

# CHAPTER 2: THE ASSESSMENT SCHEDULE FOR THE RAI

This chapter presents the instructions for the completion of the mandated clinical and Medicare assessments in nursing facilities.

## 2.1 Introduction to the OBRA Assessment Schedule for the MDS

### INTRODUCTION TO THE OBRA ASSESSMENT SCHEDULE

The OBRA regulations have defined a schedule of assessments that will be performed for a nursing facility resident at admission, quarterly, and annually, whenever the resident experiences a significant change in status, and whenever the facility identifies a significant error in a prior assessment. These are known as “OBRA assessments.” MDS assessments are also required for Medicare payment purposes and are discussed in detail in Section 2.6.

When the OBRA and Medicare assessment time frames coincide, one assessment may be used to satisfy both requirements. When combining OBRA and Medicare assessments, the most stringent requirement for MDS completion must be met. It is important for facility staff to fully understand the requirements for both types of assessments in order to avoid unnecessary duplication of effort.

### OBRA ASSESSMENTS

When the resident is first admitted to a facility, the RN Assessment Coordinator (RNAC) and the interdisciplinary team will agree on a period known as the observation period for the Admission assessment. The last day of this observation period is the Assessment Reference Date (ARD). This is the end date of the observation period and provides a common reference point for all team members participating in the assessment. In completing sections of the MDS that require observations of a resident over specified time periods such as 7, 14, or 30 days, the ARD is the common endpoint of these “look back” periods. This concept of setting the ARD is used for all assessment types. When completing the MDS, only those items that occurred during the look back period will be captured. In other words, if it did not occur during the look back period, it should not be coded on the MDS.

When all members of the team have completed their portions of the assessment and the assessment is complete, the RN Assessment Coordinator (RNAC) will sign Item R2a and will date Item R2b with the date that R2a was signed. The R2b date is the completion date for all assessment types that do not require RAPs, and is the date used to determine when the next OBRA assessment is to be completed. An OBRA assessment is due no less frequently than every 92 days.

Resident Assessment Protocols (RAPs) are reviewed following the completion of the MDS portion of the RAI for comprehensive assessments in order to identify the resident’s strengths, problems, and

needs. This decision-making process is documented on the Resident Assessment Protocol Summary, which is detailed in Chapter 4.

The timing requirements for a comprehensive assessment apply to both completion of the MDS (R2b) and the completion of the RAPs (VB2). For example, an Admission assessment must be completed within 14 days of admission. This means that both the MDS and the RAPs (R2b and VB2 dates) must be completed by day 14. The MDS Completion Date (R2b) may be earlier than or the same as the RAPs Completion Date (VB2), and neither can be later than day 14.

The comprehensive RAI is considered complete on the date the RN Coordinator indicates completion of the RAPs (VB2). The care plan must be completed by the end of the 7th day following completion of the RAI assessment. In other words, 7 days following the VB2 date.

Assuming the resident does not have any significant changes in status or is not discharged from the facility, the next assessment in the OBRA assessment schedule is the Quarterly assessment. The Quarterly assessment is to be completed within 92 days of the R2b date of the Admission assessment. The OBRA schedule would continue with another Quarterly assessment to be completed within 92 days of the R2b of the previous Quarterly. A third Quarterly is completed within 92 days of the completion (R2b) of the previous Quarterly.

Following the third Quarterly, and within a year of the Admission assessment, an Annual assessment is completed. This is a comprehensive assessment that requires a full MDS with RAPs and care plan review.

This cycle (comprehensive assessment – Quarterly – Quarterly - Quarterly assessment - comprehensive assessment) would repeat itself annually for a resident who never experienced a significant change or discharge.

However, residents do experience significant changes, are discharged and are readmitted to facilities. Therefore, OBRA regulations have defined a comprehensive assessment that a facility completes in the event of a significant change in status that includes RAP review and care plan revision. When a resident is discharged from a facility, a Discharge Tracking form may be required. When a resident who was discharged returns to a facility, a Reentry Tracking form may be required. When a resident is readmitted to the hospital and an OBRA-required assessment is due during the resident's absence, the facility has up to 14 days after the resident's readmission to complete the assessment. If the assessment that was due during the resident's absence was the initial Admission assessment, see page 2-4. If a significant change is identified on readmission, the significant change assessment would replace the assessment that was due while the resident was in the hospital. (Error messages will result from the late assessment but can be ignored.) The Significant Change in Status assessment, and the Discharge and Reentry Tracking forms, including their impact on the assessment schedule are discussed in more detail later in this chapter.

A comprehensive assessment is also required when the facility has identified a major error in a previously submitted comprehensive assessment. A Significant Correction of a Prior Full assessment (SCPA) must be completed within 14 days of the identification of the error. A major error is one where the resident's overall clinical status is not accurately represented on the MDS, has not been addressed in a subsequent assessment, nor addressed in the resident's care plan. Because this is a comprehensive assessment, completion of the full MDS, RAPs and the RAPs Summary is required.

Section 2.2 of this chapter examines each of the OBRA assessments and provides detailed information on the completion requirements. The following table summarizes the different types of federally mandated assessments.

TYPE OF ASSESSMENT	TIMING OF ASSESSMENT	REGULATORY REQUIREMENT CMS "F" TAG
Admission (Initial) Assessment (Comprehensive)	Must be completed (VB2) by the 14th day of the resident's stay.	42 CFR 483.20 (b)(4)(i)/F 273
Annual Reassessment (Comprehensive)	Must be completed (VB2) within 366 days of the most recent comprehensive assessment.	42 CFR 483.20 (b)(4)(v)/F 275
Significant Change in Status Reassessment (Comprehensive)	Must be completed (VB2) by the end of the 14th calendar day following determination that a significant change has occurred.	42 CFR 483.20 (b)(4)(iv)/F 274
Quarterly Assessment (State mandated subset or MPAF)	Set of MDS items, mandated by State (contains at least CMS established subset of MDS items). Must be completed every 92 days.	42 CFR 483.20 (b)(5)/F 276
Significant Correction of a Prior Full Assessment	Completed (VB2) no later than 14 days following determination that a significant error in a prior full assessment has occurred.	42 CFR 483.20/F 287
Significant Correction of a Prior Quarterly Assessment	Completed (R2b) no later than 14 days following determination that a significant error in a prior Quarterly assessment has occurred.	42 CFR 483.20/F 287

The MDS is also completed for the Medicare Prospective Payment System. The Medicare schedule is discussed in detail in Section 2.5

## 2.2 Required OBRA Assessments for the MDS

### ADMISSION ASSESSMENTS

The Admission assessment is a comprehensive assessment for a new resident that must be completed within 14 calendar days of admission to the facility if:

- this is the resident's first stay,
- the resident has just returned to the facility after being discharged prior to the completion of the initial assessment, or
- the resident has just returned to the facility after being discharged as return not anticipated.

The 14-day calculation includes weekends. When calculating when the RAI is due, the day of admission is counted as Day "1". For example, if a resident is admitted at 8:30 a.m. on Wednesday

(Day 1), a completed RAI is required by the end of the day Tuesday (Day 14), 13 days after admission. If a resident dies or is discharged within 14 days of admission, then whatever portions of the RAI that have been completed must be maintained in the resident's discharge record.<sup>1</sup> In closing the record, the facility may wish to note why the RAI was not completed.

**The interdisciplinary team may start and complete the initial assessment at any time prior to the end of the 14th day. If desired by the facility, the MDS could be completed in entirety on the day of admission. However, this requires the staff to rely on resident and family reporting of information and transfer documentation to a large degree as a source of information on the resident's status during the time periods used to code each MDS item, as opposed to allowing a period for facility observation. Facilities may find early completion of the MDS and RAPs particularly beneficial for individuals with short lengths of stay, when the assessment and care planning process is often accelerated.**

### EXAMPLES

Miss A is admitted on Friday, September 1. Staff establish the Assessment Reference Date as September 8, which means that September 8 is the final day of the observation period for all MDS items (i.e., count back 6 days before the ARD to determine the period of observation for 7-day items, count back 13 days before the ARD for 14-day items, and so on). As this is an initial assessment, staff must rely on the resident and family's verbal history and transfer documentation accompanying Miss A to complete items requiring longer than a 7-day period of observation. Staff completes the MDS by September 12 (note that the Assessment Reference Date (A3a) does not need to be the same as the date RN Assessment Coordinator signed as complete (R2b). Staff takes an additional 2 days to assess the resident using triggered RAPs and to complete all related documentation, which is noted as a date field that accompanies the signature of the RN Coordinator for the RAP assessment process on the RAP Summary form (VB2).

If a resident goes to the hospital and returns during the 14-day assessment period and most of the initial assessment was completed prior to the hospitalization, then the facility may wish to continue with the original assessment, provided the resident did not have a significant change in status. In this case, the Assessment Reference Date remains the same and the Admission comprehensive assessment must be completed by day 14 counting from the original date of admission. Otherwise the assessment should be reinitiated with a new Assessment Reference Date and completed within 14 days after readmission from the hospital. The portion of the resident's assessment that was previously completed should be stored on the resident's record with a notation that the assessment was reinitiated because the resident was hospitalized.

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<sup>1</sup>The RAI is considered part of the resident's clinical record and is treated as such by the RAI Utilization Guidelines, e.g., portions of the RAI that are "started" must be saved.

***Assessment Management Tips: ADMISSION COMPREHENSIVE ASSESSMENT***

	<b>Assessment Reference Date (ARD)</b>	<b>7-day Observation Look Back</b>	<b>14- day Observation Look Back</b>	<b>RAPs Completion Date (VB2)</b>
<b>ADMISSION</b>	No later than admission date + 13 days	Consists of ARD + 6 previous calendar days	Consists of ARD + 13 previous calendar days	No later than admission date + 13 days

- The above chart summarizes how to count the days for various points within the admission assessment. As stated previously, the date of admission is Day 1 for determining when the assessment must be completed and for setting the Assessment Reference Date. Once the ARD has been established, then the ARD is day 1 whenever counting back for those items observed over a specific time period.
- Both the MDS Completion Date (R2b) and RAPs Completion Date (VB2) must be dated within 14 days of admission. R2b must always be earlier than or the same as VB2. If R2b is dated prior to day 14, VB2 may or may not be the same day, but can be no later than day 14.
- Care Plan Completion Date (VB4) must be dated by the end of the 7th calendar day following VB2 (VB2 + 7 days) and can be no later than day 21.
- Electronic submission is due within 31 days following VB4 (VB4 + 31 days).

**ANNUAL REASSESSMENTS**

The annual comprehensive assessment must be completed within 366 days of the completion date at VB2 of the most recent comprehensive assessment (could be the Admission assessment, an Annual assessment, a Significant Change in Status assessment or a Significant Correction of a Prior Full assessment). If a significant change reassessment is completed in the interim, the clock “restarts,” and the Annual assessment would be due within 366 days of the significant change reassessment. Routinely scheduled RAI assessments may be scheduled early if a facility wants to stagger due dates for assessments.

In managing the dates for the Annual assessment, the anticipated completion date of the assessment to be scheduled as well as the completion dates of the previous comprehensive and Quarterly assessments must be considered when setting the ARD. The completion date of the Annual assessment must meet two requirements: 1) a comprehensive assessment must be completed within 366 days of the RAPs Completion Date (VB2 ) of the previous comprehensive, and 2) there can be no more than 92 days since the (MDS Completion Date (R2b) of the last Quarterly assessment.

