Agenda

• SNF PPS Assessments

• SNF Part A Policies
  o Early assessment
  o Late assessment
  o Missed assessment
  o Medicare Short Stay

• Examples
PPS Assessments
PPS Assessments

OBRA, PPS, and Tracking Records

• SNFs
  o All OBRA requirements
  o PPS requirements
  o Tracking records

• Swing Beds
  o Discharge assessments
  o PPS requirements
  o Tracking records
PPS Assessments

Scheduled – A0310B

- 5-day
- 14-day
- 30-day
- 60-day
- 90-day
- Readmission/return
Scheduled – A0310B

- Predetermined assessment window and grace days
  - May not combine scheduled assessments

- One scheduled may **not** replace another scheduled

- Must be completed sequentially

- Predetermined payments days, which may be impacted by unscheduled assessment
## PPS Assessments

<table>
<thead>
<tr>
<th>Assessment Type</th>
<th>Assessment Reason</th>
<th>ARD</th>
<th>ARD Grace Days</th>
<th>Standard Medicare Payment Days</th>
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<tr>
<td>5-day Readmission</td>
<td>01 06</td>
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<td>05</td>
<td>80-89</td>
<td>90-94</td>
<td>91-100</td>
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</table>

Modified tabled – see page 2-42 of MDS 3.0 RAI manual
PPS Assessments

- 5-day & Readmission/return
  - ARD – 1-5
  - Grace days – 6-8
  - Payment – days 1-14
  - A0310B = 01 or 06
PPS Assessments

• 14-day
  o ARD – 11-14
  o Grace days – 15-19
  o Payment – days 15-30
  o A0310B = 02
PPS Assessments

• 30-day
  o ARD – 21-29
  o Grace days – 30-34
  o Payment – days 31-60
  o A0310B = 03
PPS Assessments

- 60-day
  - ARD – 50-59
  - Grace days – 60-64
  - Payment – days 61-89
  - A0310B = 04
PPS Assessments

• 90-day
  o ARD – 80-89
  o Grace days – 90-94
  o Payment – days 91-100
  o A0310B = 05
PPS Assessments

Unscheduled – A0310A,B,C,D

- May occur any time during stay when requirements met
- May be combined with a PPS scheduled assessment
- May be combined with each other^*^Significant change in status and significant correction of prior comprehensive may not be combined
Unscheduled – A0310A,B,C,D

- Significant change in status/clinical change
  - IDT determines meets significant change guidelines
  - A decline or improvement in a resident’s status that:
    - Will not normally resolve itself without intervention or by implementing standard disease-related clinical intervention
    - Impacts more than one area of resident’s health status
    - Requires IDT review and/or revision of care plan
  - Manual lists examples – not all inclusive list
  - Individually based
  - New RUG may be established, payment change on ARD
PPS Assessments

Unscheduled – A0310A,B,C,D

- Significant correction to prior comprehensive
  - IDT determines prior comprehensive assessment contains significant error
  - Significant error is an error in an assessment where:
    - Resident’s overall clinical status is not accurately represented; and
    - Error has not been corrected via submission of a more recent assessment
  - New RUG may be established, payment change on ARD
Unscheduled – A0310A,B,C,D

- Other Medicare Required Assessment (OMRA)
  - Two types
    - Start of Therapy (SOT)
    - End of Therapy (EOT)
  - Shortened assessments
  - May not replace a scheduled PPS assessment
  - New RUG **will** be established, payment change according to rules
PPS Assessments

• SOT OMRA

  o New assessment type
  o OPTIONAL
  o To obtain therapy RUG* any time during stay (Z0100A)
  o ARD 5-7 days after start of first therapy (day 1 = day therapy started)
  o Payment starts first day of therapy
  o Only complete if therapy RUG (index maximized), otherwise rejected
  o Be attentive when combining

*Rehabilitation or Extensive Services Plus Rehabilitation
PPS Assessments

• **EOT OMRA**
  - Not new assessment
  - Not optional
  - Complete only when skilled care continues
  - To obtain a non-therapy RUG (Z0150A)
  - ARD 1-3 days after last day of therapy provided (day 1= the next day therapy normally available)
  - Payment changes day after last day of therapy
  - No penalty for early ARD when set on day therapy not normally available
SNF Part A Policies
SNF Policies

- Short Stay
- Early assessment
- Late assessment
- Missed assessment
Medicare Short Stay

