

## MDS Alert

### What Do You Think?

**Question 1:** Do I have to complete a 14-day assessment if I know there is going to be a COT and the 14-day PPS assessment will not be used for payment?

**Answer 1:** All required, that is scheduled, PPS assessments must be completed and submitted whether they are used for payment or not. Realistically, if the 14-day assessment has an ARD in the early part of the window, you would not know if a COT would be needed when the 14-day assessment is started.

In any case, all scheduled assessments must all be completed, submitted, and accepted into the QIES ASAP system before the Medicare program can be billed.

**Question 2:** Can I complete and submit OBRA assessments that I know are late or have been missed?

**Answer 2:** The mandate for assessments is clear: both OBRA and PPS regulations must be met. That means the assessments must be completed and submitted as required in the RAI manual. Nothing specific is indicated relating to late or missed OBRA assessments.

However, when reviewing OBRA requirements, the following F tags relate to timeliness of the RAI completion process: 273, 275, 276, and 287. It is important to follow the timelines and guidance for completion. However, if an OBRA MDS is missed, it is best to complete a late one and potentially be cited for a late assessment, than to be cited for not completing one at all.

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