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Simple and Easy: Winning in PDPM Payment and Regulatory Strategies

Data Accuracy Starts on the Front Line



Your Data Formulation: 5 Reasons Why Documentation is King

With the accuracy of data formulation essential to optimal reimbursement, facilities need to have a process for getting the data to flow from meetings and discussions about elders at the front line of caregiving into the MDS process. No matter how well you think your staff have the procedures down, there are key reasons why everything should be in writing.

- 1. *Your data collection process needs to be in writing.*** Before you can document your policies and procedures, you'll need to conduct an evaluation of the way you currently collect data, specifically, where data comes from and how it gets formulated into each section of the MDS. The key is to create an understanding that the data on the MDs is stimulated by what comes out of the record. Work with clinical and operational leadership to assess how things are happening in your building today against the RAI Manual dated October 1, 2019. Then make sure your data formulation and documentation processes are put in writing.
- 2. *Staff competency should be documented.*** You'll need to confirm you have staff competency about the timelines, definitions, steps for the assessment and exclusions for the MDS. How have you communicated these to your team? F-Tag 641 states that the facility is responsible for ensuring that all participants in the assessment process have the requisite knowledge to complete an accurate assessment as stated in the RAI Manual. To demonstrate this, keep a record of the training and competency documents you give and keep it in your HR or education files.
- 3. *Interdisciplinary documentation must meet reproducibility standards.*** You need to look at the reproducibility of the data in the medical record. There are strict parameters that you'll need to adhere to so you'll want to make sure you have the right tools in order to collect adequate data for reproducibility. It's important that interdisciplinary team members, whether they are in a morning meeting or falls meeting, document the discussions about the elders so that the information can be used as part of the MDS documentation back up.

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5 Steps to Building a Team Approach to Data Formulation

- 4. *Substantiating information must be timely.*** In many buildings, the assessment codes may be present in the MDS but there is no substantiating data – or it is on day 8, 9 or 10 of the stay, which does not apply. Everyone must understand the two timelines of the admission assessment – the first 3 days and the first 7 days – and that the documentation needs to be timely, specific and clear. During an audit, surveyors want to see substantiating data for functional performance scores so frontline staff documentation much be rich.
- 5. *Survey results depend on documentation.*** When surveyors come in, you'll need to show documentation to demonstrate compliance with the regulations. The regulatory tags are tied to the accuracy standard so you'll want to avoid a negative survey outcome by ensuring documentation of, for example, trainings you lead when things change. Conduct a self-audit or bring in a consultant and if you discover issues with competency, look at QAPI for guidance on how to problem solve.

Remember: the data on the MDS writes your Medicare Part A checks. All staff must have habits of documentation to gather the data on close to 200 items so if your operational leadership hasn't reviewed your data formulation and documentation process, now's the time.