

CMS MDS 3.0 Vendor Call

Submitted Questions and Answers

March 29, 2023

Question	Response
<p>I am a software developer for Epic's LongTerm Care team. We work to provide Long Term Care facilities with an effective medium for their workflows.</p> <p>As part of Epic's software, we offer facilities the opportunity to electronically complete MDS assessments. We recently received the draft of the MDS submission specifications, including the new edits that will apply to MDS assessments with an ARD of October 1, 2023 or later.</p> <p>During our review of these edits, we have found a discrepancy that we would like to address as part of the MDS 3.0 vendor call if possible.</p> <p>Details: In the v1.18.11 drafts of the new MDS item sets, NPE assessments have this instruction for M0300G1:</p> <div style="border: 1px solid black; padding: 5px;"> <p>G. Unstageable - Deep tissue injury:</p> <p>Item Number <input type="checkbox"/> 1. Number of unstageable pressure injuries presenting as deep tissue injury - If 0 → Skip to N2005, Medication Intervention</p> <p>Item Number <input type="checkbox"/> 2. Number of these unstageable pressure injuries that were present upon admission/entry or reentry - enter how many were noted at the time of admission/entry or reentry</p> </div> <p>This is the same instruction that NPEs had prior. It stands to reason that we "Skip to N2005" because we are only skipping M0300G2 here, and N2005 is the next item in the item set.</p> <p>However, in the v1.18.11 draft of the NPE item set, NPE assessments now have N0415. As the instruction has remained, this implies that for NPE assessments, N0415 should be skipped in its entirety if M0300G1 = 0. This would not match up with the behavior of other item sets. Is this intentional?</p>	<p>CMS: The final NPE item set to be released in April has the following instructional change to M0300G1:</p> <p>If 0 → Skip to N0415, High-Risk Drug Classes</p>
<p>Is it appropriate to code/crosswalk Parkinsonism to I5300, Parkinson's disease?</p>	<p>CMS: This is inappropriate coding. Parkinsonism is NOT a single disease. It is an umbrella term for slowed movement, stiffness, and tremors, which can occur for numerous reasons, including but not limited to medications, infections, genetic mutations, and various diseases. When you are developing your software, you should ensure your mapping and coding practices are clinically and medically accurate.</p>

<p>Will the final version of the Item Sets be FILLABLE pdf forms? CMS has always provided fillable pdf's since the beginning of MDS 3.0, but so far the v1.18.11 forms are not fillable.</p>	<p>CMS: CMS will not provide fillable forms.</p>
<p>Edit -3983: (e)If A1010Z=[1], then all active items from A1010A to A1010N must equal [0], and A1010Y must equal [0]. Does that mean that A1010X can be [1] when A1010Z=[1]?</p>	<p>CMS: Yes. If the resident is unable to respond and no other resources (family, significant other, or legally authorized representative or medical records) know the answer, then both A1010X and A1010Z can be checked.</p>
<p>A2121, A2122, A2123, A2124 appear on the NPE Item Set, but those items depend on A2105 which is not on NPE.</p>	<p>CMS: The final NPE item set to be released in April has the following changes to the Current Reconciled Medication List Transmission items:</p> <p>A2121 completion instruction change to “Complete only if A0310H = 1” A2123 is removed from the NPE item set A2124 is removed from NPE the item set A2123 and A2124 have been removed from the NPE item set since those items will not be completed as the resident will not be leaving the facility.</p>
<p>According to the Data Dictionary, GG0130I3 and GG0170FF3 are only active on NC, NQ, ND, but they appear on the NPE, NP, SP, SD item sets.</p>	<p>CMS: The Data Dictionary is correct. The final item sets to be released in April have the following changes:</p> <p>GG0130I3 and GG0170FF3 are removed from the NPE, NP SP and SD item sets.</p>
<p>Edit -4055: a) If A2300 (assessment reference date) minus A1600 (entry date) is greater than or equal to 7 days, then the following items in Column 2 must be equal to [^]: K0520A2, K0520B2, K0520Z2. But A1600 is not active on IPA, how do we determine whether Column2 should be [^]?</p>	<p>CMS: This isn't new. The only change is to the column numbers.</p> <p>This is 1.17.2 vs. 1.18.11 below:</p> <p>This is the response on the Vendor Call Minutes</p> <p>Q3: I am still unclear on how to answer Section K Column 2 on an IPA when A1600 is not available. I don't how to determine whether at admission within the last 7 days.</p> <p>A3: You should have the provider answer with “0” or “1” for column 2 when its on the IPA or the dash. Any of those are acceptable items. The edit will not apply.</p>