- New
- 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 or readmission/return assessment (A01310B = 01 or 06) combined with SOT OMRA or prior to SOT OMRA
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, O0400B5, O0400C5)
6. OT/PT/SLP started during last 4 days
7. At least one therapy (O0400A6, O0400B6, O0400C6) continued through last day of Part A stay (dash or ARD = EOT date)
8. RUG must be Rehab + ES or Rehab group (Z0100A)
Short Stay Payment

1. If earliest SOT date is 1st day of short stay, use short stay assessment Z0100A entire stay

2. If earliest SOT date is after 1st day of stay
   - If 5-day assessment before short stay assessment: use Z0100A from 5-day from 1st day of stay to day before earliest SOT date, then use Z0100A from SOT date to end of stay
   - If SOT OMRA combined w/ 5-day: use Z0150A from 1st day of stay to day before therapy, then use Z0100A from SOT date to end of stay
Early Assessment

• Not new
• Paid default rate for # of days assessment out of compliance
• Not applicable for EOT OMRA when ARD set on day therapy not normally available
Late Assessment

- Not new
- ARD may not be earlier than the date the omission of assessment is identified
- ARD set prior to end of payment period
  - Default rate up to day before ARD
  - HIPPS rate ARD and on
- ARD set after payment period and stay is still covered
  - Default rate for related payment period
- Stay is no longer covered: ARD would be after payment period
  - Not able to complete an assessment which would cover days - ARD would be after SNF coverage ended (this is missed assessment)
Missed Assessment

• Not new

1. Stay less than 8 days (short stay may apply)

2. Notified untimely of MSP denial*

3. Notified untimely of revocation payment ban*

4. Demand bill request*

5. Notified untimely of dis-enrollment from MA plan*

*may use OBRA admission assessment for 5 & 14-day; must have assessment w/ARD in window of 30,60,90-day for non-default RUG
Late vs. Missed Assessment

• Late assessment
  o Omission is discovered while resident is in SNF Part A stay and a SNF PPS assessment is then completed
  o ARD is during SNF Part A stay

• Missed assessment
  o Omission is discovered after SNF Part A stay and an assessment already exists
  o ARD is during SNF Part A stay
Examples
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?
SOT OMRA- Example 1

- 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

<table>
<thead>
<tr>
<th>11/4</th>
<th>11/5</th>
<th>11/6</th>
<th>11/7</th>
<th>11/8</th>
<th>11/9</th>
<th>11/10</th>
</tr>
</thead>
<tbody>
<tr>
<td>Therapy start 22min</td>
<td>No tx</td>
<td>No tx</td>
<td>Tx 63min</td>
<td>Tx 67min</td>
<td>Tx 72min</td>
<td>Tx 70min</td>
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<tr>
<td>SOT OMRA ARD</td>
<td>-------</td>
<td>Day 5</td>
<td>Day 6</td>
<td>Day 7</td>
<td></td>
<td></td>
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</table>

Resident in HD2 (CMI 43 - Urban)

Start of therapy 11/4.
ARD must be 5-7 days => 11/8, 11/9, 11/10
SOT OMRA- Example 2

- SOT OMRA ARD
  - 11/8 – 3 therapy days, 152 minutes
  - 11/9 – 4 therapy days, 224 minutes
  - 11/10 – 5 therapy days, 294 minutes

- 11/10 = RMB (CMI 41 - Urban)
Outcome

- Do not complete SOT
- SOT is optional
- Therapy RUG will pay less than nursing RUG because of ADL change from 11-14 to 6-10
  - ADL index may change and you must consider the ADL index when determining if SOT is beneficial
Resident in LD2 (CMI 38 - Urban)

Start of therapy 11/4. ARD must be 5-7 days => 11/8, 11/9, 11/10

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<thead>
<tr>
<th></th>
<th>11/4</th>
<th>11/5</th>
<th>11/6</th>
<th>11/7</th>
<th>11/8</th>
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<td>Tx 67min</td>
<td>Tx 72min</td>
<td>Tx 70min</td>
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<tr>
<td>SOT OMRA ARD</td>
<td>------</td>
<td>Day 5</td>
<td>Day 6</td>
<td>Day 7</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
SOT OMRA – Example 3

• SOT OMRA ARD
  o 11/8 – 3 therapy days, 152 minutes
  o 11/9 – 4 therapy days, 224 minutes
  o 11/10 – 5 therapy days, 294 minutes

• 11/10 = RMB (CMI 41 - Urban)
SOT OMRA – Example 3

Outcome

- Complete SOT
- Therapy RUG higher than current nursing RUG
- Therapy RUG begins 11/4
EOT OMRA – Example 1

