



Center for Medicaid, CHIP, and Survey & Certification/Survey & Certification Group

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DATE: July 1, 2011

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: Changes to the Minimum Data Set Version 3.0 (MDS 3.0) Assessment Modification & Formatting Policies & Nursing Home Compare as a result of MDS 3.0 Implementation

Memorandum Summary

- **Changes to MDS 3.0 Assessment Modification Policy:** Effective April 1, 2011, nursing home and swing bed providers may not modify existing MDS 3.0 records to correct an event date or a reason for assessment.
- **Changes to MDS 3.0 Assessment Formatting Policy:** Effective February 1, 2011, Resident Assessment Validation and Entry system (jRAVEN) version 1.0.5 provides for more signature lines in Section Z of the MDS. In addition, the Centers for Medicare & Medicaid Services made a decision that the print format provided by jRAVEN for a MDS 3.0 assessment is acceptable for review in the nursing home survey process.
- **MDS 3.0 Impacts on Nursing Home Compare:** On April 23, 2011 CMS “froze” Quality Measure data and the Quality Measure (QM) ratings currently on the Nursing Home Compare website for a period of six months as a result of MDS 3.0-derived Quality Measure data not yet being available for display.

The purpose of this memorandum is to describe changes that the Centers for Medicare & Medicaid Services (CMS) has made to the MDS 3.0 assessment modification and formatting policies, as well as changes to the Nursing Home Compare website (<http://www.medicare.gov/NHCompare>) as a result of MDS 3.0 implementation.

Changes to MDS 3.0 Assessment Modification Policy: On April 1, 2011, CMS revised its MDS 3.0 assessment modification policy to prohibit nursing home and swing bed providers from revising an existing MDS 3.0 record to correct an event date or a reason for assessment. Instead, these providers must make these corrections by inactivating the incorrect record in the Quality Improvement and Evaluation System Assessment Submission and Processing (QIES ASAP) system. A new MDS 3.0 record with the correct event date or reason for assessment must then be created and submitted.

Event date items on the MDS 3.0 include the following: Assessment Reference Date - Item A2300; Entry Date - Item A1600; and Discharge Date - Item A2000. The Reason for Assessment item on the MDS 3.0 is item A0310.A – A0310.F, which includes the following types of assessments:

- o Federal Omnibus Budget Reconciliation Act (OBRA) Reason for Assessment;
- o Prospective Payment System (PPS) Assessment;
- o PPS other Medicare Required Assessment – Other Medicare Required Assessment (OMRA);
- o Is this a Swing bed clinical change assessments;
- o Is this assessment the first assessment (OBRA, PPS, or Discharge) since the most recent admission; and
- o Entry/discharge reporting.

Changes to MDS 3.0 Assessment Formatting Policy: On February 1, 2011, CMS revised its MDS 3.0 assessment formatting policy by issuing version 1.0.5 of jRAVEN, the CMS data entry software application that nursing home and swing bed providers use in collecting, maintaining, and submitting MDS 3.0 assessment information. This version of jRAVEN allows users to add more signature lines to item Z0400 of the MDS 3.0 as needed to capture attestations of all individuals completing some portion of a particular assessment.

Also on February 1, 2011, CMS made a decision that the print format provided by jRAVEN for a MDS 3.0 assessment is acceptable for review in the nursing home survey process. Providers do not need to provide printed copies of blank items on the MDS 3.0. For those providers who utilize the services of a software program other than jRAVEN, the printed copies of the MDS 3.0 are acceptable if they display the following:

- o The item identifier;
- o The item description;
- o The item response;
- o The assessment reference and resident birth dates; and
- o Identifiers including resident name.

MDS 3.0 Impacts on Nursing Home Compare: Finally, on April 23, 2011, CMS “froze” QM data and the Five Star QM ratings currently on the Nursing Home Compare website for a period of six months. The QMs displayed on Nursing Home Compare since January, 2011, reflect MDS 2.0 data submitted during quarters one, two, and three of 2010, prior to the conversion to

MDS 3.0. Historically, CMS has updated QM data each quarter. However, new MDS 3.0-derived QM data are not yet available for display, so CMS will retain the current QM scores and Five Star ratings until October, 2011. We anticipate that new MDS 3.0 QM data will be available in early 2012.

If you have further questions, please send them to the MDS S&C mailbox at mdsforsandc@cms.hhs.gov.

Effective Date: The information contained in this memorandum is current policy and is in effect for all long term care facilities and swing bed providers. State Survey Agencies should disseminate this material within 30 days of the date of this memorandum.

Training: This clarification should be shared with all Survey & Certification staff, surveyors, Regional Office and State RAI Coordinators, MDS Automation Coordinators and their managers.

/s/

Thomas E. Hamilton

cc: Survey & Certification Regional Office Management