

Eli's Rehab Report

MDS 3.0: Count Therapy Dates Based on ARD

Changes to Section I & O still in draft stage.

If you've been gearing up for the changes that the **Centers for Medicare & Medicaid Services** (CMS) has made to the MDS 3.0 in its most recent draft Nursing Home Comprehensive (NC) item set for version 1.14.0, you'll need to stay on your toes. CMS may have more changes coming your way.

What CMS is Tweaking in Sections I & O

CMS announced that when the Assessment Reference Date (ARD) on the MDS record is prior to Oct. 1, 2014, you must code I8000 □ Additional active diagnoses using ICD-9 diagnosis codes. But if the ARD is after Oct. 1, you must list ICD-10 codes in I8000. CMS has yet to announce whether it will change the Oct. 1 date based on the recent postponement for ICD-10 implementation.

Plus, CMS is tightening its rules for therapy start and stop dates in O0400 □ Therapies. Now the start date encoded on a given MDS must be on or after the date reported in item A1600. And this will be retroactive after the Sept. 21 CMS downtime.

If the ARD is not the end date, the days reported for speech, occupational and physical therapies must be less than or equal to the ARD, CMS says. And what you report in A0420 □ Distinct Calendar Days of Therapy must be less than or equal to the ARD, if the ARD is ongoing.

Important: Keep in mind that these are still draft changes and may change before CMS releases the final version. For more information on the draft changes, visit www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/NHQIMDS30TechnicalInformation.html and scroll to the bottom of the page for the "Downloads" section.