K0510. Nutritional Approaches
Check all of the following nutritional approaches that were performed during the last 7 days

	1. While NOT a Resident	2. While a Resident
1. While NOT a Resident Performed <i>while NOT a resident</i> of this facility and within the <i>last 7 days</i> . Only check column 1 if resident entered (admission or reentry) IN THE LAST 7 DAYS. If resident last entered 7 or more days ago, leave column 1 blank	↓ Check all that apply ↓	↓ Check all that apply ↓
2. While a Resident Performed <i>while a resident</i> of this facility and within the <i>last 7 days</i>		
A. Parenteral/IV feeding	<input type="checkbox"/>	<input type="checkbox"/>
B. Feeding tube - nasogastric or abdominal (PEG)	<input type="checkbox"/>	<input type="checkbox"/>
C. Mechanically altered diet - require change in texture of food or liquids (e.g., pureed food, thickened liquids)		<input type="checkbox"/>
Z. None of the above	<input type="checkbox"/>	<input type="checkbox"/>

Section K - Swallowing/Nutritional Status
K0520. Nutritional Approaches
Check all of the following nutritional approaches that apply

	2. While Not a Resident	3. While a Resident
2. While Not a Resident Performed <i>while NOT a resident</i> of this facility and within the <i>last 7 days</i> . Only check column 2 if resident entered (admission or reentry) IN THE LAST 7 DAYS. If resident last entered 7 or more days ago, leave column 2 blank	↓ Check all that apply ↓	↓ Check all that apply ↓
3. While a Resident Performed <i>while a resident</i> of this facility and within the <i>last 7 days</i>		
A. Parenteral/IV feeding	<input type="checkbox"/>	<input type="checkbox"/>
B. Feeding tube (e.g., nasogastric or abdominal (PEG))	<input type="checkbox"/>	<input type="checkbox"/>
C. Mechanically altered diet - require change in texture of food or liquids (e.g., pureed food, thickened liquids)		<input type="checkbox"/>
Z. None of the above	<input type="checkbox"/>	<input type="checkbox"/>

Question 1: Edit -4028 (a) If D0150A1 = [9] and D0150B1 = [9], then D0160 must equal [^]. In this case, should D0500 and D0600 be completed?

Question 2: Should D0500 and D0600 be completed if D0160 = [99]?

Question 3: [-] is one of the item values for D0160, but when must D0160 be a [-]?

Question 4: Follow-up from Question 3: Should D0500 and D0600 be completed if D0160 = [-]?

CMS:
Q1 and Q2: On the vendor call, we said yes to both of these questions. However, after further discussion, we have determined that D0500 and D0600 should only be completed when D0100 = 0. Therefore, D0100 will be treated as a true gateway item.
Q3: We don't need a dash; it will be removed as a valid value in the final specs.
Q4: This is not an issue, per the answer to Q3.

Response updated on Vendor Call Minutes:

Q4: If the Total Severity Score for D0160 is a blank or dash, or a "99", then should the D0500 be conducted?

A4: After the vendor call, this question and our response was revisited. The answer has been determined to be No. D0500 and D0600 should only be entered on the MDS if D0100=0. The specs currently reflect this rule.

Edits -3985, -3986, and -3987 cover skip logic for all ISCs that A1250 is active in, except for ND. However, the ND form has instructions on A1250 to complete only if

CMS: We will add an edit to cover the ND ISC skip logic for the A1250 items in the final specs.

