

LEARNING OBJECTIVES

- ☐ Describe 2 Challenges faced by Long-Term Care **Providers**
- ☐ Identify the Manual that provides specific guidance on how to code the MDS 3.0 Items
- ☐ Enumerate the components of the RAI (Resident Assessment Instrument) Process in LTC
- ☐ List two (2) Reasons why Accurate Coding of the MDS 3.0 is important to ensure a Skilled Nursing Facility's
- ☐ Enumerate three (3) MDS 3.0 Sections or Items that will affect Clinical Reimbursement under PDPM
- ☐ Discuss how the MDS 3.0 affects the facility's Five Star Rating Score

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AGENDA

9:00 AM - 10:30 AM:

- □ OVERVIEW OF CURRENT STATE OF AFFAIRS AND CHALLENGES FACED BY LONG-TERM CARE PROVIDERS
- ☐ MDS 3.0 and the RAI PROCESS
- ☐ IMPORTANCE OF THE MDS 3.0 IN LTC
 - o Resident Care Planning and Survey
 - o Five Star Rating and QM's
 - o SNF Clinical Reimbursement: PDPM

Break: 10:30 AM - 10:45 AM

10: 45 AM - 12:15 PM:

☐ REVIEW OF MDS 3.0 SECTIONS AND ITEMS - A PRACTICAL APPROACH

Lunch Break: 12:30 PM -1:00 PM

(Continuation)

1:00 PM - 2:30 PM:

☐ MDS 3.0: IMPACT ON—5-STAR RATING, QUALITY MEASURES, SURVEY, CARE COMPARE

Break: 2:30 PM -2:45 PM

2:45 PM - 4:15 PM:

☐ MDS 3.0: IMPACT ON CASE MIX – PDPM: Understanding the Components and Logic behind the assignment of Case Mix Indices

4:15 PM - 4:30 PM:

☐ QUESTIONS and ANSWERS

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CURRENT STATE OF AFFAIRS

2020 Total US Health Expenditures = \$4.1 Trillion

- ☐ Medicare Beneficiaries = 61.2 Million (Traditional = 37.74 M & MA = 23.46 M)
- ☐ Medicare Part A Trust Fund Insolvency: Currently projected in 2026
- □CMS CERT Program: Reported \$79.6 Billion **Improper Medicare Payments over the past three**
- ■SNF's: Improper Payments in 2021 increased to 7.79% from 5.43% in 2020. (Decreased for other Providers)
- □COVID-19-RELATED FUNDING: Will be Scrutinized

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES

- ☐ Most Medicare FFS improper payments: Secondary to Insufficient documentation, Incorrect Coding,
 Billing errors and Lack of Medical Necessity
- □ These errors could be unintentional, due to lack of education or review and in many cases, lack of effective communication between the clinicians and the billers.
- □When compliance is not met, providers risk (whether intentionally or with gross negligence)
 False Claims Act violations and potential criminal or civil proceedings.

Many Agencies Charged with Oversight: Our **Esteemed Auditors** HMO'S CERT UPIC/ PERM SMRC Q10 -LIVANTA RAC OIG SNF CHART MAC - TPE to support UB-04 & MEDICAID PROBE)

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CHALLENGES IN LONG-TERM CARE

- 1. SUSTAINING OCCUPANCY:
- ☐ February 2022 SNF Occupancy at its highest since the COVID-19 Pandemic = Average of **76.7%** (Source: National Investment Center for Seniors Housing & Care)
- ☐ Hospitals pushing discharge to Home Health Care."
- 2. HEIGHTENED LEVELS OF WORKFORCE STRESS
- ☐ On-going scrutiny: Federal & State Survey Agencies ☐ Increased Staffing Requirements YET there is a
- shortage of Health Care Workers; Agency Staffing

 Average annual Turnover Rates (Source: Journal of the American Geriatrics Society (published 5/2022): Data from PBJ Data 2018 2019)

 RN 's = 44%; Total Nursing Staff = 46%

Lower among nursing homes with higher star ratings.

STAFF RETENTION EFFORTS: CRUCIAL

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CHALLENGES IN LONG-TERM CARE

- 3. PROPOSED FY 2023 MEDICARE PAYMENT CUTS:
- ☐ CMS estimates that the aggregate impact of the payment policies in this proposed rule would result in a decrease of approximately \$320 million in Medicare Part A payments to SNFs in FY 2023
- 4. INCREASED SCRUTINY OF CLAIMS
- Claims Audits ramping up
- Areas of Scrutiny: PDPM, ICD-10-CM, and UB-04 coding and supportive documentation, the proper use of SNF waivers, and appropriate access to and accounting for Provider Relief Funds.

(SOURCE: Proactive Medical Review | April 20, 2021)

CHALLENGES IN LONG-TERM CARE

- 5. PRESIDENT BIDEN'S NURSING HOME REFORM PLANS
- "... The only additional funding called for in the
 Administration's nursing home initiative is for more
 survey resources," she noted. "Finding more deficiencies
 & taking money out of nursing homes is not going to get
 us what we want. If this model worked, & if today's
 reimbursement was sufficient, we wouldn't be
 experiencing the crisis in access to care."

 "A staffing ratio mandate will not amount to more than
 words and more fines for noncompliance without
 meaningful changes to increase the supply of qualified
 workers, for example, in immigration policy,"
 [Statements from Leading Age MD President Allison Ciborowski]

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PRESIDENT BIDEN'S NURSING HOME REFORM PLANS

Ensuring Taxpayer Dollars Support Nursing Homes That Provide Safe, Adequate, and Dignified Care

- 1. Establish Minimum Nursing Home Staffing Requirement
- 2. Reduce Resident Room Crowding.
- 3. Strengthen the "SNF-VBP" Program.
- 4. Reinforce Safeguards against Unnecessary Medications and Treatments.

Enhancing Accountability and Oversight

- 5. Adequately Fund Inspection Activities (25% increase)
- 6. Beef up Scrutiny on More of the Poorest Performers (SPECIAL FOCUS FACILITIES)

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PRESIDENT BIDEN'S NURSING HOME REFORM PLANS

Increasing Transparency

- 10. Create a Database of NH Owners & Operators.
- 11. Improve Transparency of Facility Ownership & Finances
- 12. Enhance Nursing Home Care Compare: CMS will ensure that ratings more closely reflect data that is verifiable, rather than self-reported, and will hold nursing homes accountable for providing inaccurate information. The President is calling on Congress to give CMS additional authority to validate data and take enforcement action against facilities that submit incorrect information.
- 13. Examine the Role of Private Equity.

PRESIDENT BIDEN'S NURSING HOME REFORM PLANS

PRESIDENT BIDEN'S NURSING HOME REFORM PLANS

o CMS will also use data, predictive analytics, and other

President Biden is also calling on Congress to raise the

dollar limit on per-instance financial penalties levied

on poor-performing facilities, from \$21,000 to

9. Provide Technical Assistance to Nursing Homes to

8. Increase Accountability for Chain Owners of

\$1,000,000.

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Substandard Facilities.

Help them Improve. (QIO'S)

information processing tools to improve enforcement.

7. Expand Financial Penalties & Other Enforcement

Creating Pathways to Good-paying Jobs with the Free and Fair Choice to Join a Union

- 14. Ensure Nurse Aide Training is Affordable.
- 15. Support State Efforts to Improve Staffing and Workforce Sustainability.
- 16. Launch National Nursing Career Pathways Campaign Ensuring Pandemic & Emergency Preparedness in NH's
- 17. Continued COVID-19 Testing in LTC Facilities.
- 18. Continued COVID-19 Vaccinations and Boosters in Longterm Care Facilities.
- 19. Strengthen Requirements for On-site IP'S
- 20. Enhance Requirements for Pandemic & Emergency Preparedness.
- 21. Integrate Pandemic Lessons into NH Requirements.

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April 16th is
National Stress Awareness Day

IT'S TRUE
MISERY LOVES
COMPANY BUT
RIGHT NOW
THERE'S acode for that!
INTURES (ICD:10) F43:0

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LET US FOCUS... HOW CAN WE SURVIVE?

- FEDERAL and STATE REGULATORY COMPLIANCE; LIFE SAFETY CODE
- FACILITY ASSESSMENT & QAPI (Huge Focus on Infection Control)
- 3. CLINICAL REIMBURSEMENT AND BENEFITS INTEGRITY
- 4. CORPORATE COMPLIANCE and ETHICS
- 5. STAFFING RECRUITMENT and RETENTION
- 6. EDUCATION & TRAINING (COMPETENCIES)
- 7. BUDGET and RESOURCE UTILIZATION
- 8. SUSTAINABILITY & COMMITMENT to POSITIVE CLINICAL & FINANCIAL OUTCOMES
- 9. PATIENT and FAMILY (RP) SATISFACTION

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ROLE OF MDS



☐ The MDS 3.0 is the most important document in a Skilled Nursing Facility.

- ☐ Accuracy in coding the MDS (in accordance with the RAI MDS 3.0 Manual instructions) is key to the success of a facility.
- ☐ The role of the MDS Department has evolved into something that not only coordinates the care of each resident but also manages systems to promote the facility's survival.
- ☐ MDS Coordinators must work closely with Nursing, MD's & the IDCP team to ensure STRONG CLINICAL & NURSING DOCUMENTATION, ICD-10-CM CODING & CARE PLANNING

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OVERCOME OBSTACLES TO
ACCURATE MDS

COMMON OBSTACLES:

- **□**Communication
- **□**Education
- □ Lack of Collaboration
- **□**Environment
- □Time
- □ Documentation
- ☐ Data Collection
- ☐ Lack of Oversight and Accountability

TEAMWORK IS A MUST!

□ ATTENDING PHYSICIAN □ ADMINISTRATOR

□ DIRECTOR OF NURSING

☐MDS DEPARTMENT

□IDC TEAM MEMBERS: NURSING, REHAB, SOCIAL SERVICES, DIETARY, ACTIVITIES

□ FRONT-LINE CAREGIVERS

□PHYSICIANS
□ADMISSIONS DEPARTMENT

□BILLING OFFICE STAFF

□ UR COMMITTEE MEMBERS

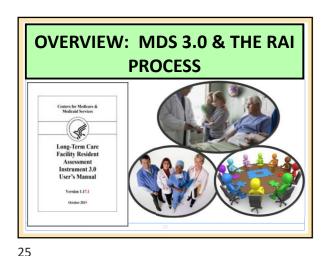
□ QA COMMITTEE MEMBERS

There is NO "1" in TEAM!!!

Teamwork

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BRIEF-HISTORY OF THE MDS

- OBRA '87: Major Federal Nursing Home Reform
- ☐ 1990: Nursing Home Case Mix and Quality Demo
- ☐ 1991: MDS 1.0 Nationally Implemented
- ☐ 1995: MDS 2.0 Nationally Implemented
- ☐ 1998: Medicare PPS & National MDS Automation for Data Transmission
- ☐ 1999: Quality Indicators for Survey
- 2002: Quality Measures /RAI Manual revised
- ☐ 2010: MDS 3.0 implemented on October NUMEROUS UPDATES & ERRATA DOCUMENTS (now v1.17.1)
- 2014: SNF-QRP; SNF-VBP
- ☐ 2018: FY 2019 SNF PPS FINAL RULE PDPM INTRO
- ☐ 2019: OCTOBER 1, 2019 PDPM IMPLEMENTATION

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MDS UPDATES SINCE COVID-19

March 19, 2020:

☐ CMS <u>delayed the Minimum Data Set (MDS) 3.0</u> v1.18.1 release, which had been scheduled for October 1, 2020, in response to stakeholder concerns. Draft was posted in December of 2019.

October 01, 2021:

☐ "MDS 3.0 RAI Manual v1.17.1R. Errata. Revisions to pages in Chapter 6 of the MDS 3.0 RAI Manual v1.17.1R that update the NTA Comorbidity Score Calculation table.



APPENDIX B: STATE RAI COORDINATORS NJ Dawn Stillwell dawn.stillwell@doh.nj.gov Arlene McNinch (backup) arlene.mcninch@doh.nj.gov ☐ MDS AUTOMATION COORDINATOR Eunice Santiago cheryl.boknoski@doh.ni.d Cheryl Boknoski (backup) RAI Panel: Experienced RAI Coordinators who assist CMS & other State RAI Coordinators to answer MDS-related questions. State/Region RAI Coordinator Panel Member Email Susana Belda Susana.Belda@cdph.ca.gov п Lori Brown Lori.j.brown@illinois.gov ME Suzanne Pinette Suzanne.pinette@maine.gov MN Nadine Olness Health.mds@state.mn.us МО Stacey Bryan Stacey.Bryan@health.mo.gov NM Rosie Brandenberger Rosie.Brandenberger@state.nm.us OK Diane Henry DianeH@health.ok.gov

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WHAT IS THE MDS?

- ☐ A federally mandated tool that ensures collection of minimum, standardized assessments for each resident at regular intervals
- Drives the development of an individualized plan of care based on resident's identified needs, strengths and preferences
- □ Required for all residents in Medicaid/ Medicare certified beds in LTC facilities & who have been in the facility for 14 days or more
- ☐ The 1st component of the RAI process

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WHAT IS THE RAI?

- ☐ Resident Assessment Instrument
- □ A structured, standardized approach to applying a <u>problem identification process</u>
- ☐ RAI is comprised of **3 Basic Components**:
- 1) MDS 3.0 (Minimum Data Set)
- Care Area Assessment Process (CAA) -Includes Care Area Triggers (CATS)
- Care Planning and RAI Utilization Guidelines - in State Operations Manual, Appendix PP.

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RAI PROCESS

Regulatory requirements. Federal regulations at 42 CFR 483.20 (b)(1)(xviii), (g), and (h) require that

- (1) the <u>assessment accurately reflects the</u> <u>resident's status</u>
- (2) a <u>Registered Nurse</u> conducts or coordinates each assessment with the appropriate participation of health professionals
- (3) the assessment process includes <u>direct</u> <u>observation</u>, <u>as well as communication with the resident and direct care staff on all shifts.</u>

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RAI PROCESS

- ☐ Given the requirements of participation of appropriate health professionals and direct care staff, completion of the RAI is best accomplished by an interdisciplinary team (IDT) that includes nursing home staff with varied clinical backgrounds, including nursing staff and the resident's physician.
- ☐ IDT brings their combined experience & knowledge to the table in providing an understanding of the strengths, needs and preferences of a resident to ensure the best possible quality of care and quality of life.

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LAYOUT OF RAI MANUAL

Appendices

- ☐ <u>Appendix A:</u> <u>Glossary and Common Acronyms</u>
- ☐ <u>Appendix B:</u> State Agency and CMS Regional Office RAI/MDS Contacts
- ☐ <u>Appendix C:</u> Care Area Assessment (CAA) Resources
- ☐ Appendix D: Interviewing to Increase Resident Voice in MDS Assessments
- □ Appendix E: PHQ-9 Scoring Rules and Instruction for BIMS (When Administered In Writing)
- Appendix F: MDS Item Matrix
- Appendix G: References
- ☐ Appendix H: MDS 3.0 Item Sets

RAI PROCESS

Nursing homes are left to determine

- (1) who should participate in the assessment process
- (2) how the assessment process is completed
- (3) how the assessment information is documented while remaining in compliance with the requirements of the Federal regulations and the instructions contained within this manual.

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LAYOUT OF RAI MANUAL

- ☐ Chapter 1: Resident Assessment Instrument
- ☐ Chapter 2: Assessments for the Resident Assessment Instrument (RAI)
- ☐ Chapter 3: Overview to the Item-by-Item
 Guide to the MDS 3.0
- ☐ Chapter 4: Care Area Assessment (CAA)

 Process and Care Planning
- ☐ Chapter 5: Submission and Correction of the MDS Assessments
- ☐ <u>Chapter 6: Medicare Skilled Nursing Facility</u> <u>Prospective Payment System (SNF-PPS)</u>







RESPONSIBILITIES OF NURSING HOMES FOR COMPLETING MDS ASSESSMENTS

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The RAI PROCESS

- ■Minimum Data Set (MDS) is a screening tool that provides clues about the resident's functional and health status
- □Specific MDS answer options are the clues (Triggers) that point to possible problem in a particular Care Area
- □Further assessment of entire care area required to be able to draw conclusions

Individualized and Personalized CARE
PLAN = Outcome

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DEFINITIONS

- ☐ Admission refers to the date a person enters the facility and is admitted as a resident. A day begins at 12:00 a.m. and ends at 11:59 p.m. (DAY #1)
- Assessment Reference Date (ARD) refers to the last day of the observation (or "look back") period that the assessment covers for the resident. Since a day begins at 12:00 a.m. and ends at 11:59 p.m., the ARD must also cover this time period. The facility is required to set the ARD on the MDS Item Set or in the facility software within the required time frame of the assessment type being completed.

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DEFINITIONS

- □ <u>Death in Facility</u> refers to when the resident dies in the facility or dies while on a leave of absence (LOA)
- □ Leave of Absence (LOA), which does not require completion of either a Discharge assessment or an Entry tracking record, occurs when a resident has a:
 - o Temporary home visit of at least one night; or
 - o Therapeutic leave of at least one night; or
 - Hospital observation stay less than 24 hours and the hospital does not admit the resident.

DEFINITIONS

- □ <u>Discharge</u> refers to the date a resident leaves the facility, or the date the resident's Medicare Part A stay ends but the resident remains in the facility.
- o Resident discharged to a private residence
- Resident is <u>admitted to a hospital or other care</u> setting
- Resident has a hospital observation stay greater than 24 hours, regardless of whether the hospital admits the resident.
- Resident is transferred from a Medicare- and/or Medicaid-certified bed to a non-certified bed.
- Resident's Medicare Part A stay ends, but the resident remains in the facility. (NPE)

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DEFINITIONS

- □ Discharge Assessment: Assessment required on resident discharge from the facility, or when a resident's Medicare Part A stay ends, but the resident remains in the facility (unless it is an instance of an interrupted stay).
- □ Interrupted Stay: A Medicare Part A SNF stay in which a resident is discharged from SNF care (i.e., the resident is discharged from a Medicare Part A-covered stay) and subsequently resumes SNF care in the same SNF for a Medicare Part A-covered stay during the interruption window.

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DEFINITIONS

- □ Interruption Window: A 3-day period, starting with the calendar day of Part A discharge and including the 2 immediately following calendar days.
- ☐ If a resident in a Medicare Part A SNF stay is discharged from Part A, the resident must resume Part A services, or return to the same SNF (if physically discharged) to resume Part A services, by 11:59 p.m. at the end of the third calendar day after their Part A-covered stay ended.
- ☐ The interruption window begins with the first noncovered day following a Part A-covered stay and ends at 11:59 p.m. on the third consecutive non-covered day following a Part A-covered SNF stay.

TYPES OF MDS 3.0 ASSESSMENTS

OBRA-REQUIRED
TRACKING RECORDS & ASSESSMENTS

Tracking Records

□Entry (A0310F=01)

□Death in Facility (A0310F=12)

OBRA Assessments (A03010)

- □ Admission (Comprehensive)
- Quarterly
- ☐ Annual (Comprehensive)
- □ SCSA (Comprehensive)
- □ Discharge (Return Not Anticipated or Return Anticipated)
- ☐ SCPA (Comprehensive)
- □ SCQA

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TYPES OF MDS 3.0 ASSESSMENTS (PPS ASSESSMENTS) – A0310B

- □ 5-Day Assessment
- ☐ Interim Payment Assessment (IPA)



***If completed for Medicare HMO's or other private insurances – DO NOT TRANSMIT! MDS 3.0 ITEM SETS



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ITEM SETS

- □ <u>Comprehensive</u> (NC2) <u>Item Set.</u> This is the set of items active on an OBRA Comprehensive assessment (Admission, Annual, SCSA, and SCPA).
- □ Quarterly (NQ) Item Set. This is the set of items active on an OBRA Quarterly assessment (including Significant Correction of Prior Quarterly assessment [SCQA]). This item set is used for a standalone Quarterly Assessment, or a Quarterly assessment combined with any type of PPS assessment and/or Discharge assessment.

ITEM SETS

- □ <u>PPS (NP) Item Set.</u> This is the set of items active on a 5-Day PPS assessment
- □ Interim Payment Assessment (IPA) Item Set.

 This is the set of items active on an Interim

 Payment Assessment and used for PPS payment
 purposes. This is a standalone assessment.
- □ <u>Discharge (ND) Item Set</u>. This is the set of items active on a standalone OBRA Discharge assessment (either return anticipated or not anticipated) to be used when a resident is physically discharged from the facility.

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ITEM SETS

- □ Part A PPS Discharge (NPE) Item Set. This is the set of items active on a standalone nursing home Part A PPS Discharge assessment for the purposes of the SNF QRP. It is completed when the resident's Medicare Part A stay ends, but the resident remains in the facility.
- □ Tracking (NT) Item Set. This is the set of items active on an Entry Tracking Record or a Death in Facility Tracking Record.

ITEM SETS

- □ Optional State Assessment (OSA). This is the set of items that may be required by a State Medicaid agency to calculate the RUG III or RUG IV HIPPS code. This is not a Federally required assessment; rather, it is required at the discretion of the State Agency for payment purposes. This is a standalone assessment.
- □ <u>Inactivation Request (XX) Item Set.</u> This is the set of items active on a request to inactivate a record in the QIES ASAP system.

