

## MDS Alert

### MDS 3.0 Section O: Be Aware of These Clarifications for Start and End Dates for Therapy

The manual walks **you through what day to count as the first day after therapy ends.**

CMS clarified the start and end dates for rehab therapy in the revised Chapter 3, Section O, of the MDS 3.0 RAI User's Manual. The revision to the therapy start date includes a reference to "completion of the evaluation regardless of treatment minutes" being provided,

"which was verbally discussed at the April [MDS 3.0] training," says **Marty Pachciarz, RN**, managing director of clinical services for the Polaris Group in Beaverton, Ore.

The manual says to "record the date the most recent therapy regimen (since the most recent entry) started.

This is the date the initial therapy evaluation is conducted regardless if treatment was rendered or not." The revision defines the therapy end date as "the last date the resident received skilled therapy treatment."

The complete instruction reads as follows:

"Therapy End Date-Record the date the most recent therapy regimen (since the most recent entry) ended. This is the last date the resident received skilled therapy treatment. Enter dashes if therapy is ongoing."

The therapy end date dictates when you do an end-of-therapy Other Medicare Required Assessment (OMRA) for the MDS 3.0. The end-of-therapy OMRA has an assessment reference date (ARD) that can be one to three days after the person received his last therapy minutes, says **Elisa Bovee, OT R/L**, director of education and training for Harmony Healthcare International in Topsfield, Mass.

"Day 1 would correspond to the first day on which therapy services would normally be provided after the last day therapy was provided," states Chapter 2 of the RAI User's Manual for the MDS 3.0.

Example: "When a SNF provides rehabilitation therapies Monday [through] Friday and the resident's last day of therapy was on Tuesday, Day 1 is Wednesday," states Chapter 2. "If the resident's last day of therapy was Friday at the same SNF, Day 1 would be Monday."

When doing the end-of-therapy OMRA, "the payment change to the nursing RUG will be effective the day after the therapy end date, which is why you record it on the MDS," Bovee says.