

SNF PPS and RUG-IV

SNF PPS Assessments and Policies

September 1, 2010

Agenda

- SNF PPS Assessments
- SNF Part A Policies
 - Early assessment
 - Late assessment
 - Missed assessment
 - Medicare Short Stay
- Examples

PPS Assessments

PPS Assessments₁

OBRA, PPS, and Tracking Records

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

PPS Assessments₂

Scheduled – A0310B

- o 5-day
- o 14-day
- o 30-day
- o 60-day
- o 90-day
- o Readmission/return

PPS Assessments₃

Scheduled – A0310B

- o Predetermined assessment window and grace days
 - May not combine scheduled assessments
- o One scheduled may **not** replace another scheduled
- o Must be completed sequentially
- o Predetermined payments days, which may be impacted by unscheduled assessment

PPS Assessments₄

Assessment Type	Assessment Reason	ARD	ARD Grace Days	Standard Medicare Payment Days
5-day Readmission	01 06	1-5	6-8	1-14
14-day	02	11-14	15-19	15-30
30-day	03	21-29	30-34	31-60
60-day	04	50-59	60-64	61-90
90-day	05	80-89	90-94	91-100

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

PPS Assessments₅

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

PPS Assessments₆

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

PPS Assessments₇

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

PPS Assessments₈

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

PPS Assessments₉

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

PPS Assessments₁₀

Unscheduled – A0310A,B,C,D

- o May occur any time during stay when requirements met
- o May be combined with a PPS scheduled assessment
- o May be combined with each other^

^Significant change in status and significant correction of prior comprehensive may not be combined

PPS Assessments₁₁revised

Unscheduled – A0310A,B,C,D

- o 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 or beginning of payment period when grace day

PPS Assessments_{12revised}

Unscheduled – A0310A,B,C,D

- o 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 or beginning of payment period when grace day

PPS Assessments₁₃

Unscheduled – A0310A,B,C,D

- o 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 Assessments₁₄

- **SOT OMRA**

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

*Rehabilitation or Extensive Services Plus Rehabilitation

PPS Assessments₁₅revised

- **EOT OMRA**

- Not new assessment
- Not optional
- Complete only when skilled care continues
 - When there is a break in the furnishing of therapy for 3 or more treatment days, an EOT OMRA is required
- 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
 - o 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
 - o 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_{revised}

- Not new
- Paid default rate for # of days assessment out of compliance
- Applicable to all assessment types
 - Exception: when ARD for EOT OMRA is set on day of discharge from Part A and therapy not normally provided

Late Assessment_{revised}

- Not new, applicable to all assessment types
- 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[^] revised

- 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*

[^]see Chapter 6 of RAI manual for detail

*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^{revised}

- Late assessment
 - Omission is discovered while resident is in SNF Part A stay and a SNF PPS assessment is then completed
 - ARD must be during SNF Part A stay
- Missed assessment
 - Omission is discovered after SNF Part A stay and an assessment already exists
 - ARD must be during SNF Part A stay, except for
 - Notified untimely of MSP denial, revocation payment ban, and dis-enrollment from MA plan
 - Demand bill request

Examples

SOT OMRA- Example 1₁

- 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 1₂

- 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 2₁

11/4	11/5	11/6	11/7	11/8	11/9	11/10
Therapy start 22min	No tx	No tx	Tx 63min	Tx 67min	Tx 72min	Tx 70min
SOT OMRA ARD			-----→	Day 5	Day 6	Day 7

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 2₂

- 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 2₃

Outcome

- o Do not complete SOT
- o SOT is optional
- o 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

SOT OMRA- Example 3₁

11/4	11/5	11/6	11/7	11/8	11/9	11/10
Therapy start 22min	No tx	No tx	Tx 63min	Tx 67min	Tx 72min	Tx 70min
SOT OMRA ARD			-----→	Day 5	Day 6	Day 7

Resident in LD2 (CMI 38 - Urban)

Start of therapy 11/4.

ARD must be 5-7 days => 11/8, 11/9, 11/10

SOT OMRA – Example 3₂

- 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 3₃

Outcome

- o Complete SOT
- o Therapy RUG higher than current nursing RUG
- o Therapy RUG begins 11/4

EOT OMRA – Example 1₁

- 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 1₂

- Yes, an EOT OMRA is required
- ARD must be Tuesday, Wednesday, or Thursday.

EOT OMRA – Example 2₁

- 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 2₂

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

EOT OMRA – Example 3₁

Thurs	Fri	Sat	Sun	Mon
Therapy end	Therapy available	Therapy available	Therapy available	Resident is discharged.
EOT OMRA ARD ----→	Day 1	Day 2	Day 3	

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 3₂

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

EOT OMRA – Example 3₃

Outcome

- o Must complete EOT
 - ARD must = Friday, Saturday, or Sunday
 - May not be later than Sunday
- o Previously in therapy RUG
- o Skilled nursing services continue
- o Payment changes day after last day of therapy - Friday

EOT OMRA – Example 4₁

Thurs	Fri	Sat	Sun	Mon	Tues
Therapy end	Therapy available	Therapy not available	Therapy not available	Therapy available	Therapy available
EOT OMRA ARD ----→	Day 1			Day 2	Day 3

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 4₃

- EOT OMRA not required, resident no longer receiving skilled services

EOT OMRA – Example 5₁

Thurs	Fri	Sat	Sun	Mon	Tues
Therapy end	Therapy available	Therapy not available	Therapy not available	Therapy available	Therapy available
EOT OMRA ARD ----→	Day 1			Day 2	Day 3

