

Welcome!

This material was prepared by Mountain-Pacific Quality Health, a Medicare Quality Innovation Network-Quality Improvement Organization (QIN-QIO), under contract with the Centers for Medicare & Medicaid Services (CMS), an agency of the U.S. Department of Health and Human Services (HHS). Views expressed in this material do not necessarily reflect the official views or policy of CMS or HHS, and any reference to a specific product or entity herein does not constitute endorsement of that product or entity by CMS or HHS. 12SOW-MPQHF-AS-NH-04/22-130



ARD Management: Making Molehills out of Mountains

Jessie McGill, RN, RAC-MT, RAC-MTA

Objectives

After participating in this webinar, learners will be able to:

- Explain the assessment reference dates (ARDs) impact on observation periods and completion dates for the different Omnibus Budget Reconciliation Act (OBRA) and PPS assessments
- Identify strategic approaches to ARD selection using existing facility meetings and processes
- Recognize how state and federal payment policies impact ARD management

Mountains and Molehills



ARD Defined



What is the ARD?

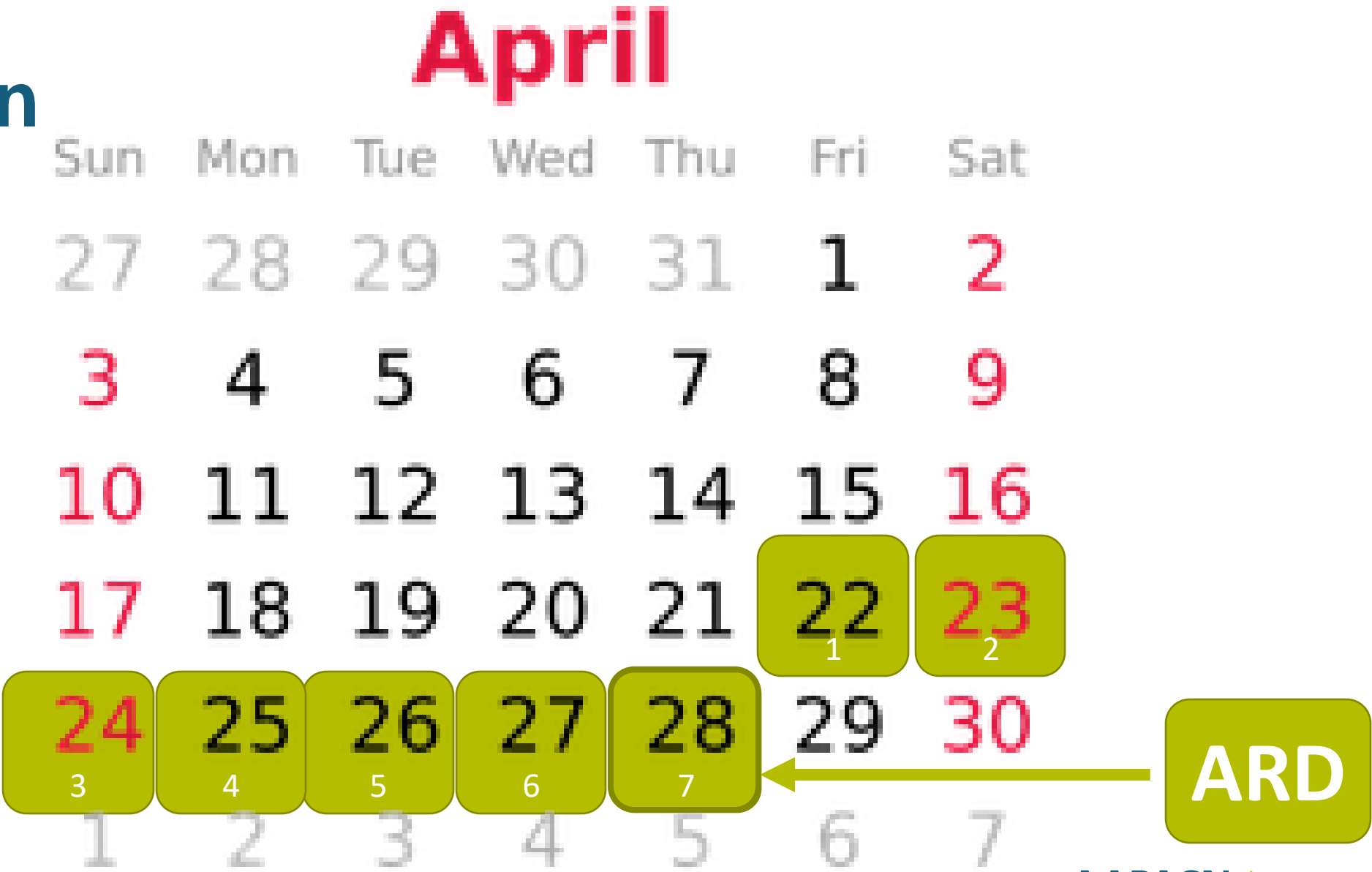
- Assessment Reference Date (ARD)
 - MDS item A2300
 - The end-point in time for all items with an observation period for the particular assessment
 - Different MDS sections have different observation periods, but they all end on the ARD
 - Establishes a common observation period for all disciplines

A2300. Assessment Reference Date									
Observation end date:									
<input type="text"/>		<input type="text"/>		-		<input type="text"/>		<input type="text"/>	
Month		Day				Year			

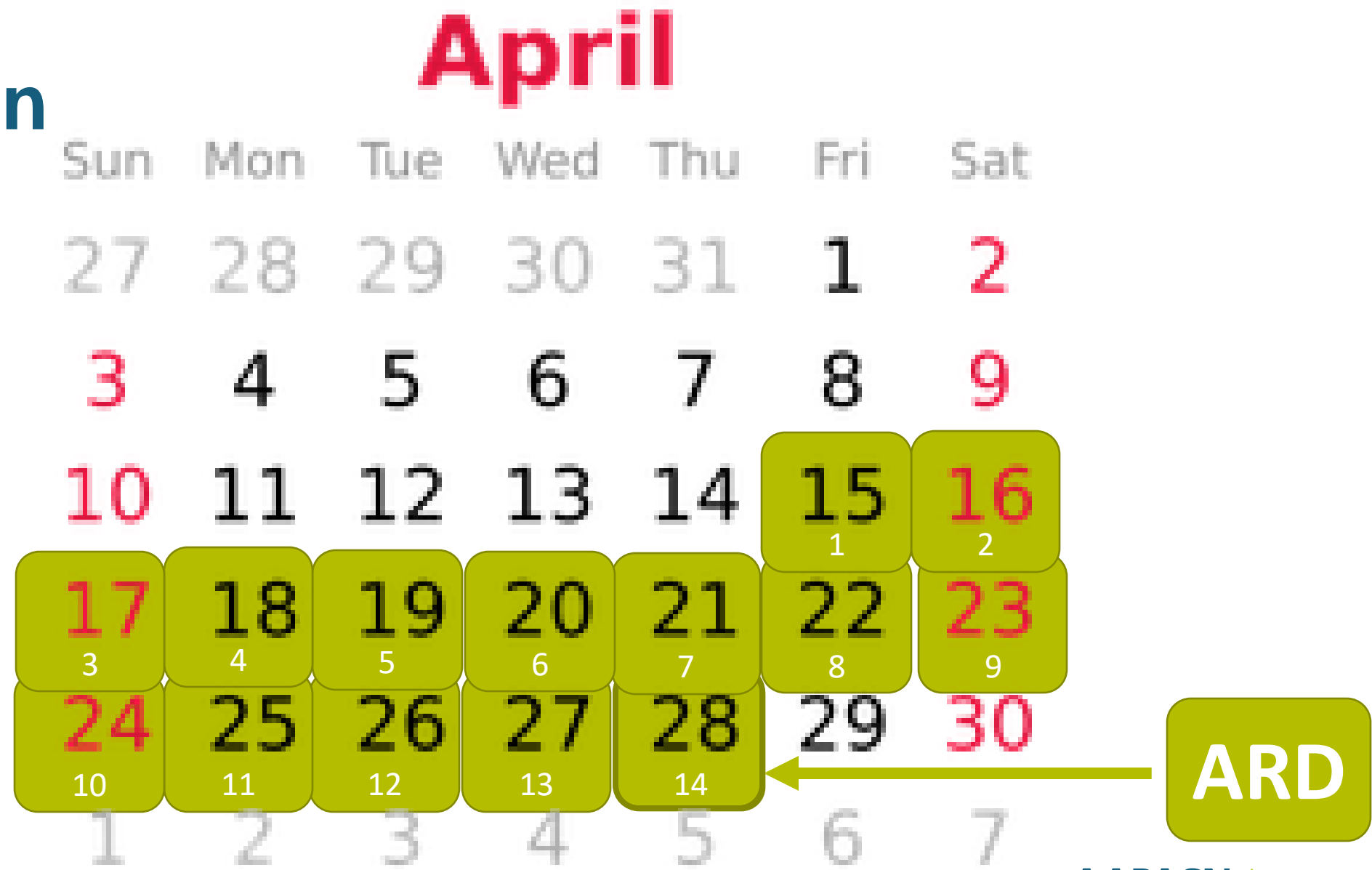
Why is ARD Management Needed?

