LVN Completion of Focused and Comprehensive Assessments  
(Developed October 2014 – Note: Items underlined by author/not underlined in the source document)

> CMS Guidance on Completion of MDS Assessments from page 1-7 to 1-8 of the MDS 3.0 RAI Manual:

“Given the requirements of participation of appropriate health professionals and direct care staff, completion of the RAI is best accomplished by an interdisciplinary team (IDT) that includes nursing home staff with varied clinical backgrounds, including nursing staff and the resident’s physician. Such a team brings their combined experience and knowledge to the table in providing an understanding of the strengths, needs and preferences of a resident to ensure the best possible quality of care and quality of life. It is important to note that even nursing homes that have been granted a RN waiver under 42 CFR 483.30 (c) or (d) must provide a RN to conduct or coordinate the assessment and sign off the assessment as complete.”

> CMS Definition of Comprehensive MDS Assessments from page 2-9 of the MDS 3.0 RAI Manual:

“Comprehensive MDS assessments include both the completion of the MDS as well as completion of the Care Area Assessment (CAA) process and care planning. Comprehensive MDSs include Admission, Annual, Significant Change in Status Assessment (SCSA), and Significant Correction to Prior Comprehensive Assessment (SCPA).”

> CMS Definition of Non-Comprehensive MDS Assessments from page 2-13 of the MDS 3.0 RAI Manual:

“Non-Comprehensive MDS assessments include a select number of items from the MDS used to track the resident’s status between comprehensive assessments and to ensure monitoring of critical indicators of the gradual onset of significant changes in resident status. They do not include completion of the CAA process and care planning. Non-comprehensive assessments include Quarterly and Significant Correction to Prior Quarterly (SCQA) assessments.”

> Texas Board of Nursing (BON) guidance on LVN and RN performance of nursing assessments at 22 TAC §217.11:

“(2) Standards Specific to Vocational Nurses: The licensed vocational nurse practice is a directed scope of nursing practice under the supervision of a registered nurse, advanced practice registered nurse, physician's assistant, physician, podiatrist, or dentist. Supervision is the process of directing, guiding, and influencing the outcome of an individual’s performance of an activity. The licensed vocational nurse shall assist in the determination of predictable healthcare needs of clients within healthcare settings and:
(A) Shall utilize a systematic approach to provide individualized, goal-directed nursing care by:
(i) collecting data and performing focused nursing assessments...”

“(3) Standards Specific to Registered Nurses: The registered nurse shall assist in the determination of healthcare needs of clients and shall:
(A) Utilize a systematic approach to provide individualized, goal-directed, nursing care by:
(i) performing comprehensive nursing assessments regarding the health status of the client;”

Analysis: When CMS guidance is followed and the MDS is completed by an IDT, each assessor is performing individual sections or subsets of sections of the MDS and no individual is performing the assessment entirely. In support of BON requirements, when an IDT is not utilized and an LVN is assigned to determine the coding of every MDS item:
- Completing a non-comprehensive MDS such as a Quarterly or a correction to a Quarterly would not be an issue as these are focused assessments.
- Completing a comprehensive MDS such as an Admission or Annual would be an issue because these MDS are comprehensive.

Questions regarding CMS MDS requirements should be addressed to your State RAI Coordinator. In Texas, contact Cheryl Shiffer at (210) 619-8010 or e-mail cheryl.shiffer@dads.state.tx.us.

Questions regarding BON requirements should be addressed to the BON. In Texas, call the BON at (512) 305-7400 or email the BON at webmaster@bon.texas.gov. To look up information on-line, visit http://www.bon.texas.gov/index.asp.