

**Long-Term Care Hospital (LTCH) Continuity Assessment
Record and Evaluation Data Set (LCDS)
Quarterly Q&As**

March 2022

Consolidated September 2020 to March 2022



Introduction

The Centers for Medicare & Medicaid Services (CMS) is publishing the Long-Term Care Hospital (LTCH) Continuity Assessment Record and Evaluation Data Set (LCDS) Quarterly Q&As so that all LTCH providers have the clarifications to existing guidance. Through inquiries to the LTCH Post-Acute Care (PAC) Quality Reporting Program (QRP) Help Desk, CMS identifies the opportunity to clarify or refine guidance.

New Q&As Added in March 2022

No new questions for LCDS were added in this quarterly Q&A document.

Consolidated Table of Contents

| | |
|---|----|
| Introduction..... | i |
| New Q&As Added in March 2022 | i |
| Admission Items: General Questions..... | 1 |
| Section GG: Functional Abilities and Goals..... | 2 |
| GG0100, GG0110 | 2 |
| GG0110 | 2 |
| GG0130, GG0170 | 3 |
| GG0130A | 7 |
| GG0130B | 8 |
| GG0130C | 8 |
| GG0170 | 10 |
| GG0170C | 10 |
| GG0170E..... | 11 |
| GG0170F | 12 |
| GG0170I, GG0170J, GG0170K..... | 13 |
| GG0170I..... | 14 |
| GG0170Q | 15 |
| GG0170R, GG0170S | 16 |
| GG0170S..... | 17 |
| Section H: Bladder and Bowel..... | 18 |
| H0350 | 18 |
| H0400 | 19 |
| Section K: Swallowing/Nutritional Status | 20 |
| K0200 | 20 |
| Section M: Skin Conditions | 21 |
| M0210, M0300..... | 21 |
| M0300 | 21 |
| Section N: Medications..... | 24 |
| N2005 | 24 |

*This document is intended to provide guidance on LCDS questions that were received by CMS help desks.
Responses contained in this document may be superseded by guidance published by CMS at a later date.*

Admission Items: General Questions

Question 1: If a patient is admitted to a Long-Term Care Hospital (LTCH) on Monday but has to be transferred back to the acute care hospital the next day (Tuesday) and then returns to the LTCH on Thursday, we know that this is considered a program interruption. Can we use assessment information from Tuesday morning's functional assessments (the day the patient returned to the acute care hospital) to code the admission items?

Answer 1: If the patient has a program interruption, the assessment data gathered on the discharge date (the day the patient is admitted to Acute Care from the LTCH) may be used to code the admission items.

At times CMS provides new or refined instruction that supersedes previously published guidance. In such cases, use the most recent guidance.

Added: September 2020

Question 2: In the latest Q&A release, there was a question that spoke to a decline with a patient within the assessment window with instructions to not update the assessment with such. The example given was related to dysphagia following an ER stay. I am questioning now if we can identify other “updates” within the 3-day admission assessment time period.

Answer 2: Each LCDS item should be considered individually, and coded based on the guidance provided for that item.

Unless otherwise specified in item guidance, information collected by the assessing clinician during the time period for the specified assessment type may be used to inform LCDS coding.

Note that item guidance does specify special rules for coding pressure ulcer/injury and GG items at admission. To support consistency of data collection related to pressure ulcers and GG function data across all post-acute care (PAC) providers, cross-setting guidance directs coding for pressure ulcers/injuries to be based on the “first skin assessment” and GG self-care and mobility items should be based on a functional assessment that occurs at or soon after the patient’s admission, and reflect the patient’s baseline ability to complete the activity, prior to the benefit of services provided by your facility staff.

Added: June 2021

Section GG: Functional Abilities and Goals

GG0100, GG0110

Question 1: We have questions regarding prior level of functioning and prior device use. A patient is admitted to our facility for rehab, has a medical issue, and is discharged to an acute care hospital for a week. When the patient returns to our facility, would the prior level of functioning reported in GG0100B - Prior Functioning: Indoor Mobility reflect the patient's ambulation status prior to the original admission (which is the reason we are still treating the patient) or is the prior level of functioning based on what the patient was doing during the hospital stay? Would this also apply to GG0110 - Prior Device Use?

Answer 1: The intent of GG0100B - Prior Functioning: Indoor Mobility is to report the patient's need for assistance with walking from room to room, with or without a device such as a cane, crutch, or walker, prior to the current illness, exacerbation, or injury. The intent of GG0110 - Prior Device Use is to indicate which devices and aids were used by the patient prior to the current illness, exacerbation, or injury. The assessing clinician must consider each patient's unique circumstances and use clinical judgment to determine how prior functioning and prior device use apply for each individual patient.

In responding to GG0100 - Prior Functioning: Everyday Activities, the activities should be reported based on the patient's usual ability prior to the current illness, exacerbation, or injury. This is the patient's functional ability prior to the onset of the current illness, exacerbation of a chronic condition, or injury, whichever is most recent, that initiated this episode of care. Clinicians should use clinical judgment within these parameters in determining the time frame that is considered "prior to the current illness, exacerbation, or injury."

The same approach should be used in determining Prior Device Use for GG0110.

Added: September 2020

GG0110

Question 1: Should a transport chair be considered a "wheelchair" for GG0110 - Prior Device Use?

Answer 1: The intent of GG0110 - Prior Device Use is to indicate which devices and aids were used by the patient prior to the current illness, exacerbation, or injury. The assessing clinician must consider each patient's unique circumstances and use clinical judgment to determine how prior device use applies for each individual patient.

CMS does not provide an exhaustive list of assistive devices that may be used when coding prior device use.

Added: December 2020

GG0130, GG0170

Question 1: For section GG what is the definition of “therapeutic intervention”?

