

2.10 Combining PPS Assessments and OBRA Assessments⁷

SNF providers are required to meet two assessment standards in a Medicare certified nursing facility:

- The OBRA standards are designated by the reason selected in item A0310A, **Federal OBRA Reason for Assessment**, and item A0130F, **Entry/Discharge Reporting** and are required for all residents.
- The PPS standards are designated by the reason selected in item A0310B, **PPS Assessment** and item A0310H, **Is this a SNF Part A PPS Discharge Assessment?**
- When the OBRA and PPS assessment time frames coincide (except the IPA), one assessment may be used to satisfy both requirements. PPS and OBRA assessments (except

⁷ OBRA assessments do not apply to Swing Bed providers; however, Swing Bed providers are required to complete the Entry Tracking record, Swing Bed PPS (SP), Swing Bed Discharge (SD) assessment, and Death in Facility Tracking record.

the IPA) may be combined when the ARD windows overlap allowing for a common assessment reference date. When combining the OBRA and PPS assessments, the most stringent requirements for ARD, item set, and CAA completion requirements must be met. For example, the skilled nursing facility staff must be very careful in selecting the ARD for an OBRA Admission assessment combined with a 5-Day assessment. For the OBRA Admission, the ARD must be set between days 1 and 14 counting the date of admission as day 1. For the 5-Day, the ARD must be set for days 1 through 8. However, when combining a 5-Day assessment with the OBRA Admission assessment, the use of the latter end of the OBRA Admission ARD window would cause the 5-Day assessment to be considered late. To assure the assessment meets both standards, an ARD of a day between Day 1 and 8 would have to be chosen in this situation. In addition, the completion standards must be met. While a PPS assessment can be completed within 14 days after the ARD when it is not combined with an OBRA assessment, the CAA completion date for the OBRA Admission assessment (item V0200B2) must be day 14 or earlier. With the combined OBRA Admission/ 5-Day assessment, completion by day 14 would be required. Finally, when combining a PPS assessment with an OBRA assessment, the SNF staff must ensure that all required items are completed.

Some states require providers to complete additional state-specific items (Section S) for selected assessments. States may also add comprehensive items to the Quarterly and/or PPS item sets. Providers must ensure that they follow their state requirements in addition to any OBRA and/or PPS requirements.

The following tables provide the item set for each type of assessment or tracking record. When two or more assessments are combined, then the appropriate item set contains all items that would be necessary if each of the combined assessments were being completed individually.

Item Sets by Assessment Type for Skilled Nursing Facilities

	Comprehensive Item Sets	Quarterly and PPS* Item Sets	Other Assessments and Tracking Records/Item Sets
Standalone Assessment Types	<ul style="list-style-type: none"> • OBRA Admission • Annual • Significant Change in Status (SCSA) • Significant Correction to Prior Comprehensive (SCPA) 	<ul style="list-style-type: none"> • Quarterly • Significant Correction to Prior Quarterly • 5-Day 	<ul style="list-style-type: none"> • Entry Tracking Record • OBRA Discharge assessments • Death in Facility Tracking Record • Part A PPS Discharge • Interim Payment Assessment (IPA)
Combined Assessment Types	<ul style="list-style-type: none"> • OBRA Admission and 5-Day • Annual and 5-Day • SCSA and 5-Day • SCPA and 5-Day • Any OBRA comprehensive and any Discharge 	<ul style="list-style-type: none"> • Quarterly and 5-Day • Significant Correction to Prior Quarterly and 5-Day • 5-Day and any Discharge • Significant Correction to Prior Quarterly and any Discharge 	<ul style="list-style-type: none"> • OBRA Discharge assessment and Part A PPS Discharge Assessment

*Nursing home-based SNFs must check with their State Agency to determine if the state requires additional items to be completed for the required OBRA Quarterly and PPS assessments.

Item Sets by Assessment Type for Swing Bed Providers

Swing Bed PPS/Item Set		Other Assessments/Tracking Item Sets for Swing Bed Providers
Assessment Type	<ul style="list-style-type: none">(SP) Swing Bed PPS assessment	<ul style="list-style-type: none">Entry Tracking recordDeath in Facility Tracking record(SD) Swing Bed DischargeInterim Payment Assessment (IPA)
Assessment Type Combinations	<ul style="list-style-type: none">(SP) Swing Bed PPS assessment and (SD) Swing Bed Discharge	<ul style="list-style-type: none">N/A

Tracking records (Entry and Death in Facility) and the Interim Payment Assessment can never be combined with other assessments.