

## Long-Term Care Survey Alert

### MDS 3.0 Corner: Get Up to Speed on the Latest MDS 3.0 and RUG-IV Developments

Check out a helpful CMS-posted Q&A on MDS 3.0.

If you feel like MDS 3.0 and RUG-IV implementation have become moving targets, you're not alone. Here's the latest, as of press time.

- The healthcare reform legislation delayed RUG-IV implementation for a year (until Oct. 1, 2011) but not MDS 3.0. That means, absent congressional intervention or a regulatory remedy, RUG-III will remain in place until then -- sort of. The legislation also calls for CMS to implement two features of RUG-IV on Oct. 1 of this year: (1) the limitation on concurrent therapy (where only half of concurrent minutes count toward rehab RUG placement) and (2) elimination of the hospital lookback for services that affect RUG classification. Industry trade group reps say to "stay tuned" as they are seeking a legislative fix to the delay.

- CMS has completed the train-the-trainer sessions. That included training for state Medicaid representatives and state RAI coordinators, etc., in March, and industry association representatives and providers in April. CMS has posted a set of Q&As on the MDS 3.0 from its training for state representatives ([www.cms.gov/nursinghomequalityinits/25\\_nhqimds30.asp](http://www.cms.gov/nursinghomequalityinits/25_nhqimds30.asp)).

Example: One question asks when a facility will no longer be able to submit an MDS 2.0 assessment or correction. CMS notes that "assessments with an ARD [assessment reference date] of 09/30/2010 must be an MDS 2.0. Assessments with an ARD of 10/01/2010 must be an MDS 3.0." CMS goes on to note that the agency "has not determined the cut-off date for when an MDS 2.0 record may not be modified or inactivated."

Good idea: Check CMS' MDS 3.0 page often. In April, CMS posted a new version of the MDS 3.0 item set, which includes numerous minor changes.