

**Inpatient Rehabilitation Facility
Patient Assessment Instrument (IRF-PAI)
Quarterly Q&As**

September 2021

Consolidated June 2020 to September 2021



Introduction

The Centers for Medicare & Medicaid Services (CMS) is publishing the Inpatient Rehabilitation Facility Patient Assessment Instrument (IRF-PAI) Quarterly Q&As, so that all IRF providers have the benefit of the clarifications to existing guidance. Through inquiries to the IRF Post-Acute Care (PAC) Quality Reporting Program (QRP) Help Desk, CMS identifies the opportunity to clarify or refine guidance.

New Q&As Added in September 2021

1. GG0130, GG0170

[Question 9](#)

2. M0300

[Question 4](#)

3. N2005

[Question 1](#)

*This document is intended to provide guidance on IRF-PAI 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Responses contained in this document may be superseded by guidance published by CMS at a later date.*

Consolidated Table of Contents

Introduction.....	i
New Q&As Added in September 2021	i
Quality Indicators (QI): General Questions	1
Section A: Administrative Information	2
25A, 26A	2
25A.....	2
44D.....	3
Section C: Cognitive Patterns	4
Brief Interview for Mental Status (BIMS) C0100, C0200, C0300, C0400, C0500	4
Section GG: Functional Abilities and Goals.....	5
GG0100C.....	5
GG0100C, GG0170M, GG0170N, GG0170O.....	5
GG0100, GG0110	6
GG0110	6
GG0130, GG0170	7
GG0130A	11
GG0130B.....	13
GG0130C.....	13
GG0130E.....	15
GG0130F, GG0130G, GG0130H	16
GG0130G, GG0130H.....	17
GG0130G	17
GG0130H	18
GG0170	19
GG0170C.....	20
GG0170E.....	20
GG0170F	21
GG0170G	22
GG0170I, GG0170J, GG0170K, GG0170L.....	26
GG0170I.....	27

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GG0170M, GG0170N, GG0170O	28
GG0170M.....	29
GG0170N, GG0170O	30
GG0170P	30
GG0170Q	31
GG0170R, GG0170S.....	32
GG0170S.....	33
Section H: Bladder and Bowel.....	34
H0350	34
H0400	35
Section K: Swallowing/Nutritional Status	36
K0110	36
Section M: Skin Conditions	37
M0210, M0300.....	37
M0300.....	37
Section N: Medications	39
N2005	39

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Quality Indicators (QI): General Questions

Question 1: If a patient is admitted to an IRF on Monday but has to be transferred back to the acute care hospital the next day (Tuesday) and then returns to the IRF on Thursday, we know that this is considered a program interruption and the ARD date would be updated to reflect the days the patient was not in the IRF. 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 QI items?

Answer 1: If the patient has a program interruption, the discharge date is not included as one of the 3 calendar days used to calculate the ARD, however the assessment data gathered on the discharge date (the day the patient is admitted to Acute Care from the IRF) may be used to code the admission QI items.

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

Added: June 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 IRF-PAI 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 IRF-PAI 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 A: Administrative Information

25A, 26A

Question 1: When entering a patient’s height and weight on admission for items 25A and 26A do the height and weight need to be measured while a patient is in the Inpatient Rehabilitation Facility? 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 1: The intent of item 25A - Height on admission is to record the patient’s most recent height. The intent of item 26A - Weight on admission is to record the initial weight measurement for the patient. 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 2: If a patient’s height and/or weight was not measured within the 3-day admission assessment period for 25A - Height on admission and 26A - Weight on admission, is it okay to use a height and/or weight that was measured day 5?

Answer 2: 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 25A - Height on admission and/or for 26A - Weight on admission. CMS expects dash use to be a rare occurrence.

Added: June 2021

25A

Question 1: How should height be reported for item 25A - Height on admission for a patient with bilateral lower extremity amputations? Should their current height or their height prior to amputation be reported?

Answer 1: Item 25A - Height on admission 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

44D

Question 1: We had a patient who transferred from our IRF to the COVID Field Hospital in our area. Would the discharge disposition be Acute Care Hospital?

