

MDS Alert

MDS 3.0 Implementation: RAI Manual Undergoes More Changes as MDS 3.0 Countdown Continues

One strategy can help you stay on top of the revisions.

CMS made more changes to the RAI User's Manual for the MDS 3.0 in mid-August, leading some in the industry to say "enough already." Here's what you need to know and how to cope.

On Aug. 12, CMS posted additional manual revisions on its website, noting that "any sections or chapters that have had revisions will now have an updated version number along with the month and year that the information was revised (e.g. MDS 3.0 Chapter 4 V1.03 August 2010).

"Subsequent revisions of any section or chapter of the manual will have updated version numbers (e.g. V1.04, V1.05, etc.). Any sections or chapters that have NOT been revised will have the same version number, month, and year that that version was last published (e.g. MDS 3.0 RAI Manual Chapter 3 Section A V1.02 July 2010)."

Example of a change: In Section O of Chapter 3, CMS has further clarified what to count as setup minutes for rehab therapy (page O-16 under "Coding Tips and Special Populations - Minutes of Therapy," bullet No. 6). As revised, the sentence reads: "The time required to adjust equipment or otherwise prepare for the resident's individual therapy session is the set-up time and is to be included in the count of individual minutes of therapy delivered to the resident. Set-up time may be performed by the therapist, therapy assistant, or therapy aide."

Industry Experts Dish on Changes, Challenges

So why might CMS be making changes this late in the game?

Consultant **Marie Saunders, RN, BC, BSN**, believes it's because "CMS has been trying very hard to please everyone." Also the various disciplines involved with the process sometimes have different perspectives and input. "One discipline may really like something while another one really doesn't," says Saunders, director of Saunders Associates, a consulting and software development firm in Appleton, Wis.

Others point out that CMS has received a huge number of suggested changes and requests for clarification during the agency's April and August train-the-trainer sessions, as well as through other forums.

The changes have created problems for software developers and trainers who have been scrambling to stay current. For example, consultant **Lynda Mathis, RN**, in Conway, Ark., notes that the last time she had to teach MDS 3.0, she was pulling the revised Section M off the CMS website the night before.

The American Association of Homes & Services for the Aging is hearing from members that "it's confusing and time-consuming" to backtrack and try to figure out the revisions, says **Iara Woody**, finance and health policy associate for the trade group. While CMS is putting all the revisions at the beginning of each section of Chapter 3, the documents themselves don't indicate the changes, Woody notes.

Consider This Simplifying Strategy

The last thing you want to happen is to end up using an outdated RAI User's Manual or training materials for the Oct. 1 implementation. To avoid that scenario, consultant **Elisa Bovee, MS, OTR/L**, is recommending facility staff check the CMS MDS 3.0 website at least weekly to make sure they have the most current versions of the chapters. "We are downloading and printing the manual pages and keeping it in a binder. When revisions come out, then we replace those

pages," she says.

Then come September just before implementation, make sure you have the most updated version, advises Bovee, director of education and training for Harmony Healthcare International Inc. in Topsfield, Mass.