

AUGUST 29, 2014

CMS REITERATES NEED FOR DISCHARGE ASSESSMENT TO NON-CERTIFIED BEDS

On August 25, 2014, CMS issued a survey transmittal regarding the need for nursing homes to complete a discharge assessment when a resident transfers from a SNF and/or NF certified bed to a non-certified bed in the same facility. CMS issued this transmittal to reinforce to facilities that discharge assessments are critical to ensure the accuracy of CMS mandated quality measures.

CMS cited federal regulations and Medicare Manual provisions as support for the discharge assessment requirement. Per the federal transfer and discharge regulations, 42 CFR 482.12(a) defines transfer and discharge to as the transfer of "a resident to a bed outside of the certified facility whether the bed is in the same physical plant or not." Therefore, the movement from a certified bed to a non-certified bed is considered a transfer that requires a discharge assessment. CMS also cited the *Long Term Care Facility Resident Assessment Instrument User's Manual, Version 3.0 (RAI User's Manual)* as further support that a discharge assessment is required for all residents, even if the resident is transferred to a non-certified bed. More specifically, this provision states the discharge assessment is "applicable to all residents in Medicare and/or Medicaid certified long-term care facilities." These assessments must be transmitted electronically per the requirements set forth in the *RAI User's Manual*.

A copy of this transmittal, which is titled S&C: 14-43-NH, can be found [here](#).

If you have any questions regarding this transmittal please contact:

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