Answer 1: We interpret your question to be about Item 44D – Discharge disposition in the IRF-PAI. The two discharge dispositions that potentially apply are:

- **Short-term General Hospital** – refers to a short-term acute care hospital
- **Critical Access Hospital (CAH)** – used to identify an admission/transfer to a critical access hospital for inpatient care

If a field hospital is operating as an extension of a Medicare participating hospital (operating as a mobile unit), as long as the mobile unit complies with all the hospital conditions of participation (including the Life Safety Code), and the provider-based rules (including remaining within 35 miles of the main provider), and meets the provider-based regulations in 42 C.F.R. § 413.65, the mobile unit uses the associated main hospital’s provider number. Item 44D is coded based on the classification of the main hospital and the definitions above.

If the mobile unit does not meet these criteria, it is treated as a freestanding clinic and item 44D is scored as 99 – Not listed.

Added: September 2020

Section C: Cognitive Patterns

Brief Interview for Mental Status (BIMS) C0100, C0200, C0300, C0400, C0500

Question 1: Is it allowable to use the BIMS information that was completed on days 4, 5, 7 or 8 on patients to complete the IRF-PAI or would we dash the BIMS items since it was not completed during the 3-day admission assessment period?

Answer 1: The Brief Interview for Mental Status (BIMS) should be attempted with all patients during the 3-day admission assessment period.

If the patient should have been interviewed but the facility did not complete the interview during the 3-day assessment period, respond 1-Yes to C0100 – Should Brief Interview for Mental Status (C0200-C0500) Be Conducted?, and enter dashes for C0200 through C0500. Then complete the staff observation items (C0600 and C0900) using information in the medical record or interviews with IRF staff reflecting the patient status during the first 3 days of the stay.

Only answer 0-No to C0100 if the interview should not have been attempted because the patient was rarely/never understood, could not respond verbally or in writing, or an interpreter was needed but not available.

Added: June 2020

Section GG: Functional Abilities and Goals

GG0100C

Question 1: How should GG0100C - Prior functioning: Everyday Activities Stairs be coded if a patient uses a ramp to enter their home and does not use any other stairs?

Answer 1: GG0100C - Prior functioning: Everyday Activities Stairs, identifies the patient's need for assistance with internal or external stairs (with or without a device such as a cane, crutch, walker, railing, or stair lift) prior to the current illness, exacerbation, or injury.

The activity being assessed in GG0100C is going “up and down the stairs.” A ramp is not considered stairs for coding GG0100C.

If the patient was able to go up and down stairs prior to the current illness, exacerbation, or injury, code based on the amount of assistance the patient required to complete the activity.

If, even with assistance and/or devices, the patient was not able to go up and down stairs prior to the current illness, exacerbation, or injury, code 9 - Not Applicable.

Added: June 2021

GG0100C, GG0170M, GG0170N, GG0170O

Question 1: We have a patient who used a stair lift to get from one level to another in her home prior to admission to our IRF.

How would this be coded for both prior function and for admission performance? Would Code 09 - Not applicable be appropriate; or would another code best fit this scenario?

Answer 1: GG0100C - Prior Functioning: Everyday Activities Stairs identifies the patient's need for assistance with internal or external stairs prior to the current illness, exacerbation, or injury.

Completing the stair activity for GG0100C indicates that a patient went up and down the stairs, by any safe means, with or without handrails or assistive devices or equipment including a stair lift, and/or with or without some level of assistance.

For GG0170M - 1 Step (Curb), GG0170N - 4 Steps, and GG0170O - 12 Steps, completing the stair activities indicates that a patient goes up and down the stairs, by any safe means, with or without any assistive devices (including cane, walker, railing, or stair lift) and with or without some level of assistance. Going up and down stairs by any safe means includes the patient walking up and down stairs on their feet or bumping/scooting up and down stairs on their buttocks.

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

Added: June 2021

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: June 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: June 2020

Question 3: I am seeking clarification on how to accurately code the admission assessments for Section GG0130 Self-care and GG0170 Mobility when a patient leaves AMA before the admission assessment is completed.

Question # 17 of the CMS document “*Inpatient Rehabilitation Facility Quality Reporting Program (IRF QRP) Questions and Answers, Current as of October 2019*” regarding incomplete stays asked “What if the patient is discharged before we complete the admission assessment?” A portion of the answer stated that for “GG0130 - Self-Care and GG0170 - Mobility: Admission Self-Care and Mobility Performance - Code to the best of your abilities. If you are unable to assess the patient because of medical issues, enter Code 88, Not assessed due to medical condition or safety issues.” This seems to take into consideration when the patient is discharged back to the acute care unit due to a medical condition but not when a patient leaves AMA before the admission assessments are completed.