- The ARD sets the observation period which determines which care and services will be captured on the MDS
- The ARD sets the completion period for many MDS assessments
- The ARD must be set timely to ensure assessments are completed timely and within state and federal compliance

ARDs and Observation Periods



ARDs and Observation Periods



ARD Setting: OBRA Assessments



ARD and MDS Assessments

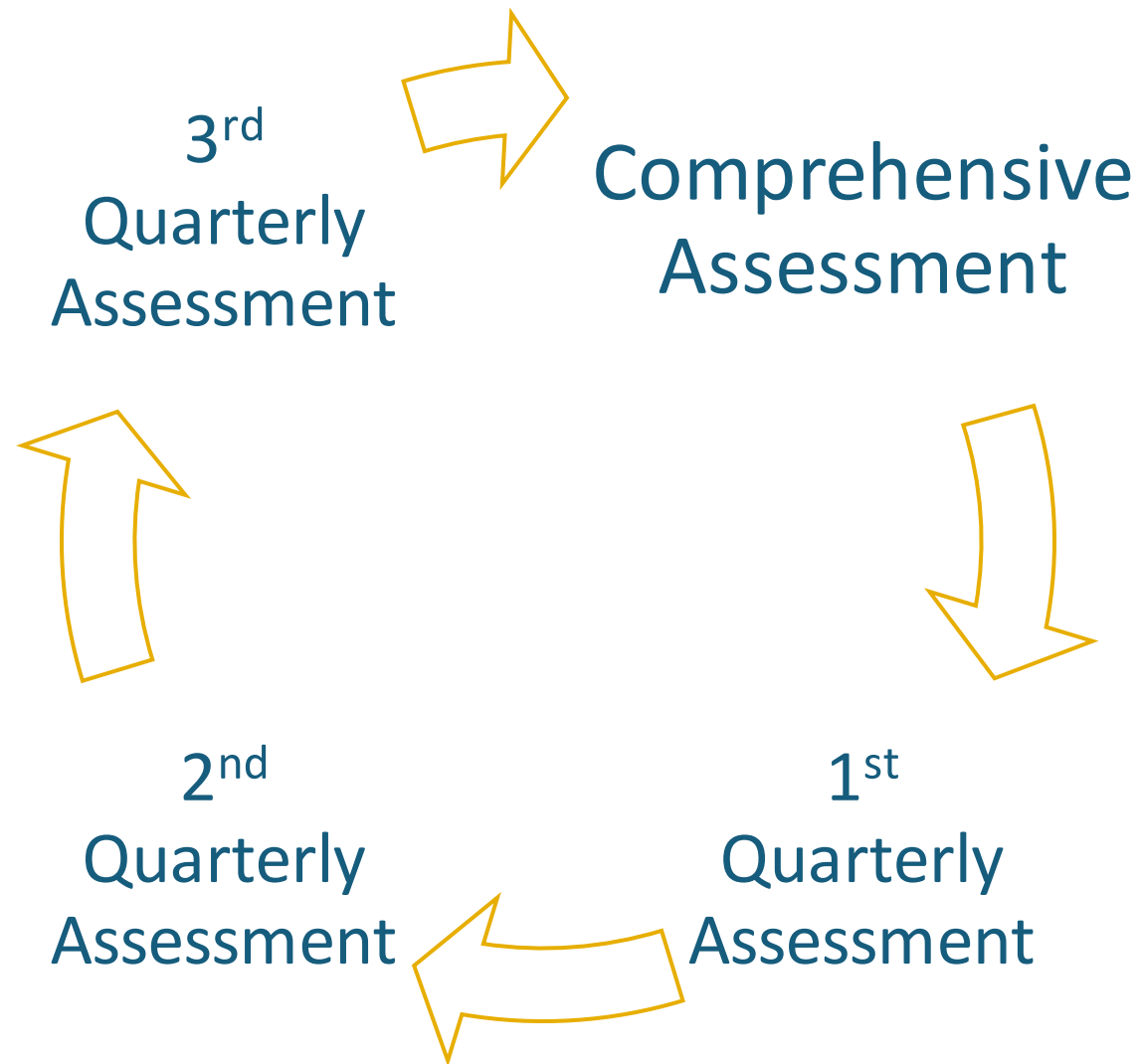
- *RAI User's Manual 2-16 – 2-18*
- OBRA Assessments

Assessment Type/Item Set	MDS Assessment Code (A0310A or A0310F)	Assessment Reference Date (ARD) (Item A2300) No Later Than	7-day Observation Period (Look Back) Consists Of	14-day Observation Period (Look Back) Consists Of	MDS Completion Date (Item Z0500B) No Later Than	CAA(s) Completion Date (Item V0200B2) No Later Than	Care Plan Completion Date (Item V0200C2) No Later Than	Transmission Date No Later Than	Regulatory Requirement	Assessment Combination
Admission (Comprehensive)	A0310A = 01	14 th calendar day of the resident's admission (admission date + 13 calendar days)	ARD + 6 previous calendar days	ARD + 13 previous calendar days	14th calendar day of the resident's admission (admission date + 13 calendar days)	14th calendar day of the resident's admission (admission date + 13 calendar days)	CAA(s) Completion Date + 7 calendar days	Care Plan Completion Date + 14 calendar days	42 CFR 483.20 (Initial) 42 CFR 483.20 (b)(2)(i) (by the 14th day)	May be combined with any OBRA assessment 5-Day or A PPS Discharge Assessment
Annual (Comprehensive)	A0310A = 03	ARD of previous OBRA comprehensive assessment + 366 calendar days <u>AND</u> ARD of previous OBRA Quarterly assessment + 92 calendar days	ARD + 6 previous calendar days	ARD + 13 previous calendar days	ARD + 14 calendar days	ARD + 14 calendar days	CAA(s) Completion Date + 7 calendar days	Care Plan Completion Date + 14 calendar days	42 CFR 483.20 (b)(2)(iii) (every 12 months)	May be combined with any OBRA assessment 5-Day or A PPS Discharge Assessment
Significant Change in Status (SCSA) (Comprehensive)	A0310A = 04	14 th calendar day after determination	ARD + 6 previous calendar days	ARD + 13 previous calendar days	14th calendar day after determination	14th calendar day after determination	CAA(s) Completion Date + 7	Care Plan Completion Date + 14	42 CFR 483.20 (b)(2)(ii) (within 14)	May be combined with any