- Resident is classified in RHx
  - Therapy ends Monday
  - Skilled nursing services continue
- Is an EOT OMRA required?
- If so, what are the possible ARDs?
EOT OMRA – Example 1

• Yes, an EOT OMRA is required

• ARD must be Tuesday, Wednesday, or Thursday.
EOT OMRA – Example 2

- Resident is classified in HD2
  - Therapy ends Monday
  - Skilled nursing services continue
- Is an EOT OMRA required?
- If so, what are the possible ARDs?
EOT OMRA – Example 2

- EOT OMRA is not required, resident was not classified in therapy RUG.
EOT OMRA – Example 3

<table>
<thead>
<tr>
<th>Thurs</th>
<th>Fri</th>
<th>Sat</th>
<th>Sun</th>
<th>Mon</th>
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<tbody>
<tr>
<td>Therapy end</td>
<td>Therapy available</td>
<td>Therapy available</td>
<td>Therapy available</td>
<td>Resident is discharged.</td>
</tr>
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<td>Day 1</td>
<td>Day 2</td>
<td>Day 3</td>
<td></td>
</tr>
</tbody>
</table>

Resident in therapy RUG.

Therapy ends Thursday and is available 7 days/week.

Resident continues to require and receive skilled nursing services.

Resident is discharged to hospital (unplanned) on Monday.
EOT OMRA – Example 3^2

- Is an EOT OMRA required?
- If so, what are the possible ARDs?
Outcome

- Must complete EOT
  - ARD must = Friday, Saturday, or Sunday
  - May not be later than Sunday

- Previously in therapy RUG

- Skilled nursing services continue

- Payment changes day after last day of therapy - Friday
## EOT OMRA – Example 4

<table>
<thead>
<tr>
<th>Thurs</th>
<th>Fri</th>
<th>Sat</th>
<th>Sun</th>
<th>Mon</th>
<th>Tues</th>
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</thead>
<tbody>
<tr>
<td>Therapy end</td>
<td>Therapy available</td>
<td>Therapy not available</td>
<td>Therapy not available</td>
<td>Therapy available</td>
<td>Therapy available</td>
</tr>
<tr>
<td>EOT OMRA ARD</td>
<td>Day 1</td>
<td></td>
<td></td>
<td>Day 2</td>
<td>Day 3</td>
</tr>
</tbody>
</table>

Resident in therapy RUG.

Therapy ends Thursday and is available 5 days/week.

Resident does not continue to require and receive skilled services.
EOT OMRA – Example 42

• Is an EOT OMRA required?
• If so, what are the possible ARDs?
EOT OMRA – Example 4

- EOT OMRA not required, resident no longer receiving skilled services
### EOT OMRA – Example 5₁

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<tr>
<th>Thurs</th>
<th>Fri</th>
<th>Sat</th>
<th>Sun</th>
<th>Mon</th>
<th>Tues</th>
</tr>
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<tbody>
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<td>Therapy end</td>
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<td>Therapy not available</td>
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</tr>
<tr>
<td>EOT OMRA ARD ----→</td>
<td>Day 1</td>
<td></td>
<td></td>
<td>Day 2</td>
<td>Day 3</td>
</tr>
</tbody>
</table>

Resident in therapy RUG.

Therapy ends Thursday and is available 5 days/week.

Resident continues to require and receive skilled nursing services.
EOT OMRA – Example 5

- Is an EOT OMRA required?
- If so, what are the possible ARDs?
EOT OMRA – Example 53

Outcome

- Must complete EOT
  - ARD may = Friday, Monday, or Tuesday
  - May not be later than Tuesday
  - May be Saturday or Sunday
- Previously in therapy RUG
- Skilled nursing services continue
- Payment changes day after last day of therapy = Friday
Start of therapy 11/11.
ARD must be 5-7 days => 11/15, 11/16, 11/17

End of therapy 11/16.
ARD must be 1-3 days => 11/17, 11/18, 11/19
SOT/EOT OMRA – Example 1

- In order to combine
  - SOT must have therapy RUG
    - 6 days therapy
    - 247 minutes therapy = RMx
  - EOT need and receive skilled nursing
    - Skilled care continues to be needed and received
  - Days must overlap
    - 11/17
SOT/EOT OMRA – Example 1