If a significant change in status is identified in the process of completing an Annual assessment, code the assessment as a Significant Change in Status assessment. Do not code it as an Annual assessment.

**Assessment Management Tips: ANNUAL COMPREHENSIVE REASSESSMENT**

	<b>Assessment Reference Date (ARD)</b>	<b>7-day Observation Look Back</b>	<b>14- day Observation Look Back</b>	<b>RAPs Completion Date (VB2)</b>
<b>ANNUAL</b>	<p><b><u>No later than:</u></b></p> <p>RAPs Completion Date (VB2) of previous OBRA comprehensive assessment + 366 days</p> <p><b><u>AND</u></b></p> <p>MDS Completion Date (R2b) of previous OBRA assessment + 92 days</p>	Consists of ARD + 6 previous calendar days	Consists of ARD + 13 previous calendar days	<p>ARD + 14 days</p> <p><b><u>BUT</u></b></p> <p><b><u>No later than:</u></b></p> <p>RAPs Completion Date (VB2) of previous OBRA assessment + 366 days</p> <p><b><u>AND</u></b></p> <p>MDS Completion Date (R2b) of previous OBRA assessment + 92 days</p>

- The Annual assessment must be completed no later than 14 days after the ARD. That is, R2b and VB2 can be no more than 14 days from the ARD (ARD + 14 days). Since the ARD is part of the observation period, it is considered day 0, and is not included in calculating the 14-day completion period. VB2 is not required to be the same day as R2b but can be no later than 14 days following the ARD.
- Once the ARD has been established, it is the last day of the observation period.
- Care Plan Completion Date (VB4) must be dated by the end of the 7th calendar day following VB2 (VB2 + 7 days) and can be no later than 21 days following the ARD.
- Electronic submission is due within 31 days following VB4 (VB4 + 31 days).

## SIGNIFICANT CHANGE IN STATUS ASSESSMENTS (SCSA)-Comprehensive Assessment

Facilities have an ongoing responsibility to assess resident status and intervene to assist the resident to meet his or her highest practicable level of physical, mental, and psychosocial well-being. If interdisciplinary team members identify a significant change (either improvement or decline) in a resident's condition they should share this information with the resident's physician, who they may consult about the permanency of the change. The facility's medical director may also be consulted when differences of opinion about a resident's status occur among team members.

Document the initial identification of a significant change in terms of the resident's clinical status in the progress notes. A Significant Change in Status (SCSA) assessment is not required in a case where the resident's condition is expected to return to baseline within a short period of time, such as one to two weeks. If the condition does not return to baseline, the assessment should be completed as soon as needed to provide appropriate care to the resident, but in no case later than 14 days after the determination was made that a significant change occurred.

An SCSA can be performed at any time after the completion of the Admission assessment. If a significant change in status is identified in the process of completing a Quarterly assessment, code the assessment as a SCSA and complete a comprehensive assessment. Do not code it as a Quarterly assessment. The SCSA restarts the schedule and the next Quarterly assessment would be due no more than 92 days from R2b of the SCSA. Similarly, if an SCSA is identified in the process of completing an Annual assessment, it should be coded as an SCSA.

A “**significant change**” is a decline or improvement in a resident's status that:

1. **Will not normally resolve itself without intervention by staff or by implementing standard disease-related clinical interventions, is not “self-limiting”**
2. **Impacts more than one area of the resident's health status; and**
3. **Requires interdisciplinary review and/or revision of the care plan.**

A condition is defined as “self-limiting” when the condition will normally resolve itself without further intervention or by staff implementing standard disease related clinical interventions. For example, a 5% weight loss for a resident with the flu would not normally meet the requirements for a “significant change” reassessment. In general, a 5% weight loss may be an expected outcome for a resident with the flu who experienced nausea and diarrhea for a week. In this situation, staff should monitor the resident's status and attempt various interventions to rectify the immediate weight loss. If the resident did not become dehydrated and started to regain weight after the symptoms subsided, a comprehensive assessment would not be required. The amount of time that would be appropriate for a facility to monitor a resident depends on the clinical situation and severity of symptoms experienced by the resident. Generally, if the condition has not resolved within approximately 2 weeks, staff should begin a comprehensive RAI assessment. This time frame is not meant to be prescriptive, but rather should be driven by clinical judgment and the resident's needs.

An SCSA is appropriate if there are either two or more areas of decline or two or more areas of improvement. In this example, a resident with a 5% weight loss in 30 days would not generally require a significant change reassessment, unless a second area of decline accompanies it. Note that this answer assumes that the care plan has already been modified to actively treat the weight loss as opposed to continuing with the original problem, “potential for weight loss.” This situation should be documented in the resident’s clinical record along with the plan for subsequent monitoring and if the problem persists or worsens, a comprehensive RAI reassessment may be clinically indicated.

If there is only one change, however, staff may still decide that the resident would benefit from an SCSA. It is important to remember that each resident’s situation is unique and the interdisciplinary treatment team must make the decision as to whether or not the resident will benefit from an RAI.

Other conditions may not be permanent but would have such an impact on the resident’s overall status that they would require a comprehensive assessment and care plan revision. For example, a hip fracture may be viewed as a transient condition but it would generally have a major impact on the resident’s functional status in more than one area (e.g., ambulation, toileting, elimination patterns, activity patterns). Changes in the resident’s condition that would affect the resident’s functional capacity and day-to-day routine should be investigated in a holistic manner through the RAI reassessment. Therefore, concepts associated with significant change are “major” or “appears to be permanent,” but a change does not necessarily need to be both major and permanent.

An SCSA is appropriate if there is a consistent pattern of changes, with either two or more areas of decline, or two or more areas of improvement. This may include two changes within a particular domain (e.g., two areas of ADL decline or improvement). Any determination about whether or not a resident has experienced a significant change in status is a clinical decision. When a SCSA is completed, the facility must review all of the RAPs because they are interrelated. If there are no changes in a RAP, they can then document that there were no changes and bring that RAP forward and specify where the supporting documentation can be located in the medical record.

### **GUIDELINES FOR DETERMINING SIGNIFICANT CHANGE IN RESIDENT STATUS (Please note this is not an exhaustive list.)**

The final decision regarding what constitutes a significant change in status must be based upon the judgment of the clinical staff and the guidelines shown below.

#### **Decline in two or more of the following:**

- Resident’s decision-making changes from 0 or 1 to 2 or 3 for Item B4;
- Emergence of sad or anxious mood pattern as a problem that is not easily altered (Item E2);
- Increase in the number of areas where Behavioral Symptoms are coded as “not easily altered” (i.e., an increase in the number of code “1”s for Item E4B);



- Any decline in an ADL physical functioning area where a resident is newly coded as 3, 4, or 8 (Extensive assistance, Total dependency, Activity did not occur) for Item G1A;
- Resident's incontinence pattern changes from 0 or 1 to 2, 3 or 4 (Item H1a or b), or there was placement of an indwelling catheter (Item H3d);
- Emergence of unplanned weight loss problem (5% change in 30 days or 10% change in 180 days) (Item K3a);
- Emergence of a pressure ulcer at Stage II or higher, when no pressure ulcers were previously present at Stage II or higher (Item M2a);
- Resident begins to use trunk restraint or a chair that prevents rising when it was not used before (Items P4c and e);
- Overall deterioration of resident's condition; resident receives more support (e.g., in ADLs or decision-making) (Item Q2 = 2);
- Emergence of a condition or disease in which a resident is judged to be unstable (Item J5a).

#### EXAMPLE

Mr. T no longer responds to verbal requests to alter his screaming behavior. It now occurs daily and has neither lessened on its own nor responded to treatment. He is also starting to resist his daily care, pushing staff away from him as they attempt to assist with his ADLs. This is a significant change and reassessment is required since there has been deterioration in the behavioral symptoms to the point where it is occurring daily and new approaches are needed to alter the behavior. Mr. T's behavioral symptoms could have many causes, and reassessment will provide an opportunity for staff to consider illness, medication reactions, environmental stress, and other possible sources of Mr. T's disruptive behavior.

#### Improvement in two or more of the following:

- Any improvement in an ADL physical functioning area where a resident is newly coded as 0, 1, or 2 when previously scored as a 3, 4, or 8 (Item G1A);
- Decrease in the number of areas where Behavioral Symptoms or Sad or Anxious Mood are coded as "not easily altered" (Items E2 and E4B);
- Resident's decision-making changes from 2 or 3 to 0 or 1 (Item B4);
- Resident's incontinence pattern changes from 2, 3, or 4 to 0 or 1 (Item H1a or b);
- Overall improvement of resident's condition; resident receives fewer supports (Item Q2 = 1).

**EXAMPLE**

Mrs. G has been in the facility for 5 weeks, following an 8-week acute hospitalization. On admission she was very frail, had trouble thinking, was confused, and had many behavioral complications. The course of treatment led to steady improvement and she is now stable. She is no longer confused or agitated. The resident, her family, and staff agree that she has made remarkable progress. A reassessment is required at this time. The resident is not the person she was at admission; her initial problems have resolved. Reassessment will permit the interdisciplinary team to review her needs and plan a new course of care for the future.

While a facility may choose to perform more frequent comprehensive assessments than mandated by CMS, reassessments are not required for minor or temporary variations in resident status. However, staff must note these transient changes in the resident's status in the resident's record and implement necessary clinical interventions, even though a reassessment is not required. In these cases the resident's condition is expected to return to baseline within a short period of time, such as 1-2 weeks.

**GUIDELINES FOR WHEN A CHANGE IN RESIDENT STATUS IS NOT SIGNIFICANT  
(Please note this is not an exhaustive list)**

- Discrete and easily reversible cause(s) documented in the resident's record and for which the interdisciplinary team can initiate corrective action (e.g., an anticipated side effect of introducing a psychoactive medication while attempting to establish a clinically effective dose level. Tapering and monitoring of dosage would not require a significant change reassessment).
- Short-term acute illness, such as a mild fever secondary to a cold from which the interdisciplinary team expects the resident to fully recover.
- Well-established, predictable cyclical patterns of clinical signs and symptoms associated with previously diagnosed conditions (e.g., depressive symptoms in a resident previously diagnosed with bipolar disease would not precipitate a significant change assessment).
- Instances in which the resident continues to make steady progress under the current course of care. Reassessment is required only when the condition has stabilized.
- Instances in which the resident has stabilized but is expected to be discharged in the immediate future. The facility has engaged in discharge planning with the resident and family, and a comprehensive reassessment is not necessary to facilitate discharge planning.

## **GUIDELINES FOR DETERMINING THE NEED FOR AN SCSA FOR RESIDENTS WITH TERMINAL CONDITIONS**

The key in determining if an SCSA is required for individuals with a terminal condition is whether or not the change in condition is an expected well-defined part of the disease course and is consequently being addressed as part of the overall plan of care for the individual. If a terminally ill resident experiences a new onset of symptoms or a condition that is not part of the expected course of deterioration, an SCSA assessment is required. Similarly, if the resident enrolls in a hospice (Medicare Hospice program or other structured hospice program), but remains a resident at the facility, an SCSA should be performed if the terminally ill resident experiences a new onset of symptoms or a condition that is not part of the expected course of deterioration. The facility is responsible for providing necessary care and services to assist the resident in achieving his/her highest practicable well-being at whatever stage of the disease process the resident is experiencing.