Answer 1: At Admission, the self-care or mobility performance code is to reflect the patient’s baseline ability to complete the activity, prior to the benefit of services provided by your facility staff. “Prior to the benefit of services” means prior to provision of any care by your facility staff that would result in more independent coding.

Please note that the term “prior to the benefit of services” replaces the term “therapeutic intervention” for the GG activities.

At times CMS provides new or refined instruction that supersedes previously published guidance. In such cases, use the most recent guidance.

Added: September 2020

Question 2: Establishing a goal is required for at least one self-care or mobility activity in section GG. Can the GG goals be changed once established during the first 3 days if the patient’s status changes?

Answer 2: The GG Self-care and Mobility Discharge Goals are used in the calculation of the Process Measure - Percentage of Patients with an Admission and Discharge Function Assessment and a Care Plan that Addresses Function. The measure reports, in part, that discharge goals were established, and does not take into consideration whether or not the goals were met. Once a goal is established, there is no need to update it if circumstances change or additional information becomes available either within or after the 3-day assessment time period.

Added: September 2020

Question 3: The LTCH CARE Data Set (LCDS) manual for section GG clarifies that a Code 03-Partial/moderate assistance indicates the helper is required to provide less than half the effort and a Code 02-Substantial/maximal assistance indicates the helper is required to provide more than half the effort. If a helper is required to provide exactly half the effort, how would the item be coded?

Answer 3: In the situation described, the helper and patient each are providing exactly half of the effort to complete a GG activity. If the patient performs half of the effort, code the item 03-Partial/moderate assistance.

Added: September 2020

Question 4: On day 2, during an evaluation, the physical therapist feels the patient is unable to complete an activity such as sit to stand without providing therapy services; for example: skilled instruction on safe body mechanics for transfers or proper technique to maintain weight bearing restrictions. Is it appropriate to code 88 as the admission assessment of baseline functional status prior to benefiting from therapy services? PT initiates treatment by providing a walker, instructing in its use, and offering cues for proper technique. The patient performed sit to stand transfers with moderate assistance the rest of the day 2 and day 3.

Answer 4: At Admission, the self-care or mobility performance code is to reflect the patient's baseline ability to complete the activity, prior to the benefit of services provided by your facility staff.

For the admission assessment, the patient may be assessed based on the first use of an assistive device or equipment that has not been previously used. The clinician would provide assistance, as needed, in order for the patient to complete the activity safely, and code based on the type and amount of assistance required, prior to the benefit of services provided by your facility/staff.

Introducing a new device should not automatically be considered as "providing a service." Whether a device used during the clinical assessment is new to the patient or not, use clinical judgment to code based on the type and amount of assistance that is required for the patient to complete the activity prior to the benefit of services provided by your facility/staff.

Communicating the activity request (e.g., "Can you stand up from the toilet?") would not be considered verbal cueing. If additional prompts are required in order for the patient to safely complete the activity ("Push down on the grab bar," etc.), the assessing clinician may need to use clinical judgment to determine the most appropriate code, utilizing the Coding Section GG Activities Decision Tree.

In your scenario, if even with assistance the patient was unable to perform the sit to stand activity prior to the benefit of services and the performance code cannot be determined based on patient/caregiver report, collaboration with other agency staff, or assessment of similar activities, use the appropriate "activity not attempted" code.

Added: September 2020

Question 5: We understand that if a patient initially refuses to attempt an activity during the assessment period, but later agrees to perform the activity, the code that represents the patient's actual performance supersedes the refusal code (07). What if on day 1 or day 2 a safety or medical issue prevents the patient from attempting an activity, but on day 3, after benefiting from therapeutic intervention, the patient can now perform the activity? Which code should be reported on the LCDS: Code 88 - Not attempted due to medical conditions or safety concerns, or one of the performance codes, 01-06?

Answer 5: At Admission, the self-care or mobility performance code is to reflect the patient's baseline ability to complete the activity, prior to the benefit of services provided by your facility

staff. “*Prior to the benefit of services*” means prior to provision of any care by your facility staff that would result in more independent coding.

Use of an “activity not attempted” code should occur only after determining that the activity is not completed prior to the benefit of services, and the performance code cannot be determined based on patient/caregiver report, collaboration with other facility staff, or assessment of similar activities.

If this is the case in your scenario code 88 even if the patient’s status changes and the patient is able to complete the activity on a later day during the assessment period.

Added: September 2020

Question 6: How would you code the following scenario for GG activities: Two people are present when a patient is performing an activity; one person is assisting the patient and the second person is standing by for safety/assist as needed but when the activity is completed the second person was not needed. Would you code the activity as Code 01 - Dependent due to having the second person present just in case, or code based on the type and amount of assistance provided by the one person only?

Answer 6: For the GG self-care and mobility activities Code 01 - Dependent is when a helper is required to do all the effort and the patient does none of the effort to complete the activity, or the assistance of two or more helpers is required for the patient to complete the activity.

If the role of the second helper is to provide standby assistance, then the presence of two helpers meets the definition of Code 01 - Dependent. This would be true even if the second helper was there for supervision/standby assist and did not end up needing to provide hands-on assistance.

Added: March 2021

Question 7: How should the following situation be coded for the GG0130 - Self-Care and GG0170 - Mobility items? On discharge a patient was nonadherent with spinal precautions. She was able to demonstrate completing functional tasks independently with good balance and strength, and was cognitively intact. By her report, she was choosing not to routinely adhere to spinal precautions in her day-to-day activities, although she was aware of the precautions and risks. Should the GG activities be coded based on her ability, which is independent, or based on the fact that she knowingly breaks her precautions?

Answer 7: The GG activities focus on the patient’s ability to complete the activities as independently as possible as long as they are safe; willingness and nonadherence are not the focus of the coding.

If, in your scenario, you have assessed the patient being able to independently complete the GG activities safely, code 06 - Independent.