Outcome

• Assessment
  o May combine SOT & EOT
  o If combine ARD must be 11/17

• Payment
  o Therapy RUG (Z0100A) 11/11 – 11/16
  o Non-therapy RUG (Z0150A) begins 11/17
SOT/EOT OMRA – Example 2

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<tr>
<td>SOT OMRA ARD</td>
<td>---→</td>
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<td>Day 6</td>
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</tbody>
</table>

Start of therapy 11/11.
ARD must be 5-7 days => 11/15, 11/16, 11/17

End of therapy 11/17.
ARD must be 1-3 days => 11/18, 11/19, 11/20
SOT/EOT OMRA – Example 2

• In order to combine
  o SOT must have therapy RUG
    ▪ 5 days therapy
    ▪ 213 minutes therapy = RMx
  o EOT need and receive skilled nursing
    ▪ Skilled care continues to be needed and received
  o Days must overlap
    ▪ No ARD days overlap
Outcome

• Assessment
  o May not combine SOT & EOT
  o Must complete SOT w/ ARD 11/17
  o Must complete EOT w/ ARD 11/18, 11/19, 11/20

• Payment
  o Therapy RUG 11/11 - 11/17
  o Non-therapy RUG (Z0150A) begins 11/18
### SOT/EOT OMRA – Example 3

<table>
<thead>
<tr>
<th>Date</th>
<th>11/12</th>
<th>11/13</th>
<th>11/14</th>
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<td>Tx 48</td>
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<tr>
<td>SOT OMRA ARD</td>
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<td>Day 5</td>
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<td>Day 2</td>
<td>Day 3</td>
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</tbody>
</table>

Therapy start 11/11.
SOT ARD 5-7 days => 11/15, 11/16, 11/17

Therapy end 11/15.
EOT ARD 1-3 days => 11/16, 11/17, 11/18

Nursing restorative program not occurring
SOT/EOT OMRA – Example 3

In order to combine:

- SOT must have therapy RUG
  - 4 days therapy
  - 180 minutes therapy

- EOT need and receive skilled nursing
  - Skilled care continues to be needed and received

- Days must overlap
  - 11/16 & 11/17
Outcome

• Assessment
  o Not appropriate to complete SOT
    ▪ 4 days therapy
    ▪ No restorative nursing program in place
  o EOT OMRA therefore not indicated
    ▪ Not in rehab RUG
### Short Stay – Example 1

<table>
<thead>
<tr>
<th>Day 1</th>
<th>Day 2</th>
<th>Day 3</th>
<th>Day 4</th>
<th>Day 5</th>
<th>Day 6</th>
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Short Stay – Example 12

- Does resident meet short stay policy requirements?
Short Stay – Example 1

1. SOT OMRA
2. 5-day assessment
3. Stay is 8 days or less (7 days)
4. ARD of SOT OMRA = end of Medicare stay date
5. ARD is not more than 3 days after start of therapy
6. Therapy started within last 4 days of stay
7. Therapy continued through last day of stay
8. RUG is Rehab group
   • RUG for days 4-7 = RMx (Z0100A)
## Short Stay Example 2

<table>
<thead>
<tr>
<th>Day 1</th>
<th>Day 2</th>
<th>Day 3</th>
<th>Day 4</th>
<th>Day 5</th>
<th>Day 6</th>
<th>Day 7</th>
<th>Day 8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medicare</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Medicare End Date ARD</td>
</tr>
<tr>
<td>Start Date</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Therapy Eval</td>
<td></td>
<td></td>
<td></td>
<td>No therapy</td>
<td></td>
<td></td>
<td>TherapyTx 40 minutes</td>
</tr>
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<td></td>
<td></td>
<td>Therapy Tx 40 minutes</td>
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<td></td>
<td>Therapy Tx 45 minutes</td>
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<td></td>
<td></td>
<td>Therapy Tx 40 minutes</td>
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</tr>
</tbody>
</table>

**Due to the nature of this example, specific therapy times are not applicable.**
Short Stay – Example 2

- Does resident meet short stay policy requirements?
Short Stay – Example 2

1. SOT OMRA
2. 5-day assessment
3. Stay is 8 days or less (Day 8)
4. ARD of SOT OMRA = end of Medicare stay date
5. ARD is more than 3 days after start of therapy
6. Therapy did not start within last 4 days of stay
7. Therapy continued through last day of stay
Short Stay – Example 24

- Does not meet requirements for short stay
  - ARD is more than 3 days after start of therapy
  - Therapy did not start within last 4 days of stay
## Short Stay Example 3

