

## Justification of Nonmaterial Changes (83-C worksheet)

**0938-1163**

1. Remove the phrase “non epithelialized” = Previously, all mentions of “unhealed pressure ulcers” were accompanied by the term “non-epithelialized”. In consultation with wound care experts, we have determined that removing this phrase from the LTCH CARE Data Set item M0300 would improve the accuracy of this item and the instructions for this item. This will not impact our current burden estimates for completing an LTCH CARE Data Set because we are not requiring additional data to be collected. Instead, we are simply changing the instructions verbiage for one item in the LTCH CARE Data Set to improve clarity and accuracy in light of expert input.
2. Remove the phrase “entry/death reporting” = Previously, there were two items in the LTCH CARE Data Set (Z0400, M0210) that referred to “entry/death reporting”. This phrase is not relevant to the LTCH setting and its removal improves the accuracy of the items and instructions for each item. This change will not impact our current burden estimates for completing an LTCH CARE Data Set because we are not requiring additional data be collected. Instead, we are simply changing the instructions verbiage to improve clarity.
3. Change assessment authorization statement = We have modified the assessment authorization statement in Section Z to improve the accuracy of instructions for the LTCH setting. This change will not impact our current burden estimates for completing an LTCH CARE Data Set because we are not requiring additional data be collected. Instead we are simply changing the instructions verbiage.
4. Change in item title = We have modified the item title for Z0500 to match change in Section Z instructions. This change will not impact our current burden estimates for completing an LTCH CARE Data Set because we are not requiring additional data be collected. Instead we are simply changing the instructions verbiage.
5. Change draft status and version number = We have removed the word “DRAFT” from the LTCH CARE Data Set to reflect OMB’s approval of the LTCH CARE Data Set for data collection. We have replaced “V1.0” with V1.01” to allow for version control within CMS.
6. Change item number = We have changed the item number A1300C to A1300D, to align LTCH CARE Data Set item numbering with MDS 3.0 item numbering.