If a resident elects the Medicare Hospice program, it is important that the two separate entities (nursing facility and hospice program staff) coordinate their responsibilities and develop a care plan reflecting the interventions required by both entities. The need to complete an SCSA will depend upon the resident's status at the time of election of hospice care, and whether or not the resident's condition requires a new assessment. Because a Medicare-certified hospice must also conduct an assessment at the initiation of its services, this is an appropriate time for the nursing facility to evaluate the MDS information to determine if it reflects the current condition of the resident. The nursing facility and the hospice's plans of care should be reflective of the current status of the resident.

- Complete an SCSA for a newly diagnosed resident with end-stage disease when:
  - a change is reflected in more than one area of decline; and
  - the resident's status will not normally resolve itself; and
  - the resident's status requires interdisciplinary review and/or revision of the care plan.
  
- Complete subsequent SCSA's based upon the degree of decline and the impact upon the comprehensive care plan. Consider the following criteria:
  - completion date of the last MDS;
  - clinical relevancy and accuracy of the MDS to the resident's current status; and
  - the need to change the resident's care plan to reflect the current status.

**EXAMPLES**

Mr. M has been in this facility for two and one-half years. He has been a favorite of staff and other residents and his daughter has been an active volunteer on the unit. Mr. M is now in the end stage of his course of chronic dementia - diagnosed as probable Alzheimer's. He experiences recurrent pneumonias and swallowing difficulties, his prognosis is guarded, and family members are fully aware of his status. He is on a special dementia unit, staff has detailed palliative care protocols for all such end stage residents, and there has been active involvement of his daughter in the care planning process. As changes have occurred, staff has responded in a timely, appropriate manner. In this case, Mr. M's care is of a high quality, and as his physical state has declined, there is no need for staff to complete a new MDS assessment for this bed bound, highly dependent terminal resident.

Mrs. K came into the facility with identifiable problems and has steadily responded to treatment. Her condition has improved over time and plateaued. She will be discharged within 5 days. The initial RAI helped to set goals and start her care. The course of care provided to Mrs. K was modified, as necessary, to ensure continued improvement. The interdisciplinary team's treatment response reversed the causes of the resident's condition. A reassessment need not be completed in view of the imminent discharge. **Remember, facilities have 14 days to complete a reassessment once the resident's condition has stabilized, and if Mrs. K is discharged within this period, a new assessment is not required. If the resident's discharge plans change or if she is not discharged, a reassessment is required by the end of the allotted 14-day period.**

Mrs. P, too, has responded to care. Unlike Mrs. K, however, she continues to improve. Her discharge date has not been specified. She is benefiting from her care and full restoration of her functional abilities seems possible. In this case, treatment is focused appropriately, progress is being made, staff is on top of the situation, and there is nothing to be gained by requiring an MDS reassessment at this time. However, if her condition was to stabilize and her discharge was not imminent, a reassessment would be in order.

***Assessment Management Tips: SIGNIFICANT CHANGE IN STATUS ASSESSMENT***

	<b>Assessment Reference Date (ARD)</b>	<b>7-day Observation Look Back</b>	<b>14- day Observation Look Back</b>	<b>Assessment Completion Date (VB2)</b>
<b>SIGNIFICANT CHANGE IN STATUS</b>	<b><u>No later than:</u></b> 14 days following determination that a significant change has occurred	Consists of ARD + 6 previous calendar days	Consists of ARD + 13 previous calendar days	ARD + 14 days <b>BUT</b> <b><u>No later than:</u></b> the end of the 14 <sup>th</sup> calendar day following determination that a significant change has occurred.

- The Significant Change in Status assessment must be completed no later than the ARD + 14 days. That is, the MDS Completion Date (R2b) and the RAPs Completion Date (VB2) can be no more than 14 days following the ARD. However, the requirement that the assessment be completed by the end of the 14th day following the determination that a significant change has occurred overrides this.
- Once the ARD has been established, it is the last day of the observation period.
- Care Plan Completion Date (VB4) must be dated by the end of the 7th calendar day following RAPs Completion Date (VB2) (VB2 + 7 days) and can be no later than 21 days following the ARD.
- Electronic submission is due within 31 days following Care Plan Completion Date (VB4) (VB4 + 31 days).
- If the significant change has been identified in the course of completing either a Quarterly assessment or an Annual reassessment, then the SCSA must be completed no later than 92 days from the previous OBRA assessment and 366 days from the previous comprehensive assessment.

### **SIGNIFICANT CORRECTION OF A PRIOR FULL ASSESSMENT**

A Significant Correction of Prior Full assessment (SCPA), including the full MDS form, RAPs and care plan review, is completed when an uncorrected major error is discovered in a prior comprehensive assessment. An error is major when the resident's overall clinical status has been miscoded on the MDS and/or the care plan derived from the erroneous assessment does not suit the resident. A major error is uncorrected when there is no subsequent assessment that has resulted in an accurate view of the resident's overall clinical status and an appropriate care plan. A Significant Correction of a Prior Full assessment is appropriate after a comprehensive assessment has been accepted into the State MDS database, or when a major error has been identified in a comprehensive assessment that has been completed but is no longer in the editing and revision time period (later than 7 days following VB4). This could include an assessment containing a major error that has not yet been transmitted, or that has been submitted and rejected. It is not necessary to complete a new Significant Correction of Prior Full assessment if another, more current assessment has just been completed or is in progress and includes a correction to the item(s) in error.

A Significant Correction of a Prior Full assessment uses a new observation period (as defined by a new Assessment Reference Date). A significant correction assessment (not the original assessment that it corrects) drives the due date of the next assessment.

When the assessment in error has already been accepted by the MDS system at the state, the facility should also correct the assessment that was in error by completing and submitting a correction request for the erroneous assessment, in addition to completing a new assessment, the Significant Correction of a Prior Full assessment. See Chapter 5 for detailed information on processing corrections. It is necessary to correct the erroneous assessment that resides in the State MDS database in order to ensure that accurate information is available for reports that consider historic MDS information, such as incidence reporting for Quality Indicators.

The Significant Correction of a Prior Full assessment differs from a Significant Change in Status assessment, in which there has been an actual significant change in the resident's health status. In any instance in which a resident experiences a significant change in status, regardless of whether or not there was also an error on the previous assessment, the primary reason for assessment should be coded as a significant change in status. In the event of a significant change in status where there are also errors in a prior assessment already accepted into the State MDS database, the facility should also correct the assessment that was in error by completing and submitting a correction request for that erroneous assessment, in addition to completing a Significant Change in Status assessment.

**Assessment Management Tips: SIGNIFICANT CORRECTION OF A PRIOR FULL ASSESSMENT**

	<b>Assessment Reference Date (ARD)</b>	<b>7-day Observation Look Back</b>	<b>14- day Observation Look Back</b>	<b>RAPs Completion Date (VB2)</b>
<b>SIGNIFICANT CORRECTION OF A PRIOR FULL ASSESSMENT</b>	<b><u>No later than:</u></b> 14 days following determination that a major error in the prior full assessment has occurred	Consists of ARD + 6 previous calendar days	Consists of ARD + 13 previous calendar days	ARD + 14 days  <b>BUT</b> <b><u>No later than:</u></b> the end of the 14 <sup>th</sup> calendar day following determination that a major error in the prior full assessment has occurred.

- The Significant Correction of a Prior Full assessment must be completed no later than the ARD + 14 days. That is, the MDS Completion Date (R2b) and the RAPs Completion Date (VB2) can be no more than 14 days following the ARD. However, the requirement that the assessment be completed by the end of the 14th day following the determination that a major error in a prior full assessment has occurred overrides this.
- Once the ARD has been established, it is the last day of the observation period.
- Care Plan Completion Date (VB4) must be dated by the end of the 7th calendar day following RAPs Completion Date (VB2) (VB2 + 7 days) and can be no later than 21 days following the ARD.
- Electronic submission is due within 31 days following the Care Plan Completion Date (VB4) (VB4 + 31 days).

## ASSESSMENTS UPON READMISSION/RETURN

If a facility has formally discharged a resident without the expectation that the resident would return, but later the resident does return (AA8a = 6, Discharged-Return Not Anticipated), this situation is considered a **new admission**. When this occurs, a new Admission assessment, including Sections AB (Demographic Information) and AC (Customary Routine), must be completed within **14 days of admission**.

If a resident returns to a facility following a temporary absence for hospitalization or therapeutic leave, it is considered a **readmission**. Facilities should evaluate a resident upon readmission to determine if a significant change in the resident's condition has occurred. In these situations, follow the procedures for Significant Change in Status assessments. It is not necessary to complete Sections AB (Demographic Information) or AC (Customary Routine) of the MDS if this information has previously been collected and entered into the resident's record. If it is determined that a resident has not experienced a Significant Change in Status, the next OBRA assessment is completed within 92 days of the completion (R2b) of the last OBRA assessment prior to the resident leaving the facility.

## QUARTERLY ASSESSMENTS

Each State's RAI includes, at a minimum, CMS's required Quarterly assessment items. Not all MDS items appear on the Quarterly assessment form. However, states may add items from the core MDS on their Section S, and require completion of Sections T and/or U. If you are unsure of your State's Quarterly assessment requirements, check with your State RAI Coordinator (listed in Appendix B of the User's Manual) to determine what is required in your state.

The Quarterly assessment is used to track the resident's status between comprehensive assessments, and to ensure monitoring of critical indicators of the gradual onset of significant changes in resident status. At a minimum, three Quarterly assessments and one comprehensive assessment are required in each 12-month period. Federal requirement CFR 483.20(c) specifies that a Quarterly assessment must be conducted "not less frequently than once every three months." Timing edits in the MDS standard system count 92-day intervals because there are never more than 92 days in any consecutive three-month intervals. These 92 days are measured from the date at MDS Item R2b of one assessment to Item R2b of the next assessment.

The resident's status must be assessed for each of the key mandated items of the Quarterly assessment using the State-specified form. For information on State requirements, contact your State RAI Coordinator. In conducting Quarterly assessments, facilities must also assess any additional items required for use by the State. Based on the Quarterly assessment, the resident's care plan is revised if necessary. If a Significant Change in Status assessment was completed replacing the Quarterly, the next assessment that is required is a Quarterly assessment. The Quarterly must be completed within 92 days of Item R2b on the Significant Change in Status assessment. In other words, there can be no more than 92 days between the dates recorded at MDS Item R2b of the last to the next clinical assessment.

