

Question of the Month

March 2025

M0300: Current Number of Unhealed Pressure Ulcers/Injuries at Each Stage.

Question: How should I code a pressure ulcer on the MDS if the only person who changed the dressing is the outpatient physician? Facility staff did not visualize the ulcer. The outpatient physician documented that the pressure ulcer is stage 3.

Answer: If facility staff were unable to visualize the pressure ulcer due to a non-removable dressing, then the correct coding would be M0300E, unstageable pressure ulcers/injuries related to non-removable dressing/device.

According to page M-8 of the MDS 3.0 RAI User's Manual, visualization of the wound bed is necessary for accurate staging. Known pressure ulcers/injuries covered by a non-removable dressing/device (e.g., primary surgical dressing, cast) should be coded as unstageable. "Known" refers to when documentation is available that says a pressure ulcer/injury exists under the non-removable dressing/device.

Inactivation vs. Deletion Request.

Question: I have a resident who was admitted to our facility for skilled care. The understanding at the time of admission was he had traditional Medicare Part A. I completed a stand-a-lone, 5-day PPS assessment and submitted the assessment to iQIES. We recently learned that the resident does not have traditional Medicare Part A and, in fact, has a Medicare Advantage plan. After learning this I completed and submitted an inactivation request for the 5-day PPS assessment that was submitted to iQIES. Is there anything else I need to do?

Answer: CMS clarified as of Oct. 1, 2023, inactivation is no longer appropriate when a Medicare PPS assessment has been submitted and accepted into iQIES for a non-Medicare part A resident. To request a record removal from the CMS database you must fill out an MDS 3.0 Manual Individual Assessment Correction/Deletion Request form. One form is needed for each assessment that meets the criteria for deletion. Currently there are two options available for completing this form. The first option is to submit the completed and signed form to your state agency via certified mail through the US Postal Service to the address below.

Send to:
Ohio Department of Health

ATTN: Yunmu Xiao
Bureau of Survey and Certification
246 N. High St
Columbus, Ohio 43215

The second option is to perform the deletion request in iQIES. Providers will be given an option to perform the deletion request on the MDS tab once they log in.

After receiving your request, the state agency will review and certify the request is accurate and complete. Once certified, your request will be sent to the iQIES Service Center for processing. Your facility will be notified by the state agency once your request is complete.

Below is an excerpt from the Resident Assessment Instrument 3.0 User's Manual, chapter five (p. 5-13 and 5-14).

5.8 Special Manual Record Correction Request

A few types of errors in a record in iQIES cannot be corrected with an automated Modification or Inactivation request. These errors are:

1. The record has the wrong unit certification or licensure designation in Item A0410.
2. The record has the wrong state code or facility ID in the control Items STATE_CD or FAC_ID.
3. **The record submitted was not for OBRA or Medicare Part A purposes.**
4. The record is a test record inadvertently submitted as production.

When a facility erroneously submits a record that was not for OBRA or Medicare Part A purposes, CMS does not have the authority to collect the data contained in the record. An inactivation request will not fix the problem, since it will leave the erroneously submitted record in the history file, that is, the CMS database. A manual deletion is necessary to completely remove the erroneously submitted record and associated information from the CMS database.

In instances in which an erroneous PPS assessment is combined with an OBRA-required assessment, if the item set code does not change, then a modification can be completed. If the item set code does change as a result of a modification, the provider must complete an MDS 3.0 Manual Assessment Correction/Deletion Request. This action will completely remove the assessment from the database. As indicated, the provider would complete and submit a new, stand-alone OBRA assessment.

A0310G, Type of Discharge.

Question: I am seeking further clarification for coding item A0310G, type of discharge. I have a situation where a resident is unexpectedly choosing to complete their treatment in another setting. This transfer is considered safe and not against medical advice. My facility will have

time to ensure all proper documentation and planning is in place for the transfer. However, this was not the intent for this resident on admission. Not completing their treatment at our facility is being considered as an unexpected discharge by this facility. In this scenario, would the correct coding for A0310G be 01, planned, or 02, unplanned?

Answer: According to page 2-41 of Resident Assessment Instrument 3.0 User's Manual, an unplanned discharge includes, for example:

- Acute-care transfer of the resident to a hospital or an emergency department in order to either stabilize a condition or determine if an acute-care admission is required based on emergency department evaluation; or
- Resident unexpectedly leaving the facility against medical advice; or
- Resident unexpectedly deciding to go home or to another setting (e.g., due to the resident deciding to complete treatment in an alternate setting).

Per further guidance provided, the final two bullets listed “unexpectedly” should be interpreted as making the decision to leave such that there is not time for completion of a planned Discharge Assessment. This could include a situation where the resident announced they were leaving in minutes or a few hours. If the care team has time to complete a discharge assessment (e.g., the resident gave notice ahead of the day of discharge), the facility should consider the discharge as a planned discharge.

If you have a Question of the Month to submit, please email Cheryl.Moya@odh.ohio.gov and place Question of the Month in the subject line.