<table>
<thead>
<tr>
<th>Day 1</th>
<th>Day 2</th>
<th>Day 3</th>
<th>Day 4</th>
<th>Day 5</th>
<th>Day 6</th>
<th>Day 7</th>
<th>Day 8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medicare Start Date</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Medicare End Date ARD</td>
<td></td>
</tr>
<tr>
<td>Therapy Eval 20 minutes</td>
<td>No therapy</td>
<td>Therapy Tx 30 minutes</td>
<td>Therapy Tx 30 minutes</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Diagnosis: COPD, SOB while lying flat, sitting at rest and upon exertion
Daily respiratory treatment, daily O2.
PHQ-9 total severity score 18
ADL score 15
Short Stay – Example 3₂

• Does resident meet short stay policy requirements?
Short Stay – Example 3

1. SOT OMRA
2. 5-day assessment
3. Stay is 8 days or less (7 days)
4. ARD of SOT OMRA = end of Medicare stay date
5. ARD is not more than 3 days after start of therapy
6. Therapy started within last 4 days of stay
7. Therapy continued through last day of stay
Short Stay – Example 3_4

• What are the possible RUG assignments?
• What should you complete based on this information?
Short Stay – Example 35

- **RUGs**
  - **Therapy - RLB**
    - $20 + 30 + 30/4 = 20$ minutes prorated
    - ADL index 15
  - **Nursing - HE2, CE2**
    - COPD w/ SOB lying flat => special care high
    - Respiratory therapy 7 days => special care high
    - Daily O2 => clinically complex
Short Stay – Example 3

- CMIs
  - RLB – 44 rural, 44 urban
  - HE2 – 46 rural, 47 urban
  - CE2 – 35 rural, 35 urban

- Do not complete SOT OMRA
  - While person meets most of requirements for short stay, therapy RUG pays less than HE2
  - Grouper will index maximize to HE2 and the SOT OMRA would be rejected
Early Assessment – Example

Scenario

- Resident admitted 12/11/2010 and Medicare stay started same day
- 5-day assessment 12/17/2010 => RHC
- 14-day assessment 12/21/2010 => RHC
- 30-day assessment 12/28/2010 => RVB
- Discharged 01/28/2011
Early Assessment – Example

Outcome

• RHC

  o 5-day
    ▪ ARD window days 1-8 (day 7)
    ▪ Payment days 1-14
  o 14-day
    ▪ ARD window days 11-19 (day 11)
    ▪ Payment days 15-30
  o ARDs for both assessments timely
Early Assessment – Example

• RVB
  o 01/13/2011 – 01/27/2011
  o 30-day
    ▪ ARD window days 21-34 (day 18)
    ▪ Payment days 31-60

• Default
  o 01/10/2011 - 01/12/2011
  o 30-day
    ▪ ARD was 3 days early
Late Assessment – Example

Scenario

- Resident admitted 12/11/2010 and Medicare stay started same day
- 5-day assessment 12/18/2010 => RHC
- 14-day assessment 12/29/2010 => RHC
- 30-day assessment 01/20/2011 => RVB
- Discharged 02/05/2011
Outcome

- RHC
  - 5-day
    - ARD window days 1-8 (day 8)
    - Payment days 1-14
  - 14-day
    - ARD window days 11-19 (day 19)
    - Payment days 15-30
  - ARDs for both assessments timely
Late Assessment – Example

- **RVB**
  - 01/20/2011 – 02/04/2011
  - 30-day
    - ARD window days 21-34 (day 41)
    - Payment days 31-60

- **Default**
  - 01/10/2011 - 01/19/2011
  - 30-day
    - ARD was late
Missed Assessment – Example

Scenario

- Resident admitted 12/11/2010 and Medicare stay started same day
- 5-day assessment 12/17/2010 => RHC
- 14-day assessment 12/21/2010 => RHC
- Discharged 01/20/2011
- Facility reviews assessment log 01/28/2011
Missed Assessment – Example

Outcome

• RHC
  o 5-day
    ▪ ARD window days 1-8 (day 7)
    ▪ Payment days 1-14
  o 14-day
    ▪ ARD window days 11-19 (day 11)
    ▪ Payment days 15-30
  o ARDs for both assessments timely
Missed Assessment – Example

• No payment
  o 01/10/2011 - 01/19/2011
  o 30-day
    ▪ ARD window days 21-34
    ▪ Payment days 31-60
    ▪ Determined not completed 01/ 28/2011
    ▪ May not complete assessment with ARD after resident is discharged from Part A
Questions