<p>A0310B = 01 or A0310G = 1 and A0310H = 1, which matches edit -3986 despite ND not being covered by that edit. Is this an error?</p>	
<p>For C0100, how can we determine when C0100 needs to equal [-]? -3980 a) If B0100=[0], then if C0100 is active it must not equal [^]. b) If B0100=[-], then if C0100 is active it must equal [-]. -3915 a) If B0100=[0] and A0310G=[1,^], then if C0100 is active it must not equal [^]. b) If B0100=[-] and A0310G=[1,^], then if C0100 is active it must equal [-]. c) If B0100=[0] and A0310G=[2] and (A0310A=[01,02,03,04,05,06] or A0310B=[01]), then if C0100 is active it must not equal [^]. d) If B0100=[-] and A0310G=[2] and (A0310A=[01,02,03,04,05,06] or A0310B=[01]), then if C0100 is active it must equal [-].</p>	<p>CMS: We will delete edit -3980 in the final specs.</p>
<p>For D0100, how can we determine when D0100 needs to equal [-]? -3979 a) If B0100=[0], then if D0100 is active it must not equal [^]. b) If B0100=[-], then if D0100 is active it must equal [-]. -3916 a) If B0100=[0] and A0310G=[1,^], then if D0100 is active it must not equal [^]. b) If B0100=[-] and A0310G=[1,^], then if D0100 is active it must equal [-]. c) If B0100=[0] and A0310G=[2] and (A0310A=[01,02,03,04,05,06] or A0310B=[01]), then if D0100 is active it must not equal [^]. d) If B0100=[-] and A0310G=[2] and (A0310A=[01,02,03,04,05,06] or A0310B=[01]), then if D0100 is active it must equal [-].</p>	<p>CMS: We will delete edit -3979 in the final specs.</p>
<p>For B1300, it seems that we will always skip the item when the form is NPE. Why will NPE have and only have B1300? -3994 (a) If A0310A=[99] AND A0310B=[99] AND A0310F=[99] and A0310G=[1] then if B1300 is active, it must not equal [^]. (b) If A0310A=[99] AND A0310B=[99] AND A0310F=[99] and A0310G=[2,^] then if B1300 is active, it must equal [^]. (c) If A0310B=[01] OR (A0310G=[1] AND A0310H=[1]) then if B1300 is active, it must not equal [^]. (d) If A0310B=[99] AND (A0310G=[2,^] OR A0310H=[0]) then if B1300 is active, it must equal [^].</p>	<p>CMS: This is to be answered on planned discharges only. The completion instructions have been updated on the final NPE item set to Complete only if A0310G = 1. This item is to be answered on planned discharges only.</p> <p>Edit -3994 (a) If A0310A=[99] AND A0310B=[99] AND A0310F=[99] and A0310G=[1] then if B1300 is active, it must not equal [^] will handle the completion instructions.</p>
<p>For D0700, it seems that we will always skip the items when the form is NPE. Why will NPE have and only have D0700? -4059 (a) If A0310A=[99] AND A0310B=[99] AND A0310F=[10,11,99] and A0310G=[1] then if D0700 is active, it must not equal [^]. (b) If A0310A=[99] AND A0310B=[99] AND A0310F=[10,11,99] and A0310G=[2,^] then if D0700 is active, it must equal [^].</p>	<p>CMS: This is to be answered on planned discharges only. The completion instructions have been updated on the final NPE item set to Complete only if A0310G = 1. This item is to be answered on planned discharges only.</p> <p>Edit -4059 (a) If A0310A=[99] AND A0310B=[99] AND A0310F=[10,11,99] and A0310G=[1] then if D0700 is active, it must not equal [^] will handle the completion instructions.</p>

