

MDS Alert

Stay Up-To-Speed On All Other RAI Manual Updates

Clarification: You can't set the ARD prospectively like you would other assessments.

Aside from the Chapter 3 MDS revisions, the newly-updated Resident Assessment Instrument (RAI) manual has a plethora of changes to other chapters. And the good news is you'll get some breathing room for conducting resident interviews for an unscheduled Prospective Payment System (PPS) assessment.

In a Sept. 25 analysis of the RAI manual changes, the **Texas Department of Aging and Disability Services (DADS)** provided the following highlights:

Chapter 1 □ Added a revised "Privacy Act Statement □ Health Care Records."

Chapter 2 □

- Section 2.6, Required OBRA Assessments for the MDS: Clarifies that you cannot set the Assessment Reference Date (ARD) prospectively, unlike other assessments. For a discharge assessment, the ARD (Item A2300) is always equal to the discharge date (Item A2000), and you may code A2000 on the assessment at any time during the discharge assessment completion period (i.e., A2000 discharge date + 14 calendar days).
- Section 2.9, MDS Medicare Assessments for SNFs: Clarifies the requirements for a Change of Therapy (COT) Prospective Payment System (PPS) MDS is when the most recent assessment used for Part A, excluding an End of Therapy (EOT) MDS, has a sufficient level of rehabilitation therapy to qualify for:
 - An Ultra High, Very High, High, Medium, or Low Rehabilitation category (even if the final classification index maximizes to a group below Rehabilitation), and
 - The RUG changes to such a degree that it would no longer reflect the RUG-IV classification and payment assigned for a given SNF resident based on the most recent assessment used for Medicare Payment.
- Section 2.9: Reiterates the requirement that a change in the provision of therapy services continues to be evaluated in successive seven-day COT observation periods until a new assessment used for PPS occurs.
- Section 2.9: Adds an acknowledgement that sometimes it may not be practicable to conduct the resident interview items on or prior to the ARD for standalone unscheduled PPS assessment and allows facilities to conduct those resident interview sections up to two calendar days after the ARD.
- Section 2.13, Factors Impacting the SNF Medicare Assessment Schedule: Clarifies an unscheduled PPS that meets the appropriate standards may have an ARD (A2300) that falls on a Leave of Absence (LOA) day for a resident. Also, you cannot combine such an unscheduled PPS falling on a LOA day with a scheduled PPS, because the ARD of a scheduled PPS must reflect a Medicare Part A benefit day.

Chapter 5 □ Section 5.2, Timeliness Criteria: To match the instructions in Chapter 2, this section clarifies the completion timing for Omnibus Budget Reconciliation Act (OBRA) Admission and Annual assessments.

Chapter 6 □

- Section 6.4, Relationship between the Assessment and the Claim: Adds detail about a limited situation where a Start of Therapy (SOT) PPS completed to establish the resident's RUG-IV therapy classification is subsequently rejected due to the resident index maximizing to a non-rehab RUG. Only in this case may a SNF choose to complete a COT PPS to establish the resident's RUG-IV therapy classification.
- Section 6.6, RUG-IV 66-Group Model Calculation Worksheet for SNFs: Changes "is" to "is not" in the example for "Situation 2," so it now reads: "If the Z0100A classification for an SOT (Item A0310C = 1), not combined with an OBRA assessment or other PPS assessment, is not in a Rehabilitation Plus Extensive Services group or a Rehabilitation group, then the following adjustment applies: 1. The Medicare Non-Therapy RUG-IV group reported

- in Item Z0150A should be adjusted to AAA (the default group)."
- Section 6.6, ARD Outside the Medicare Part A SNF Benefit: Clarifies a SNF may use a date outside the SNF Part A Medicare Benefit period (i.e., 100 days) as the ARD for an unscheduled PPS assessment, but only in the case where the ARD for the unscheduled assessment falls on a day that is not counted among the beneficiary's 100 days due to an LOA.