

# Long-Term Care Survey Alert

## MDS 3.0: Get a Handle On Scheduling For Both PPS And OBRA Assessments

**Here's how to avoid a call from your State RAI Coordinator and increased scrutiny from your state surveyors.**

Getting the timing of MDS assessments right is absolutely critical. You must schedule both Prospective Payment System (PPS) and Omnibus Budget Reconciliation Act (OBRA) assessments correctly to ensure that you don't jeopardize your reimbursement or land F-Tags for late assessment. Here are some expert pointers to help you.

**Important:** "Chronic late assessments may get you a call from your State RAI Coordinator and invite increased scrutiny from your state surveyors, with possible F-Tags associated with assessment timing," warns **Joel VanEaton, BSN, RN, RAC-CT**, MDS educator and director of clinical reimbursement for Care Centers Management Consulting, Inc. in Johnson City, TN.

### Don't Let Improper Assessment Timing Sink Your Reimbursement

"Late and/or missed assessments, particularly those affecting reimbursement, can also have a devastating impact on the money side with default and/or provider liable days adding up quickly," VanEaton cautions. So what can you do to avoid late assessments and perfect your timing?

**Best practice:** "Read and reread Chapter 2, which is the primary source for timing-related guidelines, and the portions of Chapter 6 that relate to timing, in the current RAI User's Manual," VanEaton recommends. "Always make assessment-timing decisions based on your best understanding of this material."

Look at the assessment timing tables for OBRA assessments on pages 2-15 and 2-16, as well as the tables for PPS assessments on pages 2-42 through 2-44, VanEaton says. These tables "are invaluable resources and contain the definitive guidelines and CMS' expectations related to timing of assessments."

In general, you must transmit MDS assessment records within 14 days of final completion or the event date, according to a recent presentation by the **American Association of Nurse Assessment Coordination (AANAC)**. To avoid late assessments, keep these guidelines in mind for submission timing:

- **Comprehensive assessments:** Transmit within 14 days of care plan completion (V0200C2 □ Signature of Person Completing Care Plan Decision and Date Signed).
- **All other OBRA assessments:** Transmit within 14 days of MDS completion (Z0500B □ date RN Assessment Coordinator signed assessment as complete).
- **Discharge assessments:** Transmit within 14 days of MDS completion (Z0500B).
- **Death in Facility records:** Transmit within 14 days of death (A2000 □ Discharge Date).
- **Entry records:** Transmit within 14 days of entry (A1600 □ Entry Date).

### Keep Up with Important Assessment Changes

You also need to be aware of any changes that CMS makes to assessment timing. For instance, when MDS 3.0 first came about, CMS made changes to the timing of OBRA assessments □ particularly for Annuals and Quarterlies, VanEaton notes. "Now the [Assessment Reference Date] ARD of the most recent OBRA assessment is based on the ARD of the prior OBRA assessment."

Per OBRA, you must clinically assess each resident within 14 days of admission, quarterly, annually, when a significant

change in status occurs, and when an uncorrected significant error is identified in a previous MDS, AANAC instructed

**What this means:** Once you've set the ARD appropriately, "the assessment completion timeframe remains 14 days for Annuals and Quarterlies," VanEaton explains. "In these cases, the completion date no longer impacts when the next OBRA assessment is due."

Because the ARD sets the observation period, it determines the care and services captured on the MDS, AANAC stated. You must set the ARD in a timely fashion to ensure that you complete assessments timely.

"Remember also that CMS posted three clarification documents after MDS 3.0 was initiated," VanEaton points out. You can find these documents at [www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/SNFPSP/RUGIVEDu12.html](http://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/SNFPSP/RUGIVEDu12.html). "Where these don't conflict with the RAI User's Manual, they are still a valid resource and can be extremely helpful with assessment-timing decisions."

### **Follow the Rules When Combining Assessments**

And because you have different types of assessments (PPS and OBRA), getting confused over the proper timing between the two is commonplace. "When combining assessments, the more stringent rules apply," VanEaton states.

**Example:** If you combined a 14-day PPS assessment with an OBRA Admission assessment, you would need to set the ARD for the Admission assessment by day 14, even though the 14-day assessment would allow an ARD up to day 18, VanEaton illustrates. "Using day 18 in this case would cause the Admission assessment to be late."

Not only is the ARD important, but also you must complete the entire RAI by day 14.

### **Let Your Software Do the Work for You**

"With all of the assessment types and rules governing the timing of MDS assessments, it can be a challenge to keep up," VanEaton concedes. "Find a resource that does the counting for you. Many MDS software applications have built-in calendars ☐ if they work and you trust them, use them."

**Lesson learned:** When figuring out the timing of assessments, "talk to someone," VanEaton advises. "Don't try to go it alone. It is always better to get a few heads around a complex assessment-timing situation than to make a scheduling error on your own."