

CHAPTER 4: SUBMISSION AND CORRECTION OF THE LTCH CARE DATA SET ASSESSMENT RECORDS

This chapter details the submission and correction process for the LTCH CARE Data Set Assessment Records and requirements for data submission by LTCHs for the Long-Term Care Hospital Quality Reporting (LTCHQR) Program starting July 1, 2014. These requirements are applicable to all patients receiving inpatient services in a facility certified as a hospital and designated as an LTCH under the Medicare program. This includes Medicare-participating LTCHs located within acute-care (or other) hospitals or skilled nursing facilities, as well as free-standing LTCHs. It is **not** applicable to patients receiving services in LTCH units that are not designated as LTCHs under the Medicare program.

4.1 Submitting LTCH CARE Data Set

All Medicare-participating LTCHs must complete and submit required LTCH CARE Data Set Assessment Records to CMS' Quality Improvement Evaluation System (QIES) Assessment Submission and Processing (ASAP) system for all patients, regardless of payer. After completion of the required assessment(s), each provider must create electronic transmission files that meet the requirements detailed in the current LTCH CARE Data Submission Specifications, available on the CMS LTCH Quality Reporting Program Technical Information Web site at <http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/LTCH-Quality-Reporting/LTCHTechnicalInformation.html>.

Providers must establish communication with the QIES ASAP system to submit a file. This is accomplished by using specialized communications software installed on their computer and the CMS secure wide area network (WAN). Details about how to obtain the WAN software and access are available on the QIES Technical Support Office (QTSO) Web site at <https://www.qtso.com>.

Once communication is established with the QIES ASAP system, the provider can access the LTCH welcome page in the QIES ASAP system. This site allows providers to register for ASAP user IDs, submit LTCH CARE Data Set Records and access reports. Other information such as user's guides and bulletins may also be found on the LTCH welcome page. The *LTCH CARE Data Set Submission User's Guide* located on the LTCH welcome page provides more detailed information about the QIES ASAP system. This user guide is also available on the QTSO Web site at <https://www.qtso.com/lchtrain.html>.

When the submission file is received by the QIES ASAP system, the system performs a series of validation edits to evaluate whether the data submitted meets the required data specifications. LTCH CARE Data Set Assessment Records are edited to verify that responses are within valid ranges and are consistent, dates are reasonable, and the submitted record is in the proper order with regard to records that were previously accepted by the QIES ASAP system for the same patient. The provider is notified of the results of this evaluation by error and warning messages

on a Final Validation Report. All error and warning messages are detailed and explained in Section 5 of the *LTCH CARE Data Set Submission User's Guide*.

4.2 Timeliness Criteria

- **Completion Timing for LTCH CARE Data Sets:** The LTCH CARE Data Set Completion Date (Z0500B) may be no later than 5 days from the Assessment Reference Date (ARD) (A0210). Therefore, Z0500B (LTCH CARE Data Set Completion Date) minus A0210 (ARD) should be less than or equal to 5 days.
- **Assessment Submission:** All LTCH CARE Data Set Assessment Records should be submitted electronically within 7 days of the LTCH CARE Data Set Completion Date (Submission Date minus Z0500B [LTCH CARE Data Set Completion Date] should be less than or equal to 7 days).

4.3 Validation of Records and Files

The QIES ASAP system validation edits are designed to monitor the timeliness and insure that the submitted records conform to the LTCH CARE Data Specifications. If submitted LTCH CARE Data Set Assessment Records do not meet the edit requirements, the system will provide fatal error and/or warning messages on the provider's Final Validation Report. The following describes the validation, storage and reporting of records in a submission file.

1. **Initial Submission Feedback.** For each file submitted, the submitter will receive confirmation that the file was received for processing and editing by the QIES ASAP system. This confirmation information includes the file submission number, as well as the date and time the file was received for processing. **Providers should print and maintain a copy of this confirmation.**
2. **Validation and Editing Process.** Each time a user accesses the QIES ASAP system and submits an LTCH CARE Data Set file, the QIES ASAP system performs three types of validation:
 - **Fatal File Errors.** The file structure is validated to ensure it follows the requirements outlined in the LTCH CARE Data Set Data Submission Specifications provided by CMS. The file is rejected by the QIES ASAP system if the file structure does not meet these requirements. Examples of Fatal File Errors include:
 - The file is not a ZIP file
 - The records in the ZIP file cannot be extracted
 - The file cannot be readThe Submitter Final Validation Report will list any Fatal File Error(s). Files that are rejected must be corrected and resubmitted.
 - **Fatal Record Errors.** If the file structure is acceptable, then each LTCH CARE Data Set Assessment Record in the file is validated individually for Fatal Record Errors. These errors include, but are not limited to, the following:

- Out-of-range responses (e.g., the valid codes for the item are 1, 2, 3, and 4, and the submitted value is 6).
- Inconsistent relationships between items. For example, an inconsistent date pattern, such as the Patient's Birth Date (Item A0900) is later than the Admission Date (Item A0250).