Would it be appropriate to use Code 07-Patient refused if an assessment was not done because of the patient leaving AMA?

Answer 3: Patients who meet the criteria for incomplete stays include patients who are discharged to an acute care setting (such as short-stay acute hospital, critical access hospital, inpatient psychiatric facility, or long-term care hospital), patients who die while in the IRF, patients who leave the IRF against medical advice (AMA), and patients with a length of stay less than 3 days.

If the patient's IRF stay is less than 3 days, and ends before the admission assessment was completed, code GG0130 and GG0170 performance to the best of your abilities. If the patient refused rehab at the IRF and left AMA before the admission assessment was completed, use Code 07 - Patient refused.

Added: June 2020

Question 4: The IRF-PAI 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 4: 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: June 2020

Question 5: 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 QI 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 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.

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.

"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/staff.

Communicating the activity request (i.e., “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: June 2020

Question 6: 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 IRF-PAI: Code 88 - Not attempted due to medical condition or safety concerns, or one of the performance codes, 01-06?

Answer 6: 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 7: 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 7: 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 8: 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 8: 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

[NEW] Question 9: 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 9: 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

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: A patient is admitted to an Inpatient Rehabilitation Facility (IRF) with quadriplegia from a previous spinal cord injury. Once an occupational therapist applies a universal cuff to the patient's hand, the patient is able to eat the entire meal without further assistance. What is the performance code for GG0130A - Eating? Would this scenario be similar to the rationale for a Foley catheter that is coded as 04 - Supervision or touching assistance for lower body dressing, because someone had to help thread the tubing so that it was safe to perform the task?

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.

In the scenario provided, if the patient only requires assistance to apply a universal cuff and no further assistance is required during the eating activity, then code 05 - Setup or clean-up assistance. This is because assistance is only required prior to or following the activity, but not during the activity.

Regarding the Foley catheter guidance referenced, Code 05 - Setup or clean-up assistance would not be appropriate for that specific scenario. The helper is managing the catheter **during** the activity of lower body dressing and not only before or after the activity.

Added: December 2020

Question 3: 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 3: 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: June 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: June 2020

Question 2: If a patient is admitted to an IRF 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

GG0130E

Question 1: If a patient is accustomed to washing their face when they perform grooming tasks and they do not wash their face again while bathing the rest of their body at another time during the day, is it acceptable to combine information to score bathing for item GG0130E?

Answer 1: The intent of GG0130E - Shower/bathe self, is to assess the patient's ability to bathe self, including washing, rinsing, and drying self (excludes washing of back and hair). The activity does not include transferring in/out of tub/shower.

When a GG self-care activity is not completed entirely during one clinical observation (i.e., a patient washes their body in the shower and washes their face at the sink), then code based on the type and amount of assistance required to complete the ENTIRE bathing activity.

Added: June 2020

Question 2: We have a patient who agreed to shower with OT on day 2 of admission but would not let the OT help her at all after the tub transfer. The only thing the patient did was wet her body and wash her abdomen. She would not let the therapist complete tasks for thoroughness and cleaning. Could she still be coded as 03 - Partial/moderate assistance because she completed less than half the tasks? OT does not want to put her at supervision level because she did not perform well.

Answer 2: The intent of GG0130E - Shower/bathe self, is to assess the patient's ability to bathe self, including washing, rinsing, and drying self (excludes washing of back and hair). The activity does not include transferring in/out of tub/shower.

If the patient only wets her body and washes her abdomen and does not have a complete bath during the entire 3-day assessment period, use clinical judgment to determine if the assessment based on the partial bath can represent the patient's bathing ability. If so, code the bathing activity based on the type and amount of assistance the patient required to complete the partial bath.

If, using clinical judgment, it is determined that the partial bath does not represent the patient's ability to shower/bathe 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: June 2020

Question 3: For a patient who stood while showering prior to this illness, should we now be assessing and scoring showering/bathing based on the patient's status standing?

Answer 3: The intent of GG0130E - Shower/bathe self, is to assess the patient's ability to bathe self, including washing, rinsing, and drying self (excludes washing of back and hair). The activity does not include transferring in/out of tub/shower.