OBRA Assessment Types and Definitions

- **Comprehensive assessments**
 - Admission
 - Annual
 - Significant Change in Status Assessment (SCSA)
 - Significant Correction to Prior Comprehensive (SCPA)
- **Non-comprehensive assessments**
 - Quarterly
 - Significant Correction to Prior Quarterly (SCQA)
 - Discharge Assessment- Return not anticipated
 - Discharge Assessment- Return anticipated
- **Tracking Records**
 - Entry
 - Death in facility

Standard OBRA Assessment Cycle

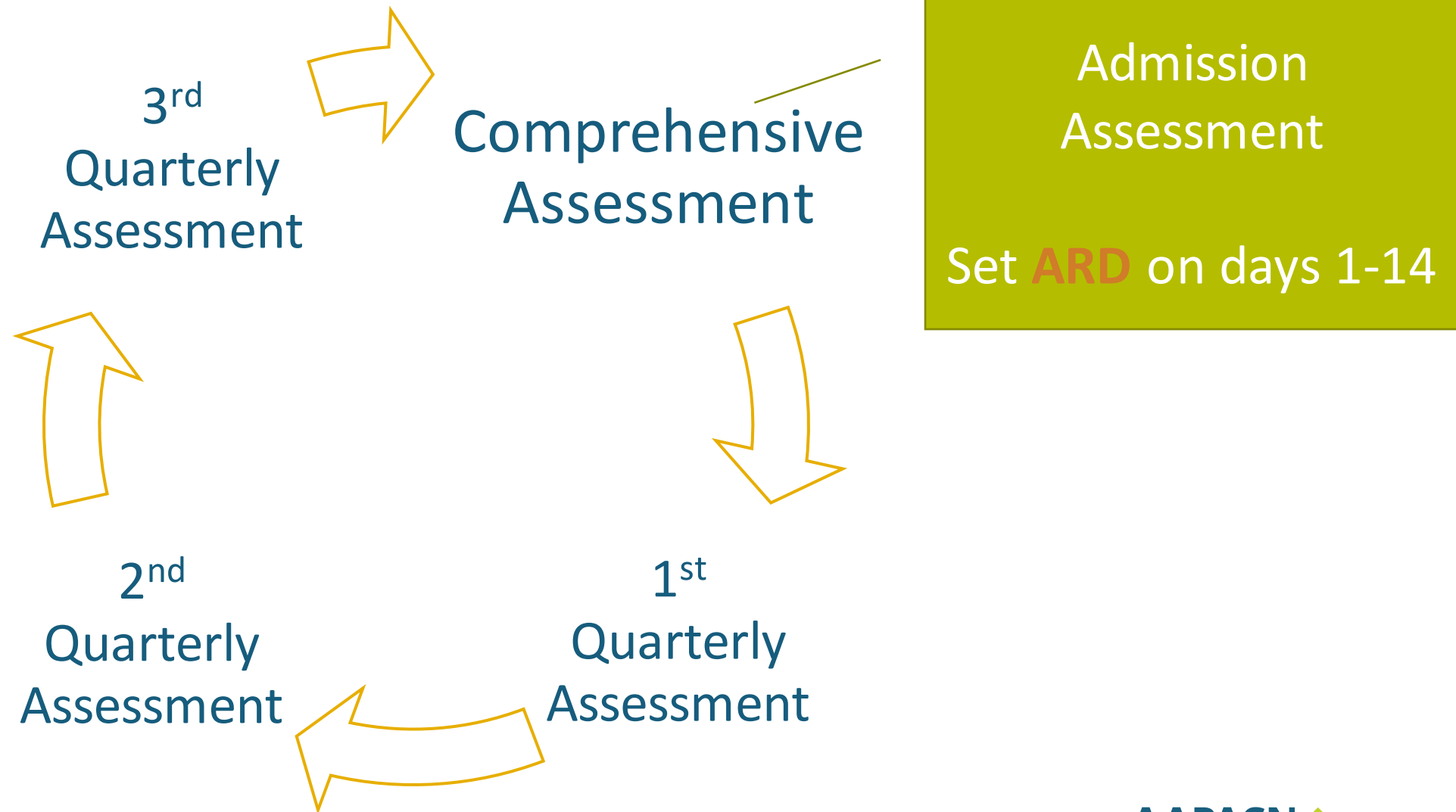


OBRA Admission Assessment

A0310. Type of Assessment	
Enter Code	A. Federal OBRA Reason for Assessment
01	01. Admission assessment (required by day 14)
	02. Quarterly review assessment
	03. Annual assessment
	04. Significant change in status assessment
	05. Significant correction to prior comprehensive assessment
	06. Significant correction to prior quarterly assessment
	99. None of the above

- **ARD** may be no later than:
 - Admission date + 13 calendar days
- MDS and CAAs must be completed by the end of day 14
 - Admission date + 13 calendar days
- Care plan must be completed within 7 days of CAA completion date
- Transmission date must be no later than care plan completion date + 14 calendar days

