

MDS Alert

Quality Assurance: Review Validation Reports To Detect Warning Message Patterns

Don't let these problems escape your RAI compliance radar.

Validation reports can let you know that the facility's MDS process needs revamping before surveyors or your FI validate that for you.

Best practice: The MDS nurse can take the validation reports from the state system to the quality assurance committee, says **Reta Underwood**, a survey consultant in Buckner, KY. The QA committee can double check to make sure all MDSs transmitted were accepted by the state repository, and review warning messages with an eye for identifying problematic patterns of errors.

Don't Be Late for Important Dates

For example, the QA committee should identify late assessments, which can cause survey problems.

The validation report will let you know about late assessments in several ways, says consultant **Patricia Boyer, RN, LNHA**. For example, you will get a warning message if an assessment was more than 92 days from the quarterly assessment or over 366 days for the annual, reports Boyer, principal of **Boyer and Associates** in Brookfield, WI.

You will also get a warning message if staff transmits the MDS more than 31 days from the completion date, she adds.

Nip the root cause before it buds into big trouble: When analyzing warning messages involving late MDSs, "it's important to figure out the underlying cause," notes **Rena Shephard, RN, RAC-MT, MHA, FACDONA**. For example, she's seen facilities where the MDS nurse wasn't submitting MDSs or was doing so sporadically. And "the FIs can detect that now" as they are supposed to "pull the corresponding MDS off their computer system" for claims review, says Shephard, president of **RRS Healthcare Consulting** in San Diego and founding chair and executive editor for the **American Association of Nurse Assessment Coordinators**.

Stay on Top of Sequencing Issues

Also look for warning messages showing out-of-sequence submissions. "The MDSs and tracking forms have to flow correctly or the computer looking at the logic of the sequence can't understand it," which generates a warning message, Boyer says.

You will get a warning message, for example, if you transmit the first MDS before a reentry tracking form--or a discharge tracking form before the last MDS.

Important: Make sure the team didn't miss any MDS assessments as the cause of a warning message about out-of-sequence assessments, advises **Ronald Orth, RN, NHA, CPC, RAC-CT**, president of **Clinical Reimbursement Solutions LLC** in Milwaukee.

Beware Medicaid woes: "A number of states won't accept assessments for Medicaid payment purposes if the assessments are out of sequence," advises **Nathan Lake, RN**, an MDS and long-term care expert in Seattle.

Solution: "If you submitted the discharge or reentry tracking form prematurely," inactivate it if the sequencing problem creates a Medicaid reimbursement issue, Shephard advises.

"The facility has seven days after the [resident's] discharge to submit the tracking form," Shephard adds. So the MDS team should use "whatever they need of those seven days to complete and submit the MDS, and then submit the tracking form."

Troubleshooting tips: If the facility has a lot of sequencing issues, the software may not be doing some of the checking that it should be doing, observes **Peter Arbuthnot**, regulatory analyst for **American HealthTech Inc.** in Jackson, MS.

Or the MDS team members' organizational skills may need a tune-up so they can submit assessments in the right order. For example, multiple people may be submitting the files at different rates of speed, Arbuthnot notes.

Another potential problem: The MDS nurse may be submitting the assessments too quickly, Arbuthnot says. "You certainly strive to submit as often as you can," he advises. "But there's a point where you might need to back off just a little to ensure you have records coming in the right order."

For example, you can get out of sequence if you're waiting for a signature on one assessment and inadvertently submit the next MDS, Arbuthnot adds.

Great organization tip: To submit tracking forms and MDS in sequence, keep a log of submissions and don't include a discharge and reentry for the same resident in the same batch, suggests Missouri state RAI coordinator **Joan Brundick, RN, BSN.**