

MDS Alert

RAI Compliance: Hold The May 1 RAI Update-Or You'll Be Out Of Compliance

CMS to clarify the changes with new May 23 release.

Out with the new and back to the old: The **Centers for Medicare & Medicaid Services** pulled the latest round of RAI manual revisions posted on its Web site on March 28.

Why the backtracking? "CMS discovered some technical problems with the revisions," CMS spokesperson **Mary Kahn** tells **Eli**. As a result, the agency plans to post a revised update on its Web site at www.cms.hhs.gov/quality/mds20 by May 23 with a new implementation date of June 15.

The good news: "For those who had begun training [on the changes] that would have been effective on May 1, the majority of content for the June 15 effective date will not be significantly changed," said a CMS representative during the April 27 SNF Open Door Forum. The revisions to the revisions will include Sections AA9, G1A, G4A, M and R2b, according to CMS.

Facilities that buy an RAI manual from a vendor should make sure it doesn't include the retracted May 1 changes, advises **Nathan Lake, RN**, an MDS expert and software developer in Seattle.

CMS will have to change its initial revision to M1 or the data specs to allow coding of the number of ulcers staged closest to the assessment reference date at M1 and the highest stage ulcer at M2, says **Peter Arbuthnot**, regulatory analyst with **American HealthTech Inc.** in Jackson, MS.

Some providers and industry insiders have expressed chagrin at CMS' about-face in pulling the revisions when training was under way. "CMS' current system of random and episodic decision-making and announcements creates confusion and makes knowing the RAI requirements, educating staff and compliance increasingly difficult," **Marie Infante**, an attorney in Washington, DC, tells **Eli**.