**Assessment Management Tips: QUARTERLY ASSESSMENT**

	<b>Assessment Reference Date (ARD)</b>	<b>7-day Observation Look Back</b>	<b>14- day Observation Look Back</b>	<b>MDS Completion Date (R2b)</b>
<b>QUARTERLY</b>	<b><u>No later than:</u></b> R2b of previous OBRA assessment + 92 days	Consists of ARD + 6 previous calendar days	Consists of ARD + 13 previous calendar days	ARD + 14 days  <b>BUT</b> <b><u>No later than:</u></b> 92 days from the R2b of previous OBRA assessment

- When setting the ARD for the Quarterly assessment, the anticipated completion date of the assessment to be scheduled as well as the MDS Completion Date (R2b) of the previous OBRA assessment must be considered. The completion date of the Quarterly assessment must be within 92 days of the MDS Completion Date (R2b) of the last OBRA assessment.
- If, in the course of completing the Quarterly assessment, it is determined that a significant change in status has occurred, the comprehensive Significant Change assessment must be completed instead of the Quarterly. The next Quarterly assessment would be due no more than 92 days of the R2b date of the SCOA.
- The Quarterly assessment must be completed no later than 14 days after the ARD. That is, R2b can be no more than 14 days from the ARD (ARD + 14 days).
- Once the ARD has been established, it is the last day of the observation period.
- Electronic submission is due within 31 days following the MDS Completion Date (R2b) (R2b + 31 days).

**SIGNIFICANT CORRECTION OF A PRIOR QUARTERLY ASSESSMENT**

Significant Correction of a Prior Quarterly assessment is completed when an uncorrected major error is discovered in a Quarterly assessment. An error is major when the resident’s overall clinical status has been miscoded on the MDS and/or the care plan derived from the erroneous assessment does not suit the resident. A major error is uncorrected when there is no subsequent assessment that has resulted in an accurate view of the resident’s overall clinical status and an appropriate care plan. A Significant Correction of a Prior Quarterly assessment is appropriate when an uncorrected major error is identified in a Quarterly assessment that has been accepted into the State MDS database, or in a Quarterly assessment that has been completed and is no longer in the editing and revision time



period (later than 7 days from R2b). This could include an assessment containing a major error that has not yet been transmitted, or that has been submitted and rejected. It is not necessary to complete a new Significant Correction of Prior Quarterly assessment if another, more current assessment is already due or in progress that contains and will correct the item(s) in error.

A Significant Correction of a Prior Quarterly assessment uses a new observation period (as defined by a new Assessment Reference Date). A Significant Correction of a Prior Quarterly assessment (not the original assessment that it corrects) drives the due date of the next assessment.

When the assessment in error has already been accepted by the MDS system at the State, the facility should also correct the assessment that was in error by completing and submitting a correction request for the erroneous assessment, in addition to completing a new assessment, the Significant Correction of a Prior Quarterly assessment. Refer to Chapter 5 for details regarding the CMS correction process. It is necessary to correct the erroneous assessment that resides in the State MDS database in order to ensure that accurate information is available for reports that consider historic MDS information, such as incidence reporting for Quality Indicators.

**Assessment Management Tips: SIGNIFICANT CORRECTION OF A PRIOR QUARTERLY ASSESSMENT**

	<b>Assessment Reference Date (ARD)</b>	<b>7-day Observation Look Back</b>	<b>14- day Observation Look Back</b>	<b>MDS Completion Date (R2b)</b>
<b>SIGNIFICANT CORRECTION OF A PRIOR QUARTERLY ASSESSMENT</b>	<b><u>No later than:</u></b> 14 days following determination that a major error in the prior Quarterly assessment has occurred	Consists of ARD + 6 previous calendar days	Consists of ARD + 13 previous calendar days	ARD + 14 days  <b>BUT</b> <b><u>No later than:</u></b> the end of the 14 <sup>th</sup> calendar day following determination that a major error in the prior Quarterly assessment has occurred.

- The Significant Correction of a Prior Quarterly assessment must be completed no later than the ARD + 14 days. That is, the MDS Completion Date (R2b) can be no more than 14 days following the ARD. However, the requirement that the assessment be completed by the end of the 14th day following the determination that a significant error in a prior Quarterly assessment has occurred overrides this.
- Once the ARD has been established, it is the last day of the observation period.

**2.3 RAPs and Care Plan Completion**

After completing the MDS portion of the comprehensive assessment, the assessor(s) then proceed(s) to further identify and evaluate the resident's strengths, problems, and needs through use of the **Resident Assessment Protocol Guidelines (RAPs)** described in detail in Chapter 4 of this manual and through further investigation of any resident-specific issues not addressed in the RAI. For example, those items that are not automatically triggered, such as Item P4 (side rails), may require further investigation.

Completed along with the MDS, the RAPs provide the foundation upon which the care plan is formulated. There are 18 problem-oriented RAPs, each of which includes MDS-based "trigger" conditions that signal the need for additional assessment and review. Triggers and their definitions for each RAP appear in Appendix C. Also in Appendix C are the RAP Guidelines for additional assessment and review to determine if a care plan is appropriate to address the triggered condition.

**Assessment Management Tips: COMPREHENSIVE ASSESSMENTS REQUIRING RAPs**

	<b>MDS Completion Date (R2b)</b>	<b>RAPs Completion Date (VB2)</b>
<b>COMPREHENSIVE ASSESSMENTS REQUIRING RAPs</b>	<p><b>Admission assessment:</b> No later than Admission date + 13 days</p> <p><b>Annual assessment:</b> ARD + 14 days, but no later than R2b of previous OBRA assessment + 92 days.</p> <p><b>Significant Change assessment:</b> Date of determination + 14 days</p> <p><b>Significant Correction of a Prior Full Assessment:</b> Date of determination of error + 14 days</p>	<p><b>Admission assessment:</b> No later than Admission date + 13 days</p> <p><b>Annual assessment:</b> ARD + 14 days, but no later than VB2 of previous OBRA comprehensive assessment + 366 days.</p> <p><b>Significant Change assessment:</b> Date of determination + 14 days</p> <p><b>Significant Correction of a Prior Full Assessment:</b> Date of determination of error + 14 days</p>

- MDS Completion Date (R2b) must be earlier than or the same date as the RAPs Completion Date (VB2). In no event can either date be later than the established timeframes as described above.

## FORMULATION OF THE CARE PLAN

**For an Admission assessment**, the resident enters the facility on day 1 with a set of physician-based treatment orders. Facility staff typically reviews these orders. Questions may be raised, modifications discussed, and change orders issued. Ultimately, of course, it is the attending physician who is responsible for the orders at admission, which form the basis for care plan development.

On day 1, facility staff also begins to assess the resident and to identify problems. Both activities provide the core of the MDS and RAP process, as staff look at issues of safety, nourishment, medications, ADL needs, continence, psychosocial status and so forth. Facility staff determines whether or not there are problems that require immediate intervention (e.g., providing supplemental nourishment to reverse weight loss or attending to a resident's sense of loss at entering the nursing facility). For each problem, facility staff will focus on causal factors and implement an initial plan of care based on their understanding of factors affecting the resident.

The MDS and RAPs provide the clinician with additional information to assist in this preliminary care planning process. The MDS ensures that staff has timely access to a wide range of assessment data. The RAPs provide criteria that trigger review of possible problem conditions to ensure that staff identifies problems in a consistent and systematic manner. Use of the RAP Guidelines helps ensure that the full range of relevant causal factors is considered.

If the admission MDS is not completed until the last date possible (i.e., at the end of calendar day 14 of the residency period), interventions will already have been implemented to address priority problems. Many of the appropriate RAP problems will have been identified, causes will have been considered, and a preliminary care plan initiated. The final care plan is then required no later than 7 days after the RAI assessment is completed.

For triggered problems that have already resulted in a care plan intervention, the final RAP review will ensure that all causal factors have been considered. For RAP conditions for which facility staff has not yet initiated a care program, the RAP review will focus on whether or not these conditions are, in fact, problems that require facility intervention. For any triggered problem, staff will apply the RAP Guidelines to evaluate the resident's status and determine whether or not a situation exists that warrants care planning. If it does, the RAP Guidelines will next be used to help identify the factors that should be considered for developing the care plan.

For an Annual reassessment or a Significant Change in Status assessment, the process is basically the same as that described for newly admitted residents. In these cases, however, the care plan will already be in place, and staff is unlikely to be actively instituting a new approach to care as they simultaneously complete the MDS and RAPs. Here, review of the RAPs when the MDS is complete will raise questions about the need to modify or continue services. The condition that originally triggered the RAP may no longer be present because it was resolved, or consideration of alternative causal factors may be necessary because the initial approach to a problem did not work, or was not fully implemented.

**Clarification:** ♦ The RAI was not designed to identify every conceivable problem that a resident might experience. An example of this is “chewing problem” at MDS

Item K1a. Although the resident might have a chewing problem, checking this problem does not trigger a RAP. Clinical judgment must be exercised in the identification of problems and potential problems in developing the plan of care. In ensuring that a resident's care plan is unique and specific to the resident, it is not sufficient to rely solely on the triggered RAPs. Another example of this is "side rails" at MDS Item P4. Although the resident may use side rails, this item does not automatically trigger a RAP.

## CARE PLAN COMPLETION

Facilities have 7 days after the completion of the RAI assessment to develop or revise the resident's care plan. The RN coordinator should sign and date the RAP Summary form after all triggered RAPs have been reviewed to certify completion of the comprehensive assessment (RAPs Completion Date, VB1 and VB2). Facilities should use this date to determine the date by which the care plan must be completed.

The 7-day requirement for completion or modification of the care plan applies to the Admission, Significant Change in Status, Significant Correction of a Prior Full assessment, or Annual RAI assessment. A new care plan does not need to be developed after each SCSA, Significant Correction of a Prior Full assessment, or Annual reassessment. Rather, the facility may revise an existing care plan using the results of the latest comprehensive assessment. Facilities should also evaluate the appropriateness of the care plan after each Quarterly assessment and modify the care plan if necessary. (See Chapter 4 for more information on care planning.)

**Clarification:** ♦ The care plan should be revised on an on-going basis to reflect changes in the resident and the care the resident is receiving. The care plan is an interdisciplinary communication tool. Review 42 CFR 483.20(d), Comprehensive Care Plans. The comprehensive care plan must include measurable objectives and time frames, and must describe the services that are to be furnished to attain or maintain the resident's highest practicable physical, mental, and psychosocial well-being. The care plan must be periodically reviewed and revised, and the services provided or arranged must be in accordance with each resident's written plan of care. Refer to the SOM Transmittal #274, (F Tag 279), "The results of the assessment are used to develop, review and revise the resident's comprehensive plan of care."

**Assessment Management Tips: CARE PLAN COMPLETION (VB4)**

	<b>MDS Completion Date (R2b)</b>	<b>RAPs Completion Date (VB2)</b>	<b>Care Plan Completion Date (VB4)</b>
<b>COMPREHENSIVE ASSESSMENTS</b>	<p><b>Admission assessment:</b> No later than Admission date + 13 days</p> <p><b>Annual assessment:</b> ARD + 14 days, but no later than R2b of previous OBRA assessment + 92 days.</p> <p><b>Significant Change assessment:</b> Date of determination + 14 days</p> <p><b>Significant Correction of a Prior Full Assessment:</b> Date of determination of error + 14 days</p>	<p><b>Admission assessment:</b> No later than Admission date + 13 days</p> <p><b>Annual assessment:</b> ARD + 14 days, but no later than VB2 of previous OBRA comprehensive assessment + 366 days.</p> <p><b>Significant Change assessment:</b> Date of determination + 14 days</p> <p><b>Significant Correction of a Prior Full Assessment:</b> Date of determination of error + 14 days</p>	<p><b>Admission assessment:</b> VB2 + 7 days, no later than Admission date + 21 days</p> <p><b>Annual assessment:</b> VB2 + 7 days, no later than ARD + 21 days</p> <p><b>Significant Change assessment:</b> VB2 + 7 days, no later than ARD + 21 days</p> <p><b>Significant Correction of a Prior Full Assessment:</b> VB2 + 7 days, no later than ARD + 21 days</p>

- Care plan development or revision is to be completed with every comprehensive assessment.
- Care Plan Completion Date (VB4) is no later than 7 days following the completion of the RAPs (RAPs Completion Date, VB2).

