

## **AGENDA**

NEVADA DIVISION of PUBLIC and Behavioral Health

09:00 - 10:10

Carol Eastburg, DPBH

10:20 - 11:30

Chris Christiano, DHCFP

11:30 - 12:00

Post-test/Answers/Eval

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## **OBJECTIVES FOR THIS SESSION**

Attendees will:

- $\checkmark$  Be familiar with recent and future changes to the RAI Item Sets
- $\checkmark$  Understand how to properly code Items addressed
- ✓ Know where to find information you need

## **DISCLAIMER**



The information in this presentation was current when assembled. As CMS frequently makes changes, the information presented here may also change.

Attendees are encouraged to review the specific statutes, regulations, and other interpretive materials on a regular basis to ensure a full and accurate, up-to-date understanding of CMS requirements.

No AI was purposely used in the preparation of this presentation.

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## LAST SESSION:



- ✓ Active and inactive diagnoses
- √ Functional status and limitations
- ✓ Nursing monitoring
- ✓ Different look-back periods (UTI = 30 days)/criteria x?
- ✓ Documentation required and where to find it
- √ Major surgery and required skilled care in a SNF

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## **FOLLOW-UP QUESTION #1**



#### **UTI Upon LTC Admission**

Resident is admitted from acute care to a SNF with a diagnosis of UTI:

Is McGeer criteria / information needed from the transferring hospital?

## **FOLLOW-UP RESPONSE #1**



#### **UTI Criteria Requirement:**

"If the diagnosis of UTI was made prior to the resident's admission, entry, or reentry into your facility, it is **not** necessary to obtain **or** evaluate the evidence-based criteria used to make the diagnosis in the prior setting. A **documented** physician (or allowed practitioner) **diagnosis of UTI** prior to admission is acceptable. This information may be included in the hospital transfer summary or other paperwork...

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## FOLLOW-UP RESPONSE #1, Cont.



#### UTI Criteria Requirement, Continued:

When the resident is transferred, but not admitted, to a hospital (e.g., emergency room visit, observation stay) the facility must use evidence-based criteria to evaluate the resident and determine if the criteria for UTI are met AND verify that there is a physician-documented UTI diagnosis when completing I2300 Urinary Tract Infection (UTI)."

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## FOLLOW-UP RESPONSE #1, Cont.



#### Code Active UTI only if both of the following are met:

- 1. Diagnosed using McGeer, NHSN, or Loeb criteria in the last 30 days and
- 2. A physician or allowed non-physician practitioner documented UTI diagnoses in the last 30 days

## **FOLLOW-UP QUESTION #2**



#### For a Schizophrenia Diagnosis:

"...when can it be coded because technically, we will never meet the 60-day documentation requirement of behaviors prior to the diagnosis being made."

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## **FOLLOW-UP RESPONSE #2**



State Operations Manual, Appendix PP:

(Rev. 211; Issued: 02-03-23; Effective: 10-21-22; Implementation: 10-24-22)

§483.10(e) Respect and Dignity. The resident has a right to be treated with respect and dignity, including:

\$483.10(e)(1) The right to be free from any physical or chemical restraints imposed for purposes of discipline or convenience, and not required to treat the resident's medical symptoms, consistent with \$483.12(a)(2).

§483.12(a) The facility must-

§483.12(a)(2) Ensure that the resident is free from physical or chemical restraints imposed for purposes of discipline or convenience and that are not required to treat the resident's medical symptoms. When the use of restraints is indicated, the facility must use the least restrictive alternative for the least amount of time and document ongoing re-evaluation of the need for restraints.

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## **INACTIVE DIAGNOSIS**



Example F:

A resident was admitted with <u>no documented psychiatric diagnoses</u>. After admission, the primary provider ordered an antipsychotic medication secondary to the resident resisting personal care. The medical record <u>lacked a detailed evaluation by an appropriate practitioner</u> of the resident's mental, physical, psychosocial, and functional status and persistent behaviors for <u>six months prior to the start of the antipsychotic medication in accordance with professional standards.</u> medication, in accordance with professional standards.

