Assessments

OBRA, PPS, and Tracking Records
- SNFs
  - All OBRA requirements
  - PPS requirements
  - Tracking records
- Swing Beds
  - Discharge assessments
  - PPS requirements
  - Tracking records

SNF PPS Assessments
- Required for reimbursement under Medicare Part A
- Must meet OBRA requirements also
- When combining Medicare and OBRA assessments:
  - **All requirements for both are met**

SNF PPS Assessments
- Two types
  - Scheduled “Day Assessments”
    - Standard, predetermined time period for ARD
    - Grace days allowed
  - Unscheduled “T Assessments”
    - Applicable when certain situations occur with therapy

Assessment Windows
- Defined days within which the ARD must be set
- Timelines of the PPS assessment is defined by selecting an ARD within the prescribed ARD window
- **The facility is required to set the ARD on the MDS form itself or in the facility software within the appropriate time frame of the assessment type being completed (pg. 2-40)**
Scheduled Medicare PPS Assessments

<table>
<thead>
<tr>
<th>Assessment Type</th>
<th>Reason for Assessment</th>
<th>Assessment Reference Date Window</th>
<th>Assessment Reference Date Grace Days</th>
<th>Applicable Medicare Payment Days</th>
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<tbody>
<tr>
<td>5-day</td>
<td>01</td>
<td>1-5</td>
<td>6-8</td>
<td>1 through 14</td>
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<td>14-day</td>
<td>02</td>
<td>13-14</td>
<td>15-18</td>
<td>15 through 30</td>
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<td>30-day</td>
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<td>27-29</td>
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<td>31 through 60</td>
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<td>61 through 90</td>
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<td>90-day</td>
<td>05</td>
<td>87-89</td>
<td>90-93</td>
<td>91 through 100</td>
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</table>

ARDS Window

Grace Days

- There is no difference between regular ARD windows and grace days and we encourage the use of grace days if their use will allow a facility more clinical flexibility or will more accurately capture therapy and other treatments. Thus, we do not intend to penalize any facility that chooses to use the grace days for assessment scheduling or to audit facilities based solely on their regular use of grace days.
- SNF PPS Final Rule p 48519

Can I move an ARD

- The ARD can be changed only during the “window”
- If a resident is discharged prior to the ARD it can be “moved” to the day of discharge if done prior to the 14th day after discharge, otherwise it is considered a missed MDS.
- If no ARD was “set” prior to discharge then there is no MDS that can be adjusted.

Not in the building at midnight (ER)

- Do not discharge
- Do not restart the PPS schedule
- Adjust the Medicare schedule by the one day.
- For example resident left on day 20 to ER and when he returns it will be day 20 again. (Do over day)

Other situations

- Admitted to the hospital or gone greater than 24 hours (not considered a LOA)
- New orders, certifications, and new therapy evals

Special situations

- Day of admission
- Dies or discharges on admission: Complete a 5 day and the death in facility or 5 day /discharge
- Leaves prior to day 8
  - Complete the 5 day for payment
  - If no ARD had been set prior to leaving then you must bill default rate
  - Check to be sure if a Short Stay would work
A0310B
Scheduled PPS Assessments

- 01 5-day
  - ARD – 1-5
  - Grace days – 6-8
  - Can not change the ARD after day 8
  - Payment – days 1-14
  - Scheduling no difference but readmission shows that the resident left the building Med A and returned Med A

- 02 14-day
  - ARD – 13-14
  - Grace days – 15-18
  - Can not change the ARD after day 18
  - Payment – days 15-30
  - Admission assessment must have ARD prior to day 14 to meet that regulation

- 03 30-day
  - ARD – 27-29
  - Grace days – 30-33
  - Can not change the ARD after day 33
  - Payment – days 31-60

- 04 60-day
  - ARD – 57-59
  - Grace days – 60-63
  - Can not change the ARD after day 63
  - Payment – days 61-90

- 05 90-day
  - ARD – 87-89
  - Grace days – 90-93
  - Can not change the ARD after day 93
  - Payment – days 91-100