The following chart provides a summary of the RAI Assessment Schedule.

**RAI ASSESSMENT SCHEDULE SUMMARY**

<b>Record Type</b>	<b>Completion</b>	<b>Care Plan Completion (VB4)</b>	<b>Submit to State by No Later Than:</b>
Admission	By VB2, no later than Day 14.	VB2 + 7 Days	VB4 + 31 Days
Annual Assessment	Completed within 366 days of most recent comprehensive assessment (VB2 to VB2).	VB2 + 7 Days	VB4 + 31 Days
Significant Change in Status	Must be completed by the end of the 14 <sup>th</sup> calendar day following determination that a significant change has occurred.	VB2 + 7 Days	VB4 + 31 Days
Significant Correction of Prior Full Assessment	Must be completed within 14 days of identification of a major, uncorrected error in a prior comprehensive assessment.	VB2 + 7 Days	VB4 + 31 Days
Quarterly	R2b, no later than 14 days after the ARD, 92 days from R2b to R2b.	N/A	R2b + 31 Days
Significant Correction of Prior Quarterly Assessment	Must be completed within 14 days of the identification of a major, uncorrected error in a prior Quarterly assessment.	N/A	R2b + 31 Days
Discharge Tracking Form	Date of Event at R4 + 7 Days	N/A	R4 + 31Days
Reentry Tracking Form	Date of Event at A4a + 7 Days	N/A	A4a + 31 Days
Correction Request Form	Date at AT6, no later than 14 days after detecting an inaccuracy in an MDS record that has been accepted in State MDS database.	N/A	AT6 + 31 Days

## 2.4 Tracking Documents: Discharge and Reentry for Nursing Facilities

With MDS Version 2.0, two new forms have been developed to track each resident's "whereabouts" in the health care system. The Discharge and Reentry Tracking forms provide key information to identify and track the movement of residents in and out of the facility.

### The Discharge Tracking form contains:

- Section AA (Identification Information), Items 1 through 7,
- A subset of codes from Item AA8a, Primary Reason for Assessment, numbers 6, 7, or 8,
- AB1 (Date of Entry) and AB2 (Admitted From [at Entry]) completed if AA8a = 8,
- A6 (Medical Record Number),
- R3 (Discharge Status) and R4 (Discharge Date).

### The Reentry Tracking form contains:

- Section AA (Identification Information), Items 1 through 7,
- A single code from Item AA8a, Primary Reason for Assessment, number 9,
- A4a (Date of Reentry), A4b (Admitted From [at Reentry]) and A6 (Medical Record Number).

Some parts of the State specific Section S may be required with these tracking documents. The Discharge and Reentry documents can be found in Chapter 1. Contact your State RAI Coordinator for specific State requirements.

In some situations, Discharge and Reentry Tracking forms **are not completed**:

- When the resident leaves the facility on a temporary visit home, or on another type of therapeutic or social leave.
- When residents are in a hospital outpatient department for an observational stay of less than 24 hours and the resident is not admitted for acute care as an inpatient.

If the observational stay goes beyond 24 hours or if the resident is admitted for acute care, then a Discharge Tracking form must be completed within seven days. The discharge date entered at R4 would be the date that the resident actually left the facility, not the date he was admitted to the hospital.

The clinician must clearly understand the differences between the three types of discharge in order to correctly select the appropriate response at AA8a. They are:

- Discharged-return not anticipated (Reason for Assessment AA8a = 6)
- Discharged-return anticipated (Reason for Assessment AA8a = 7)
- Discharged prior to completing initial assessment (Reason for Assessment AA8a = 8)

A **Discharge-return not anticipated** (AA8a = 6) is completed when it is determined that the resident is being discharged with no expectation of return after a comprehensive Admission assessment has been completed. A discharge with return not anticipated can be a formal discharge to home, to another facility, or when the resident dies. If the resident is formally discharged from the facility and returns at a later date, this will be a new admission and requires a new Date of Entry (AB1). The MDS assessment schedule will start over with a new comprehensive Admission assessment. If the resident will receive Medicare Part A services, then the Medicare 5-Day assessment would be completed and the Medicare assessment schedule would continue.

A **Discharge-return anticipated** (AA8a = 7) reports a more temporary absence from the facility after the Admission assessment is completed, when it is anticipated that the resident will return for continued nursing facility services. If a resident is temporarily admitted for acute care in the hospital, or a hospital observation stay lasts more than 24 hours, but the resident is expected to return to the nursing facility, the Discharge Tracking form would be coded as a discharge with return anticipated. When the resident returns to the facility, a Reentry Tracking form must be completed to report the return of the resident.

In some situations, a resident may be discharged with a return anticipated and later the facility learns that he/she will not be returning or has died. In this situation, another Discharge Tracking form (return not anticipated) is not necessary unless the State requires this second discharge document. Please contact your State RAI Coordinator for clarification if your state requires this additional Discharge Tracking form.

The **Discharged-prior to completion of the initial assessment** (AA8a = 8) is indicated when a resident is admitted to the facility and the Admission assessment is not completed before the resident is discharged. This reason for assessment should be selected whether or not the resident is expected to return, e.g., from an admission to the hospital, or is not expected to return, e.g., the resident dies in the nursing facility. If the Admission assessment had not been completed, the only discharge that may be selected is AA8a = 8.

If the resident is unstable and has several return visits to the hospital before the Admission assessment is completed, the facility should continue to submit discharges prior to completion of the initial assessment (AA8a = 8) until the resident is in the facility long enough to complete the comprehensive Admission assessment. The same date of entry (AB1) should be used for all these discharges.

In some situations, the resident may be admitted to the skilled nursing unit and a 5-Day Medicare assessment was completed before the resident was admitted to the hospital. If an MDS full assessment or a Medicare Prospective Payment Assessment Form (MPAF) was used, it is not a comprehensive assessment (AA8a = 0 (None of the Above)).

If the resident is admitted to the hospital or the observational stay is longer than 24 hours, a Discharge Tracking form should be completed with the reason for assessment being discharged prior to completing the Admission assessment (AA8a = 8). If the resident returns to the facility, a Reentry Tracking form (see below) is not required, but an Admission assessment (AA8a = 1) must be completed.



A **Reentry** Tracking form (AA8a = 9) is only required if the resident returns to the facility after being discharged – return anticipated (AA8a = 7). If the resident returns after being discharged prior to completing the initial assessment (AA8a = 8), the date of reentry is recorded on the comprehensive Admission assessment at A4a, Date of reentry.

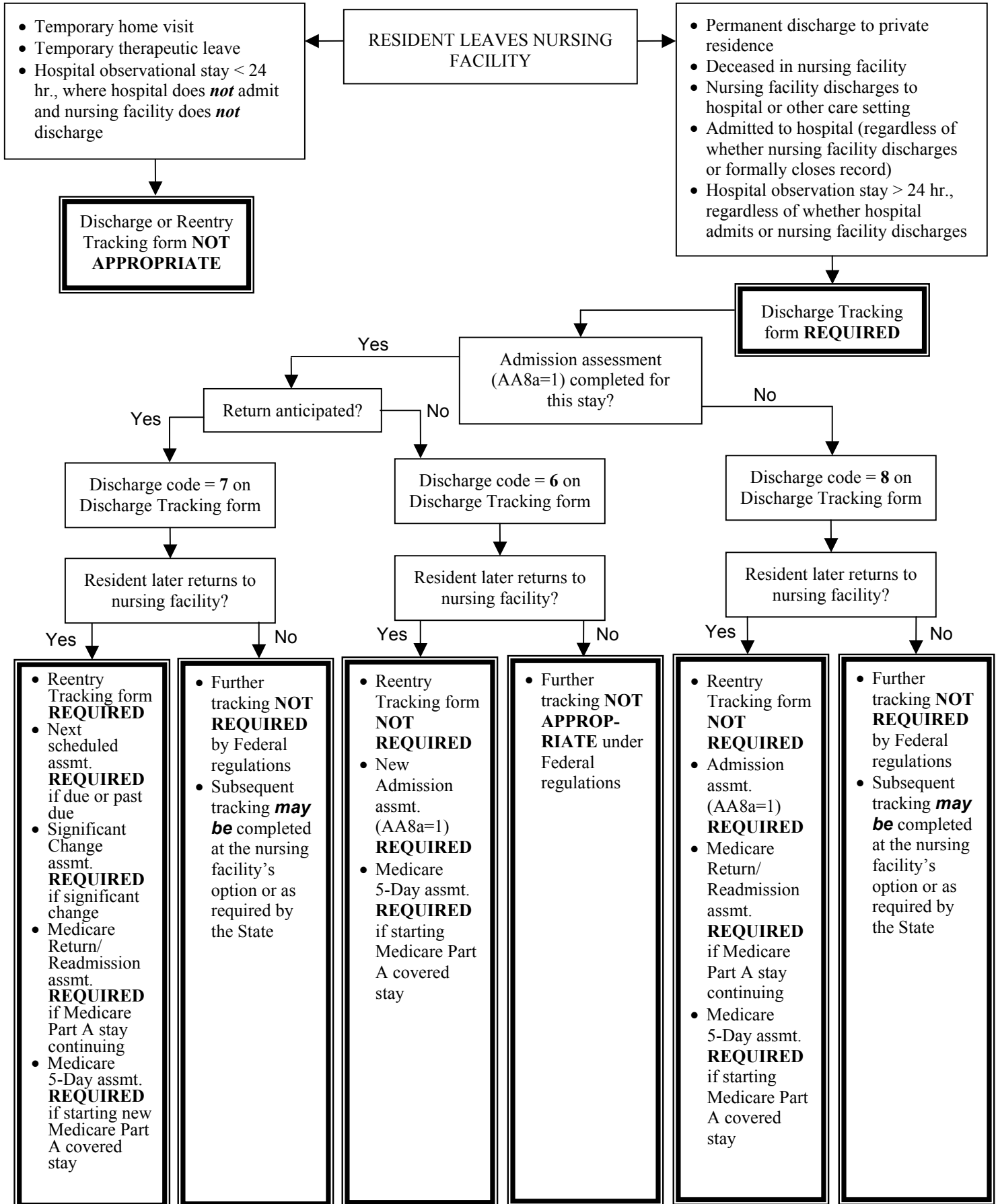
If a resident is in the hospital for a short stay and returns to the facility, the facility can either complete the initial comprehensive admission assessment that was started or start another admission assessment. Any incomplete MDS documents should be saved in the resident's clinical record.

**Clarification:** ♦ The requirements for completion of a Discharge Tracking form are not associated with bedhold status. A Discharge Tracking form is required whenever a resident is discharged, regardless of bedhold status. If the bed is being held, it logically follows that return is anticipated, and Item AA8a on the Discharge Tracking form is coded "7" (return anticipated).