Fatal Record Errors result in rejection of individual records by the QIES ASAP system. The provider is informed of Fatal Record Error(s) on the Final Validation Report. Rejected records must be corrected and resubmitted.

- **Warnings (Non-Fatal Errors).** The record is also validated for Warnings (Non-Fatal Errors). Warnings include, but are not limited to, missing or questionable data of a non-critical nature or item consistency errors of a non-critical nature.

Examples of Warnings include:

- Timing errors
 - Submission date is more than 7 days after the LTCH CARE Data Set Assessment Completion Date (Z0500B) or
 - Assessment Completion Date (Z0500B) is more than 5 days after the ARD (A0210).
- Record sequencing errors
 - LTCH CARE Data Set Admission Assessment Record is submitted after a previous LTCH CARE Data Set Admission Assessment Record and there was no LTCH CARE Data Set Discharge Assessment Record submitted in between or
 - A record is submitted for a patient after a LTCH CARE Data Set Expired Assessment Record has been submitted.

Any Warnings (Non-Fatal Errors) are reported to the provider in the Final Validation Report as Warnings. The provider must evaluate each warning to identify necessary corrective actions.

3. **Storage to the QIES ASAP System.** If there are any Fatal Record Errors, the record will be rejected and not stored in the QIES ASAP system. If there are no Fatal Record Errors, the record is stored in the QIES ASAP system, even if the record has Warnings (Non-Fatal Errors).

Detailed information on the validation error and warning messages is available in the LTCH CARE Data Set Submission Users Guide, which is available on the LTCH welcome page as well as the QTSO Web site at <https://www.qtso.com/ltchtrain.html>. Information on the edits is also found in the LTCH CARE DATA Set Data Submission Specifications, which are available for download at <http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/LTCH-Quality-Reporting/LTCHTechnicalInformation.html>.

4.4 LTCH CARE Data Set Correction Policy

The LTCH CARE Data Set Assessment Record should be accurate when submitted and accepted into the QIES ASAP system. When a provider determines that one or more data elements in an accepted record are inaccurate based on the assessment period as established ARD, the provider must take the necessary steps to correct the erroneous record (see Section 4.6).

When a patient's health status changes after the ARD of a LTCH CARE Data Set Assessment Record that has been accepted into the QIES ASAP system, no action is required by the provider to update the submitted record. Changes in and updates to a patient's health status should be noted in the patient's record (e.g., progress notes), in accordance with standards of clinical practice and documentation. Such monitoring and documentation is part of the provider's responsibility to provide necessary care and services. The LTCH CARE Data Set Assessment Record is a "snapshot" of the patient's condition for a specified time period.

The electronic LTCH CARE Data Set Assessment Record submitted to and accepted by the QIES ASAP system is a legal assessment of the patient as of the ARD. Changes made to the provider's copy of the LTCH CARE Data Set Assessment Record *after* the record is accepted into the QIES ASAP system will not be recognized. It is the provider's responsibility to correct any errors that exist in a submitted LTCH CARE Data Set Assessment Record according to the LTCH CARE Data Set Assessment Record Correction Policy. This ensures that the information in the QIES ASAP system accurately reflects the patient's identification, location, and overall clinical status, as of the ARD. A correction can be submitted for any accepted record, even if there has been a submission and acceptance of subsequent records for the patient. Further, it is the provider's responsibility to ensure the record is complete and accurate prior to submission to the QIES ASAP system.

Several processes have been put in place to ensure that the LTCH CARE Data Set Assessment Records are accurate both at the provider level and in the QIES ASAP system:

- Software used by the provider to create electronic LTCH CARE Data Set records must run all standard edits as defined in the LTCH CARE Data Submission Specifications released by CMS.
- Enhanced record rejection standards have been implemented in the QIES ASAP system whereby if an LTCH CARE Data Set Assessment Record contains responses that are out of range (e.g., a 4 is entered when only 0–3 are allowable responses for an item), or item responses are inconsistent (e.g., a skip pattern is not observed), the record is rejected. Rejected records are not stored in the QIES ASAP database.
- If an error is discovered in a record that has been accepted by the QIES ASAP system, Modification or Inactivation procedures *must* be implemented by the provider to ensure that the QIES ASAP system information is corrected.