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MDS 3.0: WHEN TO DO WHAT				
	OBRA	PPS		
WHO	All residents who are in the facility for at least 14 days	All residents in a Medicare Part A-covered stay		
WHAT	MDS 3.0	MDS 3.0		
WHEN	Completed upon Admission/Discharge to/from a nursing home, Quarterly, Yearly, and when Significant Changes occur	Scheduled 5-DAY assessment Optional IPA (Interim Payment Assessment) PPS Discharge Assessment		
WHY	Quality Measurement, Facility Survey and Certification Requirements and Care Planning Purposes	Payment Rate Determination SNF-QRP		

GENERAL KEY POINTS

ON MDS COMPLETION

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Completion of MDS Assessment

- □ Federal regulations require the RAI be conducted or coordinated with the appropriate participation of health professionals who have the knowledge and expertise to do an accurate and comprehensive assessment in all areas.
- □RAI must be conducted or coordinated by a REGISTERED NURSE (RN)

*Important to consider State's Scope of Practice - RNs versus LPNs WHERE DOES INFO COME FROM?

□Multiple Sources

- oResident, Resident's Family, Significant Others
- oHealth Care Team Members

□Multiple Methods

- oObservation
- oInterview
- oRecord Review



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KEY POINTS: RESIDENT'S VOICE

- □ Resident Interviews are an integral part of the resident assessment process
- □All residents capable of any communication should be asked to give information about what is important in their care
- □ 5 specific areas of MDS 3.0 require a direct interview of the resident as the primary source of information
- □ Resident Interviews are "Stand-alone" Items (But Care Plan Accordingly)
 - *Appendix D of the Manual has information on interviewing, including techniques to use

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Interview Clarifications

- Applies to all interview sections
 - o Section C BIMS
 - o Section D PHQ-9
 - o Section F Activities and Preferences
 - o Section J Pain
- □ Staff interview should not be completed in place of resident interview if the resident interview should have been completed.
 - o Answer "Gateway" question as "yes"
 - o Dash interview items
- ☐ B0700 should **NOT** be coded as "Rarely/Never Understood" if any of the **resident interviews** were completed.

KEY POINTS: STAFF ASSESSMENT

Interview Clarifications

□ Section C (BIMS) – Conducted during the look

back period, preferably on ARD or day before ARD

□ Section F (Activities/Preferences) – Conducted

anytime during the 5-day lookback period. It is

PREFERRED to conduct on the ARD or the day

☐ Section D (PHQ-9) – Conducted during look

back period. Preferably on the ARD or the day

Section J (Pain Interview) – Conducted

Timing of Resident Interviews:

during the look back period.

before ARD

before.

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- □When residents are unable or refuse to participate in the *4 specific resident interview items*, staff assessment interviews will need to be done
- ☐This is the only reason to do the staff interview
- ☐These interviews will focus on the same information as the resident interview
- ☐Staff will base their responses on observations they have made of the resident during cares and activities in the look-back period.
- □ Needs "Supporting Documentation" unlike Resident Interviews

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KEY POINTS: CODING CONVENTIONS

- ☐ The standard look-back period is <u>7 days</u> unless otherwise stated
- ☐ With exception of certain items (e.g., in Sections K & O), the look-back period does not extend into the preadmission period unless the item instructions state otherwise.
- ☐ In case of reentry, look-back period does not extend into time prior to the reentry, unless instructions state otherwise
- ☐ For items that say "check all that apply" if specified conditions are not met, leave boxes empty (blank)
- ☐ Use numeric response for MDS items that require a coded response
- ☐ When the count or measurement of an item exceeds the number of boxes available, use the code of "9"

LET'S GO OVER THE
THE MDS 3.0

RAI MANUAL CHAPTER 3: FORMAT – HOW TO USE

- ☐ Intent. The reason(s) for including this set of assessment items in the MDS.
- □ <u>Item Display.</u> To facilitate accurate resident assessment using the MDS, each assessment section is accompanied by screenshots, which display the item from the MDS 3.0 item set.
- ☐ Item Rationale. The purpose of assessing this aspect of a resident's clinical or functional status.
- ☐ Health-related Quality of Life. How the condition, impairment, improvement, or decline being assessed can affect a resident's quality of life, along with the importance of staff understanding the relationship of the clinical or functional issue related to quality of life.

SECTIONS IN

THE MDS 3.0 FORM

"Refer to Color-Coded

MDS 3.0 Form -

A Practical Approach"

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COLOR-CODING

RAI MANUAL CHAPTER 3: FORMAT - HOW TO USE

□ Planning for Care. How assessment of the condition,

☐ Steps for Assessment. Sources of information and

□ Coding Instructions. The proper method of recording

☐ Coding Tips and Special Populations. Clarifications,

issues of note, and conditions to be considered when

□ Examples. Case examples of appropriate coding for

can contribute to appropriate care planning.

each MDS item.

categories.

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impairment, improvement, or decline being assessed

methods for determining the correct response for coding

each response, with explanations of individual response



□ GREEN: Payment Drivers

coding individual MDS items.

most, if not all, MDS sections/items.

□ <u>RED:</u> Potential triggers for CAA's and CARE PLANNING

□ BLUE (with numbers after the item): QM Triggers

□ PURPLE (Sections outlined in purple):
Resident Review Items

□ ORANGE (Sections outlined in orange):
Alternative to Resident Interview; i.e., Staff
Assessment

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MDS 3.0 SECTIONS

- □ SECTION A: Identification Information
- □ SECTION B: Hearing, Speech and Vision
- □ SECTION C: Cognitive Patterns & Delirium
- □ SECTION D: Mood
- □ SECTION E: Behavior
- □ SECTION F: Preferences for Customary Routine

& Activities

- □ SECTION G: Functional Status
- □ SECTION GG: Functional Abilities & Goals
- □ SECTION H: Bladder & Bowel

MDS 3.0 SECTIONS

□<u>SECTION I: Active Diagnoses</u>

□SECTION J: Health Conditions

□ SECTION K: Swallowing/Nutritional

Status

□SECTION L: Oral/Dental Status

□ SECTION M: Skin Conditions

□SECTION N: Medications

□SECTION O: Special Treatments,

Procedures and Programs

SECTION P: Restraints & Alarms



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MDS 3.0 SECTIONS SECTION Q: Participation in Assessment & Goal-Setting SECTION V: CAA Summary V0100: CARE AREA ASSESSMENT (CAA) SUMMARY V0200: CAAs and CARE PLANNING SECTION X: Correction Request SECTION Z: Assessment Administration

MDS 3.0 CODING

VULNERABILITIES related to

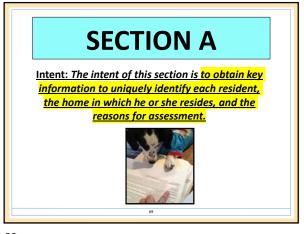
PDPM;

CMS CLARIFICATIONS;

Focus of AUDITS

http://ww

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Section A, "Identification Information"

☐ <u>A0410:</u> Unit Certification or Licensure

Designation: <u>Always Code #3 − If facility is</u>

<u>Medicare and/or Medicaid certified.</u>

☐ UNIQUE IDENTIFIERS:

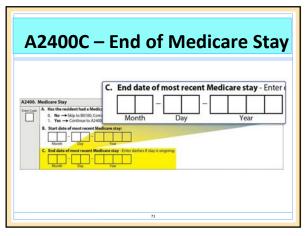
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A0500: Legal Name of ResidentA0600: SS and Medicare Numbers

A0800: GenderA0900: Birth Date

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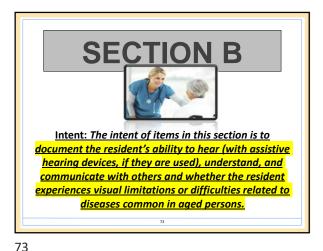
Section A, "Identification Information"

☐ Enter the Start Date of that Medicare stay in A2400B; i.e., the most recent of the Part A stays that occurred since the Entry Date.

☐ Enter the <u>end date of that stay in A2400C</u>. This is defined as <u>whichever of the ff. occurred first:</u>

- 1. The date benefits exhausted (day 100 of Part A stay)
- Date of last day covered as recorded as the effective date on the Notice of Medicare Non-Coverage (NOMNC)
- 3. <u>The last paid day of Medicare A</u> when payer source changes to another payer
- 4. <u>Date the resident was discharged from the facility (the A2000, Discharge Date)</u>

71 72



Look back period for all items is 7 days unless another time frame is indicated Hearing, Speech, and Vision B0800. Ability To Understand Others

B0700: Makes Self Understood (Will affect SLP-Cognition) B0700. Makes Self Understood Understood
 Understood - difficulty communicating some words or finishing thoughts but is able if prompted or g
 Sometimes understood - ability is limited to making concrete requests MAKES SELF UNDERSTOOD ☐ Able to express or communicate requests, needs, opinions, and to conduct social conversation in his or her primary language, whether in speech, writing, sign language, gestures, or a combination of these. Deficits in the ability to make one's self understood (expressive communication deficits) can include reduced voice volume and difficulty in producing sounds, or difficulty

in finding the right word, making sentences, writing,

B0700: Makes Self Understood (Will affect SLP-Cognition) Coding Instructions: □Code 0, Understood: if the resident expresses requests & ideas clearly. □Code 1, Usually Understood: if the resident has difficulty communicating some words or finishing thoughts but is able if prompted or given time. He or she may have delayed responses or may require some prompting to make self understood. □Code 2, Sometimes Understood: if the resident has limited ability but is able to express concrete requests regarding at least basic needs (e.g., food, drink, sleep, toilet). □Code 3, Rarely or Never Understood: if, at best, the resident's understanding is limited to staff interpretation of highly individual, resident-specific sounds or body language

SECTION C

Intent: The items in this section are intended to

determine the resident's attention, orientation and

ability to register and recall new information.

These items are crucial factors in many care-

<u>planning decisions.</u>

(e.g., indicated presence of pain or need to toilet).

75

B0700: Makes Self Understood (Will affect SLP-Cognition)

Coding Tips:

and/or gesturing.

☐ This item cannot be coded as "Rarely/Never **Understood**" if the resident completed any of the resident interviews, as the interviews are conducted during the look-back period for this item and should be factored in when determining the residents' ability to make self understood during the entire 7-day lookback period.

☐While B0700 and the resident interview items are not directly dependent upon one another,

inconsistencies in coding among these items should be evaluated.

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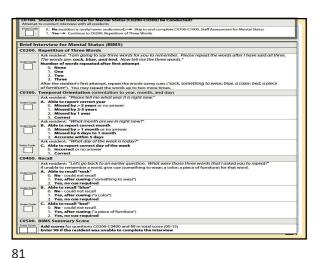
77

SECTION C: COGNITIVE PATTERNS

Steps for Assessment

- 1. Interact with the resident using his or her preferred language. Be sure he or she can hear you and/or has access to his or her preferred method for communication. If the resident appears unable to communicate, offer alternatives such as writing, pointing, sign language, or cue cards.
- 2. Determine if the resident is rarely/never understood verbally, in writing, or using another method. If rarely/never understood, skip to C0700-C1000, Staff Assessment of Mental
- 3. Review Language item (A1100), to determine if the resident needs or wants an interpreter. If the resident needs or wants an interpreter, complete the interview with an interpreter.

79



PDPM Cognitive Scoring

Because a PDPM cognitive level is utilized in the speech language pathology (SLP) payment component of PDPM, assessment of resident cognition with the BIMS or Staff Assessment for Mental Status is a requirement for all PPS assessments. As such, only in the case of PPS assessments, staff may complete the Staff Assessment for Mental Status for an interviewable resident when the resident is unexpectedly discharged from a Part A stay prior to the completion of the BIMS. In this case, the assessor should enter 0, No in C0100: Should Brief Interview for Mental Status Be Conducted? and proceed to the Staff Assessment for Mental Status. (RAI 2019, C-

SECTION C: SHOULD BIMS BE CONDUCTED?

Coding Instructions:

- □ Code 0, NO: if the interview should not be conducted because the resident is rarely/never understood; cannot respond verbally, in writing, or using another method; or an interpreter is needed but not available. Skip to C0700, Staff Assessment of Mental
- □ Code 1, YES: if the interview should be conducted because the resident is at least sometimes understood verbally, in writing, or using another method, and if an interpreter is needed, one is available. Proceed to C0200, Repetition of Three Words.

80

SECTION C: BIMS (Will affect SLP-Cognition)

Coding Tips

□ Attempt to conduct the interview with ALL residents. ☐ Conducted during the look-back period of the ARD ☐ If the resident needs an interpreter, every effort should be made to have an interpreter present for the BIMS. Includes residents who use American Sign Language (ASL).

☐ If the resident interview was not conducted within the lookback period (preferably the day before or the day of) the ARD, item C0100 must be coded 1, Yes, and the standard "no information" code (a dash "-") entered in the resident interview items.

□Do not complete the Staff Assessment for Mental Status items (C0700-C1000) if the resident interview should have been conducted but was not done.

82

Section C, BIMS - BRIEF INTERVIEW FOR MENTAL STATUS (Will affect SLP-Cognition)

C0500. BIMS Summary Score

Add scores for questions C0200-C0400 and fill in total score (00-15)
Enter 99 if the resident was unable to complete the interview

BIMS Total Score:

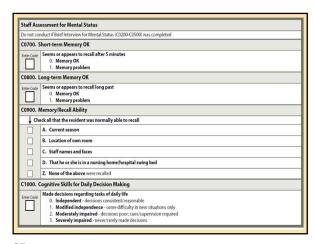
□13-15: Cognitively Intact

□8-12: Moderately Impaired

□0-7: Severe Impairment

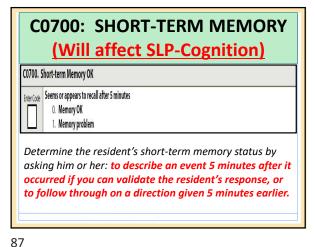
*Resident Interview (BIMS) is a Stand-alone Document – Must be completed on or before the ARD during the look back period.

83 84



| Diter Code | O. No (resident was able to complete Brief Interview for Mental Status) → Skip to C1310, Signs and Symptoms of Delin |
1. Yes (resident was unable to complete Brief Interview for Mental Status) → Continue to C0700, Short-term Memory Review whether BIMS Summary Score item (C0500), is coded 99, unable to complete interview. Coding Instructions: □ Code 0, No: if the BIMS was completed and scored between 00 and 15. Skip to C1310. □ Code 1, Yes: if the resident chooses not to participate in the BIMS or if four or more items were coded 0 because the resident chose not to answer or gave a nonsensical response. Continue to C0700-C1000 and perform the Staff Assessment for Mental Status, Note: C0500 should be coded 99. If a resident is scored 00 on C0500, C0700-C1000, Staff Assessment, should not be completed. 00 is a legitimate value for C0500 & indicates that the interview was complete. To have an incomplete interview, a resident had to choose not to answer or had to give completely unrelated, nonsensical responses to 4 or more BIMS items.

85 86



C0900: MEMORY/RECALL **ABILITY** (Will affect SLP-Cognition) C0900. Memory/Recall Ability I Check all that the resident was normally able to recall A. Current season C. Staff names and faces D. That he or she is in a nursing home/hospital swing bed Z. None of the above were recalled

88

C1000: COGNITIVE SKILLS FOR DAILY DECISION-MAKING (Will affect SLP-Cognition) C1000. Cognitive Skills for Daily Decision Making Made decisions regarding tasks of daily life 0. Independent - decisions consistent/reasonable 1. Modified independence - some difficulty in new situations only 2. Moderately impaired - decisions poor; cues/supervision required 3. Severely impaired - never/rarely made decisions □ If the resident "rarely or never" made decisions, despite being provided with opportunities and appropriate cues, Item C1000 would be coded 3, severely impaired. □ If the resident makes decisions, although poorly, code 2. moderately impaired.

Section C, Staff Assessment for Mental Status IMPAIRED COGNITION = CPS \geq 3: If one of the (3) following conditions exists: 1. B0100 Coma (B0100 = 1) & Completely ADL Dependent or ADL did not occur (G0110A1, G0110B1, G0110H1, G0100I1 all = 4 or 2. C1000 Severely Impaired Cognitive Skills (C1000 = 3) B0700, C0700, C1000: Two or more of the following impairment indicators are present: □B0700 > 0: Problem being understood □C0700 = 1: Short-term memory problem □C1000 > 0: Cognitive Skills Problem and 1 or more of the ff. severe impairment indicators are present: o B0700 >= 2: Severe problem being understood ○ C1000 >= 2: Severe cognitive skills problem Staff Assessment requires supporting documentation oring for CFS under PDPM will be different (Score of 1 – 6 will trigger Impaired Cognition)*

89 90

SECTION D

Intent: The items in this section address
mood distress, a serious condition that is underdiagnosed and
undertreated in the nursing home and is associated with
significant morbidity. It is particularly important to identify
signs and symptoms of mood distress among nursing home
residents because these signs and symptoms can be treatable.
It is important to note that coding the presence of indicators in
Section D does not automatically mean that the resident has a
diagnosis of depression or other mood disorder. Assessors do
not make or assign a diagnosis in Section D; they simply
record the presence or absence of specific clinical mood
indicators. Facility staff should recognize these indicators and
consider them when developing the resident's individualized

care plan.

Section D: MOOD (NURSING DEPRESSION END-SPLIT FOR CLINICALLY COMPLEX; SPECIAL CARE HIGH & SPECIAL CARE LOW)

☐ The resident mood interview is attempted with all

☐The resident mood interview is attempted with all residents, using either the PHQ-9 or the staff assessment, PHQ-9-OV.

☐ If the resident seems unable to communicate, offer alternatives, such as writing, pointing, sign language, or cue cards. Utilizing the techniques in Appendix D of the RAI User's Manual as well as cue cards will enhance the resident interview.

Findings suggesting mood distress should lead to:

- ☐ Identifying causes & contributing factors for Symptoms
- ☐ Identifying interventions (Tx, personal support, or environmental modifications) to address symptoms, &
- ☐ Ensuring resident safety. 92

91

92

- ☐ Most residents who are capable of communicating can answer questions about how they feel.
- ☐ Obtaining information about mood directly from the resident, sometimes called "hearing the resident's voice," is more reliable and accurate than observation alone for identifying a mood disorder.
- □ Explain the reason for the interview before beginning. Suggested language: "I am going to ask you some questions about your mood and feelings over the past 2 weeks. I will also ask about some common problems that are known to go along with feeling down. Some of the questions might seem personal, but everyone is asked to answer them. This will help us provide you with better care."

93

Interviewing Tips and Techniques:

- □ <u>UNFOLDING</u>: If the resident has difficulty selecting a frequency response, start by offering a single frequency response and follow with a sequence of more specific questions.
- □ PROBING: Noncommittal responses such as "not really" should be explored. Residents may be reluctant to report symptoms and should be gently encouraged to tell you if the symptom bothered him or her, even if it was only some of the time.
 - o "What do you mean?"; "Tell me what you have in mind."; "Tell me more about that."; "Please be more specific."; "Give me an example.

93

94

Interviewing Tips and Techniques

- □ <u>FCHOING:</u> Sometimes respondents give a long answer to interview items. It can be useful to summarize their longer answer and then ask them which response option best applies.
- Poor Appetite or Overeating. The resident responds "the food is always cold, and it just doesn't taste like it does at home. The doctor won't let me have any salt."
- Possible interviewer response: "You're telling me the food isn't what you eat at home, and you can't add salt. How often would you say that you were bothered by poor appetite or over-eating during the last 2 weeks?"

Interviewing Tips and Techniques

<u>DISENTANGLING:</u> If the resident has difficulty with longer items, separate the item into shorter parts, and provide a chance to respond after each part.

Example: Item D0200E, Poor Appetite or Overeating.

- You can simplify this item by asking: "In the last 2 weeks, how often have you been bothered by poor appetite?" (pause for a response) "Or overeating?"
 Example: Item D0200C, Trouble Falling or Staying Asleep, or Sleeping Too Much.
- You can break the item down as follows: "How often are you having problems falling asleep?" (pause for response) "How often are you having problems staying asleep?"

95

Section D	Mood		
D0100. Should Residen	st Mood Interview be Conducted? - Attempt to conduct interview with	all residents	
(PHQ-9-0)	ent is rarely/never understood) — Skip to and complete D0500-D0600, Staff Assa V) Continue to D0200, Resident Mood Interview (PHQ-90)	essment of Resident I	Mood
D0200. Resident Moo	d Interview (PHQ-90)		
	the last 2 weeks, have you been bothered by any of the following	problems?"	
If yes in column 1, then as	ter 1 (yes) in column 1, Symptom Presence. ik the resident: "About how often have you been bothered by this?" ent a card with the symptom frequency choices. Indicate response in colu	umn 2, Symptom Fr	requency.
Symptom Presence No (enter 0 in colur Yes (enter 0-3 in co No response (leave	olumn 2) 1. 2-6 days (several days) e column 2 2. 7-11 days (half or more of the days)	1. Symptom Presence	2. Symptom Frequency
blank)	12-14 days (nearly every day)	↓ Enter Scor	es in Boxes ↓
A. Little interest or plea	sure in doing things		
B. Feeling down, depre	ssed, or hopeless		
C. Trouble falling or sta	rying asleep, or sleeping too much		
D. Feeling tired or havis	ng little energy		
E. Poor appetite or over	reating		
F. Feeling bad about yo down	ourself - or that you are a failure or have let yourself or your family		
G. Trouble concentration	ng on things, such as reading the newspaper or watching television		
	so slowly that other people could have noticed. Or the opposite - estless that you have been moving around a lot more than usual		
I. Thoughts that you we	ould be better off dead, or of hurting yourself in some way		
D0300. Total Severity	Score		

Coding Instructions for Column 1

Symptom Presence

□Code 0, No: if resident indicates symptoms listed are not present enter 0. Enter 0 in Column 2 as well.