Standard OBRA Assessment Cycle

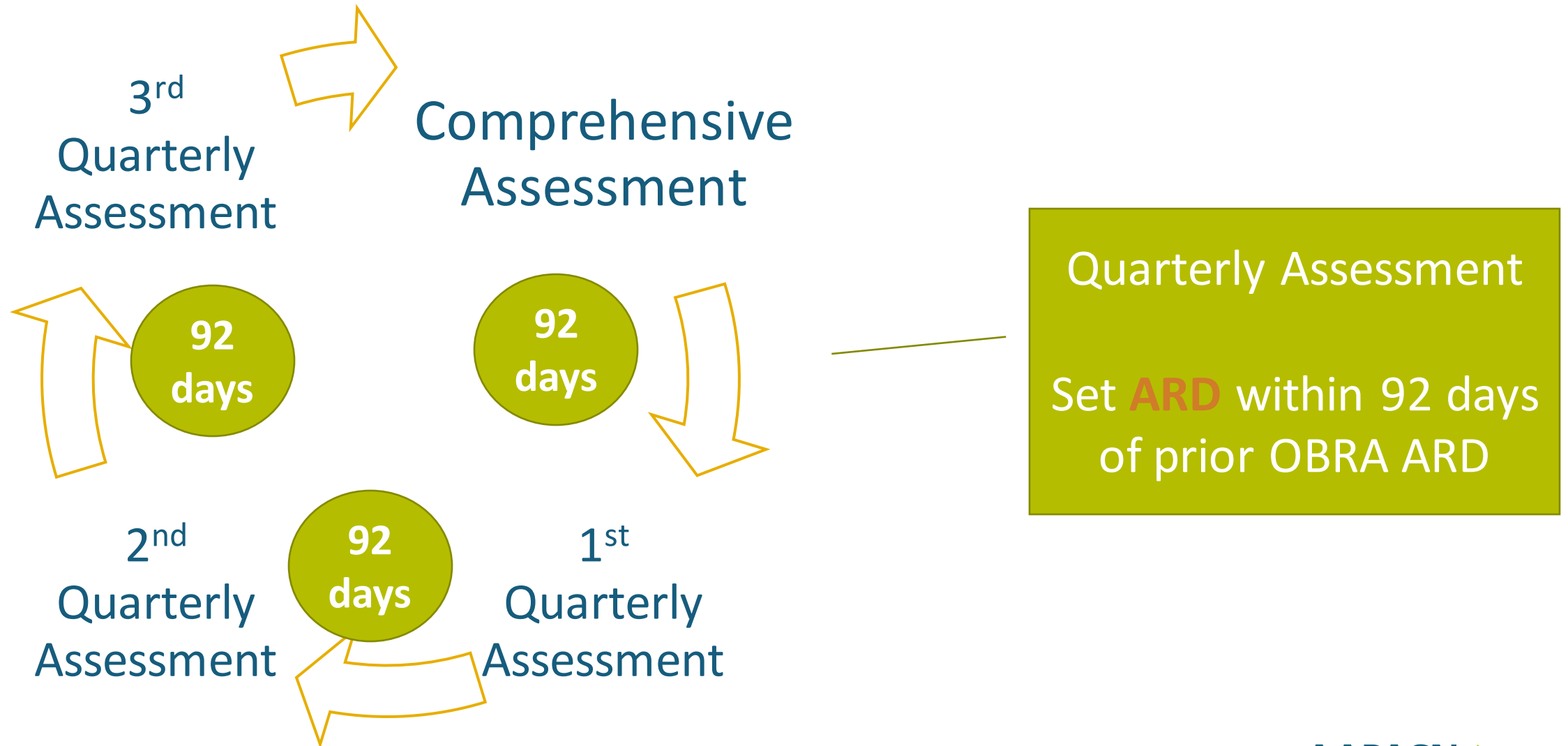


OBRA Quarterly Assessment

A0310. Type of Assessment	
Enter Code 02	A. Federal OBRA Reason for Assessment 01. Admission assessment (required by day 14) 02. Quarterly review assessment 03. Annual assessment 04. Significant change in status assessment 05. Significant correction to prior comprehensive assessment 06. Significant correction to prior quarterly assessment 99. None of the above

- **ARD** may be no later than 92 calendar days from previous OBRA ARD
 - Prior OBRA ARD + 92 calendar days
- MDS must be completed within 14 days from **ARD**
 - **ARD** + 14 calendar days

Standard OBRA Assessment Cycle

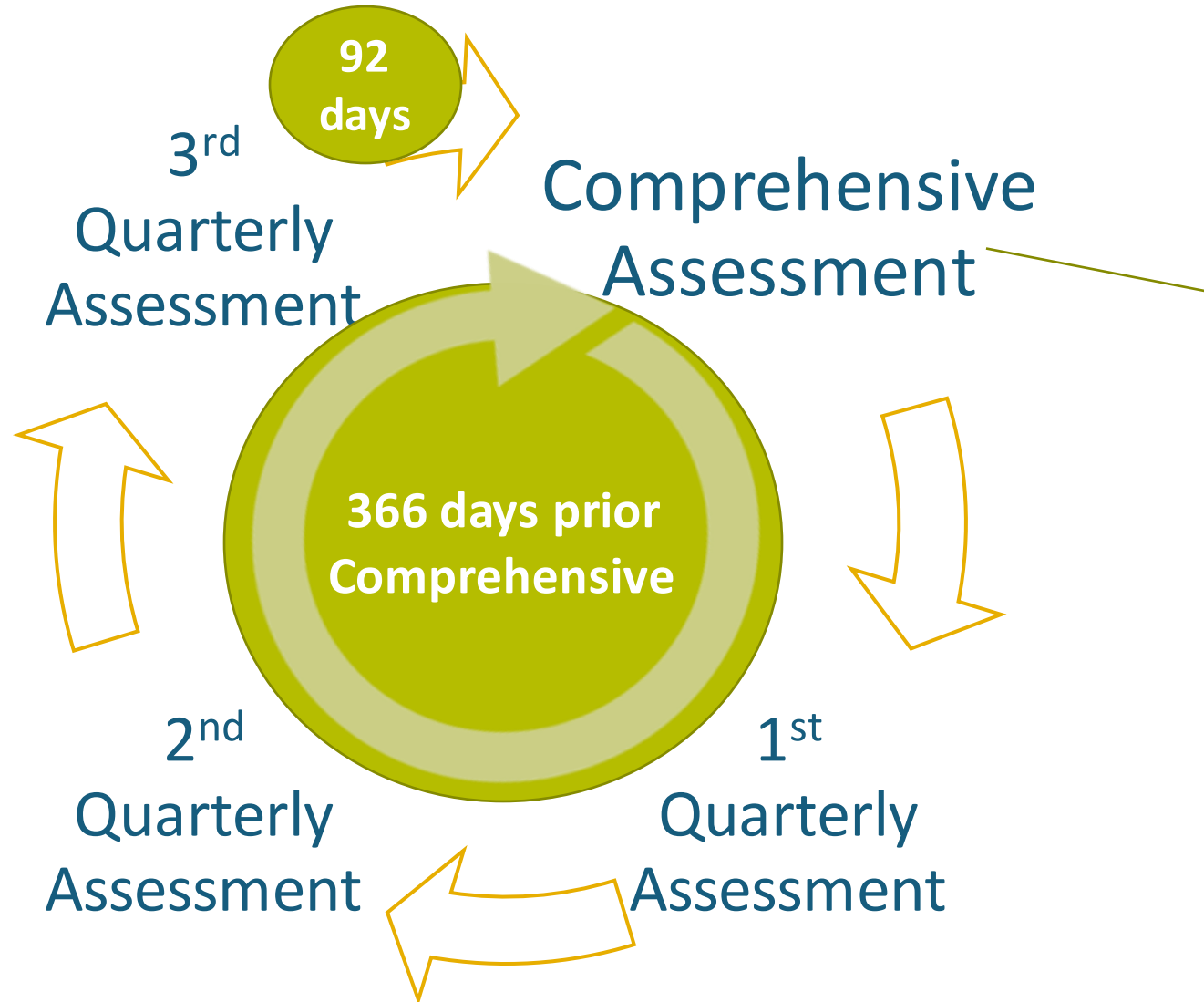


OBRA Annual Assessment

A0310. Type of Assessment	
Enter Code	A. Federal OBRA Reason for Assessment
03	01. Admission assessment (required by day 14)
	02. Quarterly review assessment
	03. Annual assessment
	04. Significant change in status assessment
	05. Significant correction to prior comprehensive assessment
	06. Significant correction to prior quarterly assessment
	99. None of the above

- **ARD** may be no later than 366 calendar days from previous comprehensive OBRA ARD and within 92 calendar days from previous OBRA ARD
 - Prior comprehensive OBRA ARD + 366 calendar days AND
 - Prior OBRA ARD + 92 calendar days
- MDS must be completed within 14 days from **ARD**
 - ARD + 14 calendar days