A0310 B
Scheduled PPS Assessments

- 04 60-day
  - ARD – 57-59
  - Grace days – 60-63
  - Can not change the ARD after day 63
  - Payment – days 61-90

- 05 90-day
  - ARD – 87-89
  - Grace days – 90-93
  - Can not change the ARD after day 93
  - Payment – days 91-100

A0310 B
Scheduled PPS Assessments

- 07 OMRA, Significant Clinical Change, or Significant Correction Assessment
  - Meets criteria for a Sig Change or Sig correction
  - May occur any time during the stay
  - OBRA required assessment
  - May be combined with a PPS scheduled assessment
  - May establish a new RUG
  - New RUG begins on ARD

Setting the “T” Assessments

ARD

- Stand alone COT, EOT or SOT must set the ARD for the assessment within the allowable ARD window for the type but may do so no more than TWO days after the window has passed
- This is NOT the same as grace days in the “Day” assessments

PPS Assessments “T” Assessments

Other Medicare Required Assessment (OMRA)

- Type
  - Start of Therapy (SOT)
  - End of Therapy (EOT)
  - End of Therapy - Resumed (EOT-R)
  - Change of therapy (COT)
- Shortened assessments
- May not replace a scheduled PPS assessment
Chapter 2

- Pg 2-52: Note: In limited circumstances, it may not be practicable to conduct the resident interview portions of the MDS (Sections C, D, F, J) on or prior to the ARD for a standalone unscheduled PPS assessment. In such cases where the resident interviews (and not the staff assessment) are to be completed and the assessment is a standalone unscheduled assessment, providers may conduct the resident interview portions of that assessment up to two calendar days after the ARD (Item A2300).

A 0310C
Other Medicare Required Assessment

- 01 Start of Therapy Assessment (SOT)
  - OPTIONAL - You don’t have to do it
  - Purpose is to obtain therapy RUG any time during the stay
  - ARD is 5-7 days after start of first therapy
  - Payment begins first day therapy is provided
  - Only complete if therapy RUG or if nursing RUG pays less otherwise MDS is rejected
  - Be attentive when combining
  - ** No need to combine with the 5 day assessment except for short stay

SOT OMRA-Example 1

- Resident on Part A for skilled nursing
  - OT eval Tuesday
  - PT eval Wednesday
  - SLP eval Friday

- What are the possible ARDs for SOT OMRA?
  - Saturday, Sunday, Monday
  - ARD for SOT OMRA must be day 5, 6, or 7, with day 1 being earliest therapy start date (therapy start date = therapy eval date)

SOT OMRA Example 2

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<thead>
<tr>
<th>10/30</th>
<th>10/31</th>
<th>11/1</th>
<th>11/2</th>
<th>11/3</th>
<th>11/4</th>
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<td>Therapy starts</td>
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</table>

Bill 5 day assessment for days 1-6
Bill 14 Day/ SOT OMRA with ARD of 11/11 for days 7-14

SOT OMRA Example 3

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<th>10/29</th>
<th>10/30</th>
<th>10/31</th>
<th>11/1</th>
<th>11/2</th>
<th>11/3</th>
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</thead>
<tbody>
<tr>
<td>Therapy starts 22 min</td>
<td>No tx</td>
<td>No tx</td>
<td>Tx 63 min</td>
<td>Tx 67 min</td>
<td>Tx 72 min</td>
<td>Tx 70 min</td>
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<tr>
<td>SOT OMRA ARD</td>
<td>Day 5</td>
<td>Day 6</td>
<td>Day 7</td>
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</tbody>
</table>

Resident in HD2 (CMI 46 Rural)

SOT OMRA Example 3

- 3 therapy days, 152 minutes
- 4 therapy days, 224 minutes
- 5 therapy days, 294 minutes. Must have 5 days to qualify for a therapy RUG
- RMB (CMI 36 - Rural)
- Resident in HD2 (CMI 46)
SOT OMRA Example 3

- Outcome
  - Do not complete SOT
  - SOT is optional
  - Therapy RUG will pay less than Nursing RUG