**NOTE:** The above response assumes that a comprehensive Admission assessment had been completed.

The following chart details the facility's requirement for completion of Discharge and Reentry Tracking forms.

## MDS 2.0 DISCHARGE AND REENTRY FLOWCHART



**2.5 The SNF Medicare Prospective Payment System Assessment Schedule**

Nursing facilities will assess the clinical condition of beneficiaries by completing the MDS assessment for each Medicare resident receiving Part A SNF-level care. The MDS must be completed in compliance with the Medicare schedule as shown in the chart below.

<b>Medicare MDS Assessment Type</b>	<b>Reason for Assessment (AA8b code)</b>	<b>Assessment Reference Date</b>	<b>Assessment Reference Date Grace Days+</b>	<b>Number of Days Authorized for Coverage and Payment</b>	<b>Applicable Medicare Payment Days</b>
5 Day	1	Days 1-5*	6 - 8	14	1 through 14
14 Day	7	Days 11-14	15 - 19	16	15 through 30
30 Day	2	Days 21-29	30 - 34	30	31 through 60
60 Day	3	Days 50-59	60 - 64	30	61 through 90
90 Day	4	Days 80-89	90 - 94	10	91 through 100

\*If a resident expires or transfers to another facility before the 5-Day assessment has been completed, the facility will still need to prepare an MDS as completely as possible for the RUG-III Classification and Medicare payment purposes. Otherwise, the days will be paid at the default rate. The Assessment Reference Date must also be adjusted to no later than the date of discharge.

+Grace Days: A specific number of grace days (i.e., days that can be added to the Medicare assessment schedule without penalty) are allowed for setting the Assessment Reference Date (ARD) for each scheduled Medicare assessment.

The Medicare assessment schedule includes a 5-Day, 14-Day, 30-Day, 60-Day and 90-Day assessment. The first day of Medicare Part A coverage is considered Day 1. In most cases, the first day of Medicare Part A eligibility is also the date of admission. However, there are situations where the Medicare beneficiary may only become eligible for Part A services at a later date. See Section 2.9 for more detailed information.

Assessments must also be completed whenever there is a significant change in clinical status or when all therapies are discontinued for a beneficiary who is classified in a RUG-III Rehabilitation group, and that beneficiary continues to require skilled services.

A Readmission/Return assessment must be completed when a beneficiary who was receiving Part A SNF-level services is hospitalized and returns to the SNF and continues to receive Part A SNF-level services.

Assessments performed solely for Medicare payment purposes must be completed within 14 days of the Assessment Reference Date (ARD). The Assessment Reference Date establishes a common reference end-point for all items. The Assessment Reference Date is described in detail in Chapter 3. Nursing facility staff should make every effort to complete assessments in a timely

manner. Each of the Medicare scheduled assessments has defined days when the Assessment Reference Date may be set. For example, for the Medicare 5-Day assessment, days one through five have been defined as the optimal days for setting the Assessment Reference Date. However, there may be situations when an assessment might be delayed and CMS has allowed for these situations by defining a number of grace days for each Medicare assessment. The Medicare 5-Day Assessment Reference Date can be extended one to three grace days.

Grace days can be added to the Assessment Reference Date in situations such as an absence/illness of the RN assessor, reassignment of the assessor to other duties for a short period of time, or an unusually large number of assessments due at approximately the same time. Grace days may also be used to more fully capture therapy minutes or other treatments. The use of grace days allows clinical flexibility in setting ARDs, and should be used sparingly. If a facility chooses to routinely use grace days, it may be subject to review through the survey process, by the fiscal intermediary, or by the Data Assessment and Verification (DAVE) contractor.

A Medicare assessment is considered complete on the day that the registered nurse (RN) coordinating the assessment signs and dates the assessment (MDS Completion Date, R2b). Each MDS record must be encoded and edited at the nursing facility. The MDS records must then be submitted electronically to the State MDS database and will be considered timely if transmitted and accepted into the database within 31 days of completion.

The following chart summarizes the Medicare MDS Assessment Schedule for skilled nursing facilities.

**MEDICARE MDS ASSESSMENT SCHEDULE FOR SNFs**

Codes for Assessments Required for Medicare	Assessment Reference Date (ARD) Can be set on any of following days	GRACE PERIOD DAYS ARD can also be set on these days	BILLING CYCLE Used by the business office	SPECIAL COMMENT
5 DAY AA8b = 1 AND Readmission/ Return AA8b = 5	Days 1-5	6-8	Set payment rate for Days 1-14	<ul style="list-style-type: none"> <li>• If a resident transfers or expires before the Medicare 5-Day assessment is finished, prepare an MDS as completely as possible for the RUG Classification and proper Medicare payment, or bill at the default rate.</li> <li>• RAPS must be completed only if the Medicare 5-Day assessment is dually-coded as an Admission assessment or SCSA.</li> </ul>
14 Day AA8b = 7	Days 11-14	15-19	Set payment rate for Days 15-30	<ul style="list-style-type: none"> <li>• RAPS must be completed only if the 14-Day assessment was dually coded as an Admission or Significant Change in Status assessment.</li> <li>• Grace period days do not apply when RAPS are required on a dually coded assessment, e.g., Admission assessment.</li> </ul>
30 Day AA8b = 2	Days 21-29	30-34	Set payment rate for Days 31-60	
60 Day AA8b = 3	Days 50-59	60-64	Set payment rate for Days 61-90	
90 Day AA8b = 4	Days 80-89	90-94	Set payment rate for Days 91-100	<ul style="list-style-type: none"> <li>• Be careful when using grace days for a Medicare 90-Day assessment. The completion date of the Quarterly (R2b) must be no more than 92 days after the R2b of the prior OBRA assessment.</li> </ul>
Other Medicare Required Assessment (OMRA)	<ul style="list-style-type: none"> <li>• 8 - 10 days after all therapy (PT, OT, ST) services are discontinued and resident continues to require skilled care.</li> <li>• The first non-therapy day counts as day 1.</li> </ul>	N/A	Set payment rate effective with the ARD	<ul style="list-style-type: none"> <li>• Not required if the resident has been determined to no longer meet Medicare skilled level of care.</li> <li>• Establishes a new non-therapy RUG Classification.</li> <li>• Not required if the resident is discharged from Medicare prior to day 8.</li> <li>• Not required if not previously in a RUG-III Rehabilitation group</li> </ul>
Significant Change in Status Assessment (SCSA)	Completed by the end of the 14 <sup>th</sup> calendar day following determination that a significant change has occurred.	N/A	Set payment rate effective with the ARD	<ul style="list-style-type: none"> <li>• Could establish a new RUG Classification and remains effective until the next assessment is completed.</li> </ul>

**\*NOTE:** Significant Correction assessments are not required for Medicare assessments that have not been combined with an OBRA assessment. See Chapter 5 for detailed instructions on the correction process.

## 2.6 Types of MDS Medicare Assessments for SNFs

The MDS has been constructed to identify the OBRA Reasons for Assessment in Items AA8a and A8a. If the assessment is being used for Medicare reimbursement, the Medicare Reason for Assessment must be coded in Item AA8b and A8b. The Medicare and State reasons for assessment are described in this section. In many cases, assessments are combined to meet both OBRA and Medicare requirements. The relationship between OBRA and Medicare assessments are discussed below and in more detail in Section 2.8.

**Codes for Assessments Required for Medicare or in States When Required** - It is possible to select a code for the MDS from both AA8a and AA8b (e.g., Item AA8a coded “3” (Significant Change in Status assessment), and Item AA8b coded “3” (60-Day assessment)).

- 1. Medicare 5-Day Assessment** - The first Medicare assessment completed upon admission to the nursing facility for Part A SNF-level services. The 5-Day Medicare assessment must have an ARD (Item A3a) established between days 1-5 of the SNF stay. The ARD (Item A3a) can be extended to day 8 if using the designated “Grace Days.” The 5-Day Medicare assessment must be completed (Item R2b) within 14 days of the ARD. The 14-day calculation is based on calendar days and includes weekends. The 5-Day assessment authorizes payment from days 1 through 14 of the stay, as long as the resident remains eligible for Part A SNF-level services. The MDS records must be submitted electronically to the State MDS database and will be considered timely if submitted and accepted into the database within 31 days of completion (Item R2b). If combined with the Admission assessment, then the assessment must be completed at VB2 by day 14 of admission.
- 2. Medicare 30-Day Assessment** - Medicare assessment that must have an ARD (Item A3a) established between days 21-29 of the SNF stay. The ARD (Item A3a) can be extended to day 34 if using the designated “Grace Days.” The 30-Day Medicare assessment must be completed (Item R2b) within 14 days of the ARD. The 30-Day assessment authorizes payment from days 31 through 60 of the stay, or as long as the resident remains eligible for Part A SNF-level services. The MDS records must be submitted electronically to the State MDS database and will be considered timely if submitted and accepted into the database within 31 days of completion (Item R2b).
- 3. Medicare 60-Day assessment** - Medicare assessment that must have an ARD (Item A3a) established between days 50-59 of the SNF stay or as long as the resident remains eligible for Part A SNF-level services. The ARD (Item A3a) can be extended to day 64 if using the designated “Grace Days.” The 60-Day Medicare assessment must be completed (Item R2b) within 14 days of the ARD. The 60-Day assessment authorizes payment from days 61 through 90 of the stay, or as long as the resident remains eligible for Part A SNF-level services. The MDS records must be submitted electronically to the State MDS database and will be considered timely if submitted and accepted into the database within 31 days of completion (Item R2b).

4. **Medicare 90-Day Assessment** - Medicare assessment that must have an ARD (Item A3a) established between days 80-89 of the SNF stay. The ARD (Item A3a) can be extended to day 94 if using the designated "Grace Days." The 90-Day Medicare assessment must be completed (Item R2b) within 14 days of the ARD. The 90-Day assessment authorizes payment from days 91 through 100 of the stay, or as long as the resident remains eligible for Part A SNF-level services. The MDS records must be submitted electronically to the State MDS database and will be considered timely if submitted and accepted into the database within 31 days of completion (Item R2b). (NOTE: When combined with an OBRA Quarterly assessment, see Section 2.2).
5. **Medicare Readmission/Return Assessment** - Medicare assessment that is completed when a resident whose stay was being reimbursed by Medicare Part A was hospitalized, discharged, and later readmitted to the SNF from the hospital. The Readmission/Return assessment, like the 5-Day assessment, must have an ARD (Item A3a) established between days 1-8 of the return. The Readmission/Return assessment must be completed (Item R2b) within 14 days of the ARD. The Readmission/Return assessment restarts the Medicare schedule and the next required assessment would be the Medicare 14-Day assessment. The MDS records must be submitted electronically, and will be considered timely if submitted and accepted into the database within 31 days of completion (Item R2b).
6. **Other State-Required Assessment – This assessment is not used for Medicare purposes.** In some cases, States have established assessment requirements in addition to the OBRA and Medicare assessments. Contact your RAI Coordinator for State specific requirements.
7. **Medicare 14-Day Assessment** - Medicare assessment that must have an ARD (Item A3a) established between days 11-14 of the SNF stay or as long as the resident remains eligible for Part A SNF-level services. The ARD (Item A3a) can be extended to day 19 if using the designated "Grace Days." The 14-Day assessment must be completed (Item R2b) within 14 days of the ARD. The 14-Day assessment authorizes payment from days 15 through 30 of the stay, or as long as the resident remains eligible for Part A SNF-level services. The MDS records must be submitted electronically to the State MDS database and will be considered timely if submitted and accepted into the database within 31 days of completion (Item R2b). If combined with the Admission assessment, then the assessment must be completed at VB2 by day 14 of admission. (NOTE: When combined with an OBRA Admission assessment, see instructions in Sections 2.2 and 2.8.)
8. **Other Medicare-Required Assessment** - The OMRA is completed only if the resident was in a RUG-III Rehabilitation Classification and will continue to need Part A SNF-level services after the discontinuation of therapy. The last day in which therapy treatment was furnished is day zero. The OMRA ARD (Item A3a) must be set on day eight, nine, or ten after all rehabilitation therapies have been discontinued. The OMRA must be completed (Item R2b) within 14 days of the ARD. The OMRA will establish a new non-therapy RUG-III group and Medicare payment rate. The MDS records must be submitted electronically, and will be considered timely if submitted and accepted into the database within 31 days of completion (Item R2b). If the OMRA falls in the assessment window of a regularly schedule Medicare assessment, code the assessment as an OMRA to affect the change in payment status.