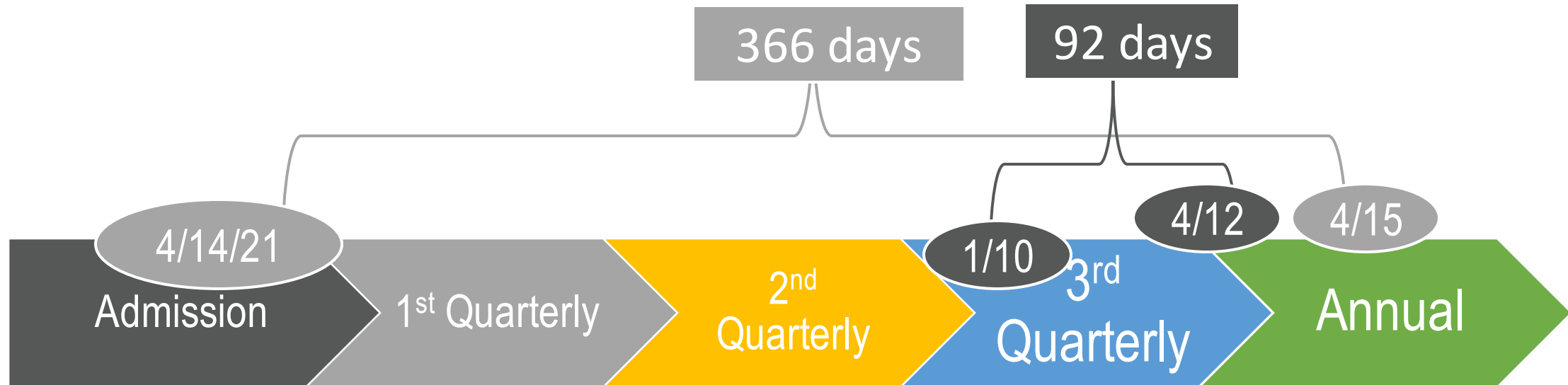
Standard OBRA Assessment Cycle



Annual Assessment

Set **ARD** within 366 days of prior comprehensive ARD and within 92 days of prior OBRA ARD

OBRA Annual Assessment Example



Day 366 from prior Comprehensive assessment = 4/15

Day 92 from prior OBRA assessment = 4/12

Annual Assessment ARD must be set on or before 4/12 to meet criteria of within 366 days of prior comprehensive **and** within 92 days of prior OBRA

OBRA Significant Change in Status Assessment (SCSA)

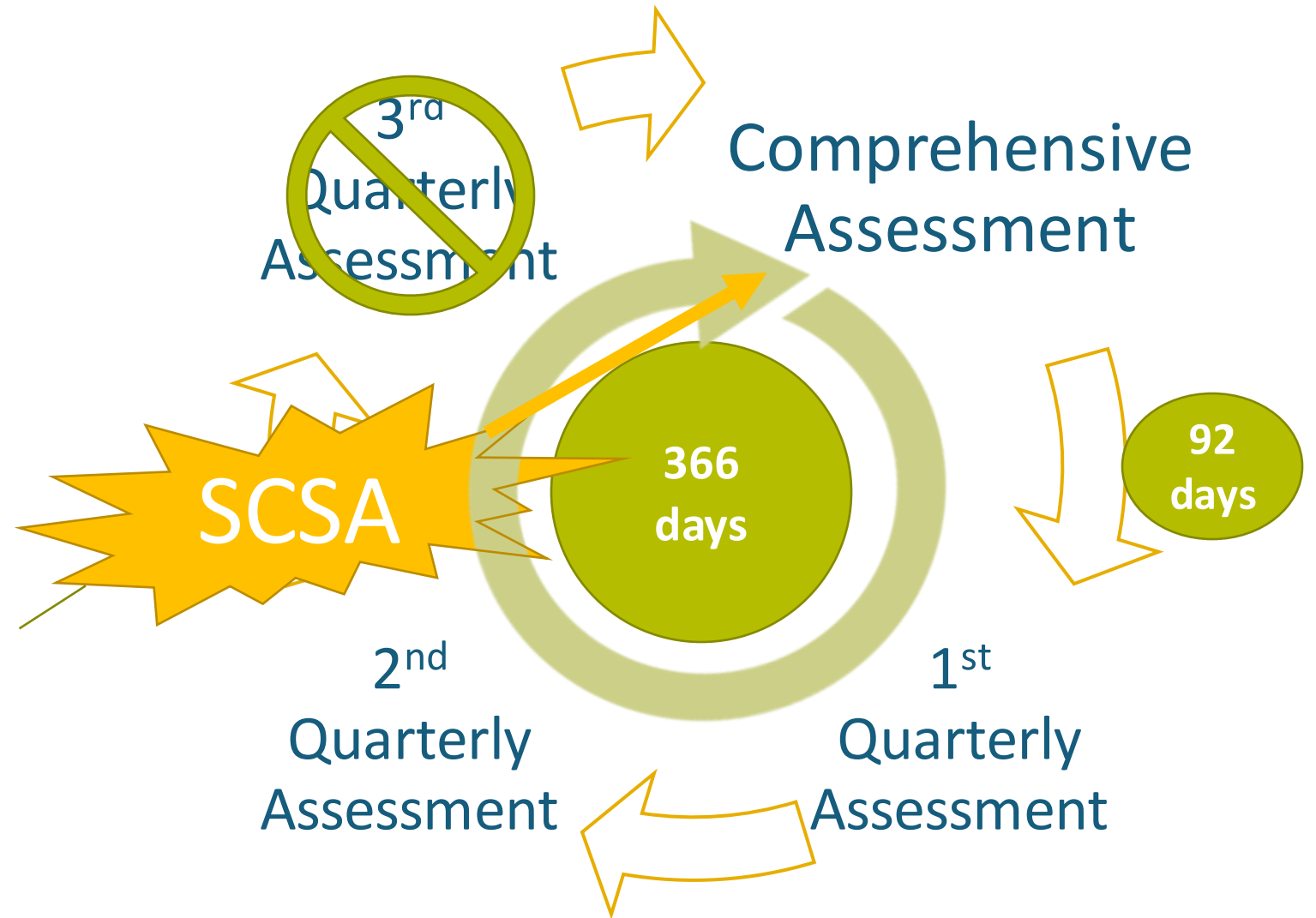
A0310. Type of Assessment	
Enter Code	A. Federal OBRA Reason for Assessment
04	01. Admission assessment (required by day 14)
	02. Quarterly review assessment
	03. Annual assessment
	04. Significant change in status assessment
	05. Significant correction to prior comprehensive assessment
	06. Significant correction to prior quarterly assessment
	99. None of the above

- **ARD** must be set and assessment must be completed (MDS/CAAs) within 14 days of determination a significant change occurred

SCSA and Standard OBRA Assessment Cycle

Significant Change in Status Assessment

Set **ARD** within 14 days of determination



OBRA Significant Correction to Prior Comprehensive

A0310. Type of Assessment	
Enter Code	A. Federal OBRA Reason for Assessment
05	01. Admission assessment (required by day 14)
	02. Quarterly review assessment
	03. Annual assessment
	04. Significant change in status assessment
	05. Significant correction to prior comprehensive assessment
	06. Significant correction to prior quarterly assessment
	99. None of the above

- **ARD** must be set and assessment completed (MDS/CAAs) no later than 14 days after the determination that a significant error occurred
- Same impact on assessment cycle as a SCSA