Added: June 2021

Question 8: For GG0130 - Self-Care and GG0170 - Mobility, it is our facility's policy that a patient always have a staff member present during walking or toileting activities. Is it possible for the GG activity to be assessed and coded 06 - Independent, for situations where a staff member is required to be present per facility policy, but is not required to assist or supervise the patient in any way?

Answer 8: When assessing self-care and mobility activities, allow the patient to complete each activity as independently as possible, as long as he/she is safe.

If a helper is present (only due to facility policy) code the activity based on the type and amount of assistance the patient requires to complete the activity as independently as possible, as long as they are safe. If no assistance/supervision/set-up is required, then code 06 - Independent.

Added: September 2021

Question 9: When determining the appropriate performance code at admission for the GG self-care and mobility activities there are times when the score on day 1 differs from the scores on days 2 and 3. For example:

- **On Day 1 when attempting to perform a sit to stand transfer, even with assist from the therapist the patient is unable to complete the transfer due to pain. The therapist scores GG0170D – Sit to stand as a Code 88 - Not attempted due to medical condition or safety concerns in day 1 notes. On day 2, per therapy notes the patient was able to complete the sit to stand transfer with assistance of two people. Which code would I use? Code 88 - Not attempted due to medical condition or safety concerns or Code 01 - Dependent?**
- **On Day 1 there is no mention of sit to stand noted in documentation. On day 2 documentation reports that the patient requires partial/moderate assistance of 1 (Code 03) and later that day the therapy note shows that the patient required the assistance of two people to stand. How would this scenario be coded? Does any source take priority? Do I look at all three days and select usual performance from all sources?**

Answer 9: At Admission, the self-care or mobility performance code is to be based on a functional assessment that occurs at or soon after the patient's admission, and reflects the patient's baseline ability to complete the activity prior to the benefit of services provided by your facility staff.

"Prior to the benefit of services" means prior to provision of any care by your facility staff that would result in more independent coding.

When the baseline function code differs from the usual performance during the assessment period, report the baseline function code.

If in your first scenario, the patient being unable to complete the sit to stand activity due to medical conditions or safety concerns represents their baseline ability, then code 88 - Not attempted due to medical condition or safety concerns.

In your second scenario, as in all admission scenarios, select the code that represents the patient's baseline ability to complete the activity as independently as possible as long as they are safe, prior to the benefit of services provided by your facility staff.

Added: December 2021

GG0130A

Question 1: How would the following scenario for GG0130A - Eating be coded: A patient was admitted and on day 1 required only setup assistance for eating. On day 2 the patient was transferred to an acute care hospital and returned on day 3 with an overall decline in status and was made NPO due to dysphagia. Would we code 05 - Setup or clean-up assistance based on initial ability or 88 - Not attempted due to medical conditions or safety concerns because this is the new baseline following the decline?

Answer 1: The intent of GG0130A - Eating is to assess the patient's ability to use suitable utensils to bring food and/or liquid to the mouth and swallow food and/or liquid once the meal is placed before the patient.

At admission, the performance code is to reflect the patient's baseline ability to complete the activity, prior to the benefit of services provided by your facility staff.

In the scenario provided, use Code 05 - Setup or clean-up assistance for GG0130A - Eating if this represents the patient's baseline status.

Only use an "activity not attempted" code if the patient was not able to complete the activity prior to the benefit of services and the performance code cannot be determined based on patient/caregiver report, collaboration with other facility staff, or assessment of similar activities.

Added: December 2020

Question 2: How would you code GG0130A - Eating for a patient who has been on tube feeding for years but is able to drink water independently?

Answer 2: The intent of GG0130A - Eating is to assess the patient's ability to use suitable utensils to bring food and/or liquid to the mouth and swallow food and/or liquid once the meal is placed before the patient. For a patient taking only fluids by mouth, the item may be coded based on ability to bring liquid to mouth, once the drink is placed in front of the patient.

When coding activities in Section GG, clinicians should code based on the patient's baseline ability during the 3-day assessment period. Allow the patient to perform the activity as independently as possible, as long as the patient is safe, regardless of the food consistency and regardless of how the patient performed the activity prior to the current illness, exacerbation, or injury.

In the scenario, if the patient is independently taking liquids by mouth, code 06 - Independent.

Added: March 2021

GG0130B

Question 1: A helper gathers and sets out the patient's oral hygiene items. The patient is able to brush their teeth with steady assist from a helper while standing at the sink. What is the code for oral hygiene?

Answer 1: The intent of GG0130B - Oral hygiene is to determine the patient's ability to use suitable items to clean teeth. Dentures (if applicable): The ability to insert and remove dentures into and from the mouth, and manage denture soaking and rinsing with use of equipment.

When coding activities in Section GG, clinicians should code based on the type and amount of assistance required to complete the activity, allowing the patient to perform the activity as independently as possible, as long as they are safe.

In your scenario, if the patient standing at the sink requiring steady assistance to brush their teeth represents the patient performing the activity as independently as possible, then code 04-Supervision or touching assistance for GG0130B - Oral hygiene.

Added: September 2020

GG0130C

Question 1: A patient used a bedpan for both bowel and bladder and was able to lift and lower her hospital gown (no brief or underwear were stated to be present), and the patient was not able to perform any of her own perineal hygiene for bowel or bladder. How is Toileting hygiene coded?

Answer 1: The intent of GG0130C - Toileting hygiene is to assess the patient's ability to maintain perineal hygiene and adjust clothes before and after voiding or having a bowel movement.

In your scenario, code GG0130C - Toileting hygiene based on the type and amount of assistance required to complete the ENTIRE activity, including toileting hygiene and adjusting any clothing relevant to the individual patient (in this case lifting and lowering the hospital gown). If, in the assessing clinician's clinical judgment, the patient required a helper to provide less than half the effort, then code 03-Partial/moderate assistance; or if the patient required the helper to provide more than half the effort code 02-Substantial/maximal assistance.

