

MDS Alert

Assessments: Brush Up On The Proper Use Of 'Grace Days' - 12 Reminders

How completing an SCSA with a scheduled assessment impacts your RUG-IV ARD.

"Grace days" can certainly come in handy for a variety of situations, but applying them improperly can ruin your accuracy in setting the Assessment Reference Date (ARD) and even hurt your reimbursement. Make sure you have a solid grasp on the rules for using grace days with these tips.

Know When You Can Use Grace Days

Basics: Grace days are a specific number of days that you can add to the ARD window without penalty, according to a recent MDS advanced training by **Mary Woodyard, BSN, RN**, of the Ohio Department of Health. You can apply grace days in situations where an assessment "might be delayed or additional days are needed to fully capture therapy or other treatments."

Examples: You may also need to use grace days if the RN assessor is ill or if you have a large amount of assessments due at the same time. The option to use grace days allows clinical flexibility in setting ARDs, according to the RAI manual.

You can use grace days for PPS assessments only, Woodyard noted. You cannot apply grace days to unscheduled Medicare PPS assessments, but instead you can use them for scheduled Medicare-required assessments.

CMS has given you a two-day window beyond the requirements, however, to actually open and indicate the ARD for any unscheduled PPS assessment before penalties are given, explains **Marilyn Mines, RN, BC, RAC-CT**, senior manager of clinical services for **FR&R Healthcare Consulting Inc.** in Deerfield, Ill. If you use a grace day for a PPS assessment, you must be sure that the OBRA guidelines are also met. But you can't ignore the PPS grace day to keep the OBRA assessment requirements.

Scheduled assessments include the five-day, 14-day, 30-day, 60-day and 90-day assessments, each of which have a specified number of grace days that you can use. Unscheduled assessments include: the Significant Change in Status Assessment (SCSA); Significant Correction of Prior Comprehensive Assessment; Start of Therapy (SOT) Other Medicare Required Assessment (OMRA); End of Therapy (EOT) OMRA; and Change of Therapy (COT) OMRA.

Heed 12 Reminders on Grace Days

According to Chapter 2 of the RAI manual:

1. For the Medicare-required five-day scheduled assessment, you can extend the ARD up to Day 8 using the designated grace days.
2. For the Medicare-required 14-day scheduled assessment, you can extend the ARD up to Day 18 using the designated grace days.
3. Grace days do not apply when the 14-day scheduled assessment is dually coded as an OBRA Admission. This means that you cannot use grace days when setting the ARD if you're combining the 14-day assessment with the OBRA Admission assessment.
4. For the Medicare-required 30-day scheduled assessment, you can extend the ARD up to Day 33 using grace days.

5. For the Medicare-required 60-day scheduled assessment, you can extend the ARD up to Day 63 using grace days.
6. For the Medicare-required 90-day scheduled assessment, you can extend the ARD up to Day 93 using grace days.
7. When you complete the SCSA with a scheduled Medicare-required assessment and you set the ARD within the grace days, the RUG-IV classification begins on the first day of the payment period of the scheduled Medicare-required assessment standard payment period.
8. When you complete the SCSA with a scheduled Medicare-required assessment and you do not use grace days when setting the ARD, the RUG-IV classification begins on the ARD.
9. For combined Medicare-required five-day and OBRA Admission assessments, you can extend the ARD up to Day 8 using the designated grace days.
10. When combining the Medicare-required 14-day and OBRA Admission assessments, you cannot use grace days to extend the ARD.
11. When combining a Medicare-required scheduled assessment and an OBRA Quarterly assessment, you can use grace days to extend the ARD, as long as you meet the requirement for the Quarterly ARD.
12. When combining a Medicare-required scheduled assessment and an Annual assessment, you can extend the ARD using grace days, as long as you meet the requirement for the Annual ARD.