OBRA Significant Correction to Prior Quarterly

A0310. Type of Assessment	
Enter Code	A. Federal OBRA Reason for Assessment
<input type="text" value="0"/> <input type="text" value="6"/>	01. Admission assessment (required by day 14)
	02. Quarterly review assessment
	03. Annual assessment
	04. Significant change in status assessment
	05. Significant correction to prior comprehensive assessment
	06. Significant correction to prior quarterly assessment
	99. None of the above

- **ARD** must be set and assessment completed (MDS) no later than 14 days after the determination that a significant error occurred
- Same impact on assessment cycle as a Quarterly assessment



ARD Setting: PPS Assessments

ARD and MDS Assessments

- *RAI User's Manual 2-45*
- PPS Assessments

Assessment Type/ Item Set for PPS	Assessment Reference Date (ARD) Can be Set on Any of Following Days	Billing Cycle Used by the Business Office	Special Comment
5-Day A0310B = 01	Days 1-8	Sets payment rate for the entire stay (unless an IPA is completed. See below.)	<ul style="list-style-type: none">• See Section 2.12 for instructions involving beneficiaries who transfer or expire day 8 or earlier.• CAAs must be completed only if the 5-Day assessment is dually coded as an OBRA Admission, Annual, SCSA or SCPA.
Interim Payment Assessment (IPA) A0310B = 08	Optional	Sets payment for remainder of the stay beginning on the ARD.	<ul style="list-style-type: none">• Optional assessment.• Does not reset variable per diem adjustment schedule.• May not be combined with another assessment.
Part A PPS Discharge Assessment A0310H = 1	End date of most recent Medicare Stay (A2400C)	N/A	<ul style="list-style-type: none">• Completed when the resident's Medicare Part A stay ends, but the resident remains in the facility, or can be combined with an OBRA Discharge assessment if the Part A stay ends on the same day or the day before the resident's Discharge Date (A2000).

PPS Scheduling

Medicare MDS Assessment Schedule Type	Assessment Reference Date (ARD)	Applicable Standard Medicare Payment Days	Completion	Transmission to QIES ASAP
5-Day PPS	ARD must be set between days 1-8	All covered Medicare Part A days until the Part A discharge (unless an IPA is completed)	Must be completed (item Z0500B) within 14 days after the ARD (ARD + 14 calendar days)	Within 14 days after completion (item Z0500B) (completion + 14 calendar days)

5-Day ARD Window

Day 1	Day 2	Day 3	Day 4	Day 5	Day 6	Day 7
5-day ARD must be set within days 1-8						
Day 8	Day 9	Day 10	Day 11	Day 12	Day 13	Day 14
Day 15	Day 16	Day 17	Day 18	Day 19	Day 20	Day 21

PPS Scheduling

Medicare MDS Assessment Schedule Type	Assessment Reference Date (ARD)	Applicable Standard Medicare Payment Days	Completion	Transmission to QIES ASAP
Interim Payment Assessment (IPA)	Optional assessment, ARD per facility discretion	ARD of the assessment through Part A discharge (unless another IPA is completed)	Must be completed (item Z0500B) within 14 days after the ARD (ARD + 14 calendar days)	Within 14 days after completion (item Z0500B) (completion + 14 calendar days)

PPS Scheduling

Medicare MDS Assessment Schedule Type	Assessment Reference Date (ARD)	Applicable Standard Medicare Payment Days	Completion	Transmission to QIES ASAP
Part A PPS Discharge Assessment	PPS Discharge: Equal to the end date of the most recent Medicare stay (A2400) or discharge date (A2000) if combined with OBRA Discharge	N/A	Must be completed (item Z0500B) within 14 days after the end date of most recent Medicare stay (A2400C + 14 calendar days)	Within 14 days after completion (item Z0500B) (completion + 14 calendar days)

Part A PPS Discharge Assessment

Enter Code 1	H. Is this a SNF Part A PPS Discharge Assessment? 0. No 1. Yes
------------------------	---

- Required when a resident's Medicare Part A stay ends
 - Required if stay ends due to physical discharge
 - Required if the stay ends and the resident remains in the facility
- If the Medicare stay ends (A2400C) on the day of or one day before physical discharge from the facility
 - Both OBRA and PPS Part A discharge are required
 - May be combined
 - **ARD** must equal day of physical discharge

Part A PPS Discharge ARD Setting

Day 15	Day 16	Day 17	Day 18	Day 19	Day 20	Day 21
Day 22	Day 23	Day 24	Day 25	Day 26	Day 27	Day 28

Last Day
of
Medicare

Remains in facility


PPS Discharge

Part A PPS Discharge ARD Setting

Day 8	Day 9	Day 10	Day 11	Day 12		
			Last Day billed to Medicare	Physical discharge		

OBRA Discharge and PPS Discharge combined

Combining OBRA and Medicare Assessments

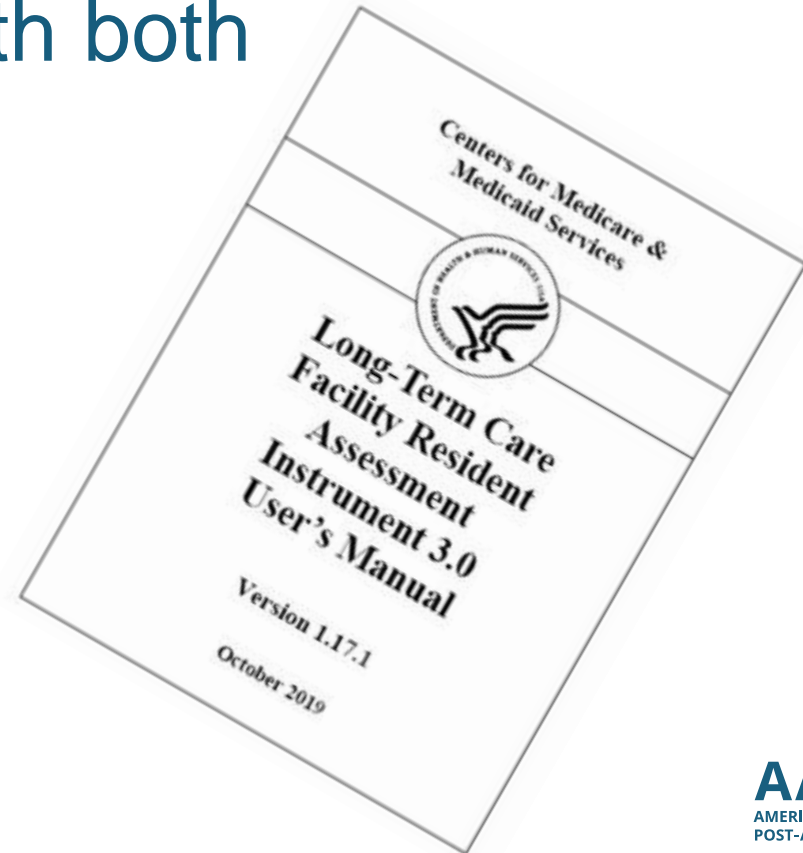
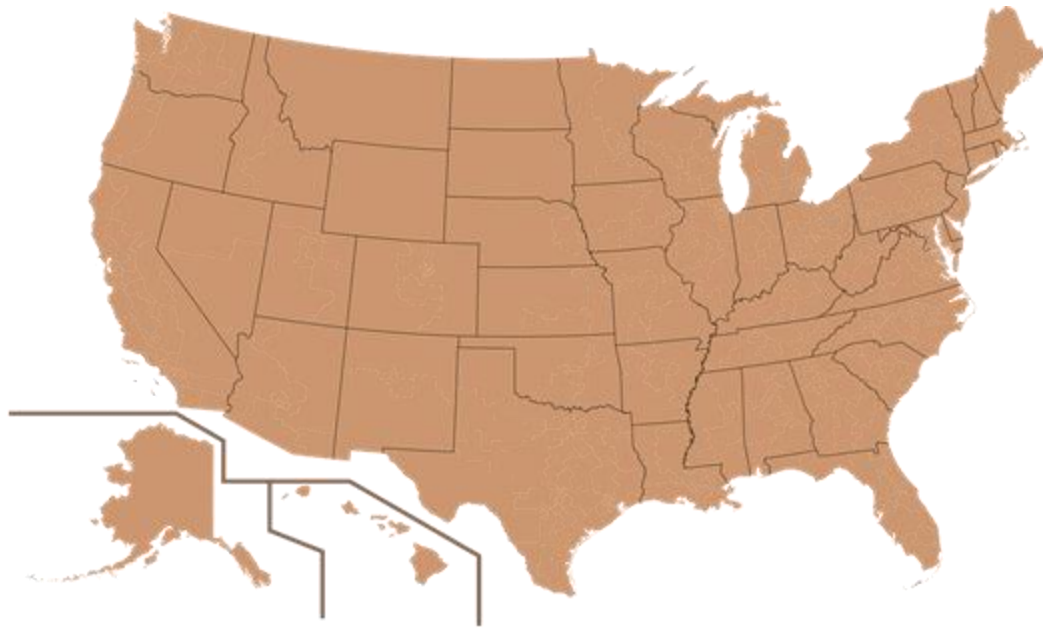
Day 1	Day 2	Day 3	Day 4	Day 5	Day 6	Day 7
5-day ARD must be set within days 1-8						
Admission ARD Window						
Day 8 	Day 9	Day 10	Day 11	Day 12	Day 13	Day 14
Admission ARD Window						
Day 15	Day 16	Day 17	Day 18	Day 19	Day 20	Day 21