Added: September 2020

Question 2: If a patient is admitted to an LTCH with a Foley catheter and does not have a bowel movement during the 3-day assessment period how should GG0130C - Toileting hygiene be coded? Would it be Code 88 - Not attempted due to medical conditions or safety concerns or can the nurse code the activity based on how much assistance the patient requires to manage the Foley bag?

Answer 2: The intent of GG0130C - Toileting hygiene is to assess the patient's ability to maintain perineal hygiene and adjust clothes (including undergarments and incontinence briefs) before and after voiding or having a bowel movement.

The toileting hygiene activity can be assessed and coded regardless of the patient's need to void or have a bowel movement.

If a patient has a Foley catheter, toileting hygiene includes perineal hygiene to the indwelling catheter site. It does not include management of the equipment.

If the patient has an indwelling urinary catheter and has bowel movements, code the toileting hygiene item based on the type and amount of assistance needed by the patient before and after moving his or her bowels. This may necessarily include the need to perform perineal hygiene to the indwelling urinary catheter site after the bowel movement.

If a patient manages an ostomy, include wiping the opening of the ostomy or colostomy bag but not managing equipment for GG0130C - Toileting hygiene.

Added: June 2021

Question 3: How should GG0130C - Toileting hygiene be coded if a patient requires different types and amount of assistance after voiding versus after having a bowel movement?

Answer 3: The intent of GG0130C - Toileting hygiene is to assess the patient's ability to maintain perineal hygiene and adjust clothes (including undergarments and incontinence briefs) before and after voiding or having a bowel movement.

When the patient requires different levels of assistance to perform toileting hygiene after voiding vs. after a bowel movement, code based on the type and amount of assistance required to complete the ENTIRE activity. This is true even in scenarios where GG0130C - Toileting hygiene is not completed entirely during one clinical observation.

Added: June 2021

Question 4: I understand that if a helper provides setup before toileting hygiene or clean-up after, and the patient completes the activity of toileting hygiene without additional assistance, the correct code is 05 - Setup or clean-up assistance.

What would the correct code be if a helper provided assistance (contact guard or touching assistance) to the patient as the patient gathered their incontinence products but then the patient completed the toileting hygiene activity without further assistance?

Answer 4: The intent of GG0130C - Toileting hygiene is to assess the patient's ability to maintain perineal hygiene and adjust clothes (including undergarments and incontinence briefs) before and after voiding or having a bowel movement.

It is not the type of assistance that is provided that determines the 05 - Setup or clean-up assistance code but rather when (related to the completion of the activity) the needed assistance is provided.

If the assistance provided is necessary only before or after the activity is completed, and no assistance is needed during the completion of the activity, select Code 05 - Setup or clean-up assistance.

Added: December 2021

GG0170

Question 1: If a patient is dependent for all GG bed mobility activities would it be acceptable to code the patient as dependent for all other GG mobility activities even if those activities were not specifically assessed?

Answer 1: At Admission, the mobility performance code is to reflect the patient's baseline ability to complete the activity, and is based on observation of activities, to the extent possible. Clinicians may assess the patient's performance based on direct observation (preferred) as well as reports from the patient and/or family, assessment of similar activities, collaboration with other facility staff, and other relevant strategies to complete all GG items.

Each LCDS item should be considered individually and coded based on the guidance provided for that item.

It is important to determine whether the appropriate code for each GG activity is a performance code (including 01 - Dependent) vs. an "activity not attempted" code.

It is also important to note that a helper cannot complete the walking activities for a patient. The walking activities cannot be considered completed without some level of patient participation that allows patient ambulation to occur the entire stated distance. For instance, if even with assistance a patient was not able to participate in walking a distance of 10 feet, an "activity not attempted" code (rather than 01 - Dependent) would be selected.

Added: December 2020

GG0170C

Question 1: How do we code lying to sitting on side of bed for a bilateral amputee not wearing their prosthetics, since the definition states "with feet on floor"?

Answer 1: If the patient with a unilateral (or bilateral) lower extremity amputation does not have or is not wearing a prosthesis (or prostheses), use clinical judgment to determine if the patient completes the activity (Lying to sitting on side of bed without back support). Code the activity based upon the type and amount of assistance the patient requires to safely complete the activity.

Added: September 2020

GG0170E

Question 1: We understand that verbal cueing during a task should fall under the score of 04-Supervision or touching assistance. Our question is can a verbal cue provided prior to the task be considered set up as long as no further cues were provided during the actual task?

A specific example we just encountered was during the “chair/bed to chair transfer” activity. The therapist cued the patient prior to the activity where to place their hand for stability (in a novel environment), and then the patient completed all of the activity safely and without further cues or assistance. Is this Code 05-Setup or Code 04-Supervision?

Answer 1: When assessing self-care and mobility activities, allow the patient to complete each activity as independently as possible, as long as he/she is safe. At admission, the self-care or mobility performance code is to reflect the patient’s baseline ability to complete the activity prior to benefit of services provided by your facility/staff. This may be achieved by having the patient attempt the activity prior to providing any instruction that could result in a more independent code, and coding based on the type and amount of assistance required.

Communicating the activity request (e.g., “Can you stand up from the toilet?”) would not be considered verbal cueing. If additional prompts are required in order for the patient to safely complete the activity (“Push down on the grab bar,” etc.), the assessing clinician may need to use clinical judgment to determine the most appropriate code, utilizing the Coding Section GG Activities Decision Tree.

In the scenarios described, assuming the verbal cues were only provided prior to the benefit of services and were required, and no other assistance was needed in order for the patient to complete the activity safely, then the verbal cues would be considered 05-Setup.

