

MDS Alert

MDS, CODING AND SURVEY NEWS

Despite rumors to the contrary, the MDS 3.0 is on track for an October 2009 rollout. That's the latest word as of the Jan. 29, 2009 SNF/LTC Open Door Forum during which the Centers for Medicare & Medicaid's **Sheila Lambowitz** noted that the agency's phones had been ringing and e-mails coming "fast and furious" due to rumors in the community about a MDS 3.0 delay.

But CMS is working aggressively toward the Oct. 1, 2009 implementation date, emphasized CMS' **Mary Pratt** during the call. But Pratt also noted that stakeholders have been expressing concerns about the implementation timeline. And CMS is considering the comments, she noted, and will post any updates on its Web site (www.cms.hhs.gov).

In other ODF news, **Ron Lambert** provided an update on CMS' value-based purchasing initiative. The agency has received the green light for the demonstration, which will evaluate nursing home quality in four domains: nurse staffing, avoidable hospitalizations, MDS outcomes, and survey deficiencies, said Lambert, project officer for the demo.

In a nutshell, facilities that perform best or improve the most on those domains will be eligible for performance payments, Lambert said. CMS is expected to announce the states in the demo soon and will then begin the process of soliciting nursing home participants.

Ready for some breathing room for implementing an all new diagnosis coding system? You're in luck. The government has extended the compliance date by two years, from Oct. 1, 2011, to Oct. 1, 2013, according to a recently published final rule. But you'll have to ensure compliance with ICD-10 by the effective date of Oct. 1, 2013, according to a U.S. Department of Health & Human Services press release.

A major expansion: The new edition of the ICD manual will expand the code set from 17,000 codes, which ICD-9-CM currently has, to more than 155,000 codes, which ICD-10 includes.

HHS maintains that ICD-10 will improve claims processing and payment. For example, pressure ulcers are a common condition in elderly Medicare beneficiaries with chronic illnesses, notes the agency in the press release. And under the current ICD-9-CM system, healthcare practitioners can identify the severity or location of a pressure ulcer but the coding system cannot link those elements if the patient has more than one ulcer. Under a single ICD-10 code, a patient's medical history will identify the severity and location of each pressure ulcer.

Mark your calendars: The revised F309 survey guidance goes into effect on March 31. The guidance includes a new general investigative protocol for quality of care, new pain management guidance and an investigative protocol for pain.

"The guidance says you need to recognize pain, as well as the risk for pain," says **Rena Shephard, MHA, RN, RAC-MT, C-NE**. And the facility has "to take action in both cases that meets the standard of clinical practice and in a way that's consistent with the resident's goals," adds Shephard, president and CEO of RRS Healthcare Consulting in San Diego, and founding chair and executive editor for the American Association of Nurse Assessment Coordinators. The guidance provides examples of what surveyors might consider immediate jeopardy, actual harm and less severe deficiencies. Examples of scenarios that could pave the way for an immediate jeopardy citation include one where a resident experienced "recurring, episodic excruciating pain or incapacitating distress related to specific situations where pain could be anticipated (e.g., because pain has already been identified during dressing changes or therapies) and the facility failed to attempt pain management strategies to try to minimize the pain," according to the guidance.

An actual harm citation might include a scenario where the resident experienced pain intense enough to lead to recurrent insomnia, anorexia with resultant weight loss, reduced ability to move and perform ADLs, a decline in mood, or reduced social engagement and participation in activities. Review the guidance at

<http://www.cms.hhs.gov/SurveyCertificationGenInfo/downloads/SCletter09-22.pdf>.