□Code 1, Yes: if resident indicates symptoms listed are present enter 1. Enter 0, 1, 2, or 3 in Column 2, Symptom Frequency.

□Code 9, No Response: if the resident was unable or chose not to complete the assessment, responded nonsensically and/or the facility was unable to complete the assessment. Leave Column 2, Symptom Frequency, blank.

97 98

Coding Instructions for Column 2. Symptom Frequency

Record the resident's responses as they are stated, regardless of whether the resident or the assessor attributes the symptom to something other than mood. Further evaluation of the clinical relevance of reported symptoms should be explored by the responsible clinician.

□Code 0, never or 1 day: if the resident indicates that he or she has never or has only experienced the symptom on 1 day. □Code 1, 2-6 days (several days): if the resident indicates that he or she has experienced the symptom for 2-6 days.

□Code 2, 7-11 days (half or more of the days): if the resident indicates that he or she has experienced the symptom for 7-11 days

□Code 3, 12-14 days (nearly every day): if the resident indicates that he or she has experienced the symptom for 12-14 days.

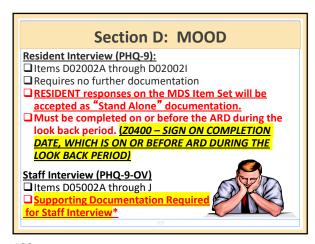
99

Mood		
nt Mood Interview (D0200-D0300) was completed		
ter 1 (yes) in column 1, Symptom Presence.		
2. Symptom Frequency umn 2) 0. Never or 1 day 1. 2-6 days (several days) 2. 7-11 days (fail or more of the days)	1, Symptom Presence	2. Symptom Frequency
	‡ Enter scor	Is in boxes ‡
		H
aying asleep, or sleeping too much		
ing little energy		
reating		
feels bad about self, is a failure, or has let self or family down		
ng on things, such as reading the newspaper or watching television		
so slowly that other people have noticed. Or the opposite - being so fidgety has been moving around a lot more than usual		
worth living, wishes for death, or attempts to harm self		
ed, easily annoyed		
Score		
or all frequency responses in Column 2, Symptom Frequency. Total score must be b	setween 00 and 30.	
	search of Bealdest Mound (PHGo-CHV)* Model Searcher (2000 000000 0000 0000 0000 0000 0000	Least of Beadeant Mond (PHLPs - QPC) Mond interesting Chico (Chico) (

SPECIAL CARE HIGH OR SPECIAL CARE LOW.

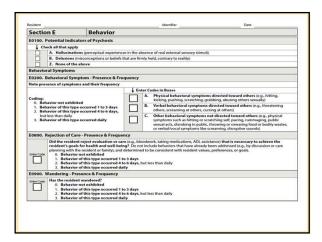
100

Add scores for all frequency responses in Column 2. Symptom TOTAL SEVERITY SCORE After completing items D0500 A- 1. Add the numeric scores across Assessment of Mood, Symptom 2. Maximum score is 30 (3 × 10 DA SCORE OF 10 OR MORE WILL	i: all frequency items for Staff Frequency (D0500) Column 2		
After completing items D0500 A-1. Add the numeric scores across Assessment of Mood, Symptom 2. Maximum score is 30 (3 × 10	all frequency items for Staff Frequency (D0500) Column 2 .		
1. Add the numeric scores across Assessment of Mood, Symptom 2. Maximum score is 30 (3 × 10	all frequency items for Staff Frequency (D0500) Column 2 .		
Assessment of Mood, Symptom 2. Maximum score is 30 (3 × 10	Frequency (D0500) Column 2		
2. Maximum score is 30 (3 × 10			
□ A SCORE OF 10 OR MORE WIL			
	. INCREASE THE NURSING		
COMPONENT CMI SCORE IF RUG SCORE IS CLINICALLY			
COMPLEX, SPECIAL CARE HIGH	R SPECIAL CARE LOW.		
*STAFF ASSESSMENT REQUIRES	DOCUMENTATION DURING		
THE 14-DAY LOOK BACK PERIOD	(FREQUENCY OF		



Intent: The items in this section identify behavioral symptoms in the last seven days that may cause distress to the resident, or may be distressing or disruptive to facility residents, staff members or the care environment. These behaviors may place the resident at risk for injury, isolation, and inactivity and may also indicate unrecognized needs, preferences or illness.

103 104



Section E: BEHAVIOR (NURSING COMPONENT –
BEHAVIOR/COGNITION QUALIFIER)

Presence of Behavior(s): Need Documentation during
the Look Back period to support Coding:

□E0100A Hallucinations
□E0100B Delusions

Presence and Frequency of Behavior(s): Need Daily
Documentation during the Look Back period to support
Coding:
□E0200A Physical Behaviors
□E0200B Verbal Behaviors
□E0200C Other Behaviors
□E0800 Rejection of Care
□E0900 Wandering

105 106

Section E: BEHAVIOR

Rejection of Care, Item E0800: "Behavior that interrupts or interferes with the delivery or receipt of care" (p. E-14).

ODO not include behaviors that have already been addressed (e.g., by discussion or care planning with the resident or family) AND determined to be consistent with the resident's values, preferences, or goals. Residents who have made an informed choice about not wanting a particular treatment, procedure, etc., should not be identified as "rejecting care."

SECTION F:
PREFERENCES FOR
CUSTOMARY ROUTINE &
ACTIVITIES
Intent: The intent of items in this section is to obtain

information regarding the resident's preferences for his or her daily routine and activities. This is best accomplished when the information is obtained directly from the resident or through family or significant other, or staff interviews if the resident cannot report preferences. Nursing homes should use this as a guide to create an individualized plan based on the resident's preferences and is not meant to be all-inclusive.

107 108

SECTION G

Intent: Items in this section assess the need for assistance with activities of daily living (ADLs), altered gait and balance, and decreased range of motion. In addition, on admission, resident and staff opinions regarding functional rehabilitation potential are noted.

Section G: Functional Status

[Step] 3. When an activity occurs 3 or more times & at multiple levels, but not 3 times at any one level:

109

a) Convert episodes of full staff performance to weightbearing assistance when applying the third Rule of 3, as long as the full staff performance episodes did not occur every time the ADL was performed in the 7-day look-back period. It is only when every episode is full staff performance that Total Dependence (4) can be coded. [Remember, that weight-bearing episodes that occur 3 or more times or full staff performance that is provided 3 or more times during part but not all of the last 7 days are included in the ADL Self-Performance coding level definition for Extensive Assistance (3).]

111 112

G0400, Functional Limitation in Range of Motion

- ☐ Code for limitations "that interfered with daily functions or placed resident at risk of injury" during the seven-day observation period.
- ☐ The existence of a limitation in ROM is not enough to result in coding of that limitation on the MDS. The limitation must interfere with the resident's functional ability to perform ADLs.
- ☐ The same concept applies when a resident has had a digit or limb amputated.

Section G: Functional Status

□When an ADL activity has occurred 3 or more times, apply the steps of the Rule of 3 (keeping the ADL coding level definitions and the above exceptions in mind) to determine the code to enter in Column 1, ADL Self-Performance. These steps must be used in sequence. Use the first instruction encountered that meets the coding scenario (e.g., if #1 applies, stop and code that level).

[Step] 1. When an activity occurs 3 or more times at

[Step] 1. When an activity occurs 3 or more times at any one level, code that level.

[Step] 2. When an activity occurs 3 or more times at multiple levels, code the most dependent level that occurred three or more times.

110

| Del die archive) consu ar levent 1 taues* | 200 ar der Frest Code The Applies* | 200 archive | 200

SECTION GG:

Safety & Quality of Performance
"FUNCTIONAL ABILITIES
AND GOALS

Intent: This section includes items about functional abilities and goals. It includes items focused on prior function, admission performance, discharge goals, and discharge performance.

Functional status is assessed based on the need for assistance when performing self-care and mobility activities.

113 114

INTENT - Section GG

☐ Functional status is assessed based on the need for assistance when performing self - care and mobility activities

☐ Residents in SNFs have self - care and mobility limitations and are at risk for further functional decline and complications because of limited mobility

115

GG0130 & GG0170: **Review of Coding Instructions**

Code the resident's usual performance for each activity using the six - point scale:

- □Code **"06"** for Independent
- □Code **"05"** for Setup or clean up assistance
- □Code "04" for Verbal Cues, Supervision or Touching/Steadying Assistance, CGA
- □Code "03" for Partial/moderate assistance
- □Code **"02"** for Substantial/maximal assistance
- □Code **"01"** for Dependent or the assistance of two or more helpers to complete the activity.

117 118

GG0130 & GG0170: Review of Coding Instructions

Steps for Assessment:

☐ Assess the resident's self-care performance based on direct observation, INCORPORATING resident's selfreport and reports from qualified clinicians, care staff, or family documented in the resident's medical record during the three-day assessment period.

□CMS anticipates that <u>an interdisciplinary team of</u> qualified clinicians is involved in assessing the resident during the three-day assessment period.

☐ QUALIFIED CLINICIAN: Healthcare professionals practicing within their scope of practice and consistent with Federal, State, and local law and regulations.

IPA ITEM SET UNDER PDPM: GG0130 & GG0170

5. Interim Performance Inter Codes in Boxes	
Inter Codes in Boxes	
	B. Sit to lying: The ability to move from sitting on side of bed to lying flat on the bed.
	C. Lyling to sitting on side of bed: The ability to move from lying on the back to sitting on the side of the bed with feet flat on the floor, and with no back support.
	D. Sit to stand: The ability to come to a standing position from sitting in a chair, wheelchair, or on the side of the bed.
	E. Chair/bed-to-chair transfer: The ability to transfer to and from a bed to a chair (or wheelchair).
	F. Toilet transfer: The ability to get on and off a toilet or commode.
	Walk 10 feet: Once standing, the ability to walk at least 10 feet in a room, corridor, or similar space. If interim performance is coded 07, 09, 10, or 86 — \$ 56p to H0100, Appliances
	J. Walk 50 feet with two turns: Once standing, the ability to walk at least 50 feet and make two turns:
	K. Walk 150 feet: Once standing, the ability to walk at least 150 feet in a corridor or similar space.

116

GG0130 & GG0170: Review of Coding Instructions

□ Code "09" If Not applicable: If the activity was not attempted & the resident did not perform this activity prior to the current illness, exacerbation, or injury.

☐ Code "07", If Resident refused

- □ Code "10", Not attempted due to environmental limitations. Examples include lack of equipment and weather constraints.
- □ Code "88", Not attempted due to medical condition or safety concerns: if the activity was not attempted due to medical condition or safety concerns.

GG0130 & GG0170: Review of Coding Instructions

- ☐ Information added to Steps for Assessment strengthening concept of collaboration to collect the resident's self-performance in the items to be assessed during the 3-Day Assessment Period.
- □ Documentation in the medical record is used to support assessment coding of section GG

119 120

GG0130 & GG0170: **Review of Coding Instructions**

- ☐ The admission functional assessment, when possible, should be conducted prior to the person benefitting from treatment interventions in order to determine a true baseline functional status on admission. If treatment has started, for example, on the day of admission, a baseline functional status assessment can still be conducted. Treatment should not be withheld in order to conduct the functional assessment.
- ☐ Refer to facility, Federal, and State policies and procedures to determine which staff members may complete an assessment. Resident assessments are to be done in compliance with facility, Federal, and State requirements.

121 122

GG0130 & GG0170: Review of Coding Instructions

Assessment Period

- o The scores should reflect the resident's status prior to any benefit from interventions. The assessment should occur, when possible, prior to the resident benefitting from treatment interventions in order to determine the resident's true admission baseline status.
- o Even if treatment started on the day of admission, a baseline functional status assessment can still be conducted. Treatment should not be withheld in order to conduct the functional assessment.

123 124

Section GG (Affects PT & OT; NURSING under

PDPM Therapy Function Score

☐ Self Care: Eating

☐ Self Care Oral hygiene ☐ Self Care: Toileting Hygiene

☐ Mobility: Sit to lying

☐ Mobility: Lying to sitting on side of bed

☐ Mobility: Sit to stand

☐ Mobility: Chair/bed transfer ☐ Mobility: Toilet Transfer

☐ Mobility: Walk 50 feet w/ 2

Mobility: Walk 150 feet

PDPM Nursing Function

Score

☐ Self Care: Eating ☐ Self Care: Toileting Hygiene

☐ Mobility: Sit to lying ☐ Mobility: Lying to sitting on side of bed ☐ Mobility: Sit to stand ☐ Mobility: Chair/bed transfer

☐ Mobility: Toilet Transfer

GG0130 & GG0170: Review of Coding Instructions

Assessment Period

□Admission: The 5-Day PPS assessment (A0310B = 01) is the first Medicare-required assessment to be completed when the resident is admitted for a SNF Part A stay.

- o For the 5-Day PPS assessment, code the resident's functional status based on a clinical assessment of the resident's performance that occurs soon after the resident's admission.
- o This functional assessment must be completed within the 1st 3 calendar days of Medicare Part A stay, starting with the date in A2400B, Start of Most Recent Medicare Stay, <u>& the following two days, ending at 11:59 PM on day 3.</u>
- o The admission function scores are to reflect the resident's admission baseline status & are to be based on an assessment.

GG0130 & GG0170: Review of Coding Instructions

- ☐ To clarify your own understanding of the resident's performance of an activity, ask probing questions to the care staff about the resident, beginning with the general and proceeding to the more specific.
- Documentation in the medical record is used to support assessment coding of Section GG.
- ☐ Data entered should be consistent with the clinical assessment documentation in the resident's medical record.
- ☐ This assessment can be conducted by appropriate healthcare personnel as defined by facility policy and in accordance with State and Federal regulations.

GG0130: EATING

- ☐ Eating: The ability to use suitable utensils to bring food and/or liquid to the mouth and swallow food and/or liquid once the meal is placed before the resident.
- o If the resident eats and drinks by mouth and relies partially on obtaining nutrition and liquids via tube feedings or TPN, <u>code Eating based on the amount of assistance the resident</u> requires to eat and drink by mouth. Assistance with tube feedings or TPN is not considered when coding Eating.
- o If the resident eats finger foods using his or her hands, then code Eating based upon the amount of assistance provided. If the resident eats finger foods with his or her hands independently, for example, the resident would be coded as 06, Independent.

125 126

GG0130: ORAL HYGIENE

- ☐ Oral hygiene: The ability to use suitable items to clean teeth. Dentures (if applicable): The ability to insert and remove dentures into and from the mouth and manage denture soaking and rinsing with use of equipment.
 - olf a resident does not perform oral hygiene during therapy, determine the resident's abilities based on performance on the nursing care unit.

GG0130: TOILETING HYGIENE

- ☐ Toileting hygiene: The ability to maintain perineal hygiene, adjust clothes before and after voiding or having a bowel movement. If managing an ostomy, include wiping the opening but not managing equipment..
 - Toileting hygiene includes <u>managing</u> <u>undergarments</u>, <u>clothing</u>, <u>and incontinence products</u> <u>and performing perineal cleansing before and after</u> <u>voiding or having a bowel movement</u>.
- olf the resident does not usually use undergarments, then <u>assess the resident's need for assistance to</u> manage lower-body clothing and perineal hygiene.

127 128

GG0130: TOILETING HYGIENE

- Toileting hygiene takes place before and after use
 of the toilet, commode, bedpan, or urinal. If the
 resident completes a bowel toileting program in
 bed, code Toileting hygiene based on the
 resident's need for assistance in managing
 clothing and perineal cleansing.
- If the resident has an indwelling urinary catheter and has bowel movements, code the Toilet hygiene item <u>based on the amount of assistance</u> <u>needed by the resident before and after moving</u> <u>his or her bowels.</u>

GG0170: BED MOBILITY

- □ Sit to Lying: The ability to move from sitting on side of bed to lying flat on the bed.
- □ Lying to Sitting on side of bed: The ability to move from lying on the back to sitting on the side of the bed with feet flat on the floor, and with no back support.

129

GG0170: TRANSFERS

- **Sit to Stand:** The ability to come to a standing position from sitting in a chair, wheelchair, or on the side of the bed
- □ Chair/Bed-to-Chair Transfer: The ability to transfer to and from a bed to a chair (or wheelchair).
- **Toilet Transfer:** The ability to get on and off a toilet or commode.

130

GG0170: WALKING

- Walk 50 feet with two turns: Once standing, the ability to walk at least 50 feet and make two turns.
- Walk 150 feet: Once standing, the ability to walk at least 150 feet in a corridor or similar space.

Section GG

Overview of Coding Instructions:

□ Admission Performance – code based on first 3 days of Medicare Part A stay (based on A2400B)

□ Discharge Performance – code based on last 3 days of Medicare Part A stay (based on A2400C).

☐ Coding is based on "Usual Performance" – will require clinical judgment

☐If activity occurs multiple times (e.g., eating, toileting, dressing, bed mobility activities, bed/chair transfers, do not code most dependent, do not code most independent.

☐Some items may only be assessed once, code that status. (e.g., car transfers, curbs, stairs).

133

Section GG: RECAP of Important Points

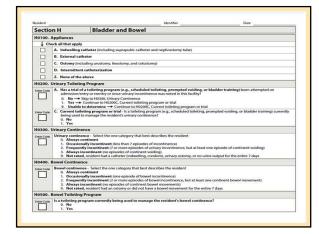
- ☐ Section GG assesses the need for assistance with self-care and mobility activities
- ☐ Must be a collaboration & integration between Therapy and Nursing!
- Requires supporting documentation
- ☐ Master the art of Coding Section GG will be utilized not just for SNF-QRP's but also for PDPM!!!

134

SECTION H

Intent: The intent of the items in this section is to gather information on the use of bowel and bladder appliances, the use of and response to urinary toileting programs, urinary and bowel continence, bowel training programs, and bowel patterns. Each resident who is incontinent or at risk of developing incontinence should be identified, assessed, and provided with individualized treatment (medications, non-medicinal treatments and/or devices) and services to achieve or maintain as normal elimination function as possible.

135 136



Section H0100C & H0100D: Ostomy & Intermittent
Catheterization (Will affect NTA Component)

| Check all that apply | A. Indwelling cath

| A. Indwelling catheter (including suprapubic catheter and nephrostor)
| B. External catheter |
| C. Ostomy (including unostomy, aleostomy, and colostomy)
| D. Intermittent catheterization

INTERMITTENT CATHETERIZATION: Insertion & removal of a catheter through the urethra for bladder drainage. Coding Tips and Special Populations:

- ☐ Suprapubic catheters & nephrostomy tubes should be coded as an indwelling catheter
- Do not include one-time catheterization for urine specimen during look-back period as intermittent catheterization.

Section H0100C: OSTOMY (NTA Component)

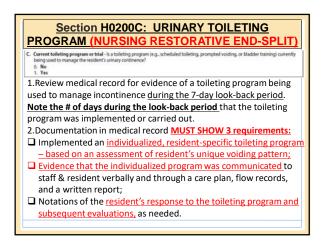
H0100C, Ostomy (includes Urostomy/lleostomy/Colostomy):
OSTOMY: _Any type of surgically created opening of the GI or
GU tract for discharge of body waste.

UROSTOMY: A stoma for the urinary system used in cases where long-term drainage of urine through the bladder and urethra is not possible, e.g., after extensive surgery or in case of obstruction.

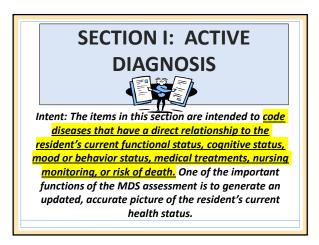
ILEOSTOMY: A stoma that has been constructed by bringing the end or loop of small intestine (the ileum) out onto the surface of the skin.

COLOSTOMY: A stoma that has been constructed by connecting a part of the colon onto the anterior abdominal wall.

137 138



139 140



IO020B. Indicate the Resident's Primary Medical Condition Category

(Will affect PT, OT & SLP Clinical Category)****

Item I0020B: Enter the code that represents the primary medical condition that resulted in the resident's SNF admission. Include the primary medical condition coded in this item in Section I: Active Diagnoses in last 7 days.

Section I Active Diagnoses

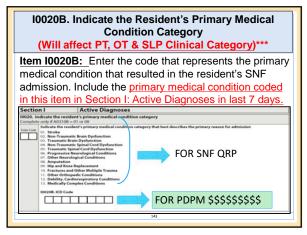
10020. Indicate the resident's primary medical condition category

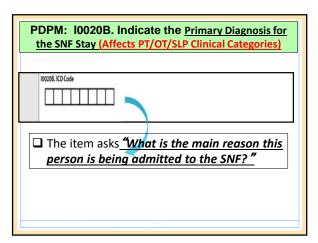
Complete only 40x1010 - 01 of 10x100 - 10x100

South Temants (spinol Cond Optimicition Complete)

Other Resumbles (and Conditions)

141 142





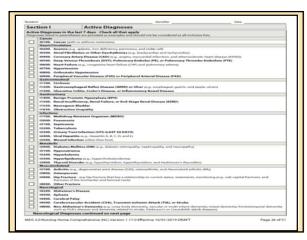
143 144

I0020B. Indicate the <u>Primary Diagnosis for the SNF Stay</u> (PT/OT SLP Clinical Category)

- ☐ To capture the patient's primary diagnosis, which is used to classify the patient into a PDPM clinical category, CMS added Item <u>10020B</u>, <u>which allows providers to report, using an ICD-10-CM code, the patient's primary SNF diagnosis.</u>
- ☐ ICD-10-CM codes, coded on the MDS 3.0 in Item
 IO020B, are mapped to a PDPM clinical category.

