

MDS Alert

Section A: Know When You Must Complete The NPE Discharge Assessment

Hint: Don't do it for unplanned discharges, discharge to hospital

Yet another important change in the October 2016 update of the RAI Manual is the Medicare Part A Prospective Payment System (PPS) Discharge Assessment, also known as the NPE Discharge Assessment or the NPE Item Set. This revision is a confusing one, so don't let it trip you up.

Where Did the Resident Go?

Like many of the changes in the RAI Manual update, the NPE Discharge Assessment arose from a new requirement under the Skilled Nursing Facility Quality Reporting Program (SNF QRP). The primary coding for the NPE in the MDS is for item A0310H □ Is this a SNF Part A PPS Discharge Assessment?

You must complete a Medicare Part A Prospective Payment System (PPS) Discharge Assessment when a resident's Part A stay ends AND that person "physically remains" in the facility (a planned event), says **Carol Smith, RN, BSN**, Managing Nurse Consultant for **BKD LLP**.

Translation: You must complete the PPS Part A Discharge Assessment whenever the resident's Part A benefits end (as a planned event), whether the resident remains in the facility or not, notes **Marilyn Mines, RN, BC, RaC-Ct**, Senior Manager at **Marcum LLP** and MDS Alert Consulting Editor.

If the resident's Part A stay ends and he is physically discharged from the facility, then you must do an Omnibus Reconciliation Act of 1987 (OBRA) Discharge Assessment (a planned event). And this OBRA Discharge Assessment may be required in combination with the PPS Part A Discharge Assessment.

"So if the Medicare Part A stay ends on the day of or one day before the date of physical discharge, the OBRA Discharge Assessment AND the PPS Part A Discharge Assessment are BOTH required AND may be combined," Smith explains. This is true as long as A2300 □ Assessment Reference Date (ARD) and A2000 □ OBRA Discharge Date are the same.

You cannot combine the PPS Medicare Part A Discharge Assessment with an unscheduled PPS assessment or an OMRA, Smith notes. "So when a Part A PPS Discharge is required and so is an [Other Medicare Required Assessment (OMRA)], the Medicare Part A PPS Discharge and the unscheduled PPS (OMRA) assessment must be completed and submitted as separate assessments."

What's more: To add to the confusion, the NPE consists of Section GG □ Functional Abilities and Goals, as well as portions of Section J □ Health Conditions (falls) and Section M □ Skin Conditions, says **Scott Heichel, RN, RaC-Ct, Dns-Ct**, Director of Clinical Reimbursement for **LeaderStat**.

When Not to Do the Assessment

"If the stay is less than three days, or the discharge is unplanned, or the discharge is to the acute (hospital) setting, Section GG of the NPE will be skipped," Heichel notes. "You will still need to complete the NPE Sections J and M though."

Also, if the Medicare Part A resident is ending his Part A stay and going home (physically leaving the facility), then you would not do a NPE, Smith agrees. Instead, you would complete the OBRA Discharge Assessment.

Remember, the resident is making the decision to discharge off of the Medicare Part A stay, which makes it an unplanned discharge, Mines notes.

Stay alert: "The computer software would not allow this to happen when the MDS is marked in Section A that the resident/patient is being Discharged to the Community (A2100 = 1)," Smith notes. "It would not also allow a check for a PPS Discharge Assessment (A0310F is a 10 or 11 and then A0310H = 1). If it does, I would question the software."

Heed These Important NPE Reminders

Keep in mind that this NPE rule applies to only traditional Medicare Part A residents, according to the **Texas Department of aging and Disability services** (DADS). You should ask your Managed Care Organization (MCO) partners if they want you to complete this form upon discharge from the facility. And remember that you don't submit Managed Care assessments to CMS.

The final version of the latest RAI Manual (v1.14) removed the "unplanned" terminology from these instructions, but the coding instructions are clear to NOT include discharges to the hospital, DADS reminds. The NPE is only for planned discharges.

Resource: You can find the NPE-specific guidance on pages 2-44 and 2-45 of the RAI Manual. The latest version (v1.14) is available for download at www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/MDS30RAIManual.html.