Depression

- Look at the impact in the nursing RUG for someone who is depressed and who is not.
  (PHQ-9 greater than or equal to 10)
- HD2 (CMI 46) $428.84
- HD1 (CMI 35 ) $357.63
- $71.21 per day difference

Don’t Forget with the SOT

- A stand alone SOT does not case mix index maximize
- Only contains information to obtain appropriate Rehab RUG
- Does not contain information to calculate a nursing RUG
- Would not want to complete a stand alone SOT if nursing RUG is higher than Rehab RUG
- Usually will not combine a SOT with a 5day unless you are trying for a short stay

PPS Assessments

EOT OMRA

- Not optional if skilled care continues
- ARD 1-3 days after last day of therapy provided
  - All facilities will be looked at as if therapy is 7 days a week no matter the facility practice. Minimum has to be 5 days a week
- Payment changes day after last day of therapy (Z0150A)
- Be aware when in a Rehab Low and no therapy for 3 consecutive days

EOT OMRA Requirements

- Resident currently receiving rehab services AND is classified in a Rehab RUG. All therapies discontinue and Medicare coverage continues under nursing skilled services
- A day of therapy is defined as the resident receiving a minimum of 15 minutes of therapy by one discipline
- 3 consecutive calendar days without therapy
  - Reason doesn’t matter
  - Therapy provider status doesn’t matter

EOT Scheduling

- Resident is discharged from the SNF on or prior to the third consecutive day of missed therapy services then no EOT is required.
- When resident comes off ALL Medicare Part A services an EOT is not required. Billing will show the last covered day on the claim.
EOT OMRA Example 1
- Resident is classified in RHX
  - Therapy ends Monday
  - Skilled Nursing continues
  - Do we need to do an EOT

Answer:
- Yes an EOT OMRA is required
  - ARD must be Tuesday, Wednesday or Thursday
  - Payment changes on Tuesday

EOT OMRA Example 2
- Resident misses therapy on Thursday and Friday due to illness.
  - Therapy not available on weekend.
  - Does an EOT OMRA necessary

ARD would have to be no later than Saturday
  - 3 consecutive days without therapy regardless of the reason, weekends, holidays, illness,

EOT-R
- End of Therapy with Resumption
  - Therapy services MUST resume within 5 consecutive calendar days after last treatment day
  - EOT-R therapy services have resumed at the same RUG level AND with the same therapy plan of care that had been in effect prior to the EOT OMRA. No clinical change in resident.
  - Eliminates need for new evaluation
  - Eliminates need for SOT OMRA

EOT-R
- If the EOT OMRA has not been accepted into the data base code the date of therapy resumption at 00450 A and 00450B
  - If the EOT OMRA has been accepted into the data. Complete the Modification Process and indicate the reason for modification is the addition of the Resumption date
EOT R Example

- Resident receiving therapy services
- Misses therapy treatment days 36-39
- Complete EOT OMA (ARD days 36-38)
- Therapy resumes on Day 40 at same level of intensity
- Complete EOT-R to resume therapy RUG
- Payment at Rehab RUG begins on resumption of therapy at same RUG level as Rehab RUG prior to EOT

What if?????????

- Therapy resumes and doesn't make the minutes as scheduled.
- COT will reset the payment 7 days later with the "R" of the EOT R being day 1 of the count

Example

- NEW Example
  - Admitted 10/01/14
  - 5 day 10/07/14 RVB
  - 14 day 10/14/14 RVB
  - 30 day 10/28/14 RVA
  - No Therapy 10/29 – 10/31
  - EOT on 10/31/14 CE2
  - R on 11/2/14

Both SOT and EOT

- May combine an SOT & EOT
- Requires ARD rules for both the SOT & EOT to be adhered to
  - ARD must be within 5-7 days from start of therapy date
  - ARD must be within 1-3 days from end of therapy date
- RUG payment effective from start of therapy date through end of therapy date (Z0100A)
- Non-therapy RUG begins on first non-therapy date after therapy ends (Z0150)
SOT/EOT Example

- Resident currently covered under Medicare Part A for a Stage IV pressure ulcer, currently in a non rehab RUG
- PT initiates therapy services for a limited number of days only to address some positioning and wheelchair management issues
- May complete SOT/EOT to obtain Rehab RUG, if they meet rehab criteria, to pay for days of therapy services