When coding any of the self-care or mobility activities in Section GG, clinicians should code what occurs at the time of the assessment and allow the patient to perform the activity as independently as possible, as long as the patient is safe, regardless of how the patient performed the activity prior to the current illness, exacerbation, or injury.

Added: June 2020

Question 4: For GG0130E - Shower/bathe self, does the shower/bathing have to be an actual wet shower or bath, or can a simulated performance be scored?

Answer 4: The intent of GG0130E - Shower/bathe self is to assess the patient's ability to wash, rinse, and dry self (excluding washing of back and hair), regardless of where the bathing takes place. It does not include transferring in/out of a tub/shower, or onto or off a tub bench.

Coding of an activity may be based on observation, patient/caregiver report, collaboration with other facility staff, or assessment of similar activities.

Use clinical judgment to determine if simulating the shower/bath allows the clinician to adequately assess the patient's ability to complete the activity of shower/bathe self (GG0130E). If the clinician determines that this observation is adequate, code based on the type and amount of assistance required to complete the shower/bathing activity.

Added: September 2020

Question 5: If a patient requires assistance only to cover a brace/port/wound prior to a shower, but is able to bathe (wash, rinse, and dry) without assistance from a helper, how would GG0130E - Shower/bathe self be coded?

Answer 5: The intent of GG0130E - Shower/bathe self is to assess the patient's ability to bathe self, including washing, rinsing, and drying self (excludes washing of back and hair). Does not include transferring in/out of tub/shower.

If the only help a patient requires is assistance to cover wounds or devices for water protection during bathing, then code 05 - Setup or clean-up assistance.

Added: December 2020

GG0130F, GG0130G, GG0130H

Question 1: A patient can dress her upper body, except for requiring assistance with her bra clasp. Should the code be 04-Supervision or touching assistance, or 03-Partial/moderate assistance?

Answer 1: If a patient requires assistance with dressing including assistance with any type of fasteners (e.g. with buttons, zippers and/or fastening a bra) code based on the type and amount of assistance required to complete the entire upper body dressing activity. If a patient requires assistance with fasteners and a helper provides less than half the effort code 03 - Partial/moderate assistance. Note that this is a change from previous guidance that considered buttons and/or

fasteners as incidental help, which was previously coded as 04 - Supervision or touching assistance.

Added: June 2020

GG0130G, GG0130H

Question 1: It is my understanding that donning/doffing an ankle foot orthosis (AFO) is included with GG0130H - Putting on/taking off footwear. For a patient using a knee ankle foot orthosis (KAFO), is this also included with GG0130H - Putting on/taking off footwear, or would this be considered part of GG0130G - Lower body dressing since it includes both the foot, knee, and the upper leg?

Answer 1: For GG0130H - Putting on/taking off footwear, consider any item/device that covers all or part of the foot as footwear, even if it extends up the leg. Do not also consider any required assistance with the item/device when coding GG0130G - Lower body dressing.

Added: June 2021

GG0130G

Question 1: If a patient is wearing a hospital gown and underwear the first time a functional assessment is conducted, is this scenario acceptable to rate lower body dressing? Or if on the following day during the assessment period, if the patient is wearing more items including underwear and shorts/pants, should we use this scenario instead as a true baseline of their lower body dressing ability?

Answer 1: The intent of GG0130G - Lower body dressing is to assess the patient's ability to dress and undress below the waist, including fasteners, if applicable.

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.

Use clinical judgment to determine if observing the patient dress and undress in the lower body clothing item (i.e. underwear) worn during the first assessment allows the clinician to adequately assess the patient's ability to complete the activity of lower body dressing (GG0130G). If the clinician determines that this observation is adequate, code based on the type and amount of assistance the patient required to complete the activity.

Added: June 2020

GG0130H

Question 1: As the definition of “Footwear” states that it “includes the ability to put on and take off socks and shoes”, how should coding occur when only one of these items (socks or shoes) is worn by the patient?

Answer 1: The intent of GG0130H - Putting on/taking off footwear is to determine a patient’s ability to put on and take off socks and shoes or other footwear.

