

As most in the industry are aware, current Medicare policy, does not allow occupational therapy alone to establish eligibility for home health services, unlike physical therapy and speech-language pathology. Occupational therapy plays an essential role in home health, but is currently only able to stand alone or continue services after an individual has been discharged from all other home health service.

Occupational therapists have been permitted to open Medicare home health cases on a temporary basis through the national Public Health Emergency period. This occurred in April 2020 when emergency rules were issued to reduce regulatory burden on home health providers during the COVID-19 pandemic. This emergency rule with expire when the Public Health Emergency period ends.

The Medicare Home Health Flexibility Act was passed by Congress as part of a large year-end legislative package that addressed multiple health care priorities. Included in this act was legislature that allows occupational therapists to perform the initial and comprehensive assessments that are required to start home health services. CMS will have 1 year to implement this new rule and therefore this will go into effect on a permanent basis no later than Jan 1, 2022.

This legislation does not alter the criteria for establishing home health eligibility and only applies to therapy cases. This was a big win for the therapy profession and was endorsed by organizations representing occupational therapy, physical therapy, speech-language pathology, and home health providers.

HealthPRO Heritage at Home is poised to support current legislation as well as this new legislation that allows occupational therapy perform start of care visits. Contact us today at if you have additional questions or need support in ensuring success in 2021 and beyond.