Chapter 2

- Bullet 4 on page 2-49 and 2-50. There is discussion on EOT-R, regular scheduled MDS and billing. The example
  - A resident misses therapy on day 11, 12, and 13 and resumes therapy on day 15. In this case the facility should bill the non therapy RUG for days 11, 12, 13, and 14 and on day 15 the facility should bill the RUG that was in effect prior to the EOT

SOT/EOT Example

- Resident currently covered under Medicare Part A for a Stage IV pressure ulcer, currently in a non rehab RUG
- PT initiates therapy services for a limited number of days only to address some positioning and wheelchair management issues
- May complete SOT/EOT to obtain Rehab RUG, if they meet rehab criteria, to pay for days of therapy services

Change of Therapy OMRA (COT)

- Would be required when the intensity of therapy services change to such a degree that the RUG from the most recent assessment is no longer an accurate reflection of the intensity of therapy being provided
- The decision on combine the COT with a scheduled PPS assessment or with a discharge assessment if occurs on or prior to day 7 then the COT is not required. This is in the manual on page 2-51
- This is OUR CHOICE (For now)

COT OMRA

- Review of the therapy intensity is done every 7 days beginning with the day after the ARD of most recent PPS assessment
- ARD of COT OMRA is always day 7 of COT observation period

COT OMRA

The following should be considered:
- Total Reimbursable Therapy Minutes (RTM)
- Number of therapy days
- Number of therapy disciplines
  - Restorative Nursing criteria if in a Rehab Low
COT OMRA

- A COT OMRA is required in cases where the therapy received during the COT observation period would cause the resident to be classified into a different RUG category.
- A COT will be required if in a therapy RUG group or is receiving therapy services but is classified in a Nursing RUG due to Case Mix Index maximization.

Chapter 2

- Pg 2-50: COT: Required when the resident was receiving a sufficient level of rehabilitation therapy to qualify for an Ultra High, Very High, High, Medium, or Low Rehabilitation category and when the intensity of therapy (as indicated by the total reimbursable therapy minutes (RTM) delivered, and other therapy qualifiers such as number of therapy days and disciplines providing therapy) changes to such a degree that it would no longer reflect the RUG-IV classification and payment assigned for a given SNF resident based on the most recent assessment used for Medicare payment.

Chapter 2

- Pg 51: When the most recent assessment used for PPS, excluding an End of Therapy OMRA, has a sufficient level of rehabilitation therapy to qualify for an Ultra High, Very High, High, Medium, or Low Rehabilitation category (even if the final classification index maximizes to a group below Rehabilitation), then a change in the provision of therapy services is evaluated in successive 7-day Change of Therapy observation periods until a new assessment used for PPS occurs.

COT OMRA

- Remunerable Therapy Minutes (RTM) would need to be evaluated on consecutive 7 day periods.
- COT Observation Period
  - Days 1-7 following ARD of any Medicare assessment (scheduled or unscheduled)
  - Days 1-7 starting with resumption of therapy date (O0450B) when EOT-R completed

The COT OMRA retroactively establishes a new RUG beginning the day following the ARD or last COT review date of the residents scheduled or unscheduled Medicare PPS assessment.

Chapter 2 COT

- Must have a RUG before a COT can be done.
- Except with the next slide a COT may only be completed when a resident is currently classified into a Rehab therapy RUG regardless of whether or not resident is classified into this group for payment based on the most recent assessment.

Chapter 2 COT

- COT OMRA may be completed when a resident is not currently classified into a therapy RUG IF BOTH of the following conditions are met:
  1. Was classified into a therapy RUG on a prior assessment during the current Med A stay
  2. No discontinuation of therapy services (planned or unplanned) occurred between Day 1 of COT that classified resident into non therapy RUG
COT EXAMPLE
Day 30: RUA
Day 37 RUA minutes but only 4 distinct days so does not qualify
Nursing RUG then for the next 7 days based on what was obtained
with the COT
Day 44 MAY complete a COT OMRA on this date to get back to
therapy RUG
NOTE: Under these circumstances, completing the COT OMRA
may be considered optional

COT Observation Period

- If a scheduled or unscheduled PPS assessment is due during the
COT observation period, then the COT observation period is reset
based on the new ARD

COT OMRA

- If an unscheduled PPS assessment is required during the ARD
window of a scheduled PPS assessment and the ARD for the
scheduled assessment has not yet been set then they must be
combined.

