Welcome!

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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

Images:
https://pixabay.com/illustrations/flaten-scenery-nature-sweden-water-5350718/
https://pixabay.com/vectors/animal-mole-underground-furry-158236/
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
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

April

- ARD on the 28th of April
ARDs and Observation Periods

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ARD and MDS Assessments

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

1st Quarterly Assessment

2nd Quarterly Assessment

3rd Quarterly Assessment

Comprehensive Assessment
### OBRA Admission Assessment

#### A0310. Type of Assessment

<table>
<thead>
<tr>
<th>Enter Code</th>
<th>Federal OBRA Reason for Assessment</th>
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</thead>
<tbody>
<tr>
<td>01</td>
<td>Admission assessment (required by day 14)</td>
</tr>
<tr>
<td>02</td>
<td>Quarterly review assessment</td>
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<tr>
<td>03</td>
<td>Annual assessment</td>
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<tr>
<td>04</td>
<td>Significant change in status assessment</td>
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<tr>
<td>05</td>
<td>Significant correction to prior comprehensive assessment</td>
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<tr>
<td>06</td>
<td>Significant correction to prior quarterly assessment</td>
</tr>
<tr>
<td>99</td>
<td>None of the above</td>
</tr>
</tbody>
</table>

- **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

3rd Quarterly Assessment ➔ Comprehensive Assessment ➔ 1st Quarterly Assessment ➔ 2nd Quarterly Assessment

Admission Assessment
Set ARD on days 1-14
### OBRA Quarterly Assessment

<table>
<thead>
<tr>
<th>Enter Code</th>
<th>A. Federal OBRA Reason for Assessment</th>
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<tbody>
<tr>
<td>02</td>
<td>01. Admission assessment (required by day 14)</td>
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<td></td>
<td>02. Quarterly review assessment</td>
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<td>03. Annual assessment</td>
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<tr>
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<td>05. Significant correction to prior comprehensive assessment</td>
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<tr>
<td></td>
<td>06. Significant correction to prior quarterly assessment</td>
</tr>
<tr>
<td></td>
<td>99. None of the above</td>
</tr>
</tbody>
</table>

- **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

- 3rd Quarterly Assessment
- Comprehensive Assessment
- 92 days
- Quarterly Assessment
- Set ARD within 92 days of prior OBRA ARD
- 2nd Quarterly Assessment
- 92 days
- 1st Quarterly Assessment
- 92 days

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OBRA Annual Assessment

- **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

<table>
<thead>
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<th>A0310. Type of Assessment</th>
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Standard OBRA Assessment Cycle

- 1st Quarterly Assessment
- 2nd Quarterly Assessment
- 3rd Quarterly Assessment
- Comprehensive Assessment
- Annual Assessment

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

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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)**

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- **ARD** must be set and assessment must be completed (MDS/CAAs) within 14 days of determination a significant change occurred.
Significant Change in Status Assessment

Set ARD within 14 days of determination
OBRA Significant Correction to Prior Comprehensive

- **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

• 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**

<table>
<thead>
<tr>
<th>Assessment Type/Item Set for PPS</th>
<th>Assessment Reference Date (ARD) Can be Set on Any of Following Days</th>
<th>Billing Cycle Used by the Business Office</th>
<th>Special Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>5-Day A0310B = 01</td>
<td>Days 1-8</td>
<td>Sets payment rate for the entire stay (unless an IPA is completed, see below.)</td>
<td>• See Section 2.12 for instructions involving beneficiaries who transfer or expire day 8 or earlier.</td>
</tr>
<tr>
<td>Interim Payment Assessment (IPA) A0310B = 08</td>
<td>Optional</td>
<td>Sets payment for remainder of the stay beginning on the ARD.</td>
<td>• CAAs must be completed only if the 5-Day assessment is dually coded as an OBRA Admission, Annual, SCSA or SCPA.</td>
</tr>
<tr>
<td>Part A PPS Discharge Assessment A0310H = 1</td>
<td>End date of most recent Medicare Stay (A2400C)</td>
<td>N/A</td>
<td>• 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).</td>
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## PPS Scheduling

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

<table>
<thead>
<tr>
<th>Day 1</th>
<th>Day 2</th>
<th>Day 3</th>
<th>Day 4</th>
<th>Day 5</th>
<th>Day 6</th>
<th>Day 7</th>
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5-day ARD must be set within days 1-8

<table>
<thead>
<tr>
<th>Day 8</th>
<th>Day 9</th>
<th>Day 10</th>
<th>Day 11</th>
<th>Day 12</th>
<th>Day 13</th>
<th>Day 14</th>
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<th>Day 15</th>
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<th>Day 18</th>
<th>Day 19</th>
<th>Day 20</th>
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</tr>
<tr>
<td>Interim Payment Assessment (IPA)</td>
<td>Optional assessment, ARD per facility discretion</td>
<td>ARD of the assessment through Part A discharge (unless another IPA is completed)</td>
<td>Must be completed (item Z0500B) within 14 days after the ARD (ARD + 14 calendar days)</td>
<td>Within 14 days after completion (item Z0500B) (completion + 14 calendar days)</td>
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### PPS Scheduling

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<tbody>
<tr>
<td>Part A PPS Discharge Assessment</td>
<td>PPS Discharge: Equal to the end date of the most recent Medicare stay (A2400) or discharge date (A2000) if combined with OBRA Discharge</td>
<td>N/A</td>
<td>Must be completed (item Z0500B) within 14 days after the end date of most recent Medicare stay (A2400C + 14 calendar days)</td>
<td>Within 14 days after completion (item Z0500B) (completion + 14 calendar days)</td>
</tr>
</tbody>
</table>
Part A PPS Discharge Assessment

- 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

|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|

- **Last Day of Medicare**
- **Remains in facility**

**PPS Discharge**
<table>
<thead>
<tr>
<th>Day 8</th>
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Last Day billed to Medicare

Physical discharge

OBRA Discharge and PPS Discharge combined
Combining OBRA and Medicare Assessments

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<thead>
<tr>
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5-day ARD must be set within days 1-8

Admission ARD Window

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Strategic ARD Selection
ARD Selection

• Understand state and federal requirements
• Must maintain compliance with both
ARDs Selection
ARDs
Selection

Day 92
ARD Selection

• What do you plan to capture?
  o Different for each resident
  o 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
  o Identify what you plan to capture
  o Be aware of other items which impact reimbursement
  o Continuously monitor for significant changes
  o 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
  o Diagnoses
  o Comorbidities
  o Function
  o Services and treatments
  o 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
  o 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
  o 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)
  o Have standardized method of communication regarding assessments, ARDs, and completion dates
  o Have an additional process to communicate unexpected changes in assessment schedules
  o 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
Questions?

jmcgill@aapacn.org
References

- **RAI User’s Manual V.1.17.1**