GG0130H - Putting on/taking off footwear is assessed with footwear that is appropriate for safe transfer and/or ambulation (mobility). If the patient wears footwear that is safe for mobility (e.g., grip socks), then GG0130H - Putting on /taking off footwear, may be coded. If the patient’s socks are not considered safe for mobility, and the patient does not have shoes available, and the performance code cannot be determined based on patient/caregiver report, collaboration with other facility staff, or assessment of similar activities, then code the appropriate “activity not attempted” code.

If the patient wears shoes that are safe for mobility, but does not wear socks, then GG0170H - Putting on/taking off footwear, may be coded.

Added: June 2020

Question 2: We have a question regarding the following scenario. On day 2 of the patient’s stay, the occupational therapist (OT) evaluates and assesses all the GG self-care activities. During that evaluation, for footwear, the patient only dons hospital socks (regular shoes and socks are not available) and requires only cueing. Toward the end of the session (after the assessment), the OT initiates the intervention of ADL re-training. On day 3, after the initiation of ADL re-training, the patient’s spouse brings in socks and tennis shoes with laces, which are the patient’s preferred footwear. The patient now requires greater than 50% assistance of one helper for donning footwear. Even though it is post intervention, can the “greater than 50% assistance” score be reported since it is still within the assessment timeframe?

Answer 2: The intent of GG0130H - Footwear is to assess the patient’s ability to put on and take off socks and shoes or other footwear that is appropriate for safe transfer and/or ambulation (mobility), including fasteners (if applicable).

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 the benefit of services provided by your facility staff.

Clinicians should use clinical judgment to determine if observing the patient putting on and taking off the footwear (i.e., hospital socks) worn during the first assessment allows the clinician to adequately assess the patient’s baseline ability to complete the activity of putting on/taking off

footwear (GG0130H). If the clinician determines that this observation is adequate, code based on the type and amount of assistance required to complete the activity.

Added: September 2020

GG0170

Question 1: Please provide guidance for discharge IRF-PAI coding in this scenario: A patient is scheduled to be discharged on a Tuesday. On the preceding Friday, the patient participates in strengthening exercises. On Saturday, the patient is in dialysis. On Sunday, the patient's family visits and decides to take the patient home right away, and the patient is discharged before a discharge assessment is completed. All discharge self-care items can be coded because the patient performed them with nursing staff. However, the patient was last assessed performing the walking and stair activities on Thursday – 4 days prior to discharge – and walked 50 feet with 2 turns and negotiated 4 steps independently. Can the assessment for those items be used to code the IRF-PAI, based on the above-described circumstances? It seems that coding a dash or a Not Attempted code would not accurately represent the patient's true baseline status.

Answer 1: In the scenario you describe, it appears that you know the patient's performance level for ambulation and on stairs from 4 days prior to discharge but the patient has not completed the walking or the stair activities since that time.

Use of an "activity not attempted" code should occur only after determining that the activity is not completed, and that the performance code cannot be determined based on patient/caregiver report, collaboration with other staff, or assessment of similar activities, in conjunction with all current discharge assessment findings.

If based on the guidance stated above you are able to determine the patient's discharge ability in conjunction with all current discharge assessment findings, then code the walking and stair activities with the performance code that best represents the type and amount of assistance needed at discharge to safely complete the activity.

Added: September 2020

Question 2: 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 2: 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 IRF-PAI 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: June 2020

GG0170E

Question 1: 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 1: 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 IRF-PAI. 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

GG0170G

Question 1: In the assessment of a patient's ability to perform a car transfer, does adjusting the car seat constitute 05-Setup? For example, after the helper reclined the seat to accommodate the patient's total hip precautions, the patient did not need any additional help to get into or out of the car.

Answer 1: The intent of GG0170G - Car transfer is to assess the patient's ability to transfer in and out of a car or van on the passenger side. This does not include the ability to open/close door or fasten seat belt.

Code 05-Setup or clean-up assistance is selected when a patient requires a helper to set up or clean up; patient completes the activity and the helper is required to assist only prior to or following the activity. In the scenario described, assuming the seat adjustment was required for safe completion of the activity, and no assistance was required during the safe transfer in and out of the car, then the seat adjustment would be coded as 05-Setup.

Added: June 2020

Question 2: If at discharge we assess the patient getting into their car to leave our facility, can we code this OR do we have to see transfers both in and out of car in order to code?

