

## MDS Alert

### Medicare: OMRA to Become a Give-and-Take Proposition Under RUG-IV

Check out a major change to this often overlooked MDS assessment.

Have you every wished your SNF could get paid something for Part A patients who get rehab in between PPS assessments? That wish appears to be coming true under the RUG-IV system, slated for implementation starting in FY 2011.

The final SNF PPS rule gives SNFs the option of doing the Other Medicare Required Assessment (OMRA) at the time therapy starts. The ARD for the assessment would be day 5, 6, or 7, with the first therapy day counting as day 1, says **Rena Shephard, MHA, RN, RAC-MT, C-NE**, president and CEO of RRS Healthcare Consulting in San Diego. "The payment at the rehab RUG level would start on day one of therapy," she says.

How it works now: Under the current RUG-III system, the SNF is out of luck payment-wise if a resident in a non-rehab RUG goes back on therapy and it's not time for a regular assessment ---unless the resident requires a significant change in status assessment, says Shephard. Otherwise, the SNF has to wait until the next assessment to capture the rehab therapy, if the patient is still receiving it at that time.

Under RUG-IV, however, the Centers for Medicare & Medicaid Services will be allowing SNFs to complete an optional start of therapy OMRA when therapy begins in between assessment windows -- and also within the Medicare-required assessment window, according to the final rule.

Now for the Payback

As it stands now, SNFs have to do an OMRA with an ARD set eight to 10 days after all therapies have stopped for patients who will be remaining on Part A for skilled nursing. The final rule specifies that SNFs will do the OMRA with an ARD set one to three days from the last day therapy is provided.

Short form in the works: To address commenters' concerns about the start of therapy OMRA requiring more assessments, CMS said in the final rule that it would be providing an abbreviated OMRA that the SNF can use when it can't combine the OMRA with any other assessment, Shephard points out. "The OMRA assessment for start of therapy isn't going to be the same as the MPAF, which has more items than the abbreviated OMRA will."

Editor's note: For tips on managing the OMRA under RUG-III, see "4 Mistakes You Don't Want to Make With the OMRA," on page 119 of this issue.