<p>Edit -3971 Consistency rules for J0700: a) If J0410=[1,2,3,4,-], then if J0700 is active it must equal [0]. b) If J0410=[9], then if J0700 is active it must equal [1,-].</p> <p>While there is also Edit -4044 (a) If J0410=[1,2,3,4] then J0700, if active, must equal [0]. (a) If J0410=[9] then J0700, if active, must equal [1].</p>	<p>CMS: Edit -4044 is redundant, will be deleted.</p>
<p>Edit -4058 point (b) states: "If A0310B=[08,99], then all active items from O0400A1 through O0420 must be equal to [^]." A0310B=08 refers to an Interim Payment Assessment (IPA). However, the v1.18.11 draft of the IPA's item set includes O0400D2. According to Edit -4058, O0400D2 should always be skipped on IPAs. Is this intentional?</p>	<p>CMS: Edit -4058b will be revised to exclude the IPA: "If A0310B=[99], then all active items from O0400A1 through O0420 must be equal to [^]."</p>
<p>For the A1250 items, the associated edits mention that A1250 should be marked with “^” for skipped in certain situations. However, the items themselves only have 0 (No), 1 (Yes), and – (Not assessed). Is there an error here? Should that “Not assessed” be “skipped” or something? Or should that “not assessed” be there, and “skipped” should be added?</p>	<p>CMS: The A1250 items should have the caret as a valid value. This will be fixed in the final specs.</p>
<p>For Section GG Discharge part, the instructions for SD and NPE are different from NC, NQ, ND, NP, and SP. Should all the instructions be identical? ND: Complete column 3 when A0310F = 10 or 11 or when A0310H = 1. When A0310G is not = 2 and A0310H = 1 and A2400C minus A2400B is greater than 2 and A2105 is not = 04, the stay ends on A2400C. For all other Discharge assessments, the stay ends on A2000. SD: Complete when A0310G is not = 2 and A0310H = 1 and A2400C minus A2400B is greater than 2 and A2105 is not = 04.</p>	<p>CMS: Posted and New NPE Complete when A0310G is not = 2 and A0310H = 1 and A2400C minus A2400B is greater than 2 and A2105 is not = 04. Posted and New SD Complete when A0310G is not = 2 and A0310H = 1 and A2400C minus A2400B is greater than 2 and A2105 is not = 04. These are missing the “Complete column 3 when A0310F = 10 or 11 or when A0310H = 1. <i>“For all other Discharge assessments, the stay ends on A2000.”</i>” However, you only get to an NPE when A0310H = 1 so that instruction isn’t needed. The SD you only get to if A0310F = 10 or 11 so again the instructions are not needed. Posted and New NC Complete column 3 when A0310F = 10 or 11 or when A0310H = 1.</p>

	When A0310G is not = 2 and A0310H = 1 and A2400C minus A2400B is greater than 2 and A2105 is not = 04, the stay ends on A2400C. For all other Discharge assessments, the stay ends on A2000.
Do you have any documentation available on your authentication/login flow?	ICF: We do have documentation but it is not suitable for non-internal consumption. Our documentation is intended for internal development teams. However, the login flow for iQIES is very straight-forward and anyone going through the process should be able to understand how to do that.
Are concurrent user logins going to be blocked?	ICF: Concurrent user logins are not allowed. A second login to the same user will essentially log out the first one, because the authorization token was changed.
Do HARP passwords have a mandatory expiry? If so, what is the cadence at which they need to be changed.	ICF: Currently it's 180 Days, but it is planned to go away in late June 2023, and only inactive accounts greater than 60 days will need a password change.
Will CMS block headless chrome on their firewall?	ICF: We don't believe that headless chrome will be blocked.
Any type of traffic restrictions, throttling, etc.?	ICF: Yes, we have rate limiting rules applied to our APIs, which are enforced at the user level.
There is currently instruction in the RAI User's manual that if a scripted interview is not completed within the look-back period, that the gateway question (C0100, D0100, F0300, J0200) is coded yes and the items in the interview itself will be dashed. The instructions also state the staff assessment for the resident interview items should not be completed. Will this continue to be the instruction? Will the technical specs allow for blank Staff Assessment answers or will a dash be required?	CMS: Yes, the instructions are correct. The technical specifications will allow a [^] for the Staff Assessment responses.