 *Note: It is possible that the primary diagnosis for the
 SNF stay may be different from the primary diagnosis
 from the preceding hospital stay.

145



147 148

SECTION I: ACTIVE DIAGNOSES

(Will affect PT, OT & SLP Clinical Category)*

(SLP Comorbidities, NTA Comorbidities, Nursing Qualifiers)**

There are two look-back periods for this section:

- <u>Diagnosis Identification</u> is a <u>60-day look-back</u> <u>period.</u>
- Diagnosis Status: Active or Inactive is a 7-day look-back period (except for Item I2300 UTI, which does not use the active 7-day look-back period).

SECTION I: ACTIVE DIAGNOSES
(Will affect PT, OT & SLP Clinical Category)*
(SLP Comorbidities, NTA Comorbidities,
Nursing Qualifiers)**

ACTIVE DIAGNOSES: Physician-documented diagnoses in the last 60 days that have a direct relationship to the resident's current functional status, cognitive status, mood or behavior, medical treatments, nursing monitoring, or risk of death during the 7-day look-back period

<u>FUNCTIONAL LIMITATIONS:</u> Loss of range of motion, contractures, muscle weakness, fatigue, decreased ability to perform ADLs, paresis, or paralysis.

NURSING MONITORING: Includes clinical monitoring by a licensed nurse (e.g., serial blood pressure evaluations, medication management, etc.).

Section 1 Active Observes with the last 7 Active Observes of the section of the s

SECTION J

Intent: The intent of the items in this section

Is to document a number of health conditions that impact the resident's functional status and quality of life. The items include an assessment of pain which uses an interview with the resident or staff if the resident is unable to participate. The pain items assess the presence of pain, pain frequency, effect on function, intensity, management and control. Other items in the section assess dyspnea, tobacco use, prognosis, problem conditions, and falls.

149 150



J1100C. SOB when Lying Flat (Nursing Qualifier for Special Care High with COPD)

J1100. Shortness of Breath (dyspnea)

| Check all that apply | Copp | Shortness of breath or trouble breathing when string at rest | Copp + SOB when Lying Flat: Will be a NURSING Qualifier |

Check J1100C:
| If shortness of breath or trouble breathing is present when the resident attempts to lie flat.
| Also code this as present if the resident avoids lying flat because of shortness of breath.
| 7-Day Look Back Period

151 152

J1550A & J1550B. FEVER; VOMITING (NURSING Qualifiers)

| Check all that apply | A. Fever | B. Vermining | C. Dishydated | D. Internal Baseling | D. Internal Baseling | Emperature 2.4 degrees F higher than baseline temperature (should be established prior to the ARD).

| Fever assessment prior to establishing base line temperature: A temperature of 100.4 degrees F (38 degrees C)

| Vomiting: Regurgitation of stomach contents; may be caused by many factors (e.g., drug toxicity, infection, psychogenic).

J2000: PRIOR SURGERY

Item J2000 is used as a risk adjustor for new SNF-QRP functional outcome quality measures:

☐ Application of (IRF) Functional Outcome Measure: Change in Self - Care Score for Medical Rehabilitation Patients (National Quality Forum (NQF) #2633)

☐ Application of IRF Functional Outcome Measure: Discharge Self-Care Score for Medical Rehab Patients (NQF #2635)

☐ Application of IRF Functional Outcome Measure: Change in Mobility Score for Medical Rehab Patients (NQF #2634)

☐ Application of IRF Functional Outcome Measure: Discharge Mobility Score for Medical Rehab Patients (NQF #2636)

153 154

Section J2100 and J2300 — J5000:

ITEMS UNDER PDPM

(Used to determine PT & OT Clinical Category)

In order to capture surgical information which may be relevant to classifying the patient into a PDPM Clinical Category, CMS is adding new items in Section J of the MDS.

Used to capture any major surgical procedures that occurred during the inpatient hospital stay that immediately preceded the SNF admission, i.e. the Qualifying Hospital Stay.

Used in conjunction with the diagnosis code captured in I0020B, to classify patients into the PT and OT casemix classification groups for PDPM.

Section J2100: ITEM UNDER PDPM

Did the resident have a major surgical procedure during the prior inpatient hospital stay that requires active care during the SNF stay?

J2100. Recent Surgery Requiring Active SNF Care - Complete only if A03108 = 01 or 08

Long Code

Oil the resident have a major surgical procedure during the prior inpatient hospital stay that requires active care during the SNF stay?

Oil the resident have a major surgical procedure during the prior inpatient hospital stay that requires active care during the SNF stay?

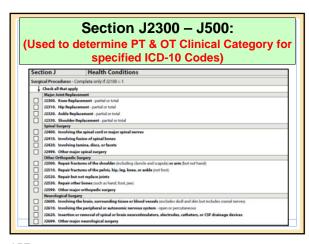
Oil the resident have a major surgical procedure during the prior inpatient hospital stay that requires active care during the SNF stay?

Complete only if 5-Day or IPA.

If YES, proceed to J2300 — J50000

GATEWAY QUESTION

155 156



| Cardiopulmonary Surgery | 12700. Involving the heart or major blood vessels - open or percutaneous procedures | 12710. Involving the respiratory system, including lungs, broachi, traches, larynx, or vocal cords - open or encloscopic | 12700. Other major cardiopulmonary surgery | 12800. Involving the respiratory system, including lungs, broachi, traches, larynx, or vocal cords - open or encloscopic | 12900. Other major cardiopulmonary surgery | 12800. Involving the kidneys, ureters, advenal glands, or bladder - open or luquoscopic (includes creation or removal of replocationies or unotamies) | 12810. Involving the kidneys, ureters, advenal glands, or bladder - open or luquoscopic (includes creation or removal of replocationies or unotamies) | 12800. Univolving the gustrointestinal tract or abdominal contents from the esophagus to the anus, the biliary tree, gall bladder, liver, pancreas, or spleen - open or luquoscopic (including creation or removal of ottomies or perchaneous feeding tubes, or herma repair) | 12920. Involving the behavior of deep tulcers, internal brachytherapy, bone marrow or stem cell harvest or transplant | 15000. Other major surgery not listed above

157 158

SECTION K

Intent: The items in this section are intended to assess the many conditions that could affect the resident's ability to maintain adequate nutrition and hydration.

This section covers swallowing disorders, height and weight, weight loss, and nutritional approaches. The assessor should collaborate with the dietitian and dietary staff to ensure that items in this section have been assessed and calculated accurately.

K0100: SWALLOWING DISORDER
(Will affect SLP Component)

K0100. Swallowing Disorder

Styres and symptoms of possible swallowing disorder

Ones at the styrey

A Law of Bigadiv-slids from mouth when eating or drinking

R Hidding food in mouth chesks or residual food in mouth after meals

Occuping or chesking during meals or when successing endecations

Assess for signs and symptoms that suggest a swallowing disorder that has NOT been successfully treated or managed with diet modifications or other interventions (e.g., tube feeding, double swallow, turning head to swallow, etc.) and therefore represents a functional problem for the resident.

159 160

K0100: SWALLOWING DISORDER

- □ When necessary, the resident should be <u>evaluated</u> by the physician, speech language pathologist and/or occupational therapist to assess for any need for swallowing therapy and/or to provide recommendations regarding the consistency of food and liquids.
- <u>Care plan should be developed to assist resident</u> to maintain safe and effective swallow using compensatory techniques, alteration in diet consistency, and positioning during and following meals.

K0100: SWALLOWING DISORDER

Steps for Assessment

consumption.

- 1. Ask the resident if he or she has had any difficulty swallowing during the 7-day look-back period. Ask about each of the symptoms in K0100A through K0100D. Observe the resident during meals or at other times when he or she is eating, drinking, or swallowing to determine whether any of the listed symptoms of possible swallowing disorder are exhibited.
 2. Interview staff members on all shifts who work with the resident and ask if any of the four listed symptoms were evident during the 7-day look-back period.
- direction, and speech language pathologist notes, and any available information on dental history or problems. Dental problems may include poor fitting dentures, dental caries, edentulous, mouth sores, tumors and/or pain with food

161 162

CODING INSTRUCTIONS: Do not code a swallowing problem when interventions have been successful in treating the problem and therefore the signs/symptoms of the problem (K0100A through K0100D) did not occur during the 7-day look-back period.

KO200: HEIGHT AND WEIGHT

KO200: HEIGHT AND WEIGHT

KO200: Height and Weight - While measuring, if the number is X1-X4 round down: X5 or greater round up

A. Height in school. Record most recent height measure is let 10 day; measure weight consistently, according to standard facility stactic ing, in a.m. after veiding, before meal, with shore off, etc.)

Steps for Assessment for KO200A, Height

1. Base height on the most recent height since the most recent admission/entry or reentry.

2. Measure height consistently over time in accordance with the facility policy and procedure, which should reflect current standards of practice (shoes off, etc.).

3. For subsequent assessments, check the medical record. If the last height recorded was more than one year ago, measure and record the resident 's height again.

163 164

K0300: WEIGHT LOSS (Will Affect Nursing Component)				
K0300. Weight Loss				
Loss of 5% or more in the last month or loss of 10% or more in last 6 months				
5% WEIGHT LOSS IN 30 DAYS : Start with the resident's weight				
closest to 30 days ago and multiply it by .95 (or 95%). The resulting				
figure represents a 5% loss from the weight 30 days ago. If the				
resident's current weight is equal to or less than the resulting figure,				
the resident has lost more than 5% body weight.				
10% WEIGHT LOSS IN 180 DAYS: Start with the resident's weight				
closest to 180 days ago and multiply it by .90 (or 90%). The resulting				
figure represents a 10% loss from the weight 180 days ago. If the				
resident's current weight is equal to or less than the resulting figure,				
the resident has lost 10% or more body weight.				

K0300: WEIGHT LOSS
(Will Affect Nursing Component)

K0300. Weight Loss

[Loss of 5% or nore in the last month or loss of 10% or more in last 6 months

1. Yes, on physician-prescribed weight-loss regimen

PHYSICIAN-PRESCRIBED WEIGHT-LOSS REGIMEN

A weight reduction plan ordered by the resident's physician with the care plan goal of weight reduction. May employ a calorie-restricted diet or other weight loss diets and exercise. Also includes planned diuresis. It is important that weight loss is intentional.

165 166

	D510C: Mechanically Altered Diet (Will affe	CC SEP COI	пропе
	ck all of the following nutritional approaches that were performed during the last 7 days		
	While NOT a Resident Performed while NOT a resident of this facility and within the last 7 days Only check column I if resident entered (admission or reentry) IN THE LAST 7 DAYS. If resident last entered 2 or more days ago, leave column I blank I. While a Resident Performed while a resident of this facility and within the last 7 days	1. While NOT a Resident	2. While a Resident hat apply ↓
A.	Parenteral/IV feeding	Check and	Figr abbit
В.	Feeding tube - nasogastric or abdominal (PEG)		F
C.	Mechanically altered diet - require change in texture of food or liquids (e.g., pureed food, thickened liquids)		

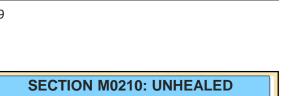
K0710: % INTAKE BY ARTIFICAL ROUTE
(Will Affect Nursing & NTA Components)

K0710: Percent Instable by Artificial Route: - Complete X0710 only if Column 1 and/or Column 2 are checked for NO7100 and or NO710 only if Column 1 and/or Column 2 are checked for NO7100 and or NO7100 only if Column 1 and/or Column 2 are checked for NO7100 and or NO7100 on or everyly if I THE LOST 7 CAYS. If 2 and 2 are checked for NO7100 and or NO7100 or everyly if I THE LOST 7 CAYS. If 2 and 2 are checked for NO7100 and or NO

167 168

SECTION L Intent: This item is intended to record any dental problems present in the 7-day lookback period.

169 170



PRESSURE ULCERS/INJURIES

(GATEWAY QUESTION)

Liner Code

Does 18. No → Skip to M1030, Number of Venous and Arterial Ulcers

1. Yes → Continue to M0300, Current Number of Unhealed Pressure Ulcers/Injuries at Each Stap

PRESSURE ULCER/INJURY

A pressure ulcer/injury is localized injury to the skin and/or underlying tissue, usually over a bony prominence, as a result of intense and/or prolonged pressure or pressure in combination with shear. The pressure ulcer/injury can present as intact skin or an open ulcer and may be painful.

171 172



STAGE 3 PRESSURE ULCER

Full thickness tissue loss. Subcutaneous fat may be visible but bone, tendon or muscle is not exposed. Slough may be present but does not obscure the depth of tissue loss. May include undermining or tunneling

(Will Affect NURSING & NTA COMPONENTS) Number of <u>these</u> Stage 4 pressure ulcers that were present upon admission/entry or reentry-noted at the time of admission/entry or reentry **STAGE 4 PRESSURE ULCER** Full thickness tissue loss with exposed bone, undermining and tunneling.

173 174

SECTION M

Intent: The items in this section document the risk, presence, appearance, and change of pressure ulcers/injuries. This section also notes other skin ulcers, wounds, or lesions, and documents some treatment categories related to skin injury or avoiding injury. It is important to recognize and evaluate each resident's risk factors and to identify and evaluate all areas at risk of constant pressure

SECTION M0300B: STAGE 2

(Will Affect NURSING COMPONENT)

☐ Partial thickness loss of dermis presenting as a

shallow open ulcer with a red-pink wound bed,

☐ May also present as an intact or open/ruptured

Number of <u>these</u> Stage 2 pressure ulcers that were present upon admiss at the time of admission/entry or reentry

STAGE 2 PRESSURE ULCER

blister.

without slough or bruising.

tendon or muscle. Slough or eschar may be present on some parts of the wound bed. Often includes

SECTION M0300D: STAGE 4

| SECTION M1030: VENOUS/ARTERIAL ULCERS (Will Affect NURSING & NTA COMPONENTS)

| M1030. Number of Venous and Arterial Ulcers
| Inter the total number of venous and arterial ulcers present
| VENOUS ULCERS: Ulcers caused by peripheral venous disease, which most commonly occur proximal to the medial or lateral malleolus, above the inner or outer ankle, or on the lower calf area of the leg.
| ARTERIAL ULCERS: Ulcers caused by peripheral arterial disease, which commonly occur on the tips and tops of the toes, tops of the foot, or distal to the medial malleolus.

175 176

SECTION M1040 A, B, C: FOOT PROBLEMS (WIII Affect NURSING & NTA COMPONENTS)				
M1040. Other Ulcers, Wounds and Skin Problems ↓ Check all that apply				
□ Infection of the foot (e.g., cellulitis, purulent drainage) □ DIABETIC FOOT ULCERS: Caused by the neuropathic & small blood vessel complications of DM. Typically occur over plantar (bottom) surface of foot on load bearing areas such as the ball of the foot. Ulcers are usually deep, with necrotic tissue, moderate amounts of exudate, and callused wound edges. The wounds are very regular in shape and the wound edges are even with a punched-out appearance. These wounds are typically not painful. □ Other open lesion(s) on the foot (e.g., cuts, fissures)				

SECTION M1040 D, E, F: OTHER PROBLEMS
(Will Affect Nursing Component)

Other Problems

D. Open lesion(s) other than ulcers, rashes, cuts (e.g., cancer lesion)
E. Surgical wound(s)
F. Burnis) (second or third degree)

OPEN LESION(S) OTHER THAN ULCERS, RASHES, CUTS:
Most typically skin lesions that develop as a result of diseases and conditions such as syphilis and cancer.

SURGICAL WOUNDS: Any healing and non-healing, open or closed surgical incisions, skin grafts or drainage sites.

BURNS (SECOND OR THIRD DEGREE): Skin & tissue injury caused by heat or chemicals and may be in any stage of healing.

177 178

TREATMENT(S) (Will Affect Nursing Component)			
00	Skin and Ulcer/Injury Treatments		
	Check all that apply		
	A. Pressure reducing device for chair		
	B. Pressure reducing device for bed		
	C. Turning/repositioning program		
	D. Nutrition or hydration intervention to manage skin problems		
	E. Pressure ulcer/injury care		
	F. Surgical wound care		
	G. Application of nonsurgical dressings (with or without topical medications) other than to feet		
	H. Applications of ointments/medications other than to feet		
	I. Application of dressings to feet (with or without topical medications)		

SECTION M1200: SKIN & ULCER/INJURY TREATMENT(S) (Will Affect Nursing Component) PRESSURE REDUCING DEVICE(S): Equipment that aims to relieve pressure away from areas of high risk. May include foam, air, water gel, or other cushioning placed on a chair, wheelchair, or bed. (e.g. pressure relieving, pressure reducing, & pressure redistributing) TURNING/ REPOSITIONING PROGRAM: Includes a consistent program for changing the resident's position and realigning the body. "Program" is defined as a specific approach that is organized, planned, documented, monitored, and evaluated based on an assessment of the resident's needs. NUTRITION OR HYDRATION INTERVENTION TO MANAGE SKIN **PROBLEMS:** Dietary measures received by resident for the purpose of preventing or treating specific skin conditions, e.g., wheat-free diet to prevent allergic dermatitis, high calorie diet with added supplementation to prevent skin breakdown, high-protein supplementation for wound healing.

179 180

SECTION M

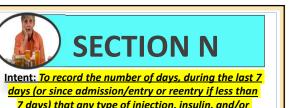
CMS adheres to the following guidelines:

☐Stage 1 pressure injuries and deep tissue injuries (DTIs) are termed "pressure injuries" because they are closed wounds

☐Stage 2, 3, or 4 pressure ulcers, or unstageable ulcers due to slough or eschar, are termed "pressure ulcers" because they are usually open wounds

☐Unstageable ulcers/injuries due to non-removable dressing/device are termed "pressure ulcers/injuries" because they may be open or closed wounds

181 182

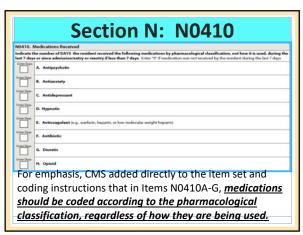


7 days) that any type of injection, insulin, and/or select medications were received by the resident.

In addition, an Antipsychotic Medication Review has been included. Including this information will assist facilities to evaluate the use and management of these medications. Each aspect of antipsychotic medication use and management has important associations with the quality of life and quality of care of residents

receiving these medications.

183



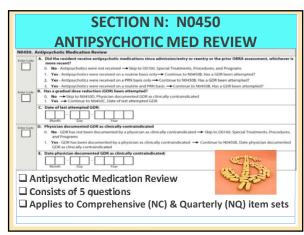
185 186

Section M

☐ Significant Change in Definition related to "Present on Admission"

o If the pressure ulcer/injury was present on admission/entry or reentry and becomes unstageable due to slough or eschar, during the resident's stay, the pressure ulcer/injury is coded at M0300F and should not be coded as "present on admission."

184



SECTION N: N0450 ANTIPSYCHOTIC MED REVIEW

Coding Tips and Special Populations

□ Physician documentation indicating dose reduction attempts are clinically contraindicated must include the clinical rationale for why an attempted dose reduction is inadvisable. This decision should be based on the fact that tapering of the medication would not achieve the desired therapeutic effects and the current dose is necessary to maintain or improve the resident's function, well-being, safety, and quality of life.

187 188

DRUG REGIMEN REVIEW □ N2001. Drug Regimen Review □ N2003. Medication Follow-Up have been added to the Admission (Start of Prospective Payment System (PPS) Section N N2001. Drug Regimen Review InterCode □ Did a complete drug regimen review identify potential clinically significant medication issues? □ N. No. -No issues found during review → Skip to 00100, Special Treatments, Procedures, and Programs 1, Yes - Issues Condud during review → Continue to N2009. Medication Follow-up □ NA. - Resident is not taking any medications → Skip to 00100, Special Treatments, Procedures, and Programs N2003. Medication Follow-up State Code □ Did the facility contact a physician (or physician-designee) by midnight of the next calendar day and complete prescribed/ recommended actions in response to the identified potential clinically significant medication issues? 0. No 1. Yes

The DRR includes all medications:

Prescribed and over-the-counter

Including nutritional supplements, vitamins, and homeopathic and herbal products

Includes total parenteral nutrition (TPN) and oxygen

SECTION N0450:

ANTIPSYCHOTIC MED REVIEW

☐ Within the first year in which a resident is admitted on

initiated an antipsychotic medication, the facility must

one month between the attempts), unless physician documentation is present in the medical record

indicating a GDR is clinically contraindicated. After the

first year, a GDR must be attempted at least annually,

attempt a GDR in two separate quarters (with at least

an antipsychotic medication or after the facility has

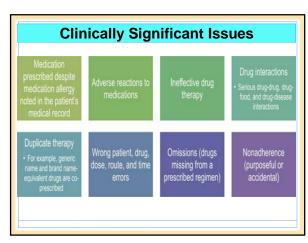
Coding Tips and Special Populations

unless clinically contraindicated.

