

MDS Alert

SNF PPS: Be Aware of This Clarification on Setting the ARD

The rule differs for these assessments, according to CMS memo.

Consultant **Judy Wilhide Brandt, RN, RAC-MT, C-NE**, points out that Chapter 2 of the revised RAI User's Manual says: "The facility is required to set the ARD on the MDS form itself or in the facility software within the appropriate timeframe of the assessment type being completed. This concept of setting the ARD is used for all assessment types (OBRA and Medicare-required PPS) and varies by assessment type and facility determination."

However, CMS in a September memo clarified that instruction, says Brandt, of Judy Wilhide MDS Consulting Inc. in Virginia Beach, Va., referring to this excerpt from the memo below:

"For the Change of Therapy (COT) OMRA, End of Therapy (EOT) OMRA, and Start of Therapy (SOT) OMRA, the decision for which day within the allowable ARD window the ARD of the assessment will be set may be made after the window has passed," the memo states.

"For example, if a resident misses therapy on July 2-4, then the facility must complete an EOT OMRA for this resident and the ARD must be set for either July 2nd, 3rd, or 4th. However, the decision for which of those days should be used for the ARD on the EOT OMRA may be made after July 4th, the last day of the ARD window. Similarly, for the COT OMRA, the ARD may be set on a day after the close of the COT observation period, as long as the date set for the ARD of the COT OMRA is Day 7 of the COT observation period," states the memo.

"In contrast, for scheduled PPS assessments, the ARD for such assessments must be set by the end of the scheduled assessment ARD window (including grace days). In other words, the decision for which day within the ARD window will be used for the ARD of the scheduled assessment must be made by the end of the ARD window," the memo continues.

"For example, the ARD for a 30-day assessment may be set for any day within the range of Day 27 and Day 33, but the ARD for the assessment must be set by Day 33. Once a facility is outside the ARD window, then the facility cannot decide to set the ARD for the scheduled assessment for a day that is within the ARD window. In such cases, the ARD cannot be set for any day earlier than the day the decision to set the ARD is made. It should also be noted that when a scheduled and unscheduled assessment are combined, then the ARD for the combined assessment must be set in accordance with the scheduled assessment ARD policy. Similarly, in cases where an unscheduled assessment is combined with an OBRA assessment, then the ARD for the combined assessment must be set in accordance with the OBRA requirements."

"Pursuant to the policy outlined in the FY 2009 SNF PPS final rule (73 FR 46434), only an MDS form (paper or electronic) may be used to establish the ARD on the day the decision is made. It is possible for facilities to change the ARD of the unscheduled PPS assessments referenced above (COT, EOT, SOT), so long as the date chosen for the ARD of the assessment is still within the allowable ARD window for the assessment. We would also note that no matter when the decision is made as to which day should be set for the ARD on a given PPS assessment, the completion and submission deadlines still apply. Therefore, no matter when a given COT OMRA record is opened and the ARD is entered as the equivalent of Day 7 of the COT observation period, the assessment must still be completed within 14 days of this ARD and submitted within 14 days of the date the assessment is completed."

Source: The paragraphs from the CMS memo above have been printed verbatim. Read the full memo, "Follow-up information from August 23 provider training call and September 1 Open Door Forum," at www.cms.gov/SNFPPS/Downloads/Provider_Call_FollowUp082311.pdf.

