

December 7, 2005

**IMPLEMENTATION OF THE MEDICARE PROSPECTIVE PAYMENT SYSTEM (PPS)
ASSESSMENT FORM (MPAF)**

1. PURPOSE: This Veterans Health Administration (VHA) Directive provides policy regarding the implementation of the Minimum Data Set (MDS) Medicare Prospective Payment System Assessment Form (MPAF) in the Department of Veterans Affairs (VA) Nursing Home Care Units (NHCU). It provides directions on the Assessment Schedule for the MDS, Types of MDS MPAF-Short Stay Assessments, the MPAF form, combining the VA-required Resident Assessment Instrument (RAI-MDS) Schedule with the MPAF-Short Stay Assessment Schedule, and factors impacting the MPAF-Short Stay Assessment Schedule.

2. BACKGROUND

a. VHA Directive 2001-029, Resident Assessment Instrument/Minimum Data Set (RAI-MDS) established VHA policy that the RAI-MDS developed by the Health Care Finance Administration (HCFA) be implemented in any VA program or bed section that is accredited under the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) Long-term Care Standards and that the RAI-MDS must be used in a manner consistent with HCFA guidelines.

b. HCFA is now known as the Centers for Medicare and Medicaid Services (CMS).

c. In 2002, CMS developed the MDS MPAF to provide facilities with a new form used for Medicare beneficiaries admitted to nursing homes for 90-100 days for skilled nursing or rehabilitation. Facilities may choose to complete and submit the shorter MPAF form rather than a full MDS assessment for nursing home admissions that are expected to last 90 days or less.

d. VHA plans to implement the new MPAF option consistent with CMS guidelines.

e. This policy facilitates the VHA's implementation of the Centers for Medicare and Medicaid Services (CMS) and National Quality Forum recommended measures for short-stay nursing home admissions.

3. POLICY: It is VHA policy that MPAF must be referred to as the MPAF-Short Stay, and by December 1, 2005, MPAF-Short Stay must be implemented in all VA programs or bed sections that are accredited under the JCAHO Long-Term Care Standards.

4. ACTION: Each Medical facility Director is responsible for ensuring that:

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- a. Effective December 1, 2005, use of the MPAF-Short Stay is implemented in all VA programs or bed sections that are accredited under the JCAHO Long-term Care Standards.
- b. The MPAF-Short Stay instrument is used for any veteran's admission with a projected length-of-stay of 90 days or less.
- c. The Assessment Schedule for the MDS for veterans admitted for short stay incorporates the MPAF-Short Stay assessment schedule to include 5-day, 14-day, 30-day, 60-day, and 90-day assessments. *NOTE: The MPAF assessment schedule is determined from the day of admission which is day 1 of the resident observation period.*

5. REFERENCES

- a. MDS 2.0 RAI User's Manual Version 2.0 Manual, Revised, December 2002.
- b. VA MPAF-Short Stay Training Manual, at: <http://vaww.vistau.med.va.gov/vistau/rai-mds/default.htm>.

6. FOLLOW-UP RESPONSIBILITY: The Office of Geriatrics and Extended Care (114) is responsible for the contents of this Directive. Questions may be referred to Chief, Nursing Home Care, at (202) 273-8544.

7. RESCISSIONS: None. This VHA Directive expires December 31, 2010.

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Under Secretary for Health

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ATTACHMENT A

**MINIMUM DATA SET (MDS) MEDICARE PROSPECTIVE PAYMENT SYSTEM
ASSESSMENT FORM (MPAF) SHORT STAY ASSESSMENTS**

1. The seven types of Minimum Data Set (MDS) Medicare Prospective Payment System Assessment Form (MPAF)-Short Stay Assessments are:

- a. MPAF 5-Day Assessment,
- b. MPAF 14-Day Assessment,
- c. MPAF 30-Day Assessment,
- d. MPAF 60-Day assessment,
- e. MPAF 90-Day Assessment,
- f. MPAF Readmission/Return Assessment, and
- g. Other Medicare Required Assessment.

