

MDS Alert

Discharge Assessments: Make Sure You're Doing Discharge Assessments When This Happens

Reminder: Federal regulations trump your state's requirements in this case.

Did you have a resident who transferred from a Medicare- and/or Medicaid-certified bed to a non-certified bed? Do you feel like you're forgetting something? If you didn't complete a discharge assessment for this resident, then you forgot something big.

In an Aug. 25 Center for Clinical Standards and Quality/Survey & Certification (S&C) Group memo, the **Centers for Medicare & Medicaid Services** (CMS) reinforced the requirement of completing MDS 3.0 discharge assessments when a resident transfers from a certified bed to a non-certified bed (Ref: S&C: 14-43-NH).

"Discharge assessments are required assessments and are critical to ensuring the accuracy of Quality Measures (QMs) and in aiding in resident care planning for discharge from the certified facility," CMS stated in the memo.

What the Law Says About Transfers

Federal regulations (42 CFR §483.12(a)) define transfer and discharge as "movement of a resident to a bed outside of the certified facility whether that bed is in the same physical plant or not. Transfer and discharge does not refer to movement of a resident to a bed within the same certified facility."

Federal regulations also require your facility to "electronically transmit encoded, accurate, and complete MDS data to the CMS System, including ... a subset of items upon a resident's transfer, reentry, discharge, and death." And CMS noted in the memo that your state's requirements for MDS completion for residents residing in licensed but not certified beds have no bearing on federal requirements for MDS 3.0 completion and submission.

"CMS recognizes that both certified and non-certified beds exist within the same physical structure or certified facility, and emphasizes All Omnibus Budget Reconciliation Act (OBRA)-mandated assessments, including discharge assessments, must be submitted by SNFs/NFs in accordance with requirements," stated **Evvie Munley**, senior health policy analyst for Washington, D.C.-based **Leading Age**, in an Aug. 27 analysis.

Link: To read the entire S&C: 14-43-NH memo to State Survey Agency Directors, go to www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Downloads/Survey-and-Cert-Letter-14-43.pdf.