- A scheduled PPS assessment cannot occur after an unscheduled
assessment in the assessment window. They must be combined
with the ARD appropriate to the unscheduled assessment.

COT OMRA Example

- ARD of 14 day assessment was day 14, RUG = RVB
- Day 1 for the COT observation period would be day 15
- Provider would be required to review therapy minutes for days 15-
21 (7 day COT observation period)
- If therapy providing RV level, no COT required
- If higher or lower RUG then COT is required

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November 2011

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Chapter 2

2.72 Scheduling T assessments and LOA’s

- There may be cases in which a SNF plans to combine a scheduled and unscheduled assessment on a given day, but then that day becomes an LOA day for the resident. In such cases, while that day may still be used as the ARD of the unscheduled assessment, this day cannot be used as the ARD of the scheduled assessment.

Changes resulting in a COT

- An increase or decrease in
  - Therapy minutes
  - Days of therapy

- Number of disciplines

- ADL score changes does not result in a COT

- Must be done if therapy is working with the resident even if not in a therapy RUG
Remember

- If therapy has DECREASED to a lower paying RUG, **substitute the scheduled assessment for the COT** by setting the ARD of the scheduled assessment for a date on or before Day 7 of the COT checkpoint.
- Also open that COT ARD in the software in case it is required! (More about this later).
- Lower payment postponed until later!

Remember

- If therapy has INCREASED to a higher paying RUG, **combine the COT with the scheduled assessment** in order to obtain the higher paying RUG retroactively to Day 1 of the COT observation period. (Must use day 7 of COT window as ARD)
- Higher Therapy RUG = More Money sooner!

Remember

- If a new PPS assessment used for payment occurs with an ARD set for on or prior to the last day of a COT observation period, then a Change of Therapy OMRA is not required for that observation period.
- Remember that COT we opened “just in case”

Remember

- If an assessment has an ARD set for on or prior to Day 7 of the COT observation period, **but this assessment is not used for payment**, then completing this assessment does not impact the COT ARD calendar.
- In other words you must go back and complete the COT that you opened.
- Ex 14 day and COT ARD’s on same day. RUG went down so we didn’t do the COT BUT resident went to the hospital and we didn’t need the 14 day BUT we would have to use the COT for the prior 7 days

DOCUMENTATION of a COT review

- Each facility should determine for itself an appropriate COT evaluation process that may be used to determine if a COT OMRA is necessary.
- Some FIs’s request written documentation that the COT has been done
- See resource

COT and Nursing RUGs

- A COT evaluation is required anytime a resident is receiving therapy services but qualifies for Nursing RUG due to case mix index maximization.
- Several Nursing RUGs pay higher than Rehab RUGs. MDS may result in nursing RUG vs. a therapy RUG.
COT and Nursing RUGs Example

- 14 day assessment completed w/ARD of day 13. Resident receiving therapy services at an RMC level. Resident also qualifies for HE1 RUG
  - RMC CMI = 38
  - HE1 CMI = 41

COT and Nursing RUGs Example

- COT observation period would be days 14-20
- If on day 20, resident still receiving RM level of therapy. No COT required, since no change in therapy level
- If on day 20, resident now receiving RH level of therapy, COT required since therapy eval changed
  - RHC CMI = 48
  - HE1 CMI = 41

COT/EOT OMRA Example 1

- Scenario
  - 30 day assessment ARD = Day 30 RVB
  - Therapy provided days 31-36
  - No therapy days 37-39
  - Therapy resumes on day 40 at same level of intensity