**I6000, Schizophrenia**, should not be coded due to a lack of documentation of a detailed evaluation of the resident's mental, physical, psychosocial, functional status and persistent behaviors for the time period required.

## FOLLOW-UP RESPONSE #2, cont.



#### Diagnostic and Statistical Manual of Mental Disorders:

- Two or more characteristic symptoms (delusions, hallucinations, disorganized speech, disorganized behavior, negative symptoms) for a significant portion of a six-month period (symptoms must include at least one of the first three)
- Prodromal or attenuated signs of illness with social, occupational, or self-care impairments evident for a six-month period that includes one month of active symptoms



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## FOLLOW-UP QUESTION #3



#### Section GG:

Must staff documenting this section be licensed?

#### MODIFIED TO READ:

Who can document in the RAI?

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## **FOLLOW-UP RESPONSE #3**



#### From Page 1-4:

The RAI process has multiple regulatory requirements. Federal regulations at 42 CFR 483.20 (b)(1)(xviii), (g), and (h) require that

- (1) the assessment  $\mbox{\bf accurately reflects}$  the resident's status
- (2) a  ${\it registered}$   ${\it nurse}$  conducts or coordinates each assessment with the appropriate participation of health professionals
- (3) the assessment process **includes** direct observation, as well as communication with the resident and direct care staff on all shifts.

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## **FOLLOW-UP RESPONSE #3**



#### Continued from Page 1-4:

Nursing homes are left to determine

- (1) who should participate in the assessment process
- (2) how the assessment process is completed

(3) how the assessment information is documented while **remaining in compliance** with the requirements of the Federal regulations and the instructions contained within the manual.

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## LPN PRACTICE DECISION



#### Requirements for LPN to participate in MDS/RAI Assessment:

- 1. A Registered Nurse (RN) Coordinator has assigned completion of the MDS/RAI Assessment to the LPN consistent with NAC 632.230.
- 2. The LPN has completed the Center of Medicare and Medicaid Services (CMS) MDS 3.0 Training or equivalent, in compliance with NAC 632.242.

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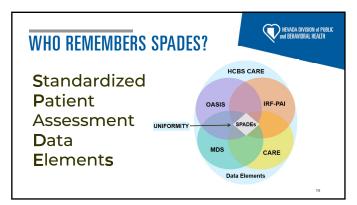
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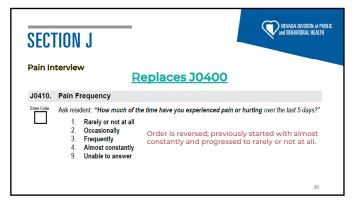
## **Z0400**



#### Signature of Persons Completing the Assessment...

certify that the accompanying information accurately reflects resident assessment information for this resident and that I collected or coordinated collection of this information on the dates specified. To the best of my knowledge, this information was collected in accordance with applicable Medicare and Medicaid requirements. I understand that this information is used as a basis for ensuring that residents receive appropriate and quality care, and as a basis for payment from federal funds. I further understand that payment of such federal funds and continued participation in the government-funded health care programs is conditioned on the accuracy and truthfulness of this information, and that I may be personally subject to or may subject my organization to substantial criminal, civil, and/or administrative penalties for submitting false information. I also certify that I am authorized to submit this information by this facility on its behalf.









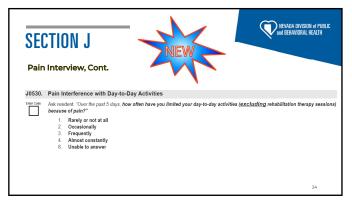
## **REHAB/RESTORATIVE REMINDER**



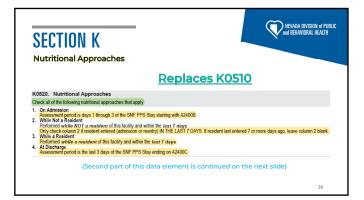
- •Rehabilitation therapies **may include** treatment supervised in person by a therapist or nurse or other staff **or** the resident carrying out a prescribed therapy program <u>without staff members present</u>.
- Rehabilitation therapies do not include restorative nursing programs.