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 5₂

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

EOT OMRA – Example 5₃

Outcome

- o Must complete EOT
 - ARD may = Friday, Monday, or Tuesday
 - May not be later than Tuesday
 - May be Saturday or Sunday
- o Previously in therapy RUG
- o Skilled nursing services continue
- o Payment changes day after last day of therapy = Friday

SOT/EOT OMRA – Example 1₁

11/11	11/12	11/13	11/14	11/15	11/16	11/17	11/18	11/19
Therap y start 32 min	Tx 48 min	Tx 56 min	Tx 44 min	Tx 37 min	Therapy end 30 min			
SOT OMRA ARD			----->	Day 5	Day 6	Day 7		
Start of therapy 11/11			EOT OMRA ARD			----->	Day	Day 2
ARD must be 5-7 days => 11/15, 11/16, 11/17						1		Day 3

End of therapy 11/16.

ARD must be 1-3 days => 11/17, 11/18, 11/19

SOT/EOT OMRA – Example 1₂

- 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 1₃

Outcome

- Assessment
 - May combine SOT & EOT
 - If combine ARD must be 11/17
- Payment
 - Therapy RUG (Z0100A) 11/11 – 11/16
 - Non-therapy RUG (Z0150A) begins 11/17

SOT/EOT OMRA – Example 2₁

11/11	11/12	11/13	11/14	11/15	11/16	11/17	11/18	11/19	11/20
Therapy start 32min	Tx 48min	Tx 56min			Tx 30min	Therapy end 47min			
SOT OMRA ARD			---→	Day 5	Day 6	Day 7			
EOT OMRA ARD						-----→	Day 1	Day 2	Day 3

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 2₂

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

SOT/EOT OMRA – Example 2₃

Outcome

- Assessment
 - May not combine SOT & EOT
 - Must complete SOT w/ ARD 11/17
 - Must complete EOT w/ ARD 11/18, 11/19, 11/20
- Payment
 - Therapy RUG 11/11 - 11/17
 - Non-therapy RUG (Z0150A) begins 11/18

SOT/EOT OMRA – Example 3₁

11/11	11/12	11/13	11/14	11/15	11/16	11/17	11/18
Therapy Start 32	Tx 48	Tx 56		Therapy end 44			
SOT OMRA ARD			-----→	Day 5	Day 6	Day 7	
EOT OMRA ARD				-----→	Day 1	Day 2	Day 3

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 3₂

- 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

SOT/EOT OMRA – Example 3₃

Outcome

- Assessment
 - Not appropriate to complete SOT
 - 4 days therapy
 - No restorative nursing program in place
 - EOT OMRA therefore not indicated
 - Not in rehab RUG

Short Stay – Example 1₁

Day 1	Day 2	Day 3	Day 4	Day 5	Day 6	Day 7
Medicare Start Date						Medicare End Date ARD
			Therapy Eval	Therapy Tx 40 minutes	Therapy Tx 45 minutes	Therapy Tx 40 minutes

Short Stay – Example 1₂

- Does resident meet short stay policy requirements?

Short Stay – Example 1₃

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 2₁

Day 1	Day 2	Day 3	Day 4	Day 5	Day 6	Day 7	Day 8
Medicare Start Date							Medicare End Date ARD
			Therapy Eval	No therapy	Therapy Tx 40 minutes	Therapy Tx 45 minutes	Therapy Tx 40 minutes

Short Stay – Example 2₂

- Does resident meet short stay policy requirements?

Short Stay – Example 2₃

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 3₁

Day 1	Day 2	Day 3	Day 4	Day 5	Day 6	Day 7	Day 8
Medicare Start Date						Medicare End Date ARD	
			Therapy Eval 20 minutes	No therapy	Therapy Tx 30 minutes	Therapy Tx 30 minutes	

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 3₃

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 3₄

- What are the possible RUG assignments?
- What should you complete based on this information?

Short Stay – Example 3₅

- RUGs
 - o Therapy - RLB
 - $20+30+30/4 = 20$ minutes prorated
 - ADL index 15
 - o 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 3₆

- CMIs
 - o RLB – 44 rural, 44 urban
 - o HE2 – 46 rural, 47 urban
 - o CE2 – 35 rural, 35 urban
- Do not complete SOT OMRA
 - o While person meets most of requirements for short stay, therapy RUG pays less than HE2
 - o Grouper will index maximize to HE2 and the SOT OMRA would be rejected

Early Assessment – Example₁

Scenario

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

Early Assessment – Example₂

Outcome

- RHC
 - o 12/11/2010 – 01/09/2011
 - 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

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Early Assessment – Example₃

- RVB
 - 01/13/2011 – 01/27/2011
 - 30-day
 - ARD window days 21-34 (day 18)
 - Payment days 31-60
- Default
 - 01/10/2011 - 01/12/2011
 - 30-day
 - ARD was 3 days early

Late Assessment – Example₁

Scenario

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

Late Assessment – Example₂

Outcome

- RHC
 - o 12/11/2010 – 01/09/2011
 - o 5-day
 - ARD window days 1-8 (day 8)
 - Payment days 1-14
 - o 14-day
 - ARD window days 11-19 (day 19)
 - Payment days 15-30
 - o ARDs for both assessments timely

Late Assessment – Example₃

- 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 – Example₁

Scenario

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

Missed Assessment – Example₂

Outcome

- RHC
 - o 12/11/2010 – 01/09/2011
 - 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 – Example₃

- No payment
 - 01/10/2011 - 01/19/2011
 - 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