The remaining sections of this chapter present the decision processes necessary to identify the proper correction steps.

4.5 Correcting Errors in LTCH CARE Data Set Assessment Records That Have Not Yet Been Accepted into the QIES ASAP System

If an LTCH CARE Data Set Assessment Record is found to have errors that incorrectly reflect the patient's status within the respective assessment period as established by the ARD, then that assessment must be corrected. The correction process will depend on the type of error. LTCH CARE Data Set Assessment Records that have not yet been accepted in the QIES ASAP system include records that have been submitted and rejected, or records that have not been submitted at all. Records that have been submitted and rejected can usually be corrected and resubmitted without any special correction procedures because they were never accepted by the QIES ASAP system. LTCHs are responsible for correcting any errors to the record prior to submission or re-submission of the record to the QIES ASAP system.

4.6 Correcting Errors in LTCH CARE Data Set Assessment Records That Have Been Accepted into the QIES ASAP System

Facilities should correct any errors necessary to ensure that the information in the QIES ASAP system accurately reflects the patient's identification, location, or clinical status. A record may be corrected even if subsequent records have been accepted for the patient.

An error identified in a QIES ASAP system LTCH CARE Data Set Assessment Record must be corrected. Inaccuracies can occur for a variety of reasons such as transcription errors, data entry errors, software product errors, item coding errors, or other errors. The following two processes exist for the correction of LTCH CARE Data Set Assessment Records that have been accepted into the QIES ASAP system:

- **Modification Request**
- **Inactivation Request**

Completion of a *Modification Request Record* will archive the inaccurate LTCH CARE Data Set Assessment Record within the QIES ASAP system and replace the record with the new, corrected record. Completion of an *Inactivation Request* will also archive an inaccurate LTCH CARE Data Set Assessment Record within the QIES ASAP system, but will not replace the record with the new record.

It is suggested that the LTCH maintain the original LTCH CARE Data Set Assessment Records electronically or in hard copy, along with any corrected versions of the LTCH CARE Data Set Assessment Records, in the clinical file to track what was modified. In addition, it is suggested that the LTCH keep a copy of inactivated records. For details on electronic records, see *Chapter 2*.

Modification Requests

A Modification Request (A0050 = 2) is used when an LTCH CARE Data Set Assessment Record is accepted into the QIES ASAP system, but the information in the record contains clinical or demographic errors.

The Modification Request (A0050 = 2) record is used to correct most LTCH CARE Data Set Assessment Record items that are erroneous. However, there are items which **cannot be corrected** with a Modification Request; rather, the erroneous record must be inactivated with an Inactivation Request record and a new assessment record submitted to the QIES ASAP system.

Items that **cannot** be corrected with a Modification Request are:

Record Event Identifiers:

- A0210: Assessment Reference Date (ARD)
- A0220 Admission Date (on an Admission record A0250 = 01)
- A0250: Reason for Assessment
- A0270: Discharge Date (on a Discharge or Expired record A0250 = 10, 11, 12)

Patient Identifiers:

- A0500A: First Name
- A0500C: Last Name
- A0600: Social Security Number (SSN)
- A0800: Gender
- A0900: Birth Date

Note: To make record event identifier and/or patient identifier corrections, you must complete an **Inactivation Request record** for the incorrect record and create a new record with the correct information.

When an error is discovered (except for those items listed in the preceding bullets) in a LTCH CARE Data Set Assessment Record, the provider must submit a Modification Request (A0050 = 2) to the QIES ASAP system. When completing a Modification Request record, the Modification Request record should contain correct values for all items (not just the values previously in error). This means if A0050 is coded as 2, the LTCH staff should proceed to A0100, Facility Provider Numbers, and complete all items in all other LTCH CARE data assessment record sections. Note: File creation software varies on how modification request records are created. Please contact your software vendor for specific instructions.

