Eli's Rehab Report

MDS 3.0: CMS Releases Corrections on Key Parts of Revised RAI Manual

Look for updates on therapy date counting and the ADL Algorithm.

Before you've had time to get used to the recently revised Resident Assessment Instrument (RAI) manual, it's time to take a look at corrections the **Centers for Medicare & Medicaid Services** (CMS) has just released.

CMS released the revised manual in late September, with the changes effective as of Oct. 1. On Nov. 5, CMS released three corrections to the RAI Manual v1.11, Chapter 3:

1. Change table page from Section O (page 3) ⬜ the change table was incorrectly transcribed;
2. Coding examples in Section O (page O-33); and
3. The flowchart "ADL Self-Performance Algorithm" found in Section G (page G-7).

Pay Attention to Corrected O0420 Examples

The Section O coding examples on page O-33 were part of the coding instructions for Item O0420 ⬜ Distinct Calendar Days of Therapy. O0420 was a new item that CMS added to the most recent RAI manual revision.

According to the manual, the coding instructions for O0420 are: "Enter the number of calendar days that the resident received Speech-Language Pathology and Audiology Services, Occupational Therapy, or Physical Therapy for at least 15 minutes in the past 7 days. If a resident receives more than one therapy discipline on a given calendar day, this may only count for one calendar day for purposes of coding Item O0420."

Take note: The revised, corrected examples are as follows:

• "**Example 1:** Mrs. T. received 60 minutes of physical therapy on Monday, Wednesday and Friday within the 7-day look-back period. Mrs. T also received 45 minutes of occupational therapy on Monday, Tuesday and Friday during the 7-day look-back period. Given the therapy services received by Mrs. T during the 7-day look-back period, item O0420 would be coded as 4 because therapy services were provided for at least 15 minutes on 4 distinct calendar days during the 7-day look-back period (i.e., Monday, Tuesday, Wednesday, and Friday).

• "**Example 2:** Mr. F. received 120 minutes of physical therapy on Monday, Wednesday and Friday within the 7-day look-back period. Mr. F also received 90 minutes of occupational therapy on Monday, Wednesday and Friday during the 7-day look-back period. Finally, Mr. F received 60 minutes of speech-language pathology services on Monday and Friday during the 7-day look-back period. Given the therapy services received by Mr. F during the 7-day look-back period, item O0420 would be coded as 3 because therapy services were provided for at least 15 minutes on 3 distinct calendar days during the 7-day look-back period (i.e., Monday, Wednesday, and Friday)."

How the ADL Algorithm Now Looks Different

CMS made a variety of changes to the ADL Self-Performance Algorithm, which essentially provides a flowchart for correctly coding Item G0110 ⬜ Activities of Daily Living (ADL) Assistance based on the Rule of 3. Here's a rundown of the changes:

- Before, the Algorithm stated, "Code 7 Activity Occurred only 1 or 2 times" in the circle that indicated a "No" answer to "Did the activity occur 3 or more times?" But CMS revised this to read: "Code 7 Activity occurred fewer than 3 times."
- In the circle indicating a "Yes" answer to "Did the resident require full staff performance every time?" CMS changed the text from "Code 4 Dependence" to "Code 4 Total Dependence."

- CMS changed the language slightly in "Did the resident require a combination of full staff performance and weight-bearing assistance 3 or more times?" to read, "Did the resident require a combination of full staff performance and weight-bearing assistance that total 3 or more times?"