Answer 2: The intent of GG0170G - Car transfer is to assess the patient's ability to transfer in and out of a car seat or van on the passenger side. Does not include the ability to open/close door or fasten seat belt.

Code the patient's functional status based on a functional assessment that occurs at discharge. The function scores are to reflect the patient's discharge status, and are to be based on observation of activities, to the extent possible.

The assessing clinician may combine general observation, assessment of similar activities, patient/caregiver(s) report, collaboration with other facility staff, and other relevant strategies to complete any and all GG items, as needed.

If, using clinical judgment, it is determined that the patient status for transferring into the car at discharge adequately represents the patient's discharge ability to transfer in and out of a car, this could be used for the coding of GG0170G - Car Transfer.

Added: June 2020

Question 3: What constitutes set-up/clean-up assistance for GG0170G - Car transfer? The guidance says it does not include the ability to open/close a door or fasten a seat belt. What, then, is set-up or clean-up assistance for a car transfer?

Answer 3: The intent of GG0170G - Car transfer is to assess the patient's ability to transfer in and out of a car or van on the passenger side. As you mention, the item does not include the ability to open/close a door or fasten a seat belt.

Code 05 - Set-up or clean-up assistance is selected when a patient requires a helper to set up or clean up; patient completes the activity and the helper is required to assist only prior to or following the activity.

An example of set-up or clean-up assistance with a car transfer is a caregiver who folds a walker and places it in the back seat after the patient transfers into the car, then retrieves the walker and sets it up for the patient prior to the patient transferring out of the car. If the patient requires the set-up (or clean-up) of this walker in order to complete the car transfer, but no assistance is needed during the completion of the activity, Code 05 - Set-up/clean-up assistance would be appropriate.

Use clinical judgment to determine if the assistance the patient requires from a helper before or after the car transfer meets the definition of set-up or clean-up as above. If it does, and the patient requires no further assistance to complete the car transfer activity, code GG0170G as 05 - Set-up/Clean-up.

Added: September 2020

Question 4: Has CMS offered any new guidance on functional activities that cannot be assessed due to a patient having COVID-19? Specifically interested in car transfers. We have our COVID-positive patients on isolation in their rooms and are unable to assess them using the car simulator. Are we able to simulate a car transfer using a mat to assess this item?

Answer 4: The intent of GG0170G - Car transfer is to assess the patient's ability to transfer in and out of a car or van seat on the passenger side.

The 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. The assessing clinician may, as needed, combine general observation, assessment of similar activities, patient/caregiver report, collaboration with other facility staff, and other relevant strategies to complete all GG items.

If, using clinical judgment, simulating the car transfer using a mat adequately represents the patient’s ability to transfer in and out of a car, code GG0170G - Car transfer based on the type and amount of assistance required to complete the activity.

For a COVID-19 patient on isolation, new guidance on coding the GG items is not necessary. The existing guidance allowing coding based on assessment of similar activities can be used, as well as the use of “activity not attempted” codes as needed.

Added: December 2020

Question 5: Can you code GG0170G - Car transfer with a performance code if the patient transfers into the back seat or into a long sitting position because of medical restrictions?

Answer 5: The intent of GG0170G - Car transfer is to assess the patient’s ability to transfer in and out of a car or van on the passenger side.

Clinical judgment may be used to determine if a transfer in and out of the back seat is an acceptable alternative to meet the intention of this activity. The car transfer could still be completed while accommodating medical restrictions such as long sitting.

Added: March 2021

Question 6: When coding GG0170G - Car transfer based on a simulation, what equipment or environmental setup would we need to have in order to make the activity similar enough to the car transfer?

Answer 6: The intent of GG0170G - Car transfer is to assess the patient’s ability to transfer in and out of a car or van seat on the passenger side.

The 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. The assessing clinician may, as needed, combine general observation, assessment of similar activities, patient/caregiver report, collaboration with other facility staff, and other relevant strategies to complete all GG items.

In situations where specific equipment may not be available (e.g., 12 steps, a vehicle), the assessing clinician may determine that assessment of a similar activity adequately represents the patient's ability to complete the activity. This practice will serve to minimize the use of an “activity not attempted” code in favor of a performance code determined to represent the patient’s status in the given self-care or mobility activity. While CMS does not provide specific parameters or a complete list of what is and is not an acceptable proxy activity, providers are expected to use clinical judgment in determining if the “similar activity” meets the intent of the target activity to make it a reasonable substitute when making a coding determination.

