

MDS Alert

Section A: 3 Examples Illustrate A1600 & A1900 Coding Interplay

Also, don't pay for CMS' mistake in its guidance for A1700 coding.

If you're struggling with coding A1600 □ Entry Date and the new Item A1900 □ Admission Date since the October 2014 RAI manual update, you're not alone. Knowing when these dates are different or the same, or when they may each change, is sometimes tricky. Check out these examples to help clear up your confusion.

Background: An "episode of care" begins with a new admission to the facility and ends with either a death in facility record, a discharge assessment with return not anticipated, or a discharge return anticipated where the resident did not return within 30 days of the discharge date, according to the **Texas Department of Aging and Disability Services'** (DADS) December 2014 MDS Mentor. "If a resident is admitted and never discharged, the entry date in A1600 will match the admission date in A1900."

Per the errata specifications, an episode is defined "as a series of one or more stays that may be separated by brief interruptions in the resident's time in the facility." The episode continues until the resident dies, is discharged with return not anticipated, or is discharged return anticipated but does not return within 30 days.

1. When A1900 Should Stay the Same

Example: Mr. Smith is a new admission on Oct. 1, 2014, so you enter this date in both A1600 and A1900. He is discharged return anticipated (A0310F = 11) on Nov. 4, 2014 and returns to your facility on Nov. 7, 2014.

How to code: For this scenario, you would update the entry date in A1600 to reflect Mr. Smith's reentry date of Nov. 7, 2014, DADS instructed. But the admission date in A1900 would remain Oct. 1, 2014, because Mr. Smith returned within 30 days from the discharge return anticipated date.

"The admission date should remain the same on all assessments for a given episode, even if it is interrupted by temporary discharges from the facility," according to recent guidance from the **Louisiana Department of Health & Hospitals** (LADHH). "If the resident is discharged and reenters within the course of the episode, that will start a new stay. The most recent entry date will change, but the admission date will remain the same."

"It does not matter what type of discharge the resident experienced or how long the resident was gone from the facility, the date in A1600 is always updated with the date of the resident's return," DADS said. Keep in mind that the intent of Item A1600 is to capture every stay the resident experiences in your facility.

2. When Both A1600 & A1900 May Change

Example: Mr. Smith is a new admission on Oct. 1, 2014 and discharged return anticipated (A0310F = 11) on Nov. 4, 2014. He returned to your facility on Dec. 11, 2014.

How to code: In this case, you would update the entry date in A1600 to reflect Mr. Smith's reentry date of Dec. 11, 2014, DADS said. You would also update the admission date in A1900 to reflect the new admission date of Dec. 11, 2014, because Mr. Smith's return was not within 30 days from the date of the return-anticipated discharge.

In other words, "the episode would end if the resident had a discharge return not anticipated or if there was a gap of more than 30 days out of the facility," LADHH noted. "If the resident returned to the facility after such an event, then a new episode would begin and would be coded as a new admission."

3. When A1600 & A1900 Have the Same Date

Example: Mr. Jones was a new admission on Dec. 8, 2014 and is discharged return not anticipated (A0310F = 10) on Dec. 13, 2014. Although unexpected, Mr. Jones returns to your facility on Dec. 25, 2014.

How to code: For this scenario, you would update both the entry date in A1600 and the admission date in A1900 to reflect the resident's reentry to the facility on Dec. 25, 2014. "Whenever a resident is discharge return not anticipated and returns, both the A1600 and A1900 dates would always be updated to consist of the date of the resident's return," DADS explained.

What the October RAI Manual Update Left Out

And if the RAI manual's changes affecting Items A1600 and A1900 aren't enough, the **Centers for Medicare & Medicaid Services** (CMS) also made revisions to how you should code Item A1700 □ Type of Entry. Unfortunately, however, the updated RAI manual failed to provide all the necessary accompanying instructions in Chapter 2.

"CMS staff unintentionally left out the instructions in Chapter 2 for when an OBRA Admission is not completed prior to a resident's discharge," DADS stated. CMS will reinser this information into the RAI manual in the next update.

Even though the intent of Item A1700 remained the same in the October 2014 RAI manual update, the coding instructions changed. Item A1700 "captures whether the date in A1600 is an admission/entry or reentry date," according to the RAI manual. But whether you completed an OBRA Admission assessment prior to discharge when determining how to code A1700 no longer matters.

In the meantime, CMS staff have reiterated that when a resident is discharged prior to the completion of an OBRA Admission assessment, you must complete an OBRA Admission assessment within 14 days of the return date (admission date + 13 calendar days), DADS instructed. But CMS' removal of all references to the OBRA Admission when coding the type of entry in A1700 was intentional.

Bottom line: "Coding of A1700 is now based strictly on whether the resident is a new admission or returning within 30 days from the date of a discharge return anticipated (i.e., a reentry)," DADS explained.

According to the updated coding instructions for A1700 on page A-22 of the RAI manual, you should:

- **Code 1, admission/entry** when one of the following occurs:

1. Resident has never been admitted to this facility before; OR
2. Resident has been in this facility previously and was discharged return not anticipated; OR
3. Resident has been in this facility previously and was discharged return anticipated and did not return within 30 days of discharge.

Code 2, reentry when all three of the following occurred prior to this entry; the resident was:

1. Admitted to this facility; AND
2. Discharged return anticipated; AND
3. Returned to facility within 30 days of discharge.

Beware: Another mistake in the revised RAI manual came about in an additional update that CMS released on Oct. 9, 2014, according to Indianapolis-based **Myers and Stauffer LC**. CMS says that the "Entry, Discharge, and Reentry Algorithms" diagram on page 2-38 is incorrect.



CMS will correct the algorithm in the next RAI manual update. Until then, you should adhere to the prior (October 2014) diagram and contact your state RAI coordinator with any questions.