When a Modification Request record (A0050 = 2) is submitted, the QIES ASAP system will process the record as follows:

1. The system will attempt to locate the existing record in the QIES ASAP database for this LTCH using specific items, which are located in *Chapter 3*, Section A, and this includes

the patient identifiers (e.g., last name, first name, SSN, birth date, gender), the facility identifier (i.e., facility and state code), the reason for assessment and the assessment-related dates (i.e., assessment reference date, admission date, or discharge date).

2. If the existing record is not found, the submitted Modification Request record will be rejected and not accepted in the QIES ASAP system. A fatal error will be reported to the LTCH on the Final Validation Report.
3. If the existing record is found, then the items in all sections of the submitted Modification Request record will be edited. If there are any fatal errors, the Modification Request record will be rejected and not accepted in the QIES ASAP system. The fatal error(s) will be reported to the LTCH on the Final Validation Report.
4. If the Modification Request record passes all the edits, it will replace the prior erroneous record in the QIES ASAP database. The prior erroneous record will be stored in an archive file within the QIES ASAP database.

Inactivation Requests

An Inactivation Request (A0050 = 3) should be used when a record has been accepted into the QIES ASAP system but the corresponding event did not occur, e.g., an LTCH CARE Data Set Discharge Assessment Record was submitted for a patient, but there was no actual discharge, and when one or more event identifiers and/or patient identifiers are found to be in error.

An Inactivation Request (A0050 = 3) **must** be completed when any of the following items are inaccurate:

Record Event Identifiers:

- A0210: Assessment Reference Date (ARD)
- A0220 Admission Date (on an Admission record A0250 = 01)
- A0250: Reason for Assessment
- A0270: Discharge Date (on a Discharge or Expired record A0250 = 10, 11, 12)

Patient Identifiers:

- A0500A: First Name
- A0500C: Last Name
- A0600: Social Security Number (SSN)
- A0800: Gender
- A0900: Birth Date

Note: Any item in the previous list that was submitted as part of the original record must also be submitted as part of the inactivation request and values for each item must match in the erroneous record and the inactivation record. For example, if A0600A, Social Security Number, was left blank on the original record, it should be left blank on the inactivation record.

If an ARD (A0210), Admission Date (A0220), Reason for Assessment (A0250), or Discharge Date (A0270) is incorrect, or if one or more patient identifiers are found to be in error, the provider must inactivate the erroneous record in the QIES ASAP system, and then complete and submit a new LTCH CARE Data Set Assessment Record with the event and patient identifiers and ensure that the clinical information is accurate.

When an Inactivation Request is submitted, the QIES ASAP system will process the record as follows:

1. The system will attempt to locate the existing record in the QIES ASAP database for the LTCH using specific items, which are located in **Chapter 3**, Section A, and that include the patient identifiers (e.g., last name, first name, SSN, birth date, gender), the facility identifier (i.e., facility and state code), and the reason for assessment and the assessment-related dates (e.g., assessment reference date, admission date, or discharge date).
2. If the existing record is not found in the QIES ASAP database, the submitted Inactivation Request will be rejected and a fatal error will be reported to the LTCH on the Final Validation Report.
3. If the existing record is found, the erroneous record will be removed from the active records in the QIES ASAP database and stored in an archive file within the QIES ASAP database.

4.7 Special Manual Record Deletion Request

A special Manual Record Deletion Request is only necessary when there has been an error in a record that has been accepted into the QIES ASAP system that cannot be corrected with an automated Modification or Inactivation Request. There are only two items to which this applies. A Manual Record Deletion Request must be performed when the record has the wrong state code and/or facility ID in the control items STATE_CD and FAC_ID. Control items are items created by the file submission software. These error(s) probably occurred at the time of software development, or when initializing the software, and not during the entry of the facility's administrative or patient's demographic data.

If a QIES ASAP system record has the wrong state code or facility ID (control items STATE_CD and FAC_ID), then the record must be removed without leaving any trace in the QIES ASAP system. The record must be resubmitted with the correct STATE_CD and/or FAC_ID value, when indicated. All data items must be complete and correct on the newly submitted record.

In the event that this error has occurred, the provider must contact the QTSO Help Desk at help@qtso.com or 1-877-201-4721 to obtain the Manual LTCH CARE Data Set Assessment Record Correction form. The provider is responsible for completing the form. The provider must submit the completed form to the QTSO Help Desk at the address on the form via Certified Mail through the United States Postal Service (USPS). The QTSO Help Desk will contact CMS for approval upon receipt of such a request. Upon CMS approval of the manual deletion request, the QTSO Help Desk will work through the request with the provider.