

MDS Alert

Document Management: Before You Go the Paper- or Electronic-Storage Route for the MDS 3.0, Consider These Key Points

If you're not doing this, surveyors will be on your case.

Once the MDS 3.0 rolls out, facilities that have been storing 15 months' worth of MDS assessments in paper form may want to reweigh that decision, literally. And facilities that elect to store assessments electronically have to make sure they are following certain rules. Here's what you need to know to pick the best storage option for your facility.

1. The MDS 3.0 will impose a hefty paper burden. CMS formatted the MDS 3.0 to be easier to read and complete electronically, which is a plus. But the MDS 3.0's computer friendly nature translates into a lot more paper for facilities when printing out the assessments, warns **Pam Campbell, RN, C, CRNA C**, with LTC Solutions Inc., a software developer in Camdenton, Mo.

In fact, "it's going to be a massive amount of extra paper in the clinical records, which is something facilities need to think through," says Campbell. She notes that now many facilities put the MDSs right in the residents' actual charts, although some have a separate MDS folder.

Using a separate folder to store the MDSs can help. This approach gives the facility and surveyors access without "cluttering the chart," says **Peter Arbuthnot**, a regulatory analyst with American HealthTech in Jackson, Miss.

Facilities can also consider purchasing a laser printer that can print double-sided and two pages per sheet, suggests **Janet Gerber RN-BC**, president and CEO of Gerber Consulting Services Inc. in Clymer, Pa. That way, you can "print two pages per sheet so that four of the MDS pages utilize only one sheet of paper," she adds.

2. Know the requirements for electronic storage. When you do store the MDS electronically, ask yourself this question: "Is the facility maintaining the electronic version so that the 15 months' worth of MDSs per resident are actually as accessible as the clinical record?" advises **Rena Shephard, MHA, RN, RAC-MT, C**, president and CEO of RRS Healthcare Consulting Services in San Diego. She reports seeing a lot of nursing homes that maintain the MDS electronically without considering the accessibility issue.

Bottom line: "Anyone who is entitled to the MDS has to be able to access it at any time," Shephard emphasizes. That includes surveyors, government auditors, staff members, and consultants.

Also: Chapter 2 of the RAI User's Manual for MDS 3.0 "says that if the facility maintains the MDS electronically without use of electronic signatures, it still has to print out the hard copy for the signed and dated Section V (Care Area Assessments) and Section X, [correction request], if there has been a correction, and Section Z, with the dates and signatures," adds Shephard.

3. Back up your computerized data. If you store MDSs electronically, make sure you have the appropriate backup and security systems. The facility needs a way to back up its computerized data reliably and consistently, says Campbell. "Many facilities today either don't back up or if they do it's not nearly often enough and they don't verify to make sure the backup is viable. A lot of times they will back up corrupted data over their last good backup." The facility should have "multiple backup data sets," she stresses.

"The primary idea behind effective backup is to keep the data offsite," advises **Nathan Lake, RN**, an MDS and long-term care expert in Seattle, Wash. "Some companies will pick up tapes or you can store the data electronically offsite, as long as it is encrypted and the company storing it meets healthcare storage requirements." If you can't store it offsite, put it in a fireproof, waterproof case. And store it in another part of the building.