If, using clinical judgment, simulating the car transfer adequately represents the patient's ability to transfer in and out of a car, code GG0170G - Car transfer based on the type and amount of assistance required to complete the activity.

Use of an "activity not attempted" code should occur only after determining that the activity is not completed, and that the performance code cannot be determined based on patient/caregiver report, collaboration with other staff, or assessment of similar activities, in conjunction with all current assessment findings.

Note that this is a refinement to the previous guidance that stated if an indoor car simulator or outdoor car is not available during the entire 3-day assessment period, then report Code 10 - Not attempted due to environmental limitations.

Added: March 2021

Question 7: If a wheelchair-bound patient independently uses a wheelchair ramp/lift to transfer into a van, how should GG0170G - Car transfer be coded?

Answer 7: The intent of item GG0170G - Car transfer focuses on transferring into and out of a car or van seat. If the patient remains in the wheelchair, and did not transfer into or out of a car or van seat, then the activity is not completed.

In your scenario select the appropriate "activity not attempted" code depending on if the patient was able to complete the car transfer prior to the current illness, exacerbation, or injury.

Added: June 2021

Question 8: Question 9 of the September Quarterly Q&As (GG0170G Q3 of the IRF Q&As March 2021) provided examples of setup/clean-up for GG0170G - Car transfer. One example given was a helper folding a walker and putting it in the back seat of the car after the transfer. The question we have now is what if the walker was not needed for the car transfer itself. Is putting the walker in the back seat still counted if the patient did not use it for the car transfer?

Answer 8: The intent of GG0170G - Car transfer is to assess the patient's ability to transfer in and out of a car or van on the passenger side. The item does not include the ability to open/close a door or fasten a seat belt.

The setup and/or clean-up of an assistive device that is used for walking to and from the car, but not used for the transfer in and out of the car seat, would not be considered when coding the car transfer activity.

The required setup and/or clean-up of an assistive device that is used for the transfer in and out of the car seat would be considered when coding the car transfer activity.

Code GG0170G based on the type and amount of assistance that the patient requires to transfer in and out of the car seat.

Added: June 2021

GG0170I, GG0170J, GG0170K, GG0170L

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, and GG0170L) 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: June 2020

Question 2: 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 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.

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 3: 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 3: 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 4: 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 4: 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: 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 1: 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 IRF-PAI item should be considered individually and coded based on the guidance provided for that item.

Added: June 2020

GG0170M, GG0170N, GG0170O

Question 1: When we initiate the assessment of GG0170M - 1 step (curb), we determine that the patient is not able to go up/down the curb due to medical/safety reasons. Are we then required to assess using a single step (i.e. the bottom step of a set of practice steps)?

Answer 1: There is no requirement to assess a patient going up and down both a curb AND a step. However, since coding GG0170M - 1 step (curb) with a 07, 09, 10 or 88 results in skipping GG0170N - 4 Steps and GG0170O - 12 Steps, when a patient is unable to go up and down a curb, you may want to consider assessing the patient’s ability to go up and down 1 step in order to possibly capture performance codes of 06 through 01 for one or more of the stair items, if that patient can complete them with assist and/or a railing.

Added: June 2020

Question 2: I have a question about how to code a specific scenario. A patient did NOT perform stairs prior to this illness, exacerbation, or injury due to frequent falls and fear of falling; however, during the evaluation, the patient told the therapist she has a goal to do stairs because her daughter recently moved into a house with 2 stairs to enter. The therapist felt it was unsafe to perform stairs within the first 3 days of the IRF stay but thought it would be a reasonable goal for the patient to perform 1-2 steps, with assistance, at discharge. Should we code the admission performance with a Code 09 - Not applicable or Code 88 - Not attempted due to medical condition or safety concerns, and if we use an activity not attempted for the performance code, how do we code the discharge goal?

Answer 2: The intent of the GG step activities is to assess the patient’s ability to go up and down 1 step/curb, 4 steps, and 12 steps with or without a railing.

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

The definitions of Code 88 and Code 09 are as follows:

Code 88 - Not attempted due to medical condition or safety concerns if at the time of assessment, the patient is unable to complete the stair activities due to medical conditions/safety concerns but could perform the activities prior to the current illness, exacerbation, or injury.