Added: September 2020

Question 2: We have a patient who at discharge requires max assistance to perform a transfer, so is coded as 02 - Substantial/maximal assistance for GG0170E - Chair/bed-to-chair transfer. This maximal assist transfer will not be safe for the patient and elderly family to attempt once at home, so two family members will be using a Hoyer lift to transfer the patient from bed to chair. At discharge, would the correct code for GG0170E be 02 - Substantial/maximal assistance, based on the patient’s performance in the facility; or would the correct code be 01 - Dependent, because that is what the patient’s “usual” status will be at home?

Answer 2: The intent of GG0170E - Chair/bed-to-chair transfer is to assess the patient’s ability to transfer to and from a bed to a chair (or wheelchair).

When assessing self-care and mobility activities, allow the patient to complete each activity as independently as possible, as long as he/she is safe.

If the patient performed the activity during the discharge assessment period, code based on that assessment. Use the GG 6-point scale codes to identify the patient's usual performance on the discharge assessment.

If in your scenario, at discharge, when allowed to complete the activity as independently as possible, the patient was able to safely complete the transfer activity with max assist, then code 02 - Substantial/maximal assistance.

Added: December 2020

GG0170F

Question 1: If a patient gets up off the side of the bed, walks to the bathroom, and then sits down on the toilet, is the effort necessary to lift up off the bed considered for coding GG0170F - Toilet transfer?

Answer 1: The intent of GG0170F - Toilet transfer is to assess the patient's ability to get on and off a toilet (with or without a raised toilet seat) or commode once the patient is at the toilet or commode.

In the scenario described, the effort necessary to lift up off the bed does not count toward the toilet transfer in GG0170F - Toilet transfer.

Added: September 2020

Question 2: A patient completes a toilet transfer requiring only supervision. As he was ambulating with contact guard assistance back to his bed he lost his balance and required assistance to steady himself. Would the contact guard assist and assistance to steady himself be considered in determining the performance code for GG0170F - Toilet transfer?

Answer 2: The intent of GG0170F - Toilet transfer is to assess the patient's ability to get on and off a toilet (with or without a raised toilet seat) or commode once the patient is at the toilet or commode.

In the scenario described, the assistance provided while ambulating to or from the toilet should not be considered when coding the GG0170F - Toilet transfer activity.

Added: December 2020

Question 3: In the recent September Quarterly Q&A publication, it indicates that "assessment of similar activities" is acceptable for coding the LCDS. Please provide clarification on if the following scenarios would be acceptable simulations for the GG0170F - Toilet transfer activity in situations where a patient does not need to use the toilet during an assessment:

- 1. An Occupational Therapist (OT) takes the patient to the toilet and simulates a toileting experience, with patient pulling down pants and transferring onto the toilet and then back to the chair.**

2. **Using the functional performance of the patient's Chair/bed-to-chair transfer performance code to code toilet transfer.**
3. **Using the functional performance of the patient's ability to transfer on and off a bedside commode in the therapy gym to code toilet transfer.**

Answer 3: The intent of GG0170F - Toilet transfer is to assess the patient's ability to get on and off a toilet or commode. Do not consider or include GG0130C - Toileting hygiene item tasks (managing clothing, undergarments, or perineal hygiene) when coding the toilet transfer item. The toilet transfer activity can be assessed and coded regardless of the patient's need to void or have a bowel movement in conjunction with the toilet transfer assessment.

Use clinical judgment to determine if each situation described adequately represents the patient's ability to transfer on and off the toilet or commode. If the clinician determines that this observation is adequate, code based on the type and amount of assistance the patient requires to complete the activity.

In each scenario, if the patient was not able to transfer on/off the toilet or commode and the performance code cannot be determined based on patient/caregiver report, collaboration with other facility staff, or assessment of similar activities, use the appropriate "activity not attempted" code.

Added: December 2020

GG0170I, GG0170J, GG0170K

Question 1: Many of our patients with a stroke ambulate with PT along a railing mounted in the hall. We understand that walking/transferring in the parallel bars would not be used to code the GG activities. Could coding be based on the patient walking in the hallway if using a railing as a support?

Answer 1: The intent of the walking items (GG0170I, GG0170J, GG0170K) is to assess the patient's ability to ambulate once in a standing position.

As noted in your question, you would not code self-care and mobility activities with use of a device that is restricted to patient use during therapy sessions (e.g., parallel bars, exoskeleton, or overhead track and harness systems). Note that while a patient may use a hallway railing during therapy sessions, its use would not be restricted to therapy sessions only and therefore does not meet the definition described above.

CMS does not provide an exhaustive list of assistive devices that may be used when coding self-care and mobility performance. Other than the exceptions listed above, clinical assessments may include any device or equipment (including a hallway railing) that the patient can use to allow them to safely complete the activity as independently as possible.

Added September 2020

Question 2: If a patient requires a therapist to provide steadying assistance/contact guard assist and manage an oxygen tank while the patient is ambulating how would the walking activities be coded?

Answer 2: The intent of the GG0170 walking items is to assess the patient's ability once standing to safely walk the stated distances and circumstances in each item.

If the helper is required to manage the oxygen tank and/or oxygen tubing and/or provide steadying assistance/contact guard, to allow the patient to complete an activity safely, then code 04 - Supervision or touching assistance.

Added: March 2021

Question 3: At discharge, if it is not recommended that a patient ambulate when they return home because it is not functional for them or if a discharge goal was not selected for an activity, should the GG walking activities still be assessed and coded with a performance code or should an "activity not attempted" code be used?

Answer 3: Assessment of the GG self-care and mobility items is based on the patient's ability to complete the activity with or without assistance and/or a device. This is true regardless of whether or not the activity is being/will be routinely performed (e.g., walking may be assessed for a patient who did/does/will use a wheelchair as their primary mode of mobility).

At discharge, code based on the patient's ability to complete each activity regardless of whether a goal was established for that activity at admission.

If the patient is able to complete a walking activity with the assistance of one or two people, code based on the type and amount of assistance required even if walking is not being recommended or used as a functional mode of mobility.