COT/EOT Action

- 30 day assessment completed with ARD Day 30
- COT evaluation to be completed on Day 37 (7 days after 30 day ARD)
- COT reviewed, no COT required
- EOT assessment required (ARD Days 37-39)
- Therapy resumed within 5 days, complete EOT-R
- COT observation period resumes on Day 40 (Day therapy resumed)

Medicare Short Stay

- Must be discharged from Part A on or before day 8 of Part A stay
- Payment policy only
- To obtain a therapy RUG
- Therapy is prorated based on average daily therapy minutes
  - RLx – 15-29 minutes
  - RMx – 30-64 minutes
  - RHx – 65-99 minutes
  - RVx – 100-143 minutes
  - RUx – 144 or > minutes

Short Stay Requirements

1. SOT OMRA (A0310C = 1 or 3)
2. PPS 5-day assessment (A01310B = 01)
3. ARD (A2300) SOT OMRA must be day 8 or earlier (A2400B)
4. ARD must be last day of Medicare stay (A2400C)
5. ARD may not be more than 3 days after start of therapy (O0400A5,B5,C5)
6. OT/PT/SLP started during last 4 days
7. At least one therapy (O0400A6, O0400B6, O0400CA) continued through last day of Part A stay (dash or ARD = EOT date)
8. RUG must be Rehab + ES or Rehab group (20100A)
Short Stay Location on MDS

Short Stay Example 1

<table>
<thead>
<tr>
<th>Day 1</th>
<th>Day 2</th>
<th>Day 3</th>
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Does this resident meet short stay policy requirements??

Short Stay Example 1

1. SOT OMRA  Yes
2. PPS 5-day assessment  Yes
3. ARD SOT OMRA must be day 8 or earlier  Yes
4. ARD must be last day of Medicare stay  Yes
5. ARD may not be more than 3 days after start of therapy  Yes
6. OT/PT/SLP started during last 4 days
7. At least one therapy continued through last day of Part A stay (dash or ARD = EOT date)
8. RUG must be Rehab + ES or Rehab group
   ◦ RUG for days 4-7 RMx

Short Stay Example 2

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Does this resident meet short stay policy requirements??

Short Stay Example 2

1. SOT OMRA  Yes
2. PPS 5-day assessment  Yes
3. ARD SOT OMRA must be day 8 or earlier  Yes
4. ARD must be last day of Medicare stay  Yes
5. ARD may not be more than 3 days after start of therapy  NO
6. OT/PT/SLP started during last 4 days  NO
7. At least one therapy continued through last day of Part A stay (dash or ARD = EOT date)  NO
8. RUG must be Rehab + ES or Rehab group

Short Stay Example 3

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<tr>
<th>Day 1</th>
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<td>Therapy Eval 20 min</td>
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Diagnosis: COPD, SOB while lying flat, sitting at rest and upon exertion. Daily treatments, daily O2, PHQ 9 score of 18, ADL score 15
Short Stay Example 3

- Qualifies for a short stay
  - BUT
- What RUG assignments does he qualify for?

Short Stay Example 3

- Therapy RLB (37)
  - 20+30+30/4=20 minutes prorated
- Nursing HE 2 CE2
  - COPD with SOB lying flat special care high (50)
  - Respiratory therapy special care high (50)
  - Daily O2 clinically complex (58)

Combining Assessments

- Can NEVER combine 2 PPS scheduled assessments
- May combine scheduled PPS assessment w/ unscheduled PPS assessment (Section 2.10)
- May combine any PPS assessment w/ any OBRA assessment (Section 2.11)

References

- MDS 3.0 manual
- Training material
- Technical Information
http://www.cms.gov/Manuals/IOM/list.asp
- Medicare Benefit Policy Manual
- Medicare Claims processing

Resources

- Medicare Benefit Manual SNP Coverage
- Medicare Benefit Manual Billing
- http://www.wpsmedicare.com/j5macparta/resources/providertypes/
  - Understanding the major categories of exclusion from consolidated billing
  - Medicare Payment Scheduler
  - Spell of Illness Chart
Resources

- Stacey Kempker State RAI Coordinator
  - 573-751-4308
- QIPMO: [www.nursinghomehelp.org](http://www.nursinghomehelp.org)
- Jessica Mueller: 573-882-0241