OASIS Data Collection: Time Points, Patient Populations & Regulations

Sponsored by: Wyoming Department of Health
Office of Healthcare Licensing & Surveys
Presented by: Linda Krulish, PT MHS COS-C
OASIS Answers, Inc.

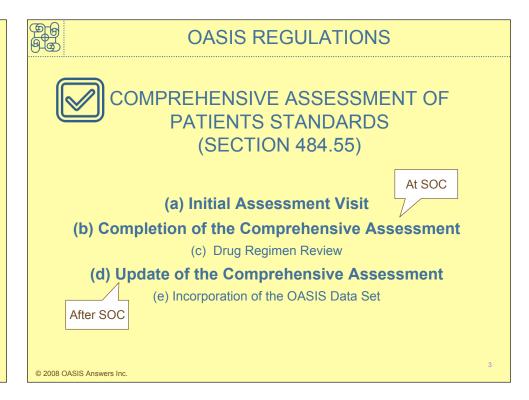
1:00-2:30 pm Mountain Time

OBJECTIVES:

Provide home health clinicians, managers, and auditors with a CMS-based update on OASIS data collection rules:

- Data collection regulations Who in the agency can collect OASIS data?
- Patient populations Which patients require OASIS data collection?
- Time points What events occur that trigger OASIS data collection?

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CRITICAL INSIGHT!



•INITIAL ASSESSMENT VISIT
•COMPREHENSIVE ASSESSMENT
•OASIS
•START OF CARE DATE



INITIAL ASSESSMENT VISIT - STANDARD (A)

INITIAL = "FIRST"

- 1. DETERMINES IMMEDIATE CARE AND SUPPORT NEEDS
- 2. DETERMINES ELIGIBILITY & HOMEBOUND STATUS (FOR MEDICARE BENEFICIARIES)

MUST BE CONDUCTED EITHER

- Within 48 hours of referral
- Within 48 hours of return home
- On physician-ordered SOC date

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INITIAL ASSESSMENT VISIT - STANDARD (A)

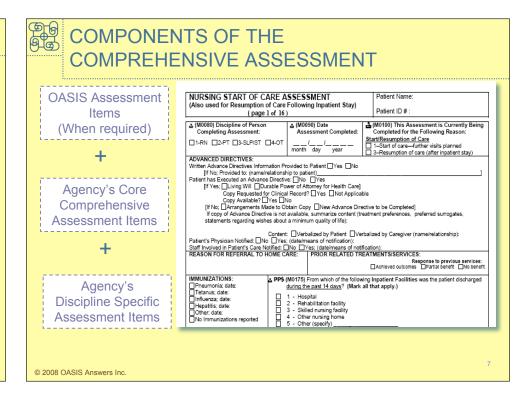
IF ORDERS ARE PRESENT FOR SKILLED NURSING AT SOC, RN MUST CONDUCT THE INITIAL ASSESSMENT VISIT

- (CMS OASIS Q&A Cat 2 Q51)

IF THERAPY ONLY:

- Appropriate therapist may perform initial assessment
- OT may only complete assessment if need for OT establishes program eligibility
 - Not for Medicare
 - Possible for other payers

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COMPREHENSIVE ASSESSMENT PATIENT POPULATION REQUIREMENTS

PROVIDE ALL PATIENTS WITH A COMPREHENSIVE ASSESSMENT EXCEPT:

 Clients receiving services entirely limited to housekeeping or chore services

- (CMS Q&As Cat 2 Q44)

OASIS ≠ COMPREHENSIVE ASSESSMENT

 OASIS will be a required part of your Comprehensive Assessment for some patients and not for others WHO REQUIRES a COMPREHENSIVE ASSESSMENT?



OASIS PATIENT POPULATIONS

OASIS DATA MUST BE COLLECTED ON SKILLED MEDICARE AND SKILLED MEDICAID PATIENTS

WHO REQUIRES OASIS?