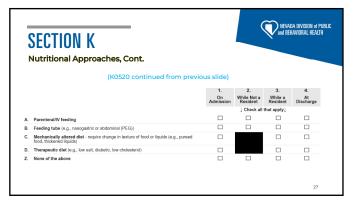
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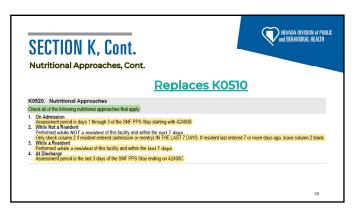
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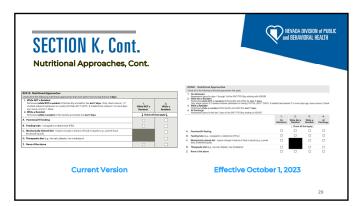


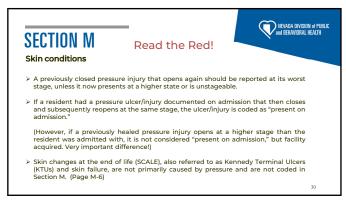


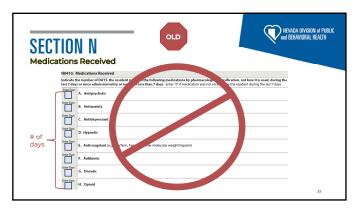


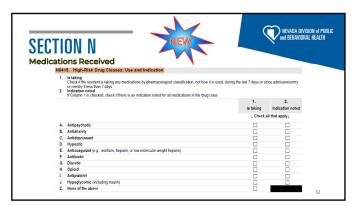


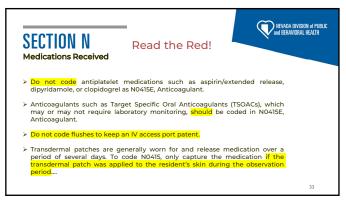












## **RECAP/SUMMARY**



- ✓ Required criteria (type and source) for coding UTI active
- $\checkmark \ \mathsf{Documentation} \ \mathsf{requirements} \ \mathsf{for} \ \mathsf{legitimate} \ \mathsf{use} \ \mathsf{of} \ \mathsf{anti-psychotics}$
- $\checkmark \mbox{Who can participate in completing the RAI}$
- ✓ Changes and new items in Section J (Pain)
- ✓ Updates regarding rehab therapies and residents carrying out their programs independently
- ✓ Changes in Section K (Nutrition)
- ✓ Changes in Sections M and N
- $\checkmark {\sf There}$  is a lot of new information written in RED and everyone needs to, at the minimum, Read the Red!

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## **CONTACT INFORMATION**



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## **ACRONYMS**

- NEVADA DIVISION of PUBLIC and BEHAVIORAL HEALTH
- · ADLs Activities of Daily Living
- Al-Artificial Intelligence
- ARD Assessment Reference Date
- ASPEN Automated Survey
- Processing Environment

  BIMS Brief Interview for Mental Status
- CAA Care Area Assessment
- CARE Continuity Assessment Record and Evaluation
- CASPER Certification and Survey Provider Enhanced Reports
- CCN CMS Certification Number
- CMS Centers for Medicare &
- Medicaid Services • DSM-5-TR – Diagnostic and Statistical Manual of Mental
- Disorders, Fifth Ed. Text Rev. · HCBS - Home and Community-**Based Services**
- IDT Interdisciplinary Team
- IMPACT Improving Medicare Post-Acute Care Transformation (Act of 2014)

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## **ACRONYMS**



- iQIES internet Quality Improvement Evaluation System
  • IRF – Inpatient Rehabilitation Facility
- LTCH Long Term Care Hospital
- MDS Minimum Data Set, aka RAI
- NAC\* Nevada Administrative Code
- NAC\* Nurse Assessment Coordinator
   \*SNF Skilled Nursing Facility
- NF Nursing Facility

  NPP Non-Physician Practitioner (also
- known as allowed practitioner)

- •OASIS Outcomes and Assessment Instrument Set
- •PAI Patient Assessment Instrument
- •PHQ Patient Health Questionnaire
- •RAI Resident Assessment Instrument, aka MDS
- •SPADEs Standardized Patient
- Assessment Data Elements

\*Context!

