

## **MDS Alert**

## Section G: Solve This Head-Scratching G0110 Problem With Professional Advice

Expert tip: When all else fails, code supervision.

Coding G0110 [] Activities of Daily Living (ADL) Assistance and using the Rule of Three is no easy task. So what can you do when you've taken all the steps, adhered to all the rules, but still couldn't come up with the right coding?

Experts faced just such a question during an instructional video published by the **Centers for Medicare & Medicaid Services** (CMS) on March 20. Here's what CMS' MDS gurus had to say.

## Crack this 'Rare' ADL Coding Scenario

**Question:** During the seven-day look-back period, the toileting ADL occurred 20 times. The resident was able to toilet independently without assistance 18 times. The other two times toileting occurred, the resident required staff assistance, classified as non-weight-bearing assistance. The assessor determined that the appropriate code for G0110l  $\square$  Toilet use was 1  $\square$  Supervision. Is this coding correct?

**Answer:** This example is actually quite rare and does not fit with any of the Rule of Three conditions, noted **Mary Pratt, RN, MSN**, with the CMS Center for Clinical Standards and Quality, in the provider update video.

Although the resident had many independent episodes, she would have had to complete the ADL independently every time to code 0  $\square$  Independent, Pratt said. And 7  $\square$  Activity occurred only once or twice does not apply because the activity itself occurred 20 times.

Even though there were episodes of non-weight-bearing assistance provided to the resident, you cannot code 2  $\square$  Limited assistance because you have not met the definition, Pratt continued. To code 2, staff must provide limited assistance three or more times. And none of the other ADL self-performance coding level definitions apply directly to this case either.

"When looking at the instructions for the Rule of Three, the ADL scenario does not apply to the first, second or third rule," Pratt noted. "However, there is a final statement under the Rule of Three that says if none of the above are met, code supervision."

## Work Out the Coding By Process-of-Elimination

**Right way:** So in this case, the appropriate code is 1 [] Supervision, because you're not able to apply any of the ADL self-performance coding level definitions or the Rule of Three, Pratt instructed.

"Again, this type of ADL scenario should actually be very rare," Pratt said. "CMS devised the third Rule of Three and this final instruction precisely so that providers could incorporate these types of ADL scenarios into current coding level definitions in a way that gave an appropriate indication of the types of staffing levels that would occur in such rare circumstances."

Link: You can view the Section G video at <a href="https://www.youtube.com/watch?v=t-6e5NV4j6k&feature=youtu.be">www.youtube.com/watch?v=t-6e5NV4j6k&feature=youtu.be</a>.