

## MDS Alert

### MDS & BILLING NEWS TO USE

The **Centers for Medicare & Medicaid Services** recently published the final FY 2009 SNF PPS/consolidated billing rule and also released a July 2008 update to the RAI user's manual.

The final rule contained a surprise: The **Centers for Medicare & Medicaid Services** decided to delay RUG recalibration to account for its projected under-utilization of the nine rehab plus extensive services RUGs. CMS acting administrator **Kerry Weems** noted in a statement that "in view of the widespread industry concern that a recalibration could potentially have adverse effects on beneficiaries, clinical staff, and the quality of SNF care, we will continue to evaluate the underlying data carefully as we consider implementing an adjustment in the future." In May 2008, CMS published the proposed rule announcing the planned recalibration.

"The SNF PPS/consolidated billing final rule discusses a lot of information related to when you can bill the default rate," notes **Marilyn Mines, RN, RAC-CT, BC**, manager of clinical services at **FR&R Healthcare Consulting** in Deerfield, IL. But the changes in the July 2008 RAI user's manual don't reflect all of the information in the final FY 2009 rule related to default rate billing. "CMS says it will issue further instructions," says Mines. (So stay tuned for coverage of the default rate billing issue in upcoming issues of MDS Alert.)

The RAI user's manual update includes numerous clarifications, including one that addresses signing at R2b (page 3-212): "Use the actual date that the MDS was completed, reviewed and signed as complete by the RN Assessment Coordinator. This date will generally be later than the date(s) at AA9 which documents when portions of the assessment information were completed by assessment team members."

To review additional clarifications, including the deleted portion related to the one above, download the update at <http://www.cms.hhs.gov/NursingHomeQualityInits/Downloads/MDS20Update200807.pdf>. Also read the next MDS Alert for more information on the RAI manual update. The copy of the final SNF PPS/consolidated billing regulation is available at: <http://www.cms.hhs.gov/SNFPPS/LSNFF/list.asp#TopOfPage>.