## **2.7 The Medicare Prospective Payment System Assessment Form (MPAF)**

Effective July 1, 2002, skilled nursing facilities may choose to complete and submit a shorter version of the MDS called the Medicare Prospective Payment System Assessment Form (MPAF), rather than a full Minimum Data Set (MDS) assessment for Medicare assessments. The MPAF provides facilities with options concerning the forms used for Medicare assessments. The MPAF consists of a subset of the MDS items that includes:

- Items for resident identification,
- Items necessary to complete the Resource Utilization Group-III calculation, and
- Items needed to calculate the Quality Indicators (QIs).

Although the MPAF has fewer items than the full MDS, the included item-by-item definitions and coding instructions are identical. The item-by-item information is not repeated in this section. Refer to the item-by-item definitions in Chapter 3. A copy of the MPAF form is in Chapter 1.

The MPAF was implemented effective July 1, 2002. Skilled nursing facilities have the option of using the MPAF rather than the full MDS assessment when performing many of the required Medicare assessments. Use of the MPAF is completely optional. If a facility continues to submit a full MDS assessment for Medicare, the extra MDS items (those not on the MPAF) will be ignored and will not be edited or stored in the State MDS database. No errors or warnings will occur because a full assessment is submitted for Medicare. NOTE: Facilities should work with their software vendors to update their systems to include the MPAF option.

When assessments are completed for both OBRA reasons and Medicare, all OBRA-required items, all Medicare-required items, and any State-specific items (Section S) must be submitted, with all required items being stored in the State MDS database. When assessments are Medicare (no OBRA reason present), only the MPAF items and any State-specific items (Section S) will be active and stored in the State MDS database.

The MPAF optional form cannot be used for a Significant Change in Status Assessment or Significant Correction of a Prior Full assessment. These are comprehensive assessments and require the full MDS, RAPs, and care planning. However, the MPAF can be used for an OMRA when it is not combined with any other comprehensive assessment.

The State may not require additional MDS items on Medicare assessments. However, the State may require State-specific items in Section S on all MDS records, including Medicare assessments. If Section S is required on Medicare assessments, then the Section S items must be submitted. CMS has approved the MPAF for use as a Quarterly assessment. A state may adopt the MPAF form as the State-specified Quarterly assessment by sending written notification to CMS.

The following are the form requirements and assessment options for different types of MDS records including the MPAF.



**\*Scenarios 1-3 are situations when the MPAF may be used.**

*Scenario 1*

The Clinician is Completing a Medicare Assessment

Reason for Assessment:  
 AA8a = 00 None of the Above  
 AA8b = 1 Medicare 5 day assessment  
           2 Medicare 30 day assessments  
           3 Medicare 60 day assessments  
           4 Medicare 90 day assessments  
           5 Medicare Readmission/Return assessments  
           7 Medicare 14 day assessments  
           8 Other Medicare required assessment

**Full Assessment Option**

**MPAF Assessment Option**

- Assessment tracking form (Section AA) is required.
- All background (face sheet) items in Sections AB and AC are optional in all-or-none-fashion, with one exception. That exception is that AB5a through AB5f (items included on the MPAF form) can be optionally submitted alone (without other face sheet items).
- Full assessment form is required.
- Medicare therapy supplement form (Section T) is required.
- Section S can be required by State.

- Assessment tracking form (Section AA) is required.
- All background (face sheet) items in Sections AB and AC are optional in all-or-none-fashion, with one exception. The exception is that AB5a through AB5f (items included on the MPAF form) can be submitted alone (without other face sheet items).
- MPAF form is required.
- Section S can be required by State.

*Scenario 2*

The Clinician is Completing a Medicare Assessment Combined with an OBRA Quarterly Assessment **In a State That Uses a RUG-III Quarterly as the State-Specified Assessment**

Reason for Assessment:  
 AA8a = 05 Quarterly review assessment  
           10 Significant Correction of Prior Quarterly assessment  
 AA8b = 1 Medicare 5 Day assessment  
           2 Medicare 30 Day assessments  
           3 Medicare 60 Day assessments  
           4 Medicare 90 Day assessments  
           5 Medicare Readmission/Return assessments  
           7 Medicare 14 Day assessments  
           8 Other Medicare-required assessment

**Full Assessment Option**

**MPAF Assessment Option**

- Assessment tracking form (Section AA) is required.
- All background (face sheet) items in Sections AB and AC are optional in all-or-none-fashion, with one exception. That exception is that AB5a through AB5f (items included on the MPAF form) can be optionally submitted alone (without other face sheet items).
- Full assessment form is required.
- Medicare therapy supplement form (Section T) is required.
- Section S can be required by State.

- Assessment tracking form (Section AA) is required.
- All background (face sheet) items in Sections AB and AC are optional in all-or-none-fashion, with one exception. The exception is that AB5a through AB5f (items included on the MPAF form) can be submitted alone (without other face sheet items).
- MPAF form is required.
- Section S can be required by State.

*Scenario 3*

The Clinician is Completing a Medicare Assessment Combined with an OBRA Quarterly Assessment **In a State That Uses a Minimum Quarterly as the State-Specified Assessment**

Reason for Assessment:  
 AA8a = 05 Quarterly review assessment  
           10 Significant Correction of Prior Quarterly assessment  
 AA8b =1 Medicare 5 Day assessment  
           2 Medicare 30 Day assessments  
           3 Medicare 60 Day assessments  
           4 Medicare 90 Day assessments  
           5 Medicare Readmission/Return assessments  
           7 Medicare 14 Day assessments  
           8 Other Medicare-required assessment

**Full Assessment Option**

- Assessment tracking form (Section AA) is required.
- All background (face sheet) items in Sections AB and AC are optional in all-or-none-fashion, with one exception. That exception is that AB5a through AB5f (items included on the MPAF form) can be optionally submitted alone (without other face sheet items).
- Full MDS assessment form is required.
- Medicare therapy supplement form (Section T) is required.
- Section S can be required by State.

**MPAF Assessment Option**

- Assessment tracking form (Section AA) is required.
- All background (face sheet) items in Sections AB and AC are optional in all-or-none-fashion, with one exception. The exception is that AB5a through AB5f (items included on the MPAF form) can be submitted alone (without other face sheet items).
- MPAF form is required.
- Section S can be required by State.

**\*Scenarios 4-6 are situations when the MPAF may not be used.**

*Scenario 4*

The Clinician is Completing a Medicare Assessment Combined with an OBRA Admission Assessment

Reason for Assessment:  
 AA8a = 01 Admission assessment (required by day 14)  
 AA8b =1 Medicare 5 Day assessment  
           5 Medicare Readmission/Return assessments  
           7 Medicare 14 Day assessments  
           8 Other Medicare-required assessment

**Full Assessment Required for All OBRA Admission Assessments**

- Assessment tracking form (Section AA) is required.
- Background (face sheet) form is required.
- Full MDS assessment form is required.
- RAP Summary form (Section V) is required.
- Medicare therapy supplement form (Section T) is required.
- Section S can be required by the State.



*Scenario 5*

The Clinician is Completing a Medicare Assessment Combined with an OBRA Comprehensive Assessment Other Than an Admission

Reason for Assessment:  
 AA8a = 02 Annual assessment  
           03 Significant Change in Status assessment  
           04 Significant Correction of Prior Full assessment  
 AA8b =1 Medicare 5 Day assessment  
           2 Medicare 30 Day assessments  
           3 Medicare 60 Day assessments  
           4 Medicare 90 Day assessments  
           5 Medicare Readmission/Return assessments  
           7 Medicare 14 Day assessments  
           8 Other Medicare-required assessment

**Full Assessment Required for All OBRA Comprehensive Assessments**

- Assessment tracking form (Section AA) is required.
- All background (face sheet) items in Sections AB and AC are optional in all-or-none-fashion, with one exception. That exception is that AB5a through AB5f (items included on the MPAF form) can be optionally submitted alone (without other face sheet items).
- Full MDS assessment form is required.
- Medicare therapy supplement form (Section T) is required.
- Section S can be required by State.



**No MPAF Option**

*Scenario 6*

The Clinician is Completing a Medicare Assessment Combined with an OBRA Quarterly Assessment **In a State That Requires a Full MDS Assessment**

Reason for Assessment:  
 AA8a = 05 Quarterly review assessment  
           10 Significant Correction of Prior Quarterly assessment  
 AA8b =1 Medicare 5 Day assessment  
           2 Medicare 30 Day assessments  
           3 Medicare 60 Day assessments  
           4 Medicare 90 Day assessments  
           5 Medicare Readmission/Return assessments  
           7 Medicare 14 Day assessments  
           8 Other Medicare-required assessment

**Full Quarterly Assessment Required by the State**

- Assessment tracking form (Section AA) is required.
- All background (face sheet) items in Sections AB and AC are optional in all-or-none-fashion, with one exception. That exception is that AB5a through AB5f (items included on the MPAF form) can be optionally submitted alone (without other face sheet items).
- Full MDS assessment form is required.
- Medicare therapy supplement form (Section T) is required.
- Section S can be required by State.



**No MPAF Option**

## 2.8 Combining the RAI OBRA Schedule with the Medicare Schedule for SNFs

SNF providers are required to meet two assessment standards in a Medicare certified facility:

- The OBRA standards, requiring comprehensive assessments on admission, annually, when a significant change in status occurs or when a Significant Correction of a Prior Full assessment is required. Quarterly assessments are also required on the form designated by the State. These assessments are designated by the reason selected in AA8a, Primary Reason for Assessment.
- The Medicare standards, requiring assessments for payment for a resident in a Medicare Part A stay at 5-day, 14-day, 30-day, 60-day and 90-day time frames. An OMRA assessment must also be completed when a resident who was in a RUG-III Rehabilitation Classification, had all therapies discontinued, and continues a Part A stay due to other skilled needs. These assessments are designated by the reason selected in AA8b, codes for assessments required for Medicare or the State. If the assessment is completed only for Medicare (AA8a = 00), then either the full MDS or MPAF form can be used.