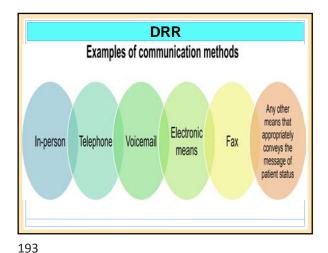
189 190

Clinically Significant Issues

- □ A clinically significant medication issue is a potential or actual issue that, in the clinician's professional judgment, warrants:
- Physician (or physician-designee) communication and
- Completion of prescribed/recommended actions by midnight of the next calendar day (at the latest)



191 192



DRUG REGIMEN REVIEW

Who can perform the DRR?

☐ No guidance on who can or cannot code the DRR items ☐ Each facility determines their P&P for completion

☐ Each facility provides patient care according to their unique characteristics and standards

■Not strictly a Pharmacy function!

When should DRR be performed?

- ☐ Upon Admission, or as close to Admission as possible Would try to get done within first 24 hours
- ☐ DRR is then ongoing throughout stay: *Each new drug* order; Each revision/change in drug order; Change in clinical status

194

196

195

DRR Overview

Medication Reconciliation

- 1) Compare admission orders with meds taken in hospital, prior to hospitalization?
- 2) Review diagnoses! Possible medications
- 3) Labs (renal status, therapeutic levels)
- 4) Ongoing lab monitoring (digoxin, coumadin, etc.) - watch for increased frequency related to ATB usage, if applicable
- 5) Review allergies

DRR Overview Discharge Assessment Admission Assessment · Identifies if a drug regimen review was conducted upon admission, and if the clinician · Identifies if the facility contacted a identified any potential or actual clinically physician (or physician-designee) significant medication issues and completed all physician- (or physician-designee)-prescribed/ recommended actions by midnight · Identifies if the facility contacted a physician (or of the next calendar day each time physician-designee) and completed all physicianpotential or actual clinically (or physician-designee)-prescribed/ recommended actions by midnight of the next significant medication issues were calendar day in response to all potential or actual identified throughout the stay clinically significant medication issues identified upon admission

DRR Overview

- ■Need to develop/review current process!
- ☐Involve consulting pharmacist in developing P&P
- ■Need to educate nursing staff on what to look for upon admission and ongoing
- □Educate physicians on regulations & need for immediate response

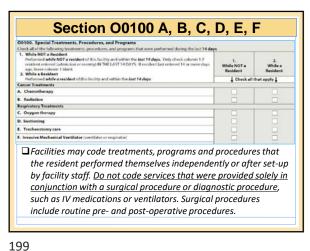
□Documentation:

- Statement by nurse that Admission DRR completed with no significant issues identified
- Statement by nurse that Admission DRR completed with physician notified of significant clinical issues.
- Statement by nurse that recommendations/new orders received and completed.

SECTION O

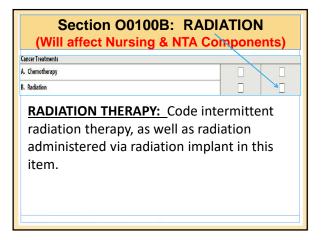
Intent: The intent of the items in this section is to identify any special treatments, procedures, and programs that the resident received during the specified time periods.

198



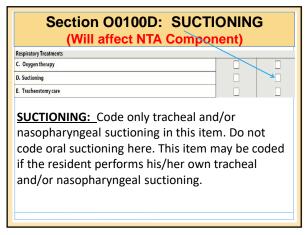
Section O0100A: CHEMOTHERAPY (Will affect Nursing Component) Cancer Treatments A. Chemotherapy B. Radiation □Code any type of chemotherapy agent administered as an antineoplastic given by any. Each medication should be evaluated to determine its reason for use before coding it here. Medications coded here are those actually used for cancer treatment. ☐ Hormonal and other agents administered to prevent the recurrence or slow the growth of cancer should not be coded in this item, as they are not considered chemotherapy for the purpose of coding the MDS.

200



Section O0100C: OXYGEN THERAPY (Will affect Nursing Component) Respiratory Treatments C. Oxygen therapy D. Suctioning E. Tracheostomy care **OXYGEN THERAPY:** Code continuous or intermittent oxygen administered via mask, cannula, etc., delivered to a resident to relieve hypoxia in this item. Code oxygen used in Bi-level Positive Airway Pressure/Continuous Positive Airway Pressure (BiPAP/CPAP) here. Do not code hyperbaric oxygen for wound therapy in this item. This item may be coded if the resident places or removes his/her own oxygen mask, cannula.

201 202



Section O0100E: TRACHEOSTOMY CARE (Will affect Nursing, SLP & NTA Components) Respiratory Treatments C. Oxygen therapy D. Suctioning TRACHEOSTOMY CARE: Code cleansing of the tracheostomy and/or cannula in this item. This item may be coded if the resident performs his/her own tracheostomy care.

203 204

Section 00100F: INVASIVE MECHANICAL VENTILATOR (Will affect Nursing, SLP & NTA Components) F. Invasive Mechanical Ventilator (ventilator or regional) INVASIVE MECHANICAL VENTILATOR: Code any type of electrically or pneumatically powered closed-system mechanical ventilator support device that ensures adequate ventilation in the resident who is or who may become (such as during weaning attempts) unable to support his or her own respiration in this item. During invasive mechanical ventilation the resident's breathing is controlled by the ventilator. Residents receiving closed-system ventilation include those residents receiving ventilation via an endotracheal tube (e.g., nasally or orally intubated) or tracheostomy.

205 206

			_	_
. IV medications				
Transfusions				1
. Dialysis				
products (e.g., are administer item. Do not ir during dialysis	ed directly into	the bloodst sions that we	ream in tl	nis

207

Section O0100M: ISOLATION (Will affect Nursing Component)\$\$\$
M. Isolation or quarantine for active infectious disease (does not include standard body/fluid precautions)
ISOLATION: Code only when the resident requires transmission-
based precautions & single room isolation because of active
infection (i.e., symptomatic and/or have a positive test and are in
the contagious stage) with highly transmissible/epidemiologically
significant pathogens that have been acquired by physical contact
or airborne or droplet transmission.
Do not code this item if the resident only has a HX of infectious
disease (e.g., s/p MRSA or s/p C-Diff - no active symptoms).
Do not code this item if only on standard precautions (e.g. include
hand hygiene compliance, glove use, & additionally may include
masks, eye protection, and gowns. Examples of when the isolation
criterion would NOT apply include urinary tract infections,
encapsulated pneumonia, and wound infections.

(Will affect Nursing& NTA Components)

Other

I. Trensfusions

Dishysis

IV MEDICATIONS: Code any drug or biological given by intravenous push, epidural pump, or drip through a central or peripheral port in this item. Do not code flushes to keep an IV access port patent, or IV fluids without medication here. Epidural, intrathecal, and baclofen pumps may be coded here, as they are similar to IV medications in that they must be monitored frequently and they involve continuous administration of a substance. Subcutaneous pumps are not coded in this item. Do not include IV medications of any kind that were administered during dialysis or chemotherapy. Dextrose 50% and/or Lactated Ringers given IV are not considered medications, and should not be coded here.

Section O0100H: IV MEDICATIONS

Section O0100J: DIALYSIS
(Will affect Nursing Component)

Other

H. IV medications

L. Transfusions

DIALYSIS: Code peritoneal or renal dialysis which occurs at the nursing home or at another facility, record treatments of hemofiltration, Slow Continuous Ultrafiltration (SCUF), Continuous Arteriovenous Hemofiltration (CAVH), and Continuous Ambulatory Peritoneal Dialysis (CAPD) in this item. IVs, IV medication, and blood transfusions administered during dialysis are considered part of the dialysis procedure and are not to be coded under items K0510A (Parenteral/IV), O0100H (IV medications), or O0100I (transfusions). This item may be coded if the resident performs his/her own dialysis.

208

Section O0100M: ISOLATION (Will affect Nursing Component)\$\$\$

Code for "single room isolation" only when ALL of the ff. are met:

- The resident has active infection with <u>highly transmissible or</u> <u>epidemiologically significant pathogens that have been acquired</u> by physical contact or airborne or droplet transmission.
- Precautions are over and above standard precautions. That is, transmission-based precautions (contact, droplet, and/or airborne) must be in effect.
- The resident is in a room alone because of active infection and cannot have a roommate. This means that the resident must be in the room alone and not cohorted with a roommate regardless of whether the roommate has a similar active infection that requires isolation.
- The resident <u>must remain in his/her room. This requires that all</u> <u>services be brought to the resident (e.g. rehabilitation, activities, dining, etc.).</u>

209 210

Section O0400D: RESPIRATORY THERAPY (Will affect Nursing Component)			
5000 W W W W	D. Respiratory Therapy		
Enter Number of Minutes	 Total minutes - record the total number of minutes this therapy was administered to the resident in the last 7 days if zero, → skip to 00400E, Psychological Therapy 		
Entur Number of Clays	2. Days - record the number of days this therapy was administered for at least 15 minutes a day in the last 7 days		
Respirat	cory Therapy - Only minutes that the respiratory		
therapist or respiratory nurse spends with the resident shall be			
recorded on the MDS. This time includes resident			
evaluation/assessment, treatment administration and			
monitoring, and setup and removal of treatment equipment.			
Time that a resident self-administers a nebulizer treatment			
without supervision of the respiratory therapist or respiratory			
nurse is	nurse is not included in the minutes recorded on the MDS. Do		
not inclu	ude administration of metered-dose and/or dry powder		
inhalers	in respiratory minutes.		
	211		

Section O0500: RESTORATIVE NURSING
(Affects Nursing Restorative End-Split for
Impaired Cognition/Behaviors & Physical Reduced)

Reader

Section O | Special Treatments, Procedures, and Programs

O0500. Restorative Worring Programs

Record to emaber of Rays and 4th Editionity restorative programs was performed (for at least 15 minutes a day) in the last 7 calendar days

Record of mone or less than 15 minutes daily)

Perhaps

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Section O0500: RESTORATIVE NURSING

documented in the care plan and in the medical record. If a

restorative nursing program is in place when a care plan is

being revised, it is appropriate to reassess progress, goals,

contraindicated by state practice act provisions, a progress

note written by the restorative aide and countersigned by a

and duration/frequency as part of the care planning

b) Evidence of periodic evaluation by the licensed nurse must

be present in the resident's medical record. When not

licensed nurse is sufficient to document the restorative nursing program once the purpose and objectives of

a) Measurable objectives and interventions must be

211 212

Section 00500: RESTORATIVE NURSING

Steps for Assessment

- 1. Review the restorative nursing program notes and/or flow sheets in the medical record.
- 2. For the 7-day look-back period, enter the number of days on which the technique, training or skill practice was performed for a total of at least 15 minutes during the 24-hour period.
- 3. The following criteria for restorative nursing programs must be met in order to code O0500:

213

213 214

Section 00500: RESTORATIVE NURSING

- Nursing assistants/aides must be trained in the techniques that promote resident involvement in the activity.
- d) A <u>registered nurse or a licensed practical (vocational)</u>
 <u>nurse</u> must supervise the activities in a restorative
 nursing program. Sometimes, under licensed nurse
 supervision, other staff and volunteers will be assigned
 to work with specific residents. Restorative nursing
 does not require a physician's order. Nursing homes
 may elect to have licensed rehabilitation professionals
 perform repetitive exercises and other maintenance
 treatments or to supervise aides performing these
 maintenance services.

Section O0500: RESTORATIVE NURSING

In situations where such services do not actually require the involvement of a qualified therapist, the services may not be coded as therapy in item O0400, Therapies, because the specific interventions are considered restorative nursing services (see item O0400, Therapies). The therapist's time actually providing the maintenance service can be included when counting restorative nursing minutes. Although therapists may participate, members of the nursing staff are still responsible for overall coordination and supervision of restorative nursing programs.

e) This category <u>does not include groups with more than</u> <u>four residents per supervising helper or caregiver.</u>

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treatment have been established.

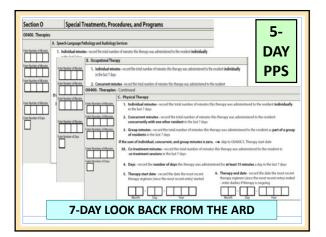
process.

Section 00500: RESTORATIVE NURSING

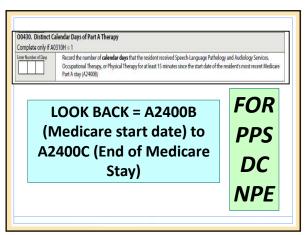
In situations where such services do not actually require the involvement of a qualified therapist, the services may not be coded as therapy in item 00400, Therapies, because the specific interventions are considered restorative nursing services (see item 00400, Therapies). The therapist's time actually providing the maintenance service can be included when counting restorative nursing minutes. Although therapists may participate, members of the nursing staff are still responsible for overall coordination and supervision of restorative nursing programs.

e) This category <u>does not include groups with more than</u> <u>four residents per supervising helper or caregiver.</u>

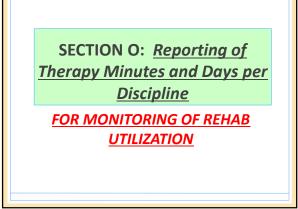
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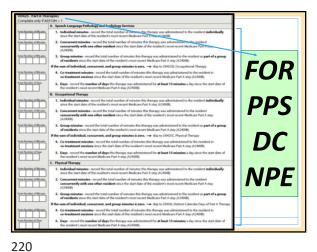


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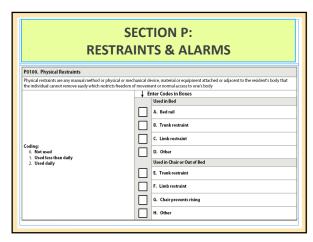


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Intent: The intent of this section is to record the frequency that the resident was restrained by any of the listed devices, or an alarm was used, at any time during the day or night, during the 7-day look-back period. Assessors will evaluate whether or not a device meets the definition of a physical restraint or an alarm and code only the devices that meet the definitions in the appropriate categories.



RESTI	SECTION P: RAINTS & ALARMS
P0200. Alarms	
An alarm is any physical or electronic device th	at monitors resident movement and alerts the staff when movement is detected
	↓ Enter Codes in Boxes
	A. Bed alarm
	B. Chair alarm
Coding: 0. Not used 1. Used less than daily	C. Floor mat alarm
2. Used daily	D. Motion sensor alarm
	E. Wander/elopement alarm
	F. Other alarm

SECTION Q: PARTICIPATION IN ASSESSMENT & GOAL SETTING

Intent: Record the participation & expectations of the resident, family members, or significant other(s) in the assessment, and to understand the resident 's overall goals. Discharge planning follow-up is already a regulatory requirement (CFR 483.21(c)(1)). Section Q of the MDS uses a person-centered approach to ensure that all individuals have the opportunity to learn about homeand community-based services and to receive long term care in the least restrictive setting possible. This is also a civil right for all residents. Interviewing the resident or designated individuals places the resident or their family at the center of decision-making.

SECTION Q: PARTICIPATION IN ASSESSMENT & GOAL SETTING

Q0550A: Does resident (or family, etc.) want to be asked about returning to the community on all the assessments?

- 1. No
- 2. Yes
- 8. Information not available

Q0550B: Indicate source for Q0550A

- 1. Resident
- $2. \ \ \text{Family or Significant Other}$
- 3. Guardian or Legally authorized representative
- 9. None of the above

225 226

SECTION S: STATE-SPECIFIC ITEMS

SECTION V: CARE AREA ASSESSMENT (CAA) SUMMARY

Intent: The MDS does not constitute a comprehensive assessment. Rather, it is a preliminary assessment to identify potential resident problems, strengths, and preferences. Care Areas are triggered by MDS item responses that indicate the need for additional assessment based on problem identification, known as "triggered care areas," which form a critical link between the MDS and decisions about care planning.

227 228

SECTION X: CORRECTION REQUEST

Intent: The purpose of Section X is to identify an MDS record to be modified or inactivated. The following items identify the existing assessment record that is in error. Section X is only completed if Item A0050, Type of Record, is coded a 2 (Modify existing record) or a 3 (Inactivate existing record). In Section X, the facility must reproduce the information EXACTLY as it appeared on the existing erroneous record, even if the information is incorrect. This information is necessary to locate the existing record in the National MDS Database.

SECTION Z: ASSESSMENT ADMINISTRATION

Intent: The intent of the items in this section is to provide billing information and signatures of persons completing the assessment.

229 230

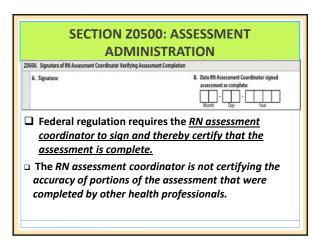
S	ECTION Z: ASSESSMENT ADMINISTRATION
Section Z	Assessment Administration
Z0100. Medicare P	art A Billing
	re Part A MIPPS code:
	cald Billing (if required by the state)
B. Version	
Z0250. Alternate S	tate Medicald Billing (if required by the state)
A. Case M	Ix group:
Z0300. Insurance B	illing
A. Billing B. Billing	code:

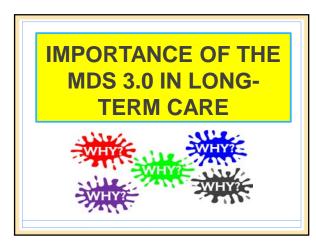
SECTION Z0400: ASSESSMENT
ADMINISTRATION

2000: Signature of Persons Completing the Assessment or Entry/Death Reporting

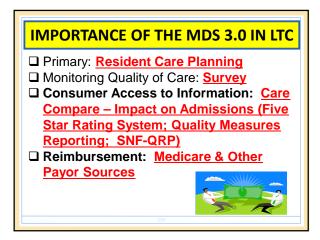
collection of this information on the dates specified. It in the best of my knowledge, this information was collected in accordance with a personal accordance with a personal collection of this information in the foliation of this information was collected in accordance with against and information accordance with against and in accordance with against and information accordance with against and insufficient control information accordance with against and insufficient control information accordance with against and insufficient control information accordance with against an information accordance with a formation accordance with

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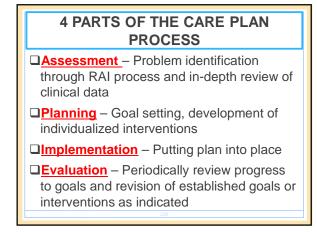




MDS 3	3.0: Anatomy of the RAI
MDS • Scree	ening tool to identify possible problems
• Clue	s to possible problems, needs, strengths
proble	er in-depth assessment to identify details of the possible ems, needs, strengths, and to draw conclusions about ot causes
	ummary includes the documentation of triggered CAAs, on of documentation to support care planning decision
	CAREPLAN

CARE AREAS						
1. Delirium	11. Falls					
2. Cognitive Loss	12. Nutrition Status					
3. Visual Function	13. Feeding Tube(s)					
4. Communication	14. Dehydration/Fluid Maintenance					
5. ADLs-Functional Status	15. Dental Care					
6. Urinary Incontinence and Indwelling Catheter	16. Pressure Ulcer(s)					
7. Psychosocial Well-Being	17. Psychotropic Medication Use					
8. Mood State	18. Physical Restraints					
9. Behavioral Symptoms	19. Pain					
10. Activities	20. Return to Community Referral					

237 238





239 240



IMPORTANCE: Imperative for Facility Survival

☐ The Original Goal: For Consumers

MANAGED CARE, ACO'S & Other Non-FFS Payor

Sources: Use ratings to establish networks & partnerships

□ CMS DEMONSTRATION PROJECTS/INITIATIVES: Will waive 3-day hospital stay to qualify for SNF stay if SNF has 3-Stars: e.g.

- o Hospitals in CJR model
- o Hospitals in Advanced ACO demonstration
- ☐ Liability Insurance Carriers: Use to set rates
- ☐ Trial Lawyers: Use to fish for cases & to support allegations of poor-quality care

242

What Do The Stars Mean?

 System that assigns 1 to 5 Stars to every Medicare and/or Medicaid certified nursing home

****	Much Above Average
***	Above Average
***	Average
**	Below Average
*	Much Below Average

BASED ON 3 DOMAINS: HEALTH INSPECTIONS; NURSING STAFFING; AND QUALITY MEASURES

243

REVISIONS: APRIL 2022

Quality Measure Rating Threshold Changes:

- □ Effective with the April 2022 refresh, CMS implemented the planned, regular increases to the Quality Measure (QM) rating thresholds, increasing each rating threshold by one-half of the average improvement in QM scores since the last time the thresholds were set.
- □ For the April 2022 refresh, the average improvement is determined from the period of April 2019 – January 2022.

244

REVISIONS: JANUARY 2022

Public Reporting of Turnover and Weekend Staffing Information on Medicare.gov Care Compare Website:

- ☐ Effective with the January 2022 refresh, CMS began posting the following information for each nursing home on the Medicare.gov Care Compare website:
- Weekend Staffing: The level of total nurse and registered nurse (RN) staffing on weekends (Saturdays and Sundays) provided by each nursing home over a quarter.
- Staff Turnover: The percentage of nursing staff and number of administrators that stopped working at the nursing home over a 12-month period.

OVERVIEW: HEALTH INSPECTION

HEALTH INSPECTION DOMAIN: Ratings for the health inspections domain are based on the <u>number</u>, scope, and severity of deficiencies identified during the 3 most recent annual inspection surveys, as well as substantiated findings from the most recent 36 months of complaint investigations and focused infection control surveys. All deficiency findings are <u>weighted by scope</u> and severity. The health inspections rating also takes into account the <u>number of revisits</u> required to ensure that deficiencies identified during health inspection surveys have been corrected.