Strategic ARD Selection

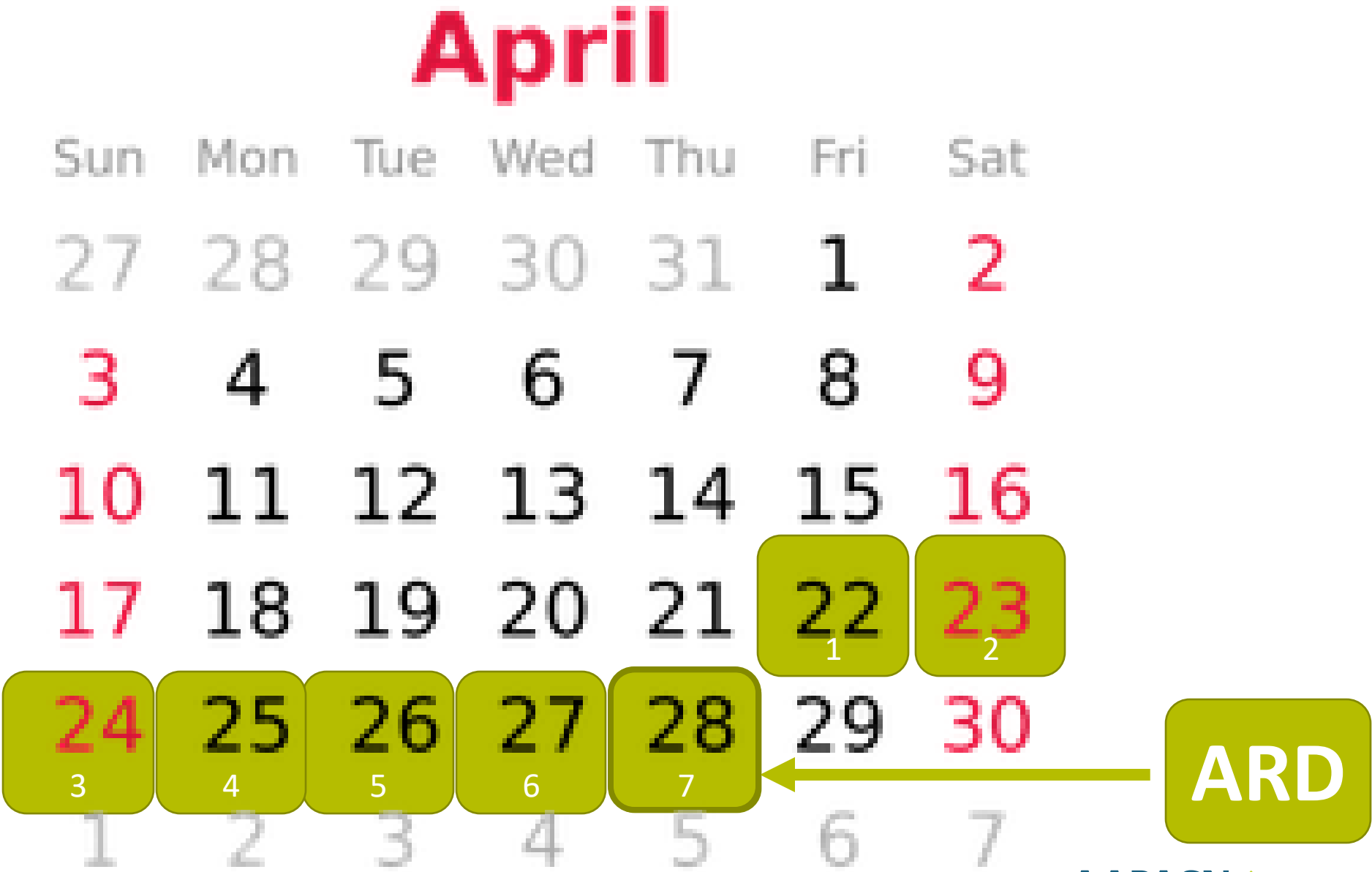


ARD Selection

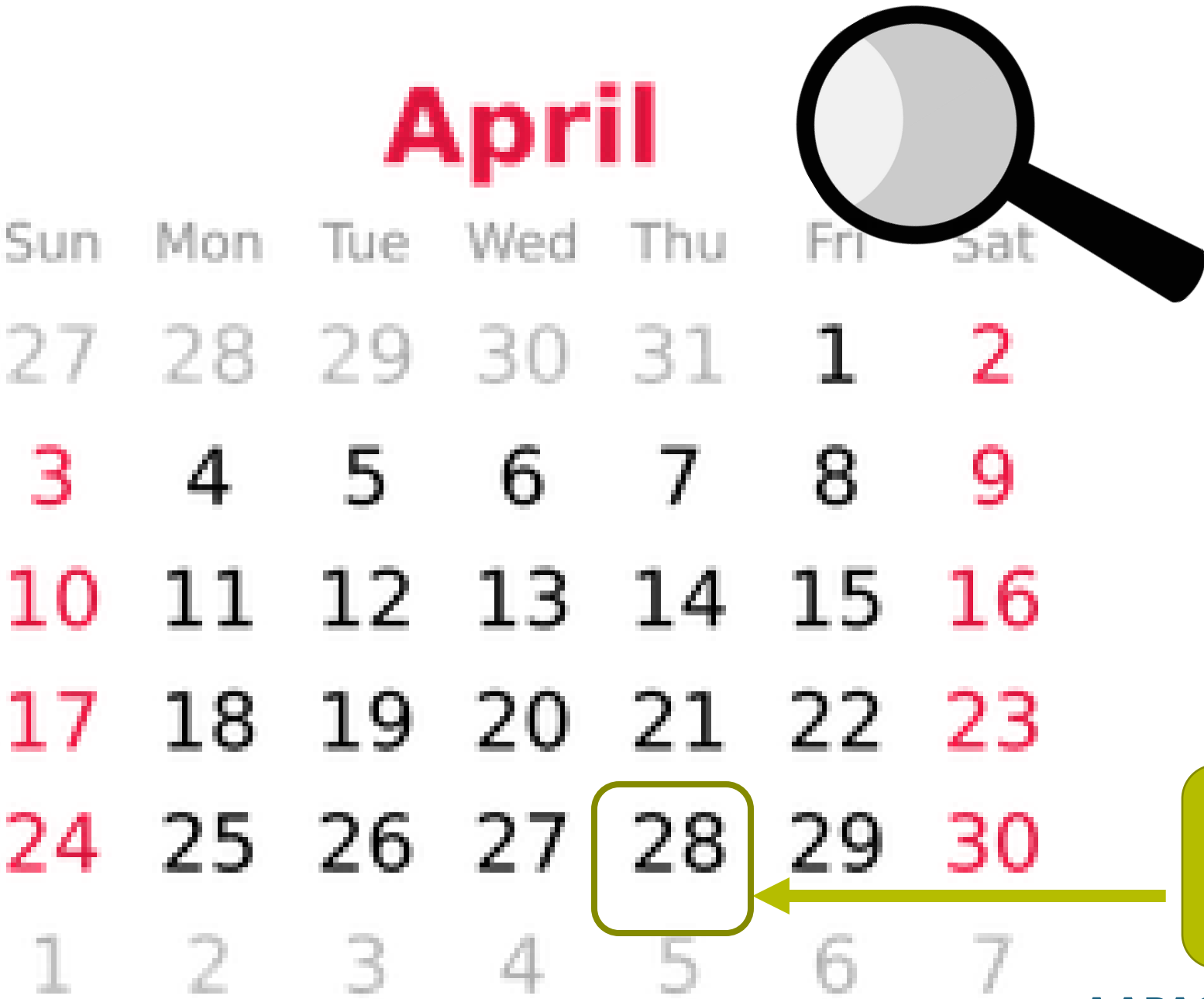
- Understand state and federal requirements
- Must maintain compliance with both



ARDs Selection



ARDs Selection



ARD Selection

- What do you plan to capture?
 - Different for each resident
 - Know payer source and payment model
 - Private pay uses flat rate
 - Medicaid
 - Know state payment model
 - Medicare
 - Patient-Driven Payment Model (PDPM)

ARD Selection

- Develop a tracking system
 - Identify what you plan to capture
 - Be aware of other items which impact reimbursement
 - Continuously monitor for significant changes
 - Utilize existing meetings

Meetings

- Daily stand up
- Incident Management
- Behavior
- PPS, Medicare, Triple Check
- Weight Loss
- Wound Care
- Resident at Risk
- Quality Improvement/Quality Assurance
- Infection Prevention and Control



ARD Selection for Medicare PPS

- Capturing services and conditions which impact the PDPM
 - Diagnoses
 - Comorbidities
 - Function
 - Services and treatments
 - Wounds
- Requires intense monitoring/research at the start of the Medicare stay



ARD Selection for Case-Mix

- Always have a reason for the ARD you selected
 - Resident receives monthly blood transfusions due to a condition that requires frequent lab tests and monitoring
 - Plan to schedule OBRA assessment to capture this service
 - Resident has a tracheostomy and continues to need help with some functional activities
 - This resident would only achieve a higher case-mix group if also on an invasive mechanical ventilator
 - Schedule at any time to capture

ARD Selection for Work-load

- ARD selection allows some flexibility with OBRA assessments
 - Six comprehensives are due the last week of the month
 - Plan ahead to spread these out over a few weeks
 - Vacation is planned next month
 - Identify which Quarterly or Annual assessments could be completed early to reduce workload during vacation



Staying on Top of the Process



Education

- Provide education to interdisciplinary team (IDT)
 - Have standardized method of communication regarding assessments, ARDs, and completion dates
 - Have an additional process to communicate unexpected changes in assessment schedules
