

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

Ref: S&C-10-33-NH

DATE: September 24, 2010

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: Advance Copy –Revisions to Appendix PP, State Operations Manual (SOM):
Guidance to Surveyors for Long Term Care Facilities (LTC) for Minimum Data Set
(MDS) 3.0 Implementation October 1, 2010

Memorandum Summary

- **Guidance to Surveyors** – We have revised the Interpretive Guidelines in Appendix PP of the SOM as well as CMS forms 672, 802 and 805 due to the release of the MDS version 3.0 and the need to remove references to MDS version 2.0, including the replacement of the Resident Assessment Protocols (RAPs) terminology with the Care Area Assessment (CAAs) terminology. Clarification revisions have also been made to the Interpretive Guidelines at §483.65 regarding infection control and §483.75 regarding nurse aides and nurse aide training;
- **Effective Date of the Revisions to Appendix PP of the SOM** – Revisions to the SOM Appendix PP will be provided through an agency transmittal on October 1, 2010, the date it is effective, and is for use for all surveys in LTC Facilities;
- **Training Materials:** We are enclosing the revised Appendix PP itself as an advanced copy so that surveyors of LTC Facilities may see, and be trained on, the actual revisions. A training document with speaker notes for Centers for Medicare & Medicaid Services (CMS) Regional Offices (ROs) and State Survey Agencies (SAs) to use to train surveyors on these revisions is attached to this memorandum. Power point slides will be issued to ROs under a separate communication.

As a result of CMS implementation of the MDS version 3.0 on October 1, 2010, we have made revisions throughout Appendix PP in order to remove any reference to the MDS Version 2.0 and replace coding and terminology references related to that version. Appendix PP revised language is presented in red and italics.

In addition, we made changes at several tags in order to remove language referencing the completion or use of RAPs. With the implementation of the MDS 3.0, RAPs have been replaced with the CAA process (for more information on the MDS 3.0 and CAAs, see the Long-Term Care Facility Resident Assessment Instrument User's Manual, Version 3.0, effective 10/1/2010, which is located on the CMS MDS 3.0 website at

http://www.cms.gov/NursingHomeQualityInits/45_NHQIMDS30TrainingMaterials.asp#TopOfPage.

Changes as a result of the implementation of MDS 3.0 also affect CMS forms CMS-672, CMS-802 and CMS-805 including instructions to providers and surveyors. These forms have also been revised to reflect the changes and advanced copies are attached to this memorandum. For the 672, the form items remain the same, while the instructions have been updated to include MDS 3.0 fields. The 802 form has been revised to accommodate MDS 3.0 coding for the fields of “falls, fractures, abrasions, bruises, behavior symptoms, and depression,” while the provider instructions have been updated to include MDS 3.0 fields. Surveyor instructions for the 802 form have been updated to indicate that QI/QM reports are unavailable at this time until further notice.

Also attached to this memorandum are training materials for the revised Appendix PP and CMS forms CMS-672 and CMS-802. Please use this training packet and make sure that all nursing home surveyors are trained in the revised guidance by the implementation date. These materials were presented and discussed in a teleconference with the CMS Regional Offices (ROs) on August 17, 2010. We encourage training to be conducted in person with group discussion to optimize learning. However, if this is not feasible to meet the needs of your surveyors, it is acceptable to use other methods. This guidance may also be used to communicate with provider groups and other stakeholders.

RO training coordinators will document the completion of training on this new guidance for all RO and State nursing home surveyors within their region.

For questions on this memorandum, please contact Christina Stillwell-Deaner at 410-786-5520 or via email at christina.stillwelldeaner@cms.hhs.gov.

Effective Date: October 1, 2010.

Training: The information contained in this announcement should be shared with all nursing home surveyors and supervisors.

/s/

Thomas E. Hamilton

Attachments:

Revision to Appendix PP
Revision to Form CMS-672
Revision to Form CMS-802
Revision to Form CMS-802P
Revision to Form CMS-802S
Revision to Form CMS-805
Instructor training guidance document

cc: Survey and Certification Regional Office Management (G-5)