Code 09 - Not applicable if at the time of assessment if the patient is unable to complete the stair activities due to medication conditions/safety concerns and could not perform the activities prior to the current illness, exacerbation, or injury.

If the admission performance of an activity was coded using one of the “activity not attempted” codes, a discharge goal may be submitted using the 6-point scale if the patient is expected to be able to perform the activity by discharge.

Added: September 2020

GG0170M

Question 1: A question has come up regarding when it is appropriate to use Code 09 - Not applicable for functional tasks such as a curb/step and stairs. If a patient has a ramp at home used to enter the home due to past medical issues would we use Code 09 - Not applicable? Or do we use Code 88 – Not attempted due to medical conditions or safety concerns?

Answer 1: The intent of GG0170M - 1 step (curb) is to assess the patient’s ability to go up and down a curb and/or up and down one step. If, at the time of the assessment, the patient is unable to complete the activity and the performance 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.

Code 88 - Not attempted due to medical conditions or safety concerns indicates the patient performed the activity prior to the current illness, exacerbation, or injury, but does not perform the activity at the time of assessment due to a medical issue or safety concern.

Code 09 - Not applicable indicates that the patient did not perform the activity prior to the current illness, exacerbation, or injury and the patient does not perform the activity at the time of assessment.

Added: September 2020

GG0170N, GG0170O

Question 1: When assessing the GG activities for 4 and 12 steps, the patient is able to navigate 4 and 12 steps by bumping up and down them with supervision. However, he needs assist getting seated on the step, and again to come to standing once completed with the steps. Is the assist required to sit on the step or to come to standing considered when coding these two stair items?

Answer 1: The intent of Section GG stair activities is to assess the patient’s ability to go up and down 1 step/curb, 4 steps, and 12 steps. Clinicians should code based on the type and amount of assistance required for the patient to complete the stair activities as independently and safely as possible. Do not consider the stand-to-sit or sit-to-stand transfer when coding any of the step activities.

Added: June 2020

Question 2: For the GG stair activities is a patient permitted to take a seated rest at the top of a staircase, prior to descending, and still have the stair activity be considered as completed?

Answer 2: For GG0170N - 4 steps and GG0170O - 12 steps, code based on the type and amount of assistance required for the patient to go up and down 4 steps and 12 steps by any safe means, with or without any assistive devices (for example, railing or stair lift).

Ascending and descending stairs does not have to occur sequentially or during one session. If the assessment of going up and down stairs occurs sequentially, the patient may take a rest break between ascending and descending the 4 steps or 12 steps.

Added: June 2021

GG0170P

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 “Picking up an item from the floor” 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 (i.e., “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: June 2020

GG0170Q

Question 1: We have a question regarding the appropriate scoring for an IRF patient who does not use a wheelchair during the admission assessment, but then begins to use a wheelchair later during the IRF 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 IRF-PAI 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 IRF-PAI. 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 IRF-PAI should be made following Federal, State, and facility policy guidelines.

Added: June 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 IRF-PAI 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 IRF 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 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: June 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

This document is intended to provide guidance on IRF-PAI 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.

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 IRF-PAI 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). There was a reference from a training in 2016 that states the scenario would be coded as Code 1-Occasionally incontinent. Is this still true?

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.

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

Added: June 2020

Section K: Swallowing/Nutritional Status

K0110

Question 1: How should K0110 - Swallowing/Nutritional Status be coded if a patient is on a liquid diet or a mechanical soft consistency diet due to reasons other than difficulty with eating and/or swallowing? Some examples might include a patient who is on a liquid or modified consistency diet following bariatric surgery, or a patient on a liquid or modified consistency diet who is recovering from an acute case of diverticulitis. Would the correct code be A. Regular food or B. Modified food consistency/supervision?

Answer 1: For item K0110 - Swallowing/Nutritional Status, coding should reflect the patient's status due to swallowing ability only. Therefore do not check B. Modified food consistency/supervision if a patient requires a modified consistency diet or liquid diet due to a medical reason not related to swallowing.

Added: March 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 IRF-PAI 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 IRF 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: June 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

[NEW] 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 IRF-PAI 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

Section N: Medications

N2005

[NEW] 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