2. Section AA, item 8 of the MDS identifies the reasons for assessment. If the assessment is being used for MPAF-Short Stay, the MPAF reason for assessment is coded as the Subtype reason on Section AA, item 8b.

3. In many cases, assessments can be combined to meet existing Department of Veterans Affairs (VA) requirements for 14-day assessments for long-term residents and MPAF-Short Stay requirements for residents admitted for 90 days or less.

4. The MPAF is a shorter version of the full MDS and consists of a subset of the MDS items that include:

- a. Items for resident identification.
- b. Items that complete the Resource Utilization Group-III (RUG-III) calculation.
- c. Items that contribute to the calculation of the Quality Indicators and Quality Measures.

5. Although the MPAF has fewer items than the full MDS, the included item-by-item definitions and coding instructions are identical. The item-by-item information is found in the Centers for Medicare and Medicaid Services (CMS) Resident Assessment Instrument (RAI)-MDS Utilization Guidelines. **NOTE:** A copy of the MPAF-Short Stay can be found at: <http://www.cms.hhs.gov/quality/mds20/mpaf.pdf>.

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6. The current VA required RAI-MDS Schedule must be combined with the MPAF-Short Stay Assessment Schedule. VA Nursing Home Care Units (NHCU) are required to meet the following assessment schedules:

a. The existing VA standards require comprehensive assessments using the full MDS on admission, annually, for a significant change in condition, or a significant correction of a prior full assessment on any resident expected to stay in the nursing home more than 14 days. VA requires the quarterly assessment be completed within 90 days from the completion date of the previous assessment.

b. The new MPAF-Short Stay option is used for residents whose expected length of stay is 90 days or less and the assessment is performed at 5-day, 14-day, 30-day, 60-day, and 90-day time frames.

c. The MPAF-Short Stay assessments are designated by specific subtype coding in section AA, Item 8b on the MDS.

d. If the assessment is completed only for MPAF-Short Stay and the resident is expected to be discharged before day 14, then either the comprehensive MDS or the MPAF-Short Stay form can be used.

e. When the current VA assessment schedule and the MPAF-Short Stay assessment time frames coincide, one assessment type may be used to satisfy both requirements.

f. When combining assessments, the most stringent requirement for RAI-MDS completion must be met, therefore careful selection must be made for the Assessment Reference Date (ARD). Any VA required assessment and any MPAF-Short Stay assessment may be combined in this way as long as the ARD and completion dates meet both requirements, and the most stringent completion timeframe requirement is met.

7. Additional factors that impact the MPAF-Short Stay Assessment Schedule include:

a. The MPAF –Short Stay Program has options, but all short-stay admissions must have an assessment completed. For admissions that are discharged before the 14th day and only have a MPAF assessment completed, a Discharge Prior to Initial Tracking Form (DCPTI) is used. The DCPTI is appropriate for all residents that have not had a comprehensive RAI-MDS assessment completed.

b. Section S and Section X are to be completed in all assessments consistent with existing policy. **NOTE:** *Section W will be required when available in the newest software upgrade.*

c. Weekly transmission of assessments to the Austin Automation Center (AAC) is recommended by CMS and VHA. The completed assessments on all residents in the facility during the reporting month must be transmitted to AAC by close of business on the 28th day of the following month.

- d. Non-compliance with the completion of assessments schedule, consistent with existing policy, will default to the lowest RUG.
 - e. The modification procedure needs to be used if any of the item responses on a transmitted assessment were incorrect.
 - f. The inactivation procedure needs to be used if the assessment itself was invalid.
 - g. Entering data in the MPAF requires the same engagement by all members of the interdisciplinary team consistent with existing policy.
9. Specific instructions on the preceding actions are outlined in the VA MPAF-Short Stay Training Manual available on the following website <http://vaww.vistau.med.va.gov/vistau/raimds/default.htm>. These instructions are consistent with CMS Utilization Guidelines.