



# Department of Health

KATHY HOCHUL  
Governor

JAMES V. McDONALD, MD, MPH  
Commissioner

JOHANNE E. MORNE, MS  
Executive Deputy Commissioner

May 21, 2025

Dear Administrator:

After reviewing the data of the latest Minimum Data Set (MDS) assessments, the New York State Department of Health (NYS DOH) is now requiring the inclusion of additional data elements.

Effective June 1st, nursing facilities are required to complete the following three MDS items (in addition to those already required) on all federally required MDS assessment submissions:

1. **I0020**: Indicate the resident's primary medical condition category
2. **J2100**: Recent Surgery Requiring Active SNF Care
3. **O0400D**: Respiratory Therapy

Though these fields are not required by the Centers for Medicare & Medicaid Services (CMS) as part of the Omnibus Budget Reconciliation Act (OBRA) assessment, they are key elements in the Patient Driven Payment Model (PDPM) schema that will assist NYS DOH in analyzing the assessment data for future case mix adjustments. Completion of these items will allow for PDPM categorization of all submitted assessments.

Please note that, at this juncture, a new methodology for employing PDPM to apply a case mix adjustment to Medicaid fee-for-service (FFS) operating per diem rates has not yet been established or implemented. These additional data elements will provide necessary additional information for NYS DOH in developing that methodology and presenting it for provider and industry feedback.

***Failure to complete these items will result in the inability to classify the assessment or tracking form. The inability to classify these assessments prevents the analysis of modernization of the nursing facility rate utilizing the PDPM classification system.***

However, given the fact that NYS DOH will require additional time to acquire additional data for full PDPM implementation, the Department has begun developing an interim methodology with the data available as a temporary solution. Once the proposed interim methodology is finalized, it will be shared with the industry for feedback.

For questions, please contact the OHIP Bureau of Nursing Home and Long-Term Care Rate Setting at [NFRates@health.ny.gov](mailto:NFRates@health.ny.gov).

Sincerely,

A handwritten signature in black ink that reads "Laura Rosenthal".

Laura Rosenthal, Bureau Director  
Nursing Home and Long-Term Care Rate Setting  
Division of Finance and Rate Setting  
Office of Health Insurance Programs