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## RESOURCES, 1



https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/MDS30RAIManual

DHHS Official YouTube Channel

https://www.youtube.com/channel/UC5Bfpf86CylhRm6vP5rjfRA

Medicare Benefit Policy Manual Chapter 8

https://beta.cms.gov/regulations-and-guidance/guidance/manuals/downloads/bp102c08pdf.pdf

## RESOURCES, 2 Pathway Health

NEVADA DIVISION of PUBLIC and BEHAVIORAL HEALTH

https://pathway-interact.com/

DSM-5-TR History

 $\frac{\text{https://www.psychiatry.org/psychiatrists/practice/dsm/about-dsm/history-of-the-dsm}{}$ 

Antipsychotic Medications https://nursinghome411.org/ap-list/

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## RESOURCES, 3



State Operations Manual (SOM) Appendix PP

https://www.cms.gov/medicare/provider-enrollment-and-certification/guidanceforlawsandregulations/downloads/appendix-pp-state-operations-manual.pdf (See Page 127 and guidance; Tags F757 and F758)

LPN Scope of Practice Decision Regarding MDS/RAI

 $\frac{https://nevadanursingboard.org/wp-content/uploads/2022/03/LPN-MDS-RAI-final.pdf}{}$ 



Richard Whitley Director

#### **Medicaid Review Process**

Division of Healthcare Financing and policy Christopher Christiano RN RAC-CT HCC IV State of Nevada Case Mix Coordinator September 20<sup>th</sup>, 2023



Department of Health and Human Services





## Agenda

- PDPM Transition update
- Diagnosis
- Isolation
- Section D Moods
- Section GG
- Questions

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#### **PDPM Transition**

- Nevada Medicaid will transition from RUG III payment model to PDPM on July  $1^{\text{st}}$ , 2024
- Stakeholder meetings are currently being held to discuss, determine and finalize components of transition to PDPM
- Section G data will no longer be collected
- Section GG will be reviewed
- Most of previously reviewed RUG III Items will be reviewed



#### **PDPM Transition**

- Reviews will start as early as January 2024
- Nevada Medicaid is investigating/working towards a mostly remote review process
- Reviews will still be annually
- Point of time vs. time weighted CMI average system
- Review notification process will be most likely be unchanged
- All updates will be provided through MDS-PDPM emails

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#### Diagnosis 10020

- Section I Primary Diagnosis Items An improper response for a resident's primary diagnosis in Section I prevents PDPM classification into any PDPM case mix group
- Section I, items I0020 and I0020B require a medical condition category and valid ICD10 code representing the diagnosis. When the ICD-10 code is blank or invalid, the HIPPS code is not generated for the assessment
- When diagnosis is completed for OBRA assessment be sure to enter diagnosis

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#### 10020: Indicate the resident's primary medical condition category

10020. Indicate the resident's primary medical condition category		
ı	Complete	only if A0310B = 01 or if state requires completion with an OBRA assessment
ı		Indicate the resident's primary medical condition category that best describes the primary reason for admission
ı	Enter Code	01. Stroke
ı		02. Non-Traumatic Brain Dysfunction
ı		03. Traumatic Brain Dysfunction
ı		04. Non-Traumatic Spinal Cord Dysfunction
ı		05. Traumatic Spinal Cord Dysfunction
ı		06. Progressive Neurological Conditions
ı		07. Other Neurological Conditions
ı		08. Amputation
ı		09. Hip and Knee Replacement
ı		10. Fractures and Other Multiple Trauma
ı		11. Other Orthopedic Conditions
ı		12. Debility, Cardiorespiratory Conditions
ı		13. Medically Complex Conditions
ı		10020B. ICD Code
ı		10020B. ICD Code
ı		
ı		