245

OVERVIEW: STAFFING DOMAIN

STAFFING DOMAIN: Ratings for the staffing domain are based on two measures:

- 1) Registered Nurse (RN) hours per resident per day; and
- Total Nursing (the sum of RN, LPN, and Nurse Aide) hours per resident per day.
- Other types of nursing home staff, such as clerical or housekeeping staff, are not included in the staffing rating calculation.
- ☐ Derived from data submitted each quarter through the Payroll-Based Journal (PBJ) System, along with daily resident census derived from MDS 3.0 assessments and are case-mix adjusted based on the distribution of MDS 3.0 assessments by RUG-IV groups.

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OVERVIEW: QUALITY MEASURES DOMAIN

QUALITY MEASURES DOMAIN

- ☐ Based on MDS-Based QMs and Claims-Based QMs
- ☐ Ratings for the quality measures are based on performance on <u>15 of the QMs</u> that are currently posted on the Care Compare website.
 - o <u>9 Long-Stay Measures</u>
 - o 6 Short-Stay Measures
- ☐ Note: In addition to an overall quality of resident care rating, separate ratings for the quality of resident care for short-stay residents and long-stay residents are also reported.

248

OVERVIEW: FIVE STAR RATING

- □ Nursing Home Compare—Five Star Quality Rating System: Technical Users' Guide—State-Level Cut Point Tables) provides the data for the State-Level Cut Points for the Health Inspection Star Ratings - <u>Updated Monthly</u>
- ☐ The cut points for the staffing ratings are included in Tables 3 and 4 in the Technical Users' Guide.
- ☐ <u>Table 6 provides the cut points for the QM ratings, and the cut points for the individual QMs are in Appendix</u>
 Table A2.

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METHODOLOGY FOR CONSTRUCTING THE RATINGS

250

STATE HEALTH INSPECTION RATING DOMAIN

<u>RATING</u> =

STATE HEALTH INSPECTIONS

(WEIGHTED DEFICIENCIES)
AND

(# OF REPEAT VISITS)

From 3 most recent Recertification Surveys,

Complaint Deficiencies during the most recent 3year period,

<u>Deficiencies cited on Focused Infection Control</u>
Surveys in the most recent 3-year period

251 252

STATE HEALTH INSPECTIONS RATING: SCOPE & SEVERITY OF DEFICIENCIES

STATE SURVEY RESULTS (Standard Surveys, Complaint Surveys & Infection Control Focused Surveys)

- ☐ Points are assigned to individual health deficiencies according to their Scope & Severity
- ☐ <u>Substandard Quality of Care</u> = Additional points assigned
- □ "Past Non-compliance" & "Severity is Immediate
 Jeopardy" (i.e., "J", "K" or "L"-level) = Points associated
 with a "G" level deficiency are assigned.

253 254

HEALTH INSPECTION SCORE: Weights for Different Types of Deficiencies								
()=Substandard QOC	* = Past	Non-Compliance	and IJ					
SEVERITY	ISOLATED	PATTERN	WIDESPREAD					
Immediate Jeopardy to Resident Health or Safety Actual Harm that is Not Immediate Jeopardy	J 50 POINTS* (75 POINTS) G 20 POINTS	K 100 POINTS* (125 POINTS) H 35 POINTS (40 POINTS)	L 150 POINTS* (175 POINTS) I 45 POINTS (50 POINTS)					
No actual harm with potential for More than Minimal Harm that is NOT IJ	D 4 POINTS	E 8 POINTS	F 16 POINTS (20 POINTS)					
No Actual Harm with Potential for Minimal Harm	A O POINTS	B O POINTS	C O POINTS					

255 256

STATE HEALTH INSPECTIONS RATING: Deficiencies from Complaint & Focused Infection Control Surveys

Complaint and Focused IC Surveys:

- ☐Based on the <u>12-month period</u> in which the complaint or infection control survey occurred.
- ☐Includes the most recent 36 months
- **□WEIGHTS**:
 - OWithin Most recent 12 months = 1/2
 - ○13 24 months ago = 1/3
 - \circ 25 36 months ago = 1/6

NOT INCLUDED in Health Inspection Score Calculation

- ☐ F-731 (Waiver of requirement to provide licensed nurses on a 24-hour basis) and
- ☐ F-884 (COVID-19 Reporting to the Centers for Disease Control) are not considered.
- ☐ Health citations with a deficiency status code indicating that a waiver has been granted
- ☐ Deficiencies from Life Safety Surveys
- ☐ Deficiencies from Federal Comparative Surveys

NOTE: Results of State Survey Agency determinations made during a Federal Oversight Survey are included.

STATE HEALTH INSPECTIONS RATING: Standard Surveys

STANDARD SURVEYS

- ☐ 3 most recent Annual Inspection Surveys: Each deficiency is weighted by Scope and Severity
- ☐ More recent annual surveys weighted more heavily than earlier surveys

STATE HEALTH INSPECTIONS:

- Most recent period (cycle 1) = 1/2
- The previous period (cycle 2) = 1/3
- The 2^{ND} prior survey (cycle 3) = 1/6

STATE HEALTH INSPECTIONS RATING: Deficiencies from Complaint & Focused Infection Control Surveys

- ☐ There are some deficiencies that appear on both standard and complaint inspections. To avoid potential double-counting, deficiencies that appear on complaint inspections that are conducted within 15 days of a recertification inspection (either prior to or after the recertification inspection) are counted only once.
- ☐ If the scope or severity differs between the two inspections, the highest scope-severity combination is used.

257 258

STATE HEALTH INSPECTIONS RATING: Deficiencies from **Complaint & Focused Infection Control Surveys**

- Deficiencies cited on focused infection control surveys are treated slightly differently.
- ☐ If two or more infection control inspections cite the same deficiency within a 15-day period, all are included; however, if one or more of these deficiencies was also cited on a recertification survey and/or a complaint inspection within the same 15-day window, only the infection control citations are included.
- □ Points from complaint deficiencies and deficiencies cited on infection control surveys from a given period are added to the health inspection score before calculating revisit points, if applicable.

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STATE HEALTH INSPECTIONS RATING: REPEAT **REVISITS (RE-SURVEY FOR COMPLIANCE)**

Repeat Revisits - Number of repeat revisits required to confirm that correction of deficiencies have restored compliance:

- 1St Revisit = NO POINTS
- 2ND Revisit = 50% Health Inspection Score
- 3RD Revisit = 70% Health Inspection Score
- 4TH Revisit= 85% Health Inspection Score
- * The health inspections score include points from deficiencies cited on the standard health inspection & complaint inspections during a given survey cycle.

STATE HEALTH INSPECTIONS RATING: CUT POINTS

Re-calibrated each month BUT rating for facility is held constant until a change in facility's survey deficiencies: https://www.cms.gov/medicare/provider-enrollment-and-certification/certificationandcomplianc/fsqrs.html

- ITEMS THAT COULD CHANGE HEALTH INSPECTION SCORE:
- 1. A New Health Inspection Survey
- 2. A complaint survey or focused infection control survey that results in one or more deficiency citations;
- 3. A 2nd, 3rd or 4th Re-visit
- 4. Resolution of an IDR or I-IDR resulting in changes to scope and/or severity of deficiencies
- 5. The "aging" of complaint and/or focused infection control deficiencies (time period based on the calendar year in which complaint/IC survey occurred)

261



Rating Methodology for Facilities with Abuse Citation(s)

- ☐ Nursing homes that receive the abuse icon have their health inspection rating capped at a maximum of two
- ☐ Due to the methodology used to calculate the overall rating, the best overall rating a facility that receives the abuse icon can have = 4 stars.
- ☐ The abuse icon (and the cap on the health inspection rating) will be removed as of the first monthly website refresh following when a nursing home no longer meets the abuse icon criteria.

Rating Methodology with Abuse Citation(s) Care Compare includes an abuse icon that

identifies facilities that meet either of the following criteria: Harm-level abuse citation in the most recent survey cycle: Facilities cited for abuse where residents were found to be harmed (Scope/Severity of G or higher) on the most recent standard survey or on a complaint or focused infection

control survey within the past 12 months. Repeat abuse citations: Cited for abuse where residents were found to be potentially harmed (Scope/Severity of D or higher) on the most recent standard survey OR on a complaint or focused infection control survey within the past 12 months AND on the previous (i.e., second most recent) standard survey OR on a complaint survey in the prior 12 months (i.e., from 13 to 24 months ago).

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Abuse Citation(s)

- ☐ F600 (Protect each resident from all types of abuse, such as physical, mental, sexual abuse, physical punishment, and neglect by anybody);
- ☐ F602 (Protect each resident from the wrongful use of the resident's belongings or money);
- ☐ F603 (Protect each resident from separation from other residents, his/her room, or confinement to his/her room);
- ☐ F223 (Protect each resident from all abuse, physical punishment, and involuntary separation from others);
- ☐ F224 (Protect each resident from mistreatment, neglect, and misappropriation of personal property).

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STATE HEALTH INSPECTIONS RATING

Step 1: Calculate weighted 3-year average survey score

- ☐ 3 Annual Inspection Surveys (Scope & Severity)
- ☐ Complaint & IC Focused Surveys (S/S) = 36 months
- ☐ Number of Revisits to correct deficiencies.

Step 2: Rank all facilities w/in each state based on scores

- ☐ **Top 10 percent** (with the lowest health inspection weighted scores) receive a health inspection rating of <u>5 Stars</u>.
- ☐ Middle 70 percent of facilities receive a rating of 2, 3 or 4 stars, (23.33 percent) in each rating category.
- ☐ Bottom 20 percent receive a 1-Star Rating.

Step 3: Assign 1 to 5 stars based on ranking

265 266

STAFFING RATING **DOMAIN**

267 268

STAFFING RATING **COMPONENTS**

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How to Avoid 1 or 2 stars on Survey

- ☐ Mock Surveys Be Proactive!!!
- No Substandard Quality Deficiencies
- Focus on INFECTION CONTROL
- No ABUSE Citations
- ☐ Know your State's Health Inspection Cutpoints (updated monthly)
- Most common reason for deficiencies:
 - o Staff did not follow SNF policy, procedure, care plan or orders

STAFFING RATING

The rating for staffing is based on two quarterly case-mix adjusted measures:

- ☐ RN hours per resident day
- ☐ Total nursing hours per resident day (RN + LPN + nurse aide hours)

Source for reported staffing hours is the Payroll-Based Journal (PBJ) system. These data are submitted quarterly and are due 45 days after the end of each reporting period. Only data submitted and accepted by the deadline are used by CMS for staffing calculations and in the Five-Star Rating System.

STAFFING RATING COMPONENTS

- ☐ Reported Hours based on PBJ Hours every Quarter
- ☐ Census: Average MDS-Based Census
- ☐ Case Mix Hours = Calculated based on resident acuity from MDS's using RUG-IV (v. 66) Categories (CASE-MIX ADJUSTED) - quarter covered by PBJ reported staffing
- □ National Average: Hours for a given staff type represent the national mean of case-mix hours across all facilities active on the last day of the quarter that submitted valid nurse staffing data for the quarter. Updated every quarter and will be available in the State US Averages table in the Provider Data Catalog on https://data.cms.gov/provider-data/

REPORTED HOURS

PBJ CODES USED IN STAFFING CALCULATIONS

- ☐ RN HOURS: Includes RN Director of Nursing (Job Code 5),
 Registered Nurses with Administrative Duties (Job Code
 6), & Registered Nurses (Job Code 7).
- □ LPN HOURS: Includes Licensed Practical/Licensed
 Vocational Nurses with Administrative Duties (Job Code
 8) and Licensed Practical/Vocational Nurses (Job Code 9)
- □ NURSE AIDE HOURS: Includes Certified Nurse Aides (Job Code 10), Aides in Training (Job Code 11), and Medication Aides/Technicians (Job Code 12)

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PBJ CODES USED IN STAFFING CALCULATIONS

- ☐ PBJ staffing data include both facility employees (fulltime and part-time) and individuals under an organization (agency) contract or an individual contract.
- ☐ The PBJ staffing data do not include "private duty" nursing staff reimbursed by a resident or his/her family. Also not included are hospice staff and feeding assistants.

DAILY RESIDENT CENSUS

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DAILY RESIDENT CENSUS

The <u>daily resident census</u>, used in the denominator of the reported nurse staffing ratios, is <u>derived from MDS</u> <u>resident assessments</u> and is calculated as follows:

- 1) Identify the reporting period (quarter) for which the census will be calculated (e.g., CY 2021 Q2: April 1–June 30, 2021).
- 2) Extract MDS assessment data for all residents of a facility beginning one year prior to the reporting period to identify all residents that may reside in the facility (i.e., any resident with an MDS assessment may still reside in the facility). For example, for the CY 2021 Q2 reporting period, extract MDS data from April 1, 2020 through June 30, 2021.

DAILY RESIDENT CENSUS

- 3) Identify discharged residents using the following criteria:
- ☐ If a resident has an MDS Discharge assessment or Death in Facility tracking record, use the date reported on that assessment and assume that the resident no longer resides in the facility as of the date of discharge/death on the last assessment.
- ☐ In the case of discharges, if there is a subsequent admission assessment, then assume that the resident reentered the nursing home on the entry date indicated on the entry assessment.

DAILY RESIDENT CENSUS

- ☐ For any resident with an <u>interval of 150 days or more</u> with no assessments, assume the resident no longer resides in the facility as of the 150th day from the last assessment. (This assumption is based on the requirement for facilities to complete MDS assessments on all residents at least quarterly). If no assessment is present, assume the resident was discharged, but the facility did not transmit a Discharge assessment.
- ☐ For any particular date, residents whose assessments do not meet the criteria in #3 above prior to that date are assumed to reside in the facility.
- ☐ The count of these residents is the census for that particular day. (CENSUS)

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DAILY RESIDENT CENSUS

- Providers should work with their State RAI Coordinator or State Automation Coordinator to correct any errors that arise during assessment submission.
- ☐ In addition, monitor MDS data using additional Certification and Survey Provider Enhanced Reports (CASPER) Reports.
 - MDS Census Summary (returns resident count per day),
 - MDS Census Detail (returns list of Resident Internal IDs counted per day), Admissions, Discharges, Duplicate Residents, Errors, and Daily Rosters, among others.

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CASE MIX ADJUSTMENT

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MDS assessments for a given resident are linked using the Resident Internal ID. The combination of state and Resident Internal ID uniquely identifies a resident in the national repository.

DAILY RESIDENT CENSUS

- oSocial Security Number (SSN)
- oLast Name
- oFirst Name
- o Date of Birth
- o Gender
- Ensure that MDS items above, are ENTERED correctly on each assessment.
- Also carefully monitor the Final Validation Reports for any errors.

EXCLUSION CRITERIA = 1 STAR

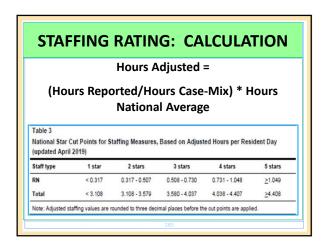
Results reported for facilities with improbable PBJ data:

- □ Total nurse staffing (job codes 5-12), aggregated over all days in the quarter = 0 hours per resident per day.
- □ Total nurse staffing (job codes 5-12), aggregated over all weekend days in the quarter = 0 hours per resident per day
- ☐ Total nurse staffing (job codes 5-12), aggregated over all weekend days in the quarter with at least one resident, is excessively high (>12 hours per resident day).
- Nurse aide staffing (job codes 10-12), aggregated over all days in the quarter with at least one resident, is excessively high (>5.25 hours per resident day).
- Nurse aide staffing (job codes 10-12), aggregated over all weekend days in the quarter with at least one resident, is excessively high (>5.25 hours per resident day).

-00

CASE MIX ADJUSTMENT

- CMS adjusts the reported staffing ratios for case-mix, using the RUG-IV case-mix system
- ☐ This is referred to these as "case-mix" hours".
- ☐ The CMS Staff Time Resource Intensity Verification (STRIVE) Study measured the average number of RN, LPN, and nurse aide minutes associated with each RUG-IV group (using the 66-group version of RUG-IV).
- ☐ A downloadable file that contains the "case-mix", "reported" and "adjusted" hours used in the staffing calculations is included in the nursing home provider information data table available in the Provider Data Catalog on CMS.gov (https://data.cms.gov/provider_data/).



STAFFING CUT POINTS Staffing and Rating (updated April 2019) Total nurse staffing rating and hours (RN, LPN and nurse aide) RN rating and hours < 3.108 3.108 - 3.579 3.580 - 4.037 4.038 - 4.407 ≥4.408 1 < 0.317 ** ** *** ** ** *** 2 0.317 - 0.507 ** *** 3 0.508 - 0.730 ** *** *** *** **** 0.731 - 1.048 *** **** **** 5 >1.049 **** **** **** *** **** Note: Adjusted staffing values are rounded to three decimal places before the cut points are applied

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SAMPLE PBJ HOURS ALL NURSING LPN'S & C.N.A.'S RN'S STAFF 5441.75 LPN'S LPN'S 448 DON **OWITH ADM** RN'S with 2239.5 RN HOURS 592ADM **119.5** RN'S 16611.5 CNA'S LPNS & 22053.5 CNAS **2239.5 HOURS** 2492.75 HOURS 22053.5 HOURS

RN HOURS

2239.5 HOURS
divided by 91 divided by 83 = 0.88359745

0.88359745 divided by 0.33798

Multiplied by 0.41088 = 0.3605

2 STARS FOR RN'S

285 286

ALL NURSING STAFF

2239.5 HOURS divided by 91 divided by 83 = 3.2163

3.2163 divided by 2.75146

Multiplied by 3.21231 = 3.7550

3 STARS FOR ALL NURSING STAFF

RN ADJUSTED HOURS = 0.3605 TOTAL NURSING HOURS = 3.7550 Table 4 Staffing and Rating (updated April 2019) RN rating and hours Total nurse staffing rating and hours (RN, LPN and nurse aide) 3.108-3.579 3.580 - 4.037 4.038-4.407 < 3.108 >4.408 1 < 0.317 ** *** 0.317 - 0.507 *** *** 0.508-0.730 ** *** *** *** **** 4 *** *** **** **** **** 0.731-1.048 5 ≥1.049 *** **** **** **** **** Note: Adjusted staffing values are rounded to three decimal places before the cut points are applied.

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SCORING EXCEPTIONS

- Providers that <u>fail to submit any staffing data</u> by the required deadline will receive a one-star rating for overall staffing and RN staffing for the quarter.
- ☐ Providers that submit staffing data indicating that there were <u>four or more days in the quarter with no RN staffing hours</u> (Job Codes 5-7) will receive a One Star Rating for Overall Staffing and RN Staffing for the quarter.

SCORING EXCEPTIONS

☐ CMS conducts audits of nursing homes to verify the data submitted and to ensure accuracy. Facilities that fail to respond to these audits and those for which the audit identifies significant discrepancies between the hours reported and the hours verified will receive a one-star rating for overall staffing and RN staffing for three months from the time at which the deadline to respond to audit requests passes or discrepancies are identified.

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TIPS FOR PBJ SUCCESS

Verify competency of staff responsible for PBJ submission

- ☐ Understands how to validate submission & data acceptance
- ☐ Understands facility-specific mapping of PBJ job title codes
- ☐ Documentation is in writing
- ☐ Knows how to utilize CASPER reports to identify potential errors
- Understands how to pull documents if necessary for audit

TIPS FOR PBJ SUCCESS

Establish process for verifying accuracy of your data

- ☐ Submit early Don't wait until last minute
- ☐ Submit at least 10 days before quarterly deadline
- ☐ Utilize CASPER reports to identify potential errors
 - Staffing Summary Report
 - Identify missing hours by category
 - Compare with previous quarter to see variances which were not attributed to change in total days

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15 QUALITY MEASURES AFFECT 5-STAR RATING

- □QM ratings are based on performance on 10 MDSbased QMs and 5 measures that are created using Medicare claims
- ☐ 9 LONG-STAY QM'S (7 MDS-BASED & 2 CLAIMS-BASED)
- □ 6 SHORT-STAY QM'S (3 MDS-BASED & 3 CLAIMS-BASED)
- ☐ Cut points have been recalculated- Deciles and Quintiles (15 or 20 point per level)

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LONG-STAY QUALITY MEASURES

- 1) % residents whose need for help with ADLs has increased
- 2) Percent of residents whose ability to move independently worsened
- 3) Percent of high-risk residents with pressure ulcers
- 4) Percent of residents who have/had a catheter
- 5) Percent of residents with a urinary tract infection
- Percent of residents experiencing one or more falls with major injury
- 7) Percent of residents who received an antipsychotic medication
- 8) Number of Hospitalizations per 1,000 Long-Stay Resident Days* (CLAIMS-BASED)
- 9) Number of Outpatient Emergency Department (ED) Visits per 1,000 Long-Stay Resident Days* (CLAIMS-BASED)

95

SHORT-STAY QUALITY MEASURES

- % of short-stay residents who improved in their ability to move around on their own
- % of SNF residents with pressure ulcers/pressure injuries that are new or worsened
- 3) % of short-stay residents who got antipsychotic medication for the first time
- 4) %of short-stay residents who were re-hospitalized after a nursing home admission*
- 5) % of short-stay residents who have had an outpatient emergency department (ED) visit*
- 6) Rate of successful return to home & community from a SNF*

Claims-Based Measures are risk-adjusted

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COMPUTATION OF ADJUSTED 4 Q MDS-BASED QM'S (Except for Short-Stay P/U QM)

QM(4Quarter)

_

 $[(QM_{Q1}*D_{Q1}) + (QM_{Q2}*D_{Q2}) + (QM_{Q3}*D_{Q3}) + (QM_{Q4}*D_{Q4})]$

divided by

 $D_{01} + D_{02} + D_{03} + D_{04}$

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RISK ADJUSTMENT

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RISK ADJUSTMENT

- ☐ Values for four of the MDS-based QMs (mobility decline, catheter, short-stay functional improvement, and short-stay pressure ulcers) are <u>risk adjusted, using resident-level covariates that adjust for resident factors associated with differences in the performance on the QM.</u>
- ☐ All of the claims-based measures are risk adjusted.
- ☐ Risk-adjustment for the hospitalization and ED visit measures incorporates items from Medicare enrollment data and Part A claims and information from the first MDS assessment associated with the nursing home stay.