If based on the guidance stated above, you are unable to determine the patient's discharge ability in conjunction with all current discharge assessment findings or the patient is not able to complete a walking activity safely even with the assistance of two people, code using the appropriate "activity not attempted" code.

Added: June 2021

GG0170I

Question 1: Can you give some clarification regarding scoring a performance with the help of a second person (if this second person is helping push an oxygen tank, IV pole, or wheelchair following the patient) because the first helper is physically assisting the patient during the walking activity? Both helpers are needed to complete the activity safely. The IRF-PAI manual says "if two or more helpers are required to assist the patient to complete the activity, code as 01, Dependent."

Answer 1: The intent of the GG0170 walking items is to assess the patient's ability once standing to safely walk the stated distances and circumstances in each item.

You are correct that if a patient requires the assistance of two helpers to complete an activity (one to provide support to the patient and a second to manage the necessary equipment to allow the safe walk), Code 01 - Dependent is the appropriate code.

If a single helper only manages the oxygen tank or the IV pole and otherwise the patient needs no assistance to safely complete the walking activity, code the walking activity as 04 – Supervision or touching assistance. This is because the helper is required to be present during the activity for the patient to complete the activity safely.

Added: September 2020

Question 2: How would you code a situation where the patient walks part of the distance, say 4 feet, and then the helper carries them the remaining distance to get to the 10 feet needed for GG0170I - Walk 10 feet? Would this be a Code 02-Substantial/maximal assistance because the helper is carrying the patient the majority of the distance? We understand that with the wheelchair activities a helper can complete the distance needed by pushing the patient in the wheelchair. Is this also true for the walking items?

Answer 2: The intent of the walking item GG0170I - Walk 10 feet is to assess the type and amount of assistance a patient requires to ambulate 10 feet once in a standing position.

Since a helper cannot complete a walking activity for a patient, the walking activities cannot be considered completed without some level of patient participation that allows patient ambulation to occur for the entire stated distance.

In your scenario, where the patient participates in walking 4 feet and then requires the helper to carry them for further distances, the activity walking 10 feet (GG0170I) is not considered completed. If the stated distance of 10 feet was not walked by the patient, with or without some level of assistance, GG0170I would be coded with one of the “activity not attempted” codes, for example 88-Not attempted due to the medical condition or safety concerns.

Each LCDS item should be considered individually and coded based on the guidance provided for that item.

Added: September 2020

GG0170Q

Question 1: We have a question regarding the appropriate scoring for an LTCH patient who does not use a wheelchair during the admission assessment, but then begins to use a wheelchair later during the LTCH stay. Our system software will not allow us to upload goals after the 3-day admission assessment has ended. When a patient does begin using a wheelchair later in the stay, would it be appropriate to go back to the initial wheelchair

assessment on the LCDS and change GG0170Q to “YES” and add the corresponding goals even though they were established after the admission assessment has ended?

Answer 1: The intent of GG0170Q - Does the patient use a wheelchair and/or scooter? is to document whether a patient uses a wheelchair or scooter at the time of the assessment. Only code 0-No if, at the time of the assessment, the patient does not use a wheelchair or scooter under any condition.

If, at the time of admission, GG0170Q is answered “No” correctly, and following the admission assessment period the patient begins to utilize a wheelchair, there is no need to update the admission performance and/or discharge goals for GG0170 activities on the admission LCDS. The gateway wheelchair item (GG0170Q1 and GG0170Q3) might not be coded the same on the admission and discharge assessments.

If, at the time of admission, GG0170Q was answered incorrectly then corrections to the admission LCDS should be made following Federal, State, and facility policy guidelines.

Added: September 2020

Question 2: If a patient utilizes a wheelchair for mobility and is able to wheel 50 feet with 2 turns but is unable to wheel 150 feet (code 07, 09, 10, 88), how should we code items GG0170S/SS1? There is not a skip pattern if one of the “activity not attempted” codes are used for GG0170S, and the guidance on the LCDS states for GG0170SS1 to “Indicate the type of wheelchair or scooter used.” Selecting one or the other does not feel logical but using a dash [-] impacts compliance with the LTCH QRP.

Answer 2: You are correct that there is no skip pattern for GG0170S/SS1 unless GG0170Q1 is answered “no.” However, for the wheelchair items, a helper can assist the patient to complete the activity or make turns if required. Therefore, if the patient is unable to wheel the entire distance with or without assistance the activity can still be completed, and a performance code can be determined based on the type and amount of assistance required to complete the entire activity.

If, in your scenario, the patient was unable to complete the 150 feet themselves, GG0170S - Wheel 150 feet could still be coded with a performance code based on the type and amount of assistance required to complete the entire activity. Then GG0170SS1 could indicate the type of wheelchair used.

Added: June 2021

GG0170R, GG0170S

Question 1: Regarding Section GG Wheelchair Items, does the activity of wheeling 50 feet with 2 turns need to be done independent of the activity of wheeling 150 feet?

Also the manual states the coding is based on an assessment completed before therapeutic intervention. Patients who had not used a wheelchair previously may not be able to complete both wheelchair activities. Would an “activity not attempted” code be used?

Answer 1: The intent of GG0170R - Wheel 50 feet with two turns is to assess the patient's ability, once seated in wheelchair/scooter, to wheel at least 50 feet and make two turns.

The intent of GG0170S - Wheel 150 feet is to assess the patient's ability, once seated in a wheelchair/scooter, to wheel at least 150 feet in a corridor or similar space.

Use clinical judgment to determine how the actual patient assessment of wheelchair mobility is conducted. If a clinician chooses to combine the assessment of multiple wheelchair activities, use clinical judgment to determine the type and amount of assistance needed for each individual activity.

At Admission, the performance code is to reflect the patient's baseline ability to complete the activity, prior to the benefit of services provided by your facility staff.