## Active Diagnoses in the Last 7 Days

- This section identifies active diseases and infections that drive the current plan of care
- There are two look back periods for this section 60 day and 7 day
- Determine if diagnosis are active(Is resident currently being affected by this)
- Item I2300 UTI not included

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#### Isolation

Per the MDS 3.0 RAI User's Manual, Isolation is coded only when the resident requires transmission-based precautions and single room isolation (alone in a separate room) because of an active infection

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## **Isolation Requirements**

- A Physicians order
- Documentation supporting the need for a private room.
- Documentation to support the need for the resident to remain in their room.



#### Isolation continued

- Precautions are over and above standard precautions.
- The resident is in a room alone.
- The resident must remain in his/her room

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#### Isolation continued

- $\bullet$  If the resident only has a history of infectious disease Ex: MRSA or C-Diff with no active symptoms.
- Urinary Tract Infections, Encapsulated Pneumonia and Wound Infections.

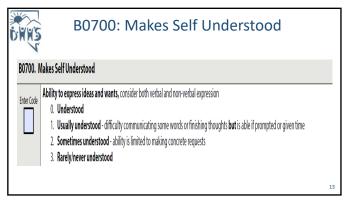
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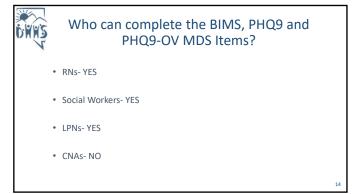
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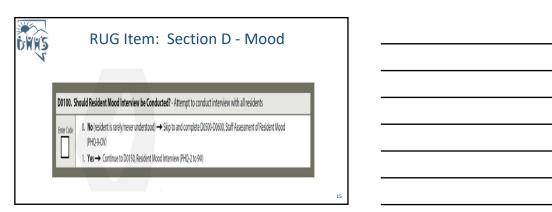


#### **Isolation Considerations**

- Psychosocial risks- balanced with infection control
- Transporting and coding
- Frequent assessment





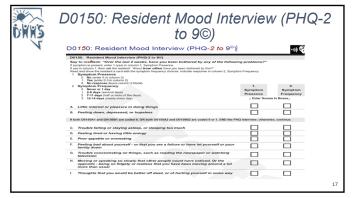


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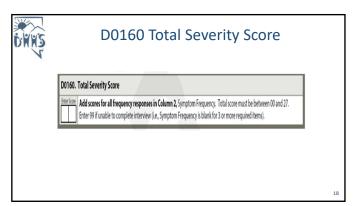
#### **D0100** Assessment

- Assess residents' ability to understand
- What methods were used
- Interpretations services
- · Document what occurred

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## D0500-Staff Assessment of Resident Mood (PHQ-9-OV)

NV Documentation Guideline Requirement:

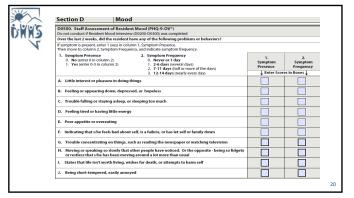
- AEB statement
- Must include frequency

#### EXAMPLE OF STAFF RESPONSES:

- $\scriptstyle \rm 1.$  Harry is feeling down AEB spending most of his time in his room daily over the past two weeks.
- $_{\rm 2.}$  Lily is always tired for the past 8 out of 14 days because she wanders during HS.