RISK ADJUSTMENT

- Risk adjustment for the rate of successful return to home and community from a SNF measure uses data derived from Medicare enrollment data and Part A claims.
- CMS calculates ratings for the QM domain using the <u>four</u> most recent quarters for which data are available (except the rate of successful return to home and community from a SNF that uses a two-year period).
- ☐ Values for the claims-based measures and the short-stay pressure ulcer/pressure injury measure are calculated in a similar manner, except that the data used to calculate the measures use a full year (or two years) of data rather than being broken out separately by quarter.

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Scoring Rules for the Individual QM's

- 2 different sets of weights are used for assigning QM points to individual QMs.
- Some measures have a <u>maximum score of 150</u> points while the <u>maximum number of points</u> for other measures is 100.
- □The weight for each measure was determined based on the opportunity for nursing homes to improve on the measure and the clinical significance of the measure based on expert feedback.

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Scoring Rules for the Individual QM	's
	POINTS
Long-stay	150
☐ % of residents whose need for help with daily activities increased ☐ %of residents who received an antipsychotic medication	135
□ %of residents whose ability to move independently worsened	120
☐ Number of hospitalizations per 1,000 resident days ☐ Number of outpatient emergency department (ED) visits per	105
1,000 resident days Short-stay	90
☐ Percentage of residents who improved in their ability to move around on their own	75
☐ Rate of successful return to home and community from a SNF	60
☐ Percentage of short-stay residents who were re-hospitalized after a nursing home admission	45
☐ Percentage of short-stay residents who have had an outpatient	30
emergency department (ED)	15

POINTS 100 ☐ Percentage of residents experiencing one or more falls with major injury ☐ Percentage of high-risk residents with pressure ulcers 80 ☐ Percentage of residents with a urinary tract infection ☐ Percentage of residents who have or had a catheter 60 inserted and left in their bladder Short-stay ☐ Percentage of residents who got an antipsychotic 40 medication for the first time ☐ Percentage of SNF residents with pressure ulcers/pressure injuries that are new or worsened 20

Scoring Rules for the Individual QM's

Scoring Rules for the Individual QM's

□For measures that have a maximum score of

150 points, the points are determined based

□Quintiles are used for measures that have a

□For all measures, points are calculated based

imputation of individual QM values, with the

points determined using this methodology:

on performance relative to the national

□Points are assigned after any needed

maximum score of 100 points.

distribution of the measure.

(Refer to next slides)

on deciles.

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Scoring Rules for QM SCORE

- After any needed imputation for individual QMs:
 - Sum Up All Long-Stay QM Scores = 155 1,150
 - Sum Up All Short-Stay QM Scores = 100 800
 points (Unadjusted QM Score) Needs Adjustment
 Factor to ensure equal weights for both LS Score &
 SS Scores adjustment factor of 1,150/800 is applied
 to the unadjusted total short-stay score.
- ☐ After applying this adjustment, the adjusted shortstay score ranges from 144 to 1,150. The total overall QM score, which sums the total long-stay score and the total adjusted short-stay score, ranges between 299 and 2,300.

Scoring Rules for QM SCORE

- □ <u>ADJUSTED LONG-STAY QM SCORE = 155 1,150 Points</u>
- ADJUSTED SHORT-STAY QM SCORE: Needs Adjustment

[Unadjusted Short-Stay QM Score x Adjustment Factor for Short-Stay QM = (1150/800) = 1.4375]

ADJUSTED SHORT-STAY QM SCORE = 144 – 1,150 Points

TOTAL OVERALL QM SCORE = 299 POINTS -2,300 POINTS

[Adjusted Long-Stay QM Score + Adjusted Short-Stay QM Score]

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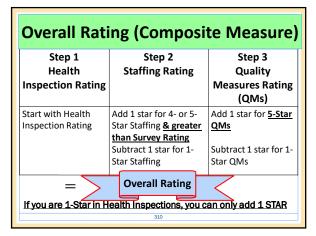
QM CALCULATIONS

□Once the long-stay, short-stay, and overall QM scores are computed for each nursing home, a long-stay QM rating is assigned to nursing homes that have long-stay QM scores; a short-stay QM rating is assigned to nursing homes that have short-stay QM scores, and an overall QM star rating is assigned using the point thresholds.

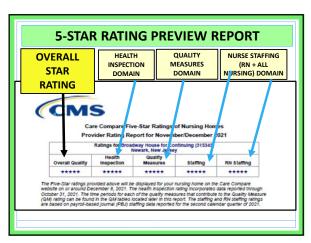
QM Rating	Long-Stay QM Rating Thresholds	Short-Stay QM Rating Thresholds	Overall QM Rating Thresholds
*	155-477	144-488	299-966
**	478-574	489-585	967-1,160
***	575-655	586-674	1,161-1,330
****	656-746	675–762	1,331-1,509
****	747-1,150	763-1,150	1,510-2,300

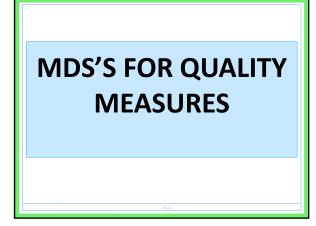
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OVER-ALL RATING



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WHAT ARE QM's?

☐ Quality measures are tools that help us measure or quantify healthcare processes, outcomes, patient perceptions, and organizational structure and/or systems that are associated with the ability to provide high-quality health care and/or that relate to one or more quality goals for health care.

PURPOSES:

- ☐ Information on Quality of Care for placement (Consumers)
- ☐ Information on Quality of Care for existing residents (Surveyors)
- ☐ Prompt for discussions with staff to improve care (Providers)
- ☐ Provide data to assist with quality improvement initiatives
 (CMS)

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QUALITY MEASURES

- MDS-BASED QM'S: Designed to assess residents' physical & clinical conditions, abilities, preferences & life care wishes
- CLAIMS-BASED QM's: Developed to provide another source of information for the consumer & the provider related to quality of care. "Data obtained from claims submitted to Medicare A & B for services rendered to beneficiaries"
- ☐ <u>Unique Info from UB-04</u>: Hospital Information, Prior SNF Stays, Treatment History, Routine Charges/Costs, NTA Costs, Physician Information, Managed Care Levels, Benchmarking data (RUG levels, Per diem rate, Episodic Cost, LOS, Types of Assessments, Discharge Status/destinations)

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HOW QUALITY	MEASURES ARE
UTIL	IZED

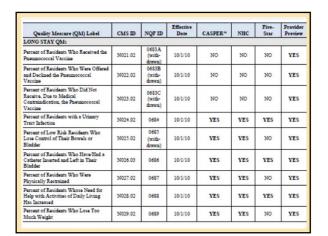
- ☐ For 5-STAR RATING
- ☐ For PUBLIC REPORTING
- ☐ For SURVEYORS
- ☐ For SNF-QRP's
- ☐ For VALUE-BASED PURCHASING

Quality Measure (QM) Label	CMS ID	NQF ID	Effective Date	CASPER*	NHC	Five- Star	Provider Preview
SHORT STAY QM:							
Changes in Skin Integrity Post-Acute Care: Pressure Ulcer/Injury	\$038.02	NA	10/1/20	YES	YES	YES	YES
Percent of Residents Who Were Assessed and Appropriately Given the Seasonal Influenza Vaccine	N003.03	0680	10/1/12	NO	YES	NO	YES
Percent of Residents Who Received the Seasonal Influenza Vaccine	N004.03	0680A	10/1/12	NO	NO	NO	YES
Percent of Residents Who Were Offered and Declined the Seasonal Influenza Vaccine	N005.03	0680B	10/1/12	NO	NO	NO	YES
Percent of Residents Who Did Not Receive, Due to Medical Contraindication, the Seasonal Influenza Vaccine	N006.03	0680C	10/1/12	NO	NO	NO	YES
Percent of Residents Assessed and Appropriately Given the Pneumococcal Vaccine	N007.02	0682 (with- drawn)	10/1/12	NO	YES	NO	YES
Percent of Residents Who Received the Pneumococcal Vaccine	N008.02	0682A (with- drawn)	10/1/12	NO	NO	NO	YES

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Quality Measure (QM) Label	CMS ID	NQF ID	Effective Date	CASPER**	NHC	Fire- Star	Provide: Preview
SHORT STAY QM:							
Percent of Residents Who Were Offered and Declined the Pneumococcal Vaccine	N009.02	0682B (with- drawn)	10/1/12	NO	NO	NO	YES
Percent of Residents Who Did Not Receive, Due to Medical Contraindication, the Pneumococcal Vaccine	N010.02	0682C (with- drawn)	10/1/12	NO	NO	NO	YES
Percent of Residents Who Newly Received an Antipsychotic Medication	N011.02	NA	4/1/12	YES	YES	YES	YES
Percentage of Residents Who Made Improvements in Function	N037.03	NA	10/1/16	YES	YES	YES	YES

Quality Measure (QM) Label	CMS ID	NQF ID	Effective Date	CASPER*	NHC	Five- Star	Provider Preview
LONG STAY QM:							
Percent of Residents Experiencing One or More Falls with Major Injury	N013.02	0674	10/1/10	YES	YES	YES	YES
Percent of High-Risk Residents with Pressure Ulcers	N015.03	0679	10/1/18	YES	YES	YES	YES
Percent of Residents Assessed and Appropriately Given the Seasonal Influenza Vaccine	N016.03	0681	10/1/10	NO	YES	MO	YES
Percent of Residents Who Received the Seasonal Influenza Vaccine	N017.03	0681A	10/1/10	NO	NO	NO	YES
Percent of Residents Who Were Offered and Declined the Seasonal Influenta Vaccine	N018.03	0681B	10/1/10	NO	NO	NO	YES
Percent of Residents Who Did Not Receive, Due to Medical Contraindication, the Seasonal Influenza Vaccine	N019.03	0681C	10/1/10	NO	NO	NO	YES
Percent of Residents Assessed and Appropriately Given the Pneumococcal Vaccine	N020.02	0683 (with-	10/1/10	NO	YES	NO	YES



Quality Measure (QM) Label CMS ID NQF ID CASPER* NHC LONG STAY OM: Percent of Residents Who Have N030.02 10/1/10 YES YES NO YES (with-Depressive Symptoms Percent of Residents Who Received an N031.03 4/1/12 NA YES YES YES YES chotic Medication Percent of Residents Who Have Had a N032.02 NA 10/1/10 YES NO NO NO Percent of residents who used Antianxiety or Hypnotic Medication without a Psychotic or Related N033.02 10/1/10 YES NO Percent of Residents Who Have N034.02 NA 10/1/10 YES NO NO NO Behavior Symptoms Affecting Other Percent of Residents Whose Ability to N035.03 NA 10/1/16 YES YES YES YES Move Independently Worsened Percent of Residents Who Used Antianxiety or Hypnotic Medicat 4/27/16 YES NO YES

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Skilled Nursing Facility Quality Reporting Program (SNF QRP)

COMPLIANCE WITH SNF-QRP TO AVOID THE 2% PENALTY:

- ☐ If you are not in compliance, you would have received a letter, notifying you that you have not reached the threshold for compliance.
- ☐ This is an MDS Completion and Submission Issue, so you need have at least 80% Compliance in the completion and submission of MDS's that trigger all of the SNF-QRP's.

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To be sure, please also go to CASPER and follow these Steps to generate QRP Reports:

- 1. Login to QIES system
- 2. Enter username and password
- 3. Select CASPER Reporting
- 4. Enter username and password
- 5. Select Reports
- 6. Select SNF Quality Reporting Program
- 7. Select the following:
 - SNF Facility Level QM report
 - SNF Provider Threshold Report (Choose FY 2022)
 - · SNF Resident Level QM Report
 - SNF Review and Correct Report
 - Reports generated can be found under Folders (Facility Inbox)

Skilled Nursing Facility Quality Reporting Program (SNF QRP) update

SNF QRP

https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-

Instruments/NursingHomeQualityInits/Skilled-Nursing-Facility-Quality-Reporting-Program/SNF-Quality-

Reporting-Program-Measures-and-Technical-Information HAI Technical Specifications

https://www.cms.gov/files/document/developmentskilled-nursing-facility-snf-healthcare-associatedinfections-hais-requiring.pdf

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REVIEW AND ANALYZE YOUR CASPER REPORTS

- I. MDS 3.0 NH Final Validation Reports
- II. MDS 3.0 NH Provider
 - a) Provider History Profile
 - b) Provider Full Profile
 - c) MDS 3.0 activity
 - d) MDS 3.0 admission/re-entry
 - e) MDS 3.0 assessment with error number choose from 1001-1068 and 3502-3912
 - f) MDS 3.0 discharges
 - g) MDS 3.0 error details by facility

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REVIEW AND ANALYZE YOUR CASPER REPORTS

(Continuation of MDS 3.0 NH Provider Reports)

- h) MDS 30 error number summary by facility vendor
- i) MDS 3.0 errors by field by facility
- j) MDS 3.0 missing assessments
- k) MDS 3.0 NH assessment print need to indicate the assessment ID
- 1) MDS 3.0 RFA statistics
- m) MDS 3.0 Roster
- n) MDS 3.0 Submission statistics by facility
- o) MDS 3.0 vendor list

REVIEW AND ANALYZE YOUR CASPER REPORTS

III.QM Reports

- a) Facility Characteristics QM Report
- b) Facility Level QM Report
- c) Monthly Comparison Report
- d) QM Package Reports
- e) Resident Level QM Report

IV.MDS 3.0 Submitter Validation - Enter Submission ID

V. SNF QRP

- a) SNF Facility Level QM Report
- b) SNF Provider Threshold Report
- c) SNF Resident Level QM Report

VI. SNF VBP Report

327 328

Operational Strategies:

Regulatory and Reimbursement

☐ Avoid or Limit Rate Penalties

- Proper reporting under QRP
- Monitor rehospitalization rates under VBP **INTERACT** programs

□ Appropriate SNF coverage of patients

- OStill opportunities under Medicare for most SNFs margins subsidize Medicaid/private pay shortfalls o Monitor staffing/other costs
- ✓ Effective budgeting and staff utilization
- ☐ Accounts Receivable Proper Billing and Collection

Operational Strategies: Managing Your DATA



Monitor your data on an ongoing basis

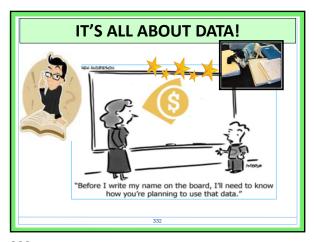
- CASPER Reports
- o Key Operational Performance Measures
 - Hospitalization/Re-hospitalization Data
 - Discharge Data

□ Assess your data for accuracy

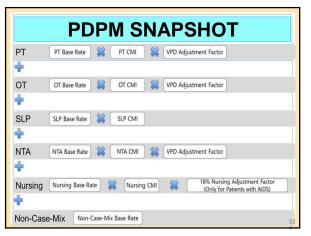
- o Focus on the key data elements that trigger the **Quality Measures**
 - MDS data
 - Claims data

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MDS 3.0
FOR
PDPM



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PT AND OT COMPONENT CRITERIA

Components 1 & 2: PT & OT

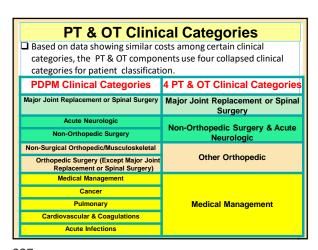
□16 RUG Categories Based on:

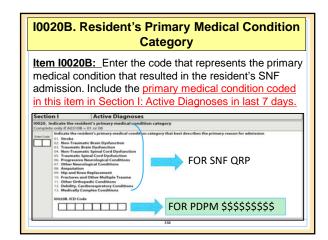
A. Clinical Category – Based on the following:

① Clinical Reason for the SNF Stay (Section 10020B) – Diagnosis Code that justifies the REASON FOR ACTIVE SNF STAY (Supports Medical Necessity of Skilled Services provided in a SNF)
② Recent Surgery Requiring Active SNF Care, if applicable (Section J2100; J2300-J5000)

B. Functional Score (SECTION GG)

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Section GG (PT & OT COMPONENTS) – Must be supported by Clinical Documentation (3-Day Look back): Collaboration between Therapy & Nursing SELF-CARE ITEMS:

1) Self Care: EATING
2) Self Care ORAL HYGIENE
3) Self Care: TOILETING HYGIENE
MOBILITY ITEMS:
4) BED MOBILITY - Sit to lying
BED MOBILITY - Lying to sitting on side of bed
5) TRANSFER - Sit to stand
TRANSFER - Chair/bed transfer
TRANSFER - Toilet Transfer
6) AMBULATION - Walk 50 feet w/ 2 turns

AMBULATION - Walk 150 feet

<u> </u>	SAMPLE: FOR ILLUSTRATION PURPOSES WAGE INDEX = 1.2639 PT/OT					
Clinical Categ	GG Score	RUG	PT RATE	OT RATE	TOTAL RATE	
	0-5	TA	\$111.06	\$100.67	\$211.73	
Maj Jt Repl or	6-9	ТВ	\$123.40	\$110.13	\$233.53	
Spinal Surg	10-23	TC	\$136.46	\$114.19	\$250.65	
	24	TD	\$139.37	\$103.38	\$242.74	
	0-5	TE	\$103.07	\$95.27	\$198.34	
Other	6-9	TF	\$116.87	\$108.11	\$224.97	
Orthoped	10-23	TG	\$121.22	\$110.81	\$232.03	
	24	TH	\$84.20	\$77.70	\$161.90	
Medical Management	0-5	TI	\$82.02	\$79.73	\$161.75	
	6-9	TJ	\$103.07	\$97.97	\$201.05	
	10-23	TK	\$110.33	\$104.05	\$214.39	
	24	TL	\$79.12	\$75.00	\$154.12	
SAME IN COLUMN	0-5	TM	\$92.19	\$87.84	\$180.02	
NonOrthop	6-9	TN	\$107.43	\$101.35	\$208.78	
Surg & Acute Neurologic	10-23	то	\$112.51	\$104.73	\$217.24	
recurologic	24	TP	\$78.39	\$73.65	\$152.04	

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SLP Component

□For the SLP component, PDPM uses a number of different patient characteristics that were predictive of increased SLP costs:

STEP 1:

a) Acute Neurologic Clinical Classification
b) Certain SLP-related Comorbidities
c) Presence of Cognitive Impairment

STEP 2:
a) Use of a Mechanically-Altered Diet
b) Presence of Swallowing Disorder

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WAGE INDEX = 1.2639 SLP				
Acute Neuro, SLP Comorb, Cog Impairm	Mech diet OR Swall disord	RUG	RATE	
None	Neither	SA	\$18.42	
None	Either	SB	\$49.31	
None	Both	SC	\$72.35	
Any One	Neither	SD	\$39.56	
Any One	Either	SE	\$63.40	
Any One	Both	SF	\$80.74	
Any Two	Neither	SG	\$55.27	
Any Two	Either	SH	\$77.49	
Any Two	Both	SI	\$95.65	
All Three	Neither	SJ	\$81.02	
All Three	Either	SK	\$100.25	
All Three	Both	SL	\$114.07	



NURSING COMPONENT

- 1. SECTION GG DOCUMENTATION –
 COLLABORATION BETWEEN NURSING AND
 REHAB (3-DAY LOOK BACK)
- ☐ Please note that if the Functional Score is 15 or 16, the any Extensive Service or Special Care High or Special Care Low Category will drop to a CA1. For these categories, Functional Score from Section GG (Late Loss ADI's) must be from 0 to 14.

