

CMS Answers CBDM Questions

Following are the questions the CBDM posed to CMS, along with CMS’s responses in quotes.

CBDM Question #1:

May a CDM, CFPP continue to document nutrition-related RAPs under the new guidance?

CMS Answer: “Yes, as long as the preparer has the knowledge and skill to do so.” Interpretive Guidelines state, “The assessment must accurately reflect the resident’s status” (F278), and the intent is “to assure that each resident receives an accurate assessment by staff that are qualified to assess relevant care areas and knowledgeable about the resident’s status, needs, strengths, and areas of decline.”

CBDM Question #2:

May a CDM, CFPP continue to write a care plan and initiate such care?

CMS Answer: “Yes, the discipline of the individual developing the care plan is not specified in the regulatory language. However, the Registered Nurse is responsible for conducting or coordinating the assessment and certifying the assessment, and the results of the assessment are used to develop the comprehensive care plan.”

CBDM Question #3:

May a CDM, CFPP complete and document a quarterly assessment (RAI) of a resident?

CMS Answer: “Yes, as long as the assessment is signed by the Registered Nurse who is responsible for conducting and coordination of the assessment.”

CBDM Question #4:

Does CMS intend for each RAI document (MDS) prepared by a CDM, CFPP to be signed by a Registered Dietitian (RD)?

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Nutrition Screening

CDM, CFPP

NUTRITION SCREENING*

If Low-Risk (per facility standard) OR If Risk Warrants (per facility standard)

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- Completes MDS Section K
- Completes RAP
- Develops Care Plan

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- Implements Established Protocols**
- Completes MDS Section K
- Completes RAP
- Develops an Initial Care Plan (refer to RD)

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RD

NUTRITION CARE PROCESS

- Initiates Nutrition Care Process (including in-depth assessment, nutrition diagnosis, nutrition intervention, nutrition monitoring and evaluation)
- Reviews MDS
- May Update RAP
- Updates Care Plan; May Revise Goal



* Per systematic, documented policies and procedures developed/approved by RD and Standards of Professional Practice developed by DMA

** These protocols would be facility specific