

## NASL's PDPM Issues/Concerns for Meeting with CMS

PDPM Issue/Concern	Unintended Consequences	Examples	Recommended Solution/Approach
The use of students in SNFs and how their use could be limited with the group and concurrent therapy limits			
Clarification on the RUGIV - PDPM Transition - e.g., is a new 5-day assessment required for every patient after October 1? How is reimbursement to be calculated if patient begins on RUGs-IV & ends stay under PDPM?			
Lack of a default category			
Compliance with the group and concurrent therapy limits			
Medicare Plans' ability to continue requiring the MDS on the old schedule of 14, 30, 60 days. IT systems will not be able to maintain two completely different systems simultaneously (i.e., RUGIV & PDPM), so how this transition is managed is critical.			
What is the timeline for the release of key PDPM files, e.g., the RAI manual and the DLL Package, which includes: the grouper code, test files, final tech specs, CMI, grouper overview, test data, and the demo (in various formats).			