When the OBRA and Medicare assessment time frames coincide, one assessment may be used to satisfy both requirements. When combining the OBRA and Medicare assessments, the most stringent requirement for MDS completion must be met. For example, an Admission assessment, including RAPs, must be completed within the first 14 days of the resident's stay. The requirements for Medicare specify that facilities must complete two assessments for each resident in a Medicare covered Part A stay – a 5-Day and a 14-Day.

There is no need to complete three separate assessments: the Admission assessment may be combined with either the 5-Day (AA8a = 01, AA8b = 1) or the 14-Day (AA8a = 01, AA8b = 7). However, the Admission assessment would have to be a comprehensive assessment with RAPs, not the shorter form that may be completed for Medicare assessments. The other assessment completed in the 14-day period solely for Medicare would be done using either the full MDS or the optional MPAF form (AA8a = 00, AA8b = 1 or 7 as applicable).

The nursing facility must be very careful in selecting the ARD for an Admission assessment combined with a 14-Day Medicare assessment. For the admission standard, the ARD must be set between Days 1 to 14. For Medicare, the ARD must be set between Days 11 and 14, but the regulation allows grace days up to Day 19. However, when combining a 14-Day Medicare assessment with the Admission assessment, grace days are not allowed. To assure, in this situation, that the assessment meets both standards, an ARD between Days 11 and 14 would have to be chosen.

Any OBRA assessment and any Medicare assessment may be combined in this way as long as the ARD and completion date (R2b or VB2) meet both requirements, and the most stringent completion timeframe requirement is met. For example, often the Quarterly assessment and the 90-Day Medicare assessment are due in the same time period. The facility must assure that the completion date (R2b) will occur within 92 days of the R2b of the previous comprehensive or Quarterly

assessment. The ARD must also be set within the proper window for the Medicare requirement. Then the facility must decide which form to complete.

- If the State requires only a two page or RUG-III Quarterly, for an assessment designated as AA8a = 05 and AA8b = 4, either a full MDS or MPAF would be completed. The full MDS or MPAF is the more extensive MDS form; the most stringent requirement must be met.
- If the State requires a full assessment for a Quarterly, for an assessment designated as AA8a = 05 and AA8b = 4, a full MDS form must be completed. It is the more extensive MDS form; the most stringent requirement must be met.

NOTE: It is extremely important to understand the MDS requirements established in your state. Your decision to use the MPAF may be dependent upon your State Medicaid agency's MDS assessment requirements and the State-designated Quarterly assessment.

For a resident who was already in the nursing facility but is now beginning a new Medicare Part A stay, it might be appropriate to combine a Quarterly with a Medicare 5-Day, depending on the resident's status.

A Significant Change in Status assessment might be combined with any Medicare assessment including an OMRA, presuming that the ARD is within the assigned Medicare assessment window and the assessment is completed within 14 days of the identification of the change. At all times, when the nursing facility chooses to complete one assessment to meet both an OBRA and a Medicare requirement, staff must carefully review the standards for each assessment to assure that the most stringent requirement is met.

## **2.9 Factors Impacting the SNF Medicare Assessment Schedule**

### **Resident Expires or Transfers**

If a beneficiary expires or transfers to another facility before the 5-Day assessment is completed, the nursing facility prepares a Medicare assessment as completely as possible to obtain the RUG-III Classification so the provider can bill for the appropriate days. If the Medicare assessment is not completed then the nursing facility provider will have to bill at the default rate.

### **Resident Discharges to Hospital Prior to the Admission Assessment Completion**

Since the Admission assessment was not completed, the facility must complete a Discharge Tracking form with a reason for assessment A8a = 8, discharged prior to completion of admission assessment. In most cases, the facility will have completed a 5-Day Medicare assessment covering the period from the date of admission to the earlier of the Assessment Reference Date (which can be assigned up through day 8 of the Part A stay) or the actual date of discharge. This Medicare assessment will be needed to bill for Part A days.

When the beneficiary returns, the facility completes the Admission (OBRA) assessment by continuing the assessment started prior to the hospital stay (and completing it within 14 days of the initial date of admission) or completes a new assessment within 14 days of the reentry date. In addition, the facility must complete a Medicare Readmission/Return assessment coded AA8b = 5. Generally the Admission assessment can be combined with either the Medicare Readmission/Return assessment or the Medicare 14-Day assessment.

### **Resident is Admitted to an Acute Care Facility and Returns**

If a Medicare resident is admitted to an acute care facility and later returns to the SNF, the Medicare assessment schedule is restarted with the Medicare Readmission/Return assessment followed by the 14-Day, 30-Day, etc. A Discharge Tracking form, return anticipated and a Reentry Tracking form, would precede this.

If a resident is out of the facility over a midnight, but for less than 24 hours, and is not admitted, the Medicare assessment schedule is not restarted. However, there are payment implications, since the day preceding the midnight on which the resident was absent from the facility is not a covered Part A day. This is known as the “midnight rule.” The Medicare schedule must then be adjusted. The day preceding the midnight is not a covered Part A day and therefore, the Medicare assessment “clock” is adjusted by skipping that day in calculating when the next Medicare assessment is due.

### **Resident Leaves the Facility and Returns During the Middle of an ARD Period**

The ARD is not altered if the beneficiary is out of the facility for a temporary leave of absence during part of the observation period. In this case, the facility may include services furnished during the beneficiary’s temporary absence (when permitted under MDS coding guidelines - see Chapter 3) but may not extend the observation period.

### **Resident Discharged from Skilled Services and Returns to SNF-Level Services**

The beneficiary is discharged from Medicare Part A services but remains in the facility in a certified bed with another pay source. Since the beneficiary remained in a certified bed after the Medicare benefits were discontinued, the facility must continue with the OBRA schedule from the beneficiary’s original date of admission. There is no reason to change the OBRA schedule when Part A benefits resume. When the Medicare Part A benefits resume, the Medicare schedule starts again with a 5-Day assessment, MDS Item AA8b = 1.

The original date of entry (AB1) is retained. The beneficiary should be assessed to determine if there was a significant change in status. An SCSA could be completed with either the Medicare 5-Day or 14-Day assessment.

### **Resident in a Part A Stay Begins Therapy**

Adding therapy services to the treatments furnished to a beneficiary in a Part A stay does not automatically require a new assessment. However, if the therapy was added because the beneficiary experienced a significant change, an SCSA must be completed. In this case, the primary reason for assessment would be a SCSA (A8a = 3). If the SCSA is done during a Medicare assessment

window, the SCSA can be combined with a regularly scheduled Medicare assessment. If the SCSA is not within a Medicare assessment window, the Medicare reason for assessment should be coded as AA8a = 3 and AA8b = 8, Other Medicare Required assessment.

### **Physician Hold Occurs**

If a physician hold occurs or 30 days has elapsed since a level of care change, the nursing facility provider will start the Medicare assessment schedule on the first day that Part A SNF-level services started. An example of a physician hold could occur when a resident is admitted to the nursing facility for rehabilitation services but is not ready for weight-bearing exercises. The physician will write an order to start therapy when the resident is able to do weight bearing. Once the resident is able to start the therapy, the Medicare Part A stay begins, and the Medicare 5-Day assessment will be completed. Day "1" of the stay will be the first day that the resident is able to start therapy services.

### **Combining Assessments**

Significant Change in Status Assessment (SCSA) or the Other Medicare Required Assessment (OMRA) may be combined with the regularly scheduled Medicare assessments. If the Medicare assessment window coincides with the SCSA assessment, a single assessment may be coded as both a regularly scheduled assessment (e.g., 5-Day, 14-Day, 30-Day, 60-Day, or 90-Day) and an SCSA. If the Assessment Reference Date of an OMRA coincides with a regularly scheduled Medicare assessment, it is coded only as the OMRA. For billing purposes, it is identified as an OMRA replacing a 14-Day, 30-Day, 60-Day or 90-Day.

Currently there is no way to code that a SCSA performed outside the assessment window is a Medicare assessment. Until this problem can be corrected, code AA8a = 3 to show the SCSA and AA8b = 8 to indicate that the record is a Medicare assessment. This procedure is an exception to the rule that OMRAs are performed only to show discontinuation of therapy for residents in a RUG-III Rehabilitation Classification. In some circumstances, an SCSA can be used as an OMRA and a scheduled Medicare assessment.

### **Non-Compliance with the Assessment Schedule**

According to the Code of Federal Regulation (CFR) section 413.343, assessments that fail to comply with the assessment schedule will be paid at the default rate. Frequent early or late assessment scheduling practices may result in onsite review.

### **Early Assessment**

An assessment should be completed according to the designated Medicare assessment schedule. If an assessment is performed earlier than the schedule indicates (the ARD is not in the defined window), the provider will be paid at the default rate for the number of days the assessment was out of compliance. For example, a Medicare-required 14-Day assessment with an ARD of day 10 (1 day early) would be paid at the default rate for the first day of the payment period that begins on day 15.

### **Default Rate**

MDS assessments are completed according to an assessment schedule specifically designed for Medicare payment, and each assessment applies to specific days within a resident's SNF stay to determine the appropriate reimbursement for the resident. Compliance with this assessment schedule is critical to ensure that the appropriate level of payment is established. Accordingly, SNFs that fail to perform assessments timely are to be paid a RUG-III default rate for the days of a resident's care for which they are not in compliance with this schedule. The RUG-III default rate takes the place of the otherwise applicable Federal rate. The RUG-III default rate is equal to the rate paid for the RUG-III group reflecting the lowest acuity level, and would generally be lower than the Medicare rate payable if the SNF had submitted an assessment in accordance with the prescribed assessment schedule.

### **Late or Missed Assessment Criteria**

A late or missed assessment may be completed as long as the window for the allowable ARD (including grace days) has not passed. If a late/missed assessment has an ARD within the allowable grace period, no financial penalty is assessed. If the assessment has an ARD after the mandated grace period, payment will be made at the default rate for covered services from the first day of the coverage period to the ARD of the late assessment. A late assessment cannot replace the next regularly scheduled assessment. Therefore, if the ARD of the 14-Day assessment was day 22, it cannot be used as both the Medicare 14-Day and Medicare 30-Day assessments.

In this situation, the late 14-Day assessment would be used to support payment for days 22-30 of the Part A stay. A new 30-Day assessment would need to be completed within the assessment window for the Medicare 30-Day assessment.

### **Errors on a Medicare Assessment**

To correct an error on an MDS that has been submitted to the State, the facility must follow the normal MDS correction procedures (see Chapter 5).

- **Modification:** This procedure should be used if any of the item responses were incorrect, e.g., Medicare number, number of therapy minutes, etc.
- **Inactivation:** This procedure should be used if the assessment itself was invalid, e.g., the Reason for Assessment for Medicare (AA8b) was incorrect. This might be an assessment completed to meet the 30-Day assessment requirement, but incorrectly submitted as a 60-Day assessment. The assessment should be resubmitted with the corrected reason for assessment.

A Significant Correction assessment is not done when the assessment in error has been completed to meet the Medicare schedule only. However, if the assessment had been completed to meet an OBRA requirement, as well as the Medicare schedule, normal MDS correction procedures might require the completion of a Significant Change in Status assessment or a Significant Correction assessment, depending on the type of errors identified. Payment will be based on the new Assessment Reference Date if appropriate. Correction procedures are explained in detail in Chapter 5.