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#### D0150 & D0500 considerations

Depression can be associated with:

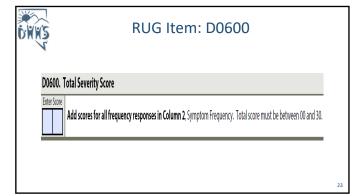
- · psychological and physical distress
- Decreased participation
- Decreased functional status
- Poorer outcomes



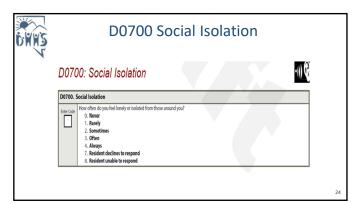
# D0150 & D0500 considerations cont....

- Goal Setting: improve resident quality of life & ensure resident safety
- Assessment/identify causes and contributing factors for symptoms.
- Plan/develop interventions: (treatment, personal support, or environmental modifications) that could address symptoms

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#### Section GG: Nursing Function Score Items

- GG0130A1- Eating.
- GG0130C1- Toileting Hygiene.
- GG0170B1- Sit to lying.
- GG0170C1- Lying to sitting on side of bed
- GG0170D1- Sit to stand
- GG0170E1- Chair/bed-to chair transfer
- GG017F1- Toilet transfer

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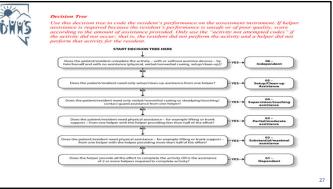
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#### **GG** considerations

- Usual performance
- Observing the resident's interactions in different settings
- Variations in performance
- Best or Worst performance

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#### Section GG: Steps for Assessment

#### **Steps for Assessment**

- 1. Assess performance based on:
  - a) Direct observation
  - b) Resident's self-report
  - c) Reports from qualified clinicians, care staff, or family

documented in the resident's medical record during the three-day assessment period

- ${\bf 2}.$  Residents should be allowed to perform activities as independently as possible.
- 3. When helper assistance is required, consider only facility staff when scoring.
- 4. Activities may be completed with or without assistive device(s).
- 4. ACHIVILES may be completed with or without assisted exects).

  5. Admission functional assessment should be completed prior to the person benefitting from treatment interventions (when possible).

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#### GG0130A1- Eating

- The MDS manual defines eating as follows:
- GG0130A, Eating involves bringing food and liquids to the mouth and swallowing food.
- The administration of tube feedings and parenteral nutrition is not considered when coding this activity.

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## GG0130C1- Toileting Hygiene

- Coding Tips for GG0130C, Toileting hygiene
- Toileting hygiene includes managing undergarments, clothing, and incontinence products and performing perineal cleansing before and after voiding or having a bowel movement.
- If the resident has an indwelling urinary catheter and has bowel movements, code the Toilet hygiene item based on the amount of assistance needed by the resident before and after moving their bowels.

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#### GG0170B1- Sit to lying

- 1. Residents should be allowed to perform activities as independently as possible
- "Helper" is defined as facility staff who are direct employees and facility contracted employees (e.g., rehabilitation staff, nursing agency staff)
- 3. Activities may be completed with or without assistive device(s)
- 4. Should be done prior to benefitting from treatments

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#### GG0170B1- Sit to lying

- Code based on the resident's performance only not residents potential.
- When coding the resident's usual performance, "effort" refers to the type and amount of assistance a helper provides in order for the activity to be completed.
- The six-point rating scale definitions include the following types of assistance: setup/cleanup, touching assistance, verbal cueing, and lifting assistance

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## GG0170C1- Lying To Sitting on Side of Bed

- The activity includes resident transitions from lying on his or her back to sitting on the side of the bed with his or her feet flat on the floor and sitting upright on the bed without back support.
- If bed mobility cannot be assessed because of the degree to which the head of the bed must be elevated because of a medical condition, then code the activities as 88, Not attempted due to medical condition or safety concern.



#### GG0170D1- Sit to Stand

Coding Tip for GG0170D,

If a sit-to-stand (stand assist) lift is used and two helpers are needed to assist with the sit-to stand lift, then code as 01, Dependent.

