & Medicaid Services (CMS) now allows IRFs to conduct a patient's initial IDT meeting by day eight of the patient's stay under specific conditions.

Key Points

Your Opinion Matters

Please take our five minute RCD survey

IRF Pre-Claim Review Submission Form
Please complete this form for IRF PCR Submissions.

IRF RCD Choice Selection Status Tool
Please use this tool to retrieve the status of your RCD Option(s).

 **Chat with Sage!**

FEEDBACK

IRF RCD Short Stay and Short Stay Transfers

- If the admission is for a short stay or short stay transfer (transfers of three days or less), the provider shall submit documentation (such as progress notes, nursing notes, discharge summaries, etc.) that confirms the specific timing of the transfer/discharge.
 - If the documentation confirms a short stay or short stay transfer, the MAC will process the claim as normal and the IRF's affirmation rate will not be impacted
 - If the documentation does not confirm a short stay or short stay transfer, the MAC will contact the provider to request the full medical record. The MAC will conduct a full review, process the claim as normal, and the IRF's affirmation will be impacted.
- If the admission is not for a short stay or short stay transfer (transfer of three days or less), the provider shall submit the full medical record to support that the claim met IRF requirements
 - The MAC will conduct a full ADR review, process the claim as normal, and the IRF's affirmation rate will be impacted

21

<https://palmettogba.com/jja/did/cssr7taokh>

Inpatient Rehabilitation Facility Review Choice Demonstration

[Appeal Process](#)

[Educational Information](#)

[Frequently Asked Questions](#)

[New to IRF RCD](#)

[Operational Guide](#)

[Submitting Pre-Claim Review Requests](#)

Inpatient Rehabilitation Facility Review Choice Demonstration and Short Stay Transfers

Published 06/06/2025

   A- A+

Inpatient Rehabilitation Facility (IRF) short stays and short stay transfers of three days or less are not included in the IRF RCD and do not require a Unique Tracking Number (UTN).

When a beneficiary is admitted to an IRF but is transferred out as described in [42 Code of Federal Regulations \(CFR\) 412.624\(f\)](#) within three days or less of the admission, the provider may not be able to complete all documentation due to the timing of the transfer to meet the coverage requirements listed in the CFR.

Therefore, when a short stay claim is billed for three days or less, Palmetto GBA will identify the claim based on the dates of service billed. The claims billed for three days may or may not be short stay transfers.

The claims processing system is unable to accurately identify and exclude those claims that were three days that didn't include a UTN. For these claims, Palmetto GBA will send an additional documentation request (ADR) and the IRF provider shall submit documentation to the Medicare Administrative Contractor (MAC) to support an appropriate IRF admission, short stay, or short stay transfer.

The below scenarios identify the action a provider should take in the event of an ADR for short stays or short stay transfers that occurred on the third day or greater:

Your Opinion Matters

Please take our five minute RCD survey

IRF Pre-Claim Review Submission Form

Please complete this form for IRF PCR Submissions.

IRF RCD Choice Selection Status Tool

Please use this tool to retrieve the status of your RCD Option(s).



Chat with Sage!

FEEDBACK

IRF RCD Documentation Tips

To support medical necessity and confirm eligibility for Inpatient Rehabilitation Facility (IRF) services, providers should:

- **Submit complete and thorough documentation** that demonstrates the beneficiary meets all medical necessity and eligibility criteria.
- **Follow official guidance** as outlined in:
 - The *Medicare Benefit Policy Manual (MBPM)*, Section 110
 - 42 CFR § 412.622
- **Use available tools** such as:
 - The [Pre-Claim Review \(PCR\) Checklist](#)
 - The [Additional Documentation Request \(ADR\) Checklist](#)
- These resources help ensure that all required documentation elements are included and aligned with Medicare standards.

23

Resource Library

[CMS Review Choice Demonstration for Inpatient Rehabilitation Facility Services](#)

[CMS Internet-Only Manual \(IOM\), Pub 100-02, Chapter 1, Section 110](#)

[Code of Federal Regulations 42 CFR 412.622 – Basis of Payment](#)

[Medicare Program Integrity Manual](#)

[IRF RCD Operational Guide](#)

[IRF RCD Cycle Transition Article Cycle 3 to Cycle 4](#)


[IRF RCD Frequently Asked Questions \(FAQs\)](#)

[IRF RCD Flowchart](#)

[Inpatient Rehabilitation Facilities Reason Codes and Statements](#)

[Palmetto GBA IRF RCD Homepage](#)

Stay Up to Date with an Email Subscription

Palmetto GBA
A CELERIAN GROUP COMPANY

[Email Updates](#)[eServices Portal](#)[Contact Us](#)

[Jurisdiction J Part A](#)[Topics](#)[Tools](#)[Forms](#)[Events and Education](#)[New to Medicare](#)

The Palmetto GBA Jurisdictions J and M Provider Contact Center (PCC) will be closed for an eight-hour training on Friday, December 13, 2024. Please note that the webchat feature will be unavailable at this time.

Subscribe to Email Updates

Subscribing to our email updates is quick, easy and free!

Enter your email address below and select the topics that interest you. We won't share your email address with anyone, and usually only send one email per day. You can also [change your email settings](#) or [unsubscribe](#).


Email Address


Confirm Email Address

Topic Selection

☒ Inpatient Rehabilitation Facility Review Choice Demonstration

FEEDBACK

RCD
Inpatient Rehabilitation Facilities25

Palmetto GBA
A CELERIAN GROUP COMPANY

Connect With Us

FACEBOOK



Follow us on Facebook to learn about upcoming events and ask us general questions



X (TWITTER)



#StayConnected on X for quick access to news and information



YOUTUBE



Go to YouTube for educational videos, tips and strategies



LINKEDIN



LinkedIn is your source for the latest Palmetto GBA news



Thank You!

THANK YOU
FOR ATTENDING!