- Not required to collect on:
 - Maternity patients
 - Patients who are currently or were recently pregnant and are receiving treatment as a direct result of the pregnancy

-(CMS OASIS Q&As Cat 1 Q11)

- Pediatric patients (< 18 years old)
- Personal care patients, or
- Single visit episodes
- -(CMS Q&As Cat 2 Q44)
- -(Comprehensive Assessment
- Requirements for MC-Approved HHAs)



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COMPLETION OF THE COMPREHENSIVE ASSESSMENT – STANDARD (B)

IF ORDERS ARE PRESENT FOR SKILLED
NURSING AT SOC, RN MUST CONDUCT THE SOC
COMPREHENSIVE ASSESSMENT

- (CMS OASIS Q&As Cat 2 Q51)

MUST BE COMPLETED IN A TIMELY MANNER

- Consistent with patient's immediate needs
- No later than 5 days after SOC
- SOC = "Day 0"
- May not be started/completed before the SOC date

- (CMS OASIS Q&As Cat 4b Q23.1; CMS OASIS OCCB Q&As 01/08 Q1)

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M0030 START OF CARE DATE

THE DATE THAT REIMBURSEABLE CARE BEGINS.

SOC DATE = DATE WHEN THE FIRST REIMBURSEABLE SERVICE IS DELIVERED.

(CMS OCCB Q&As 5/07 Q7)

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2 2000 07 1010 7 11011010 1

M0100 ~ OASIS TIME POINTS



M0100 – REASON FOR ASSESSMENT (RFA)

1 - Start of Care

- 3 Resumption of Care
- 4 Recertification (Follow-up)
- 5 Other Follow-up
- 6 Transfer to Inpatient Facility Not Discharged
- 7 Transfer to Inpatient Facility Discharged
- 8 Death at Home
- 9 Discharge from Agency



M0100 RFA 1 - START OF CARE

FURTHER VISITS PLANNED

START OF CARE (SOC) COMPREHENSIVE ASSESSMENT

MUST BE CONDUCTED DURING A HOME VISIT

COMPLETED ON OR WITHIN 5 DAYS AFTER SOC DATE

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M0090 DATE ASSESSMENT COMPLETED

M0090 = Date last information required to complete the comprehensive assessment is collected.

COMPREHENSIVE ASSESSMENT MAY TAKE MORE THAN ONE DAY TO COMPLETE

USUALLY COMPLETED ON FIRST VISIT
USUALLY COMPLETED ON DATE OF A VISIT

MAY OCCASIONALY BE A DATE WHICH DOES NOT COINCIDE WITH A VISIT

Example: Physician or daughter calls back next day

-(CMS Q&As Cat 4b Q16 & 17)

 If RN admits on Monday and confers with therapist on Tuesday regarding M0825(M0826), then Tuesday = M0090 Date Assessment Completed

-(CMS OASIS Q&As Cat 4b Q19.1)

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COMPLETING THE COMPREHENSIVE ASSESSMENT

MUST BE COMPLETED BY ONE CLINICIAN

- If two clinicians are seeing the patient at the same time:
 - Reasonable to confer about the interpretation of assessment data
 - Reasonable for the clinician performing the assessment to follow-up on any observations of patient status reported by other agency staff

- (CMS OASIS Q&As Cat 2 Q52)

 Clerical staff may enter demographic and agency ID items – assessing clinician must verify accuracy

(CMS Q&A Cat 4b Q3)

 Assessment, however, is the responsibility of one clinician – RN, PT, OT, or SLP.

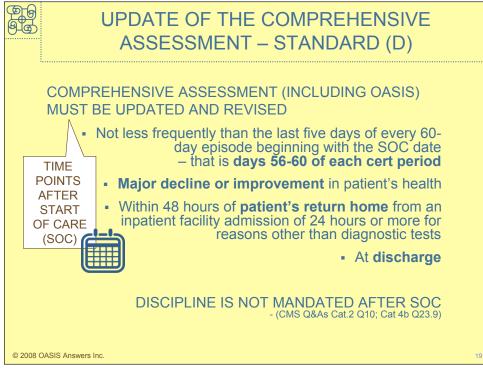
- (OASIS User's Manual, pg. 4.9)

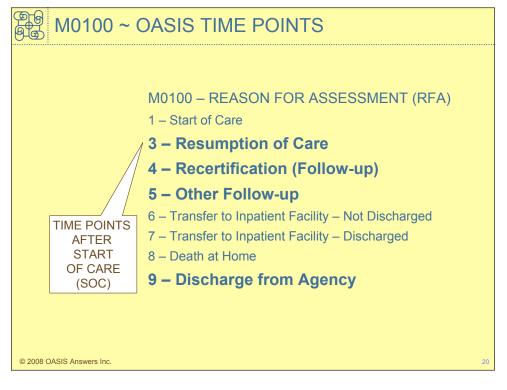
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