 - Ensure team members responsible for completing MDS sections are competent in the areas they code

Communicating ARD

- Communicating ARD to IDT
 - Identifies timeframe for supporting assessments
 - Identifies when resident interviews need to be completed
- Must also communicate MDS/CAA completion deadlines



Looking Ahead

- Projections
- Planning ahead
- Monitoring changes
- Information gathering at all meetings
- Tracking

2022 Calendar

January							February							March							April						
Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat
26	27	28	29	30	31	1	30	31	1	2	3	4	5	27	28	1	2	3	4	5	27	28	29	30	31	1	2
2	3	4	5	6	7	8	6	7	8	9	10	11	12	6	7	8	9	10	11	12	3	4	5	6	7	8	9
9	10	11	12	13	14	15	13	14	15	16	17	18	19	13	14	15	16	17	18	19	10	11	12	13	14	15	16
16	17	18	19	20	21	22	20	21	22	23	24	25	26	20	21	22	23	24	25	26	17	18	19	20	21	22	23
23	24	25	26	27	28	29	27	28	1	2	3	4	5	27	28	29	30	31	1	2	24	25	26	27	28	29	30
30	31	1	2	3	4	5	6	7	8	9	10	11	12	3	4	5	6	7	8	9	1	2	3	4	5	6	7
May							June							July							August						
Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat
1	2	3	4	5	6	7	29	30	31	1	2	3	4	26	27	28	29	30	1	2	31	1	2	3	4	5	6
8	9	10	11	12	13	14	5	6	7	8	9	10	11	3	4	5	6	7	8	9	7	8	9	10	11	12	13
15	16	17	18	19	20	21	12	13	14	15	16	17	18	10	11	12	13	14	15	16	14	15	16	17	18	19	20
22	23	24	25	26	27	28	19	20	21	22	23	24	25	17	18	19	20	21	22	23	21	22	23	24	25	26	27
29	30	31	1	2	3	4	26	27	28	29	30	1	2	24	25	26	27	28	29	30	28	29	30	31	1	2	3
5	6	7	8	9	10	11	3	4	5	6	7	8	9	31	1	2	3	4	5	6	4	5	6	7	8	9	10
September							October							November							December						
Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat
28	29	30	31	1	2	3	25	26	27	28	29	30	1	30	31	1	2	3	4	5	27	28	29	30	1	2	3
4	5	6	7	8	9	10	2	3	4	5	6	7	8	6	7	8	9	10	11	12	4	5	6	7	8	9	10
11	12	13	14	15	16	17	9	10	11	12	13	14	15	13	14	15	16	17	18	19	11	12	13	14	15	16	17
18	19	20	21	22	23	24	16	17	18	19	20	21	22	20	21	22	23	24	25	26	18	19	20	21	22	23	24
25	26	27	28	29	30	1	23	24	25	26	27	28	29	27	28	29	30	1	2	3	25	26	27	28	29	30	31
2	3	4	5	6	7	8	30	31	1	2	3	4	5	4	5	6	7	8	9	10	1	2	3	4	5	6	7



Questions?

jmcgill@aapacn.org



References

- *RAI User's Manual V.1.17.1*
 - <https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/MDS30RAIManual>