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# SunSolutions **SPOTLIGHT** News Break

## March 13, 2012, CMS Update: Highlights from the 2012 MDS National Conference which was held on March 6-7 and repeated on March 8-9, 2012, at the Hyatt Regency St. Louis at the Arch in St. Louis, MO.

The conference was open to all long-term care providers, provider associations, consultants, vendors, and organizations that support quality care in the nation's nursing home facilities. The goal of the conference was to address changes to the MDS 3.0 and MDS-related activities.

The conference presenters addressed updates to the MDS 3.0 and assessment completion. The following information provides updates to assessment policies and information on provider liability:

### Assessment Combination

Unscheduled assessments will dictate assessment combinations

### Combining Scheduled and Unscheduled PPS Assessments

If the ARD for an unscheduled PPS assessment falls within the ARD window (including grace days) of a scheduled PPS assessment and the ARD for the scheduled assessment would be set for a day that falls within the unscheduled assessment then the assessments must be combined.

### Example

If the ARD for an EOT OMRA is Day 14 of a resident's stay and the 14-day scheduled PPS assessment is not set prior to Day 14 then



## Corporate Compliance Review

### Be Proactive...

With ever increasing regulatory transparency and the recent OIG activities for facility audits, now more than ever it is important to have an effective compliance program. Did you know that an effective compliance program can reduce fines under federal sentencing guidelines?

### Be Sure...

SunSolutions offers peace of mind by assisting your facility in development and oversight of a Corporate Compliance program. SunSolutions Corporate Compliance products are customized and designed to address areas of high risk.

On-site in depth risk

the assessments must be combined and facilities should use appropriate AI code to indicate the combined assessment

### **Question?**

What happens if I do not combine assessments as I should?

### **Answer**

If a scheduled assessment ARD is set for a day that is after the ARD set for an unscheduled assessment, and the ARD for the unscheduled assessment is set for a day within the scheduled assessment ARD window, then the scheduled assessment is not used for payment purposes.

### **Example 1**

EOT OMRA completed with ARD on Day 14

- Resident last received therapy on Day 11
- 14 day assessment ARD set on Day 15- ***Violates assessment policy***

### **Example 2**

COT OMRA completed with ARD of Day 13

- 14-Day assessment ARD set for Day 15

The COT OMRA would pay beginning on Day 7 (Day 1 of the COT observation period) through Day 15 and continue until the next scheduled or unscheduled assessment used for payment  
The next COT observation period end date: Day 20

### **COT and Other Assessments**

If the ARD of a PPS assessment used for payment is set for on or prior to Day 7 of the COT observation period then no COT OMRA would be required

### **Relevance of “used for payment”**

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 on the COT ARD calendar

### **Example**

If the last day of the COT observation period is on May 4 and the ARD of the 30-day assessment is set for May 4, then the SNF may choose not to complete the COT OMRA (assuming the resident is not discharged prior to Day 32 of the stay) and the COT observation period would begin on May 5.

assessment to:

- Billing Practices
- Policies and Procedures
- Personnel and Contractor Records
- Admission/Discharge Data

### **Be Ready...**

When you contact SunSolutions we can provide support and work with your teams in the following areas:

- PPS Analysis
- Medicare Program Training
- MDS/RUG Review and Training
- Final Rule Mitigation Audit and Training
- RAC/ADR Preparation & Analysis
- Operations Assessment
- Case Mix analysis/Training Medicare Institute
- Medicare Compliance and MDS Accuracy Review

### **Quick Questions to Ask Yourself:**

- Are you confident you're not at risk for billing default days?
- Does your MDS Nurse understand the new policies for COT and EOT OMRA Assessments?
- Are you doing everything possible to secure your Medicare Rate?

If you answered no to any of the above questions, you can't afford not to contact SunSolutions Consulting.

**For unparalleled results, call SunSolutions Consulting today.**



### **Contact Info**

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Contact SunSolutions Consulting at  
sunsolutionsconsulting@sunh.com or

If the ARD of a PPS assessment used for payment is set on or prior to Day 7 of the COT observation period, then no COT OMRA would be required.

### **Example**

If the last day of the COT observation period is on May 4 and the ARD for an EOT OMRA is set for May 4, the SNF may choose not to complete the COT OMRA. If the ARD for the EOT OMRA were set for May 5 regardless of when therapy ended, then a COT OMRA would be required with an ARD of May 4. The ARD of the EOT in this example affects next assessment schedule.

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tollfree - (888) 867 2220 for a listing of products, services or to schedule an educational seminar/ teleconference.

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