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### GG0170E1- Chair/Bed-To Chair Transfer

- GG0170E, Chair/bed-to-chair transfer, begins with the resident sitting in a chair or wheelchair or sitting upright at the edge of the bed and returning to sitting in a chair or wheelchair or sitting upright at the edge of the bed.
- If a mechanical lift is used to assist in transferring a resident for a chair/bed-to-chair transfer and two helpers are needed to assist with the mechanical lift transfer, then code as 01, Dependent, even if the resident assists with any part of the chair/bed-tochair transfer.

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#### GG017F1- Toilet transfer

- Follow decision tree as in previous examples
- Remember to code usual performance

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#### **Tips For Success**

- Understand importance of functional improvement and how to best facilitate resident progress
- Review and adapt current GG coding practices to ensure a collaborative approach to coding determination
- Review 6-point rating scale and activity not attempted codes
- Establish documentation protocols to support GG coding decisions
- Practice coding a variety of scenarios
- Review (audit) GG items for accuracy on an ongoing basis

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#### **Nevada Supportive Documentation** Guidelines

- The Nevada Supportive Documentation Guidelines form (referred to as NMO-6180) is being incorporated into the Medicaid Services Manual. This form includes federal MDS descriptions and categories. It also presents Nevadaspecific requirements in addition to federal requirements. These more stringent standards and documentation requirements are described in the column named "Nevada Specific Requirements."
- Nevada Supportive Documentation Guidelines will be updated to reflect PDPM
- Document can be found at LTSSNursing (nv.gov)
- When new version is completed, it will also be sent to providers through PDPM-MDS email.

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#### Nevada Supportive Documentation Guidelines

Review Procedures

Supporting Documentation Related to the MDS/Case Mix Documentation Review: a) Any corrections made including but not limited to, the Activities of Daily Living (ADL) grid must have an associated note of

explanation per correction within the observation period.

b) A quarterly, annual, or summary note will not substitute for Documentation which is date specific to the observation period.

c) Improper or illegible corrections will not be accepted for the MDS case mix documentation review.

d) All documentation, including corrections, must be part of the original legal medical record.

e) Any and all MDS coding and interpretation questions shall be referred to the local State RAI Coordinator.

f) Late entry documentation more than 72 hours from the ARD will not be accepted



## Nevada Supportive Documentation Guidelines

Signature Date at 20400:
a) Interview Items (BIMS and PHQ-9) must be conducted during the observation periods stated in the RAI Manual and the signature date entered at 20400 must be prior to or on the ABD.
b) The signature date for these interview items entered at 20400 must match the date the interview was actually conducted in the medical records. If these dates do not match, facility will not receive credits for these interview items due to conflicting documentation.
c) In the rare situation that interview items were collected (completed) by two people or by the same person but on different dates,

cases, (e.g. half of the interview questions were conducted on the next day), each person must enter the signature date at 20400 and indicate specific interview questions conducted (e.g. D0200 2.4 through D; D0200 2.6 through I and D0300) in "Sections." d) The definition of "date collected" and date completed": date information was collected and coding decision were made. They are one, the same date. This is not the same as the data entry date.

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#### **Additional Resource Contacts**

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Christopher Christiano, RN, RAC-CT Statewide MDS Coordinator (775) 687-1925 (Office) MDS-PDPM@dhcfp.nv.gov

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Questions?



#### References

- Center for Medicare and Medicaid Services. (2023). MDS 3.0 RAI Manual. Retrieved from: https://www.cms.gov/Medicare/Quality-InitiativesPatient-Assessment-Instruments/NursingHomeQualityInits/MDS30RAIManual.html
- Centers for Medicare and Medicaid Services. (2023). . SNF PPS Payment Model Research. Retrieved from: https://www.cms.gov/Medicare/Medicare-Fee-for-ServicePayment/SNFPPS/therapyresearch.html
- 3. Centers for Medicare and Medicaid Services. (2023). Patient Driven Payment Model. Retrieved from: https://www.cms.gov/Medicare/Medicare-Feefor-Service-Payment/SNFPPS/PD

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