

Transition for Implementation of FY 2015 SNF PPS MDS 3.0 Policy Changes

Revision to COT OMRA Completion Requirements

Policy Summary

For the reasons specified in the FY 2015 Skilled Nursing Facility (SNF) Prospective Payment System (PPS) Final Rule (79 FR 45647 through 45649) and FY 2015 SNF PPS Proposed Rule (79 FR 25786 through 79 FR 25788), providers are permitted, in certain circumstances, to complete a Change of Therapy (COT) Other Medicare Required Assessment (OMRA) for a resident who is not currently classified into a Resource Utilization Group, Version 4 (RUG-IV) therapy group, or receiving a level of therapy sufficient for classification into a RUG-IV therapy group. These circumstances are limited to cases in which the resident had qualified for a RUG-IV therapy group on a prior assessment during the resident's current Medicare Part A stay and had no discontinuation of therapy services between Day 1 of the COT observation period for the COT OMRA that classified the resident into his/her current non-therapy RUG-IV group and the Assessment Reference Date (ARD) of the COT OMRA that reclassified the resident into a RUG-IV therapy group.

Transition Policy

This policy is effective on October 1, 2014. More specifically, the COT OMRA which would be used to reclassify the resident into a RUG-IV therapy group from a RUG-IV non-therapy group, pursuant to the rules associated with this policy outlined in the FY 2015 SNF final rule (79 FR 45647 through 45649) and in the Minimum Data Set, Version 3.0 (MDS 3.0) manual, must have an ARD set for on or after October 1, 2014.