Nursing Functional Score: GG Items			
Section GG items included in the Nursing functional score			
Section GG Item Functional Scor			
	Range		
GG0130A1 – Self-care: Eating	0 – 4		
GG0130C1 – Self-care: Toileting Hygiene	0 – 4		
GG0170B1 – Mobility: Sit to Lying	0 – 4 (average of 2 items)		
GG0170C1 – Mobility: Lying to Sitting on side of bed			
GG0170D1 – Mobility: Sit to Stand	0 – 4		
GG0170E1 – Mobility: Chair/bed-to-chair transfer	(average of 3 items)		
GG0170F1 - Mobility: Toilet Transfer			

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NURSING COMPONENT

- 2. CHECKLIST WITH ALL QUALIFIERS
- a) EXTENSIVE SERVICES
- b) SPECIAL CARE HIGH PHQ9
- c) SPECIAL CARE LOW PHQ9
- d) CLINICALLY COMPLEX PHQ9
- e) BEHAVIOR RNP
- f) IMPAIRED COGNITION RNP
- g) PHYSICAL REDUCED RNP

NURSING CASE MIX CATEGORIES					
NURSING COMPONENT	POINTS OR END-SPLITS	ADL SCORE	NURSING CASE MIX GROUP	СМІ	
EXTENSIVE	TRACHEOSTOMY & VENTILATOR (3)	0-14	ES3	4.04	
SERVICES	TRACHEOSTOMY OR VENTILATOR (2)	0-14	ES2	3.06	
	INFECTION ISOLATION (1)	0-14	ES1	2.91	
	DEPRESSED (2)	0-5	HDE2	2.39	
SPECIAL CARE	DEPRESSED (2)	6-14	HBC2	2.23	
HIGH	NOT DEPRESSED (1)	0-5	HDE1	1.99	
	NOT DEPRESSED (1)	6-14	HBC1	1.85	
	DEPRESSED (2)	0-5	LDE2	2.07	
SPECIAL CARE	DEPRESSED (2)	6-14	LBC2	1.71	
LOW	NOT DEPRESSED (1)	0-5	LDE1	1.72	
	NOT DEPRESSED (1)	6-14	LBC1	1.43	

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NURSING COMPONENT	POINTS OR END-SPLITS	ADL SCORE	NURSING CASE MIX GROUP	CMI
	DEPRESSED (2)	0-5	CDE2	1.86
CLINICALLY	DEPRESSED (2)	6-14	CBC2	1.54
COMPLEX	DEPRESSED (2)	15-16	CA2	1.08
	NOT DEPRESSED (1)	0-5	CDE1	1.62
	NOT DEPRESSED (1)	6-14	CBC1	1.34
	NOT DEPRESSED (1)	15-16	CA1	0.94
BEHAVIOR SYMPTOMS	NURSING REHAB (2)	11-16	BAB2	1.04
COGNITION	NO NURSING REHAB (1)	11-16	BAB1	0.99
	NURSING REHAB (2)	0-5	PDE2	1.57
REDUCED	NURSING REHAB (2)	6-14	PBC2	1.21
PHYSICAL	NURSING REHAB (2)	15-16	PA2	0.70
FUNCTION	NO NURSING REHAB (1)	0-5	PDE1	1.47
	NO NURSING REHAB (1)	6-14	PBC1	1.13
	NO NURSING REHAB (1)	15-16	PA1	0.66

SAMPLE: FOR ILLUSTRATION PURPOSES WAGE INDEX = 1.2639 NURSING					
RUG GG Score End Split RATE					
ES3	0-14	Vent & Trach	\$513.85		
ES2	0-14	Vent or Trach	\$388.55		
ES1	0-14	Isolation	\$370.83		
HDE2	0-5	s/s Depress	\$303.76		
HDE1	0-5		\$251.86		
нвс2	6-14	s/s Depress	\$283.51		
HBC1	6-14		\$235.41		
LDE2	0-5	s/s Depress	\$263.25		
LDE1	0-5		\$218.96		
LBC2	6-14	s/s Depress	\$217.69		
LBC1	6-14		\$180.99		

	0-5	s/s Depress	\$236.68
CDE1	0-5		\$205.03
CBC2	6-14	s/s Depress	\$196.18
CA2	15-16	s/s Depress	\$137.96
CBC1	6-14		\$169.60
CA1	15-16		\$118.97
BAB2	11-16	RNP	\$131.63
BAB1	11-16		\$125.30
PDE2	0-5	RNP	\$198.71
PDE1	0-5		\$186.05
PBC2	6-14	RNP	\$154.41
PA2	15-16	RNP	\$89.86
PBC1	6-14		\$143.02



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NTA - Non-Therapy Ancillary

☐ 6 RUG Categories Based on:

- oDiagnoses, conditions, and services, etc.
- □CMS has a list of conditions and assigned points to each condition (see list)
- ☐ Patients get points for each condition they have
- ☐The higher the points, the higher the CMI, and the higher the rate

NTA Component: Comorbidity Coding

- ☐ Comorbidities and extensive services for NTA classification are derived from a variety of MDS sources, with some comorbidities identified by ICD- 10-CM codes reported in Item I8000
- ☐ A mapping between ICD-10-CM codes and NTA comorbidities used for NTA classification is available on the CMS website at: https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/SNFPPS/PDPM.html
- □ One comorbidity (HIV/AIDS) is reported on the SNF claim, in the same manner as under RUG-IV
- The patient's NTA classification will be adjusted by the appropriate number of points for this condition by the CMS PRICER for patients with HIV/AIDS

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NTA Points	CMG	HIPPS	CMI
12+	NA	A	3.24
9-11	NB	В	2.53
6-8	NC	C	1.84
3-5	ND	D	1.33
1-2	NE	E	0.98
0	NF	F	0.72

SAMPLE: FOR ILLUSTRATION PURPOSES **WAGE INDEX = 1.2639** NTA **Points** RUG RATE 12+ \$309.36 NA 9-11 NB \$241.57 6-8 NC \$175.69 3-5 ND \$126.99 1-2 NE \$91.66 0 NF \$68.75

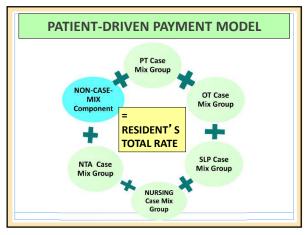
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Non- Case Mix

Fixed rate for all patients
Is not affected by patient characteristics – same rate for all patients
Accounts for overhead, administrative costs, etc.

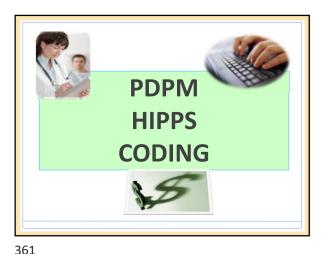
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Variable Per Diem Adjustment PT & OT Components Day in Stay Adjustment Factor Day in Stay Adjustment Factor 21-27 70-76 0.84 0.98 77-83 28-34 0.96 0.82 35-41 0.80 0.94 84-90 42-48 0.92 91-97 0.78 98-100 49-55 0.90 0.76 56-62 0.88 NTA Component

Day in Stay | Adjustment Factor 3.00

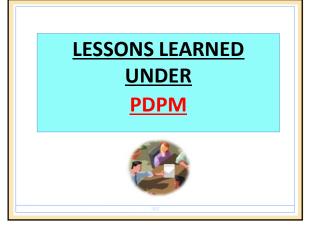
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PDPM HIPPS Coding

- ☐ Based on responses on the MDS, patients are classified into payment groups, which are billed using a 5character Health Insurance Prospective Payment System (HIPPS) code.
- ☐ In order to accommodate the new payment groups, the PDPM HIPPS algorithm is revised as follows:
 - ☐ Character 1: PT/OT Payment Group
 - ☐ Character 2: SLP Payment Group
 - ☐ Character 3: NURSING Payment Group
 - ☐ Character 4: NTA Payment Group
 - ☐ Character 5: Assessment Indicator

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CHANGES IN SNF MEDICARE CLINICAL REIMBURSEMENT

☐ Centers for Medicare & Medicaid Services (CMS): "PDPM represents a move toward Value-Based Care".

CMS wants to recognize that some patients are sicker than others and acknowledge the increased complexity by compensating centers for providing care and rehabilitation to the more ill, complex population. Whereas the RUG-IV rates were primarily determined by therapy minutes, a **majority of the rates under PDPM** will hinge on medical diagnoses and comorbidities, as determined by ICD-10 codes.

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TRANSITIONS OF CARE; IDCP COMMUNICATION; **MD DOCUMENTATION**

- ☐ Interdisciplinary Communication and Physician **Documentation of each patient's active** diagnoses, chronic conditions, treatments, functional status, cognitive status, communication status, etc. across the healthcare spectrum IS A MUST!
- □ Documentation Must be completed during the Look-back Period
- □ EFFICIENT AND EFFECTIVE TRANSITIONS OF CARE

PARTNERSHIP BETWEEN MDS. NURSING & REHAB

- ☐ Encourage the Team (MDS Coordinator, Nursing and **REHAB**) to dig thru the Hospital Records.
- ☐ WE need to find a **MEDICAL condition that was treated** in the hospital stay and relate it to the "Reason for Daily Skilled Services" and required the patient to be in a SNF - this is a "MUST' for Rehab since the Principal Diagnosis Code will be the "subject of scrutiny for PDPM AUDITS related to the PT, OT and part of the SLP Component."

PARTNERSHIP BETWEEN MDS, NURSING & REHAB

- ☐ While looking through the hospital records, copy all pages that include "any decline, PT/OT/SLP Evals or Treatments, etc.).
- ☐ This will help support claim and will help stand up to any audits in the future.
- □ Also pull out copies of any diagnoses/conditions/ treatments/etc. that may contribute to the NTA POINTS. Note that the NTA points significantly affects the Medicare Revenue.

PICKING THE PRINCIPAL DIAGNOSIS CODE FOR 10020B AND FIELD 67 IN THE UB-04

- ☐ <u>USE THE MOST CURRENT "ICD-10-CM" BOOK to ensure that you are following ALL ICD-10-CM Coding Conventions and Guidelines.</u> (In my humble opinion, this will be an area of potential "MAJOR RISK" for Denials/Recoveries in PDPM Audits).
- ☐ A principal DIAGNOSIS (that is picked for I0020B and the Claim) because it is not "RTP" (Return to provider) does NOT mean that it is the appropriate and proper PRINCIPAL DIAGNOSIS CODE.

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PICKING THE PRINCIPAL DIAGNOSIS CODE FOR 10020B AND FIELD 67 IN THE UB-04

- ☐ The Principal Diagnosis Code is the REASON for DAILY SKILLED NURSING AND REHAB SERVICES IN A SNF that is related to a condition that was treated in the Qualifying Hospital Stay or arose during the Medicare Stay that is related to a condition that was treated in the hospital Stay).
- ☐ Use Physician QUERY tools and call the MD for further clarification if need be and document via a "Telephone Order" so you can capture the diagnosis during the look back period. This also applies for NTA's (Malnutrition or At Risk for Malnutrition, Morbid Obesity, etc.)

CODING VULNERABILITIES

- 1) ICD-10-CM CODING: Adherence to ICD-10-CM Coding Conventions and Guidelines
- 2) MDS 3.0 CODING: Documentation to support Coding of MDS 3.0 Items (Except Resident Interviews)
 - ☐ Documentation to Support Principal ICD-10-CM Diagnosis Code
 - ☐ Documentation to Support Coding of Active DIAGNOSIS CODES

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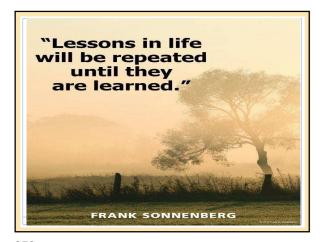
SECTION GG DOCUMENTATION

- □ Documentation MUST support coding of payment drivers in Section GG to show assessments performed by Clinicians and a "collaboration" between Rehab and Nursing (during the look back period) in order to establish resident's "Baseline Functional Status."
- ☐ The various departments can no longer function in "SILO" An INTERDISCIPLINARY APPROACH is a "MUST".

TRIPLE CHECK PROCESS

- ☐ PROPER TRIPLE CHECK is CRITICAL! Compare the MDS & Claim and Medical Records (CODING IN BOTH the MDS and Claim) MUST BE SUPPORTED by the Medical Records (including MD Documentation, Hospital Records, Rehab, Nursing, Social Services, etc.). REHAB You must MATCH the HIPPS Codes in the MDS and UB-04.
- ☐ Establish a <u>Plan of care</u> for all patients <u>in accordance</u> <u>with their individual characteristics, conditions,</u> <u>comorbidities, etc.</u>
- ☐ If you do the RIGHT thing, everything else follows.......

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MEDICAL REVIEW AUDITS

- ☐ Healthcare made up 85% of FALSE CLAIMS ACT recoveries in 2020 and that trend is likely to continue through both standard channels and a focus on new risk areas such as telehealth billing fraud.
- Recovery Audit Contractors are now authorized to review for Medical Necessity and Documentation Requirements specific to the Patient Driven Payment Model (PDPM)
- OIG has added new focus to the Work Plan to identify program integrity risks associated with Medicare telehealth services during the pandemic.

Medicare Improper Payments: Measuring, Correcting, & Preventing Overpayments and Underpayments

- ☐ Addressing improper payments in the Medicare feefor service (FFS) program and promoting compliance with Medicare coverage and coding rules is a top priority for the CMS.
- ☐ The CMS contracts with various types of contractors in its effort to fight improper payments and promote provider compliance in the Medicare FFS program:
 - ☐ CERT contractors;
 - MACs;
 - ☐ Recovery auditors
 - □ SMRC
 - UPIC

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REASONS FOR DENIAL: MEDICARE FFS PART A

LACK OF SUPPORTING DOCUMENTATION TO SUPPORT THE FOLLOWING (In accordance with the RAI MDS 3.0 Manual; ICD-10-CM Coding Conventions & Guidelines; and Medicare Benefits Policy Manual Chapter 8)

- ☐ Principal Diagnosis
- ☐ Section GG
- ☐ Active Diagnosis (CVA; HEMI; MALNUTRITION or AT RISK FOR MALNUTRITION)
- ☐ Respiratory Therapy;
- □ NTA & SLP Comorbidities (ICD-10 Coding & Cross-Mapping)
- ☐ BIMS & PHQ-9 (Not Completed & Dated on or before ARD during the Look Back Period)

ICD-10 DIAGNOSIS CODING & YOUR FISCAL SURVIVAL (This explains it ALL!)

Relay-tealth | Financial Why your denials are going up.

| Think I found why your denials are going up.

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<u>OVERPAYMENT = \$5,592.08</u>			
BILLED = KCGD1	VALIDATED = PBQF1		
X 20 Days	<u>X 20 Days</u>		
□TK = \$215.99	☐ <u>TP = \$153.18</u>		
□ <u>SC = \$72.89</u>	□ <u>SB = \$49.69</u>		
□ <u>G = \$237.16</u>	□ <u>Q = \$119.85</u>		
□ <u>ND = \$127.94</u>	□ <u>NF = \$69.26</u>		
<u>(\$383.82VPDA)</u>	(\$207.78VPDA)		
□ <u>NON-CASEMIX = \$114.17</u>	□ <u>NON-CASEMIX = \$114.17</u>		
\$1,024.03 x 3 = \$3,072.09	\$664.67 X 3 = \$1.934.01		
\$768.15 x 17 = \$13,058.55	\$506.15 X 17 = \$8,604.55		
<u>TOTAL = \$16,130.64</u>	<u>TOTAL = \$10,538.56</u>		
379			

REASONS FOR DENIAL Billed = OICD1 Validated = KEPE1 5-day assessment, ARD 09/7/2020, paying for 9/1/2020 – 9/30/2020, 10/1/20 - 10/31/20, 11/1/20 - 11/30/20, 12/1/20-12/9/2020. CMS's RAI manual requires clinical documentation to support the PDPM HIPPS code billed. No documentation received to support coding of the Primary Diagnosis of 169.351 in 10020B. Clinical documentation does not support coding of swallow disorders: Complaints of difficulty or pain when swallowing on the MDS during the assessment reference period. Clinical documentation does not support the Nursing CMG level billed. Clinical documentation does not support coding of Isolation. Documentation does not support NTA CMG level billed. Clinical documentation does not support coding of Isolation as valid

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REASONS FOR DENIAL

Billed AND PAID = OICD1

TOTAL FOR THE DOS WITH VPDA = \$57,451.26

Validated = KEPE1
TOTAL FOR THE DOS WITH VPDA =
\$82,456.55

TOTAL OVERPAYMENT = \$25,005.29

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Units: 12.00 for Revenue code: '022', HCPC Code: 'FFKE1', RUG Score: FFKF1, Comments:
'Payment information for claim 820202210131611. Billed HIPPS Code: FFKE1 X 12 Days.
Notice of the Code: FFKE1 X 12 Days. The 5-day Minimum Day Set (MMS). Assessment

REASONS FOR DENIAL

Validated HIPPS Code: FFKF1 X 12 Days. The 5 day Minimum Data Set (MDS), Assessment Reference Date (ARD) 6/23/20 paying from 7/1/20-7/13/20. The Centers for Medicare and Medicaid Services (CMS) Resident Assessment Instrument (RAI) Manual requires clinical documentation to support the Health Insurance Prospective Payment System (HIPPS) code billed. The documentation provided does not appear to support the Non-Therapy Ancillary Case (NTA) Case Mix Grouper as follows: The documentation provided does not appear to support the Non-Therapy Ancillary Case (NTA) Case Mix Grouper as follows: There was no physician supported diagnosis to support the coding of 15600 (malnutrition) on the MDS.

NO PHYSICIAN SUPPORTED DIAGNOSIS TO SUPPORT THE CODING OF 15600 (MALNUTRITION) ON THE MDS.

REMINDERS

CMS has implemented unprecedented TECHNOLOGICAL UPGRADES in Claims Processing & Management:

- Automatic Denials due to increase in "EDITS" (NCCI Edits; Medically Unlikely Edits; MAC Medical Review Edits)
- Enhanced Coordination of Benefits: To detect overlapping of claims (sequencing), avoid duplication of services, follow the beneficiary across care settings
- Determine compliance with Medicare regulations via "data (e.g., Dates, Codes, Modifiers) in the UB-04 (electronic claims submitted as reflected in FISS)

□ Waivers must be used appropriately
□ Medicare skilling criteria did not change – the level

of care requirements for skilled services must be met – documentation must support the skilled level of care

1135 WAIVERS

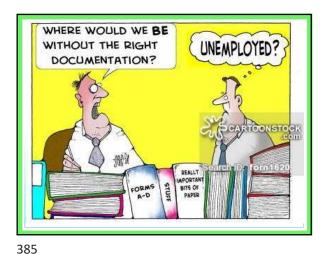
☐ Documentation supports the use of the waivers as appropriate

Risk of Noncompliance

Use of Waivers

☐ Failure to meet the Medicare guidelines for a skilled level of care can result in medical reviews and identification of overpayments

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PRACTICAL STRATEGIES

- 1) Evaluate Current Processes:
 - ☐ Review your Pre-admission & Admission Process ○ Who ensures that appropriate Hospital Records are obtained?
 - o How soon does MD come in to do a Comprehensive H&P? Discuss establishment of a system with your Medical Director and MD's.
 - ☐ Evaluate your systems (including tools and forms) on how you obtain the necessary documentation to support MDS Coding.
 - ☐ Review efficiency and productivity of your Morning Meetings, IDCP Meetings, UR Meetings and Triple Check Meetings

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PRACTICAL STRATEGIES

- 2) Review your Current Work Flow on MD Documentation and Diagnosis Coding.
- Clean up all your Diagnosis codes in your systems (upon admission and throughout the stay).
- o Have MD review, verify and clarify appropriate DX Codes (especially the payment drivers).
- How will your team work with MD's/NPP's to collect necessary diagnosis data if not originally provided?
- Include discussion of the most appropriate ICD-10-CM codes for each resident in the UR meeting (Remember: You are justifying medical necessity and/or continued stay in a SNF).

PRACTICAL STRATEGIES

- 3) Generate Diagnosis Worksheets for each Medicare beneficiary & keep them up-to-date
- 4) Discuss Training Plan around new MDS changes and MDS items that will drive payment areas.
 - Identify areas for improvement and establish a Plan of Action. Start by doing random audits on MDS Coding accuracy. Include review of Resident Interviews
 - o Review your forms and tools; Modify as necessary
 - o Review your Restorative Nursing Program

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PRACTICAL STRATEGIES

- Review your Triple Check Process to ensure accurate and documented MDS and Claims Coding. Make necessary changes if needed.
- 6) Ensure compliance with Official ICD-10-CM Coding and RAI Manual Guidelines
- Collaboration is a "Must". WE ARE A TEAM! Start with how Section GG is supported by Documentation.
- 8) It is a "confusing world." Therefore, the key is to always go back to CMS's "Intent" behind the regulations.

With integrity, you have nothing to fear, since you have nothing to hide. With integrity, you will do the right thing, so you will have no guilt.

"Most of the important things in the world have been accomplished by people who have kept on trying when there seemed to be no hope at all."

— Dale Carnegie, American writer

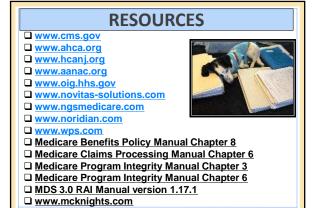
MY DAILY PRAYER

"Let me dedicate my life today to the care of those who come my way.

Let me touch each one with a healing hand and the gentle art for which I stand. And then tonight when the day is done, let me

rest in peace if I've helped just one."
- Unknown

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RESOURCES

☐ Specifications for all CMS ID quality measures are contained in the MDS 3.0 QM User's Manual V15.0 available at:

http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-

Instruments/NursingHomeQualityInits/NHQIQualityMeas ures.html

☐ Provider Preview: Facility and Resident Quality Measure Preview Reports

https://www.qtso.com/providernh.html

RESOURCES

CASPER: Certification and Survey Provider
Enhanced Reports (CASPER) Quality Measure
Reports

https://qtso.cms.gov/providers/nursing-homemdsswing-bed-providers/reference-manuals

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