The patient may be assessed based on the first use of an assistive device or equipment that has not been previously used. The clinician would provide assistance, as needed, in order for the patient to complete the activity safely. The item would then be coded based on the type and amount of assistance required, prior to the benefit of services provided by your facility staff.

"Prior to the benefit of services" means prior to provision of any care by your facility staff that would result in more independent coding.

Introducing a new device should not automatically be considered as "providing a service". Whether a device used during the clinical assessment is new to the patient or not, use clinical judgment to code based on the type and amount of assistance that is required for the patient to complete the activity prior to the benefit of services provided by your facility.

Added: December 2020

GG0170S

Question 1: A patient was able to propel his wheelchair for 100 feet with moderate assistance. He was unable to go farther and the therapist pushed the wheelchair the rest of the way to the gym, which was a total of 150 feet. What score would you give this patient for GG0170S - Wheel 150 feet?

Answer 1: The intent of GG0170S - Wheel 150 feet is to assess the patient's ability, once seated in a wheelchair/scooter, to wheel at least 150 feet. If the patient is unable to complete the entire distance required for this activity, the assessing clinician can assist the patient to complete the activity, and code this item based on the type and amount of assistance required to complete the entire activity.

In your example, the patient completed wheeling 100 feet of the 150 feet with moderate assistance and required the helper to complete the remaining distance. Use clinical judgment to determine if the patient required the helper to provide less than half the effort (then code 03-Partial/moderate assistance) or if the patient required the helper to provide more than half the effort (then code 02-Substantial/maximal assistance).

Added: September 2020

Section H: Bladder and Bowel

H0350

Question 1: Please clarify the use of the code 4 - Always incontinent for H0350 - Bladder Continence. The coding instructions state that this code is used if during the 3-day assessment period the patient had no continent voids. What if during the 3-day assessment period the patient has no continent episodes because the patient was catheterized during some portion of the 3-day assessment period?

Answer 1: The intent of H0350 - Bladder Continence is to gather information on bladder continence. Code 4 - Always Incontinent is applicable when the patient had no continent voids and did not require the use of any type of catheter at any time during the 3-day assessment period.

Added: December 2020

Question 2: How would the following scenarios for H0350 - Bladder Continence be coded?

Scenario 1

Day 1: One intermittent catheterization, no other bladder episodes

Day 2: Foley was placed, no other bladder episodes

Day 3: Foley remained in place the entire day

Would this scenario be coded as 9 - Not applicable because the patient had a Foley in place for 2 of the 3 days or as 0 - Always Continent because there were no episodes of incontinence in between intermittent catheterization; even though there were no continent episodes either?

Scenario 2

Day 1: Intermittent catheterizations, no bladder episodes in between catheterizations

Day 2: Intermittent catheterizations, no bladder episodes in between catheterizations

Day 3: Intermittent catheterizations, no bladder episodes in between catheterizations

Answer 2: The intent of H0350 - Bladder Continence is to gather information on bladder continence. Incontinence refers to the involuntary loss of urine, when there is a loss of control of the evacuation of urine from the bladder, regardless of whether clothing or linens are soiled.

In both scenarios, if intermittent catheterization is used to empty the bladder and there are no episodes of incontinence between catheterizations, H0350 - Bladder Continence is coded 0 - Always continent (no documented incontinence). Code 09 - Not applicable would not apply for either scenario as the patient did not have a catheter in place for the entire 3-day assessment period.

Added: December 2020

H0400

Question 1: If a patient only has one bowel movement during the admission assessment period, and that bowel movement is incontinent, how would H0400 be coded? With the current verbiage in the LCDS manual, it meets the definition of two scores; Code 3 (because all bowel episodes were incontinent) and Code 1 (because the patient only had one bowel movement).

Answer 1: The intent of H0400 - Bowel Continence is to gather information on the frequency of bowel continence during the 3-day assessment period. Code 1-Occasionally incontinent should only be selected if during the 3-day assessment period the patient was incontinent for bowel movement once. This includes incontinence of any amount of stool at any time. Code 3-Always incontinent is selected if during the 3-day assessment period the patient was incontinent for all bowel movements (i.e., had no continent bowel movements).

If a patient has only one bowel movement that was incontinent during the 3-day assessment period, and there were no episodes of continent bowel movements, then code 3-Always incontinent.

Added: September 2020

Section K: Swallowing/Nutritional Status

K0200

Question 1: How should height be reported for item K0200A - Height for a patient with bilateral lower extremity amputations? Should their current height or their height prior to amputation be reported?

Answer 1: Item K0200A - Height records the most recent height of measurement for the patient. Measure the patient's height in accordance with the facility's policies and procedures, which should reflect current standards of practice (shoes off, etc.).

When reporting height for a patient with bilateral lower extremity amputations, measure and record the patient's current height (i.e., height after bilateral amputations).

Added: December 2020

Question 2: When entering a patient's height and weight on admission for item K0200 do the height and weight need to be measured while a patient is in the Long-Term Care Hospital? Can they be estimated per facility policies and procedures or can they be reported based on a height and weight obtained from documentation from another facility?

Answer 2: The intent of item K0200 - Height and Weight is to record the patient's most recent height since admission and record the patient's weight based on the most recent measure in the last 3 days. Only enter a height and weight that have been directly measured by your facility staff. Do not enter a height or weight that is self-reported or derived from documentation from another provider setting.

Added: March 2021

Question 3: If a patient's height and/or weight was not measured within the 3-day admission assessment period for K0200 is it okay to use a height and/or weight that was measured day 5?

Answer 3: In order to be compliant, the admission assessment must be completed by the end of the 3-day assessment period (i.e., midnight of the third calendar day). If a patient's height and/or weight cannot be measured during the 3-day assessment period enter a dash (–) to indicate “no information” for K0200A - Height and/or K0200B - Weight. CMS expects dash use to be a rare occurrence.

Added: June 2021

Section M: Skin Conditions

M0210, M0300

Question 1: How would the following scenario be coded: A patient is admitted to a facility with one deep tissue injury (DTI) on the sacrum. A second DTI develops during the stay. A week after admission the patient is discharged emergently and does not return to the facility. Upon completion of the discharge assessment it is determined that there was no skin assessment completed during the 3-day discharge window but one was completed 3 days prior to discharge. How would M0210 - Unhealed Pressure Ulcers/Injuries and M0300 – Current Number of Unhealed Pressure Ulcers/Injuries at Each Stage be coded?

Answer 1: In the scenario described it appears that the stages of the two pressure ulcers/injuries are known from 3 days prior to discharge but a full skin assessment has not been completed within the 3-day assessment period. If using this information in conjunction with all current discharge assessment findings you are able to determine the appropriate stage of the pressure ulcers/injuries, then code Section M based on this information. If there is no information available enter a dash (-) for M0210 - Unhealed Pressure Ulcers/Injuries and M0300 - Current Number of Unhealed Pressure Ulcers/Injuries at Each Stage.

Added: March 2021

M0300

Question 1: I am seeking guidance on how to complete the LCDS accurately in this scenario. Patient is admitted with an Unstageable - Deep Tissue Injury on his right heel. On Discharge, the nurse's assessment of the patient right heel was that DTI had become Unstageable - due to the presence of eschar. How do we code M0300 at Discharge?

Answer 1: For each pressure ulcer/injury observed at Discharge, consider current and historical levels of tissue involvement. Discharge coding for the scenario described is dependent upon the clinical progression of the wound during the LTCH stay.

If the DTI noted at admission does not evolve to be numerically stageable and becomes unstageable due to eschar or slough at the time of Discharge, code at Discharge as follows:

M0300F1. Unstageable - Slough and/or eschar = 1

M0300F2. Unstageable - Slough and/or eschar = 1

M0300G1. Unstageable - Deep tissue injury = 0

M0300G2. Unstageable - Deep tissue injury = skip

However, any pressure ulcer/injury that is observed to be unstageable due to slough and/or eschar at the time of Discharge, but was previously numerically stageable, is considered new, and not coded as present at admission on the Discharge assessment.

Added: September 2020

Question 2: Is a pressure ulcer that was present when the first skin assessment was completed then healed during the stay and reopened at the same stage or less during the same stay, considered “present on admission” when completing the discharge assessment?

Answer 2: If a patient has a pressure ulcer that was documented on admission, and at discharge is documented at the same stage, it would be considered as “present on admission.” This guidance is true even if during the stay the original pressure ulcer healed and reopened.

In addition to coding the pressure ulcer as “present on admission,” a previously closed pressure ulcer that opens again should be reported at its worst stage.

Added: December 2020

Question 3: A patient is admitted Monday evening by the admissions nurse and no pressure ulcers/injuries are documented at that time. The next day the wound nurse assesses the patient’s spinal incision and notices a stage 2 pressure ulcer on coccyx. Is this pressure ulcer considered “present on admission” or facility acquired?

Answer 3: The intent of the items in Section M - Skin Conditions is to document the presence, appearance, and change of pressure ulcers/injuries.

The first skin assessment was conducted on Monday and no pressure ulcer was identified. Then during a subsequent skin assessment a pressure ulcer was identified. In this case the pressure ulcer would not be reported at admission or considered “present on admission”.

The pressure ulcer items should be coded based on findings from the first skin assessment that is conducted on or after, and as close to the admission as possible.

Added: December 2020

Question 4: I am looking for clarification in regard to coding of a wound. A patient is admitted with a Deep Tissue Injury (DTI). During the stay the DTI opens, and at discharge presents as two distinct openings, each appearing as a stage 3 pressure ulcer. For the discharge LCDS should the wound be coded as one DTI - “present on admission” or as two stage 3 pressure ulcers - also “present on admission”?

Answer 4: If at discharge the patient has two stage 3 pressure ulcers, code M0300C1 - Number of Stage 3 pressure ulcers as 2. Assuming no other pressure ulcers/injuries are present at discharge, M0300G1 - Unstageable Pressure Injuries Presenting as Deep Tissue Injury = 0.

If both stage 3 pressure ulcers present at discharge evolved from the DTI that was present at admission they would be considered “present on admission” and M0300C2 - Number of these Stage 3 pressure ulcers that were present upon admission = 2. This is because they were both numerically staged as a stage 3 when first numerically stageable.

Added: September 2021

Question 5: I have a question about the current guidance that states: If a pressure ulcer/injury is surgically closed with a flap or graft, it should be considered a surgical wound and not a pressure ulcer/injury. If the flap or graft fails, it should still be considered a surgical wound until healed.

Is this in reference to ANY point in time that the flap/graft fails? For example, if the area of flap/graft has been 100% re-epithelized greater than 30 days and patient subsequently develops a wound due to pressure at the site of the original flap/graft, would it be still considered failed surgical site or would it be considered a pressure ulcer/injury?

Answer 5: If a pressure ulcer was closed with a skin graft, the surgical wound healed, and another wound forms in the same anatomical location due to pressure, then this would be considered a pressure ulcer/injury. Note it should be staged at the highest stage the pressure ulcer/injury was prior to closure, unless currently presenting at a higher stage or unstageable.

Added: December 2021

Section N: Medications

N2005

Question 1: Can the response for N2005 - Medication Intervention be determined at any time during the discharge window (day of discharge and 2 calendar days preceding the day of discharge) or does this item need to be completed on the day of discharge?

Answer 1: The intent of N2005 - Medication Intervention is to indicate if the facility contacted and completed physician (or physician-designee) prescribed/recommended actions by midnight of the next calendar day each time potential clinically significant medication issues were identified since the admission.

In order to report on all potential clinically significant medication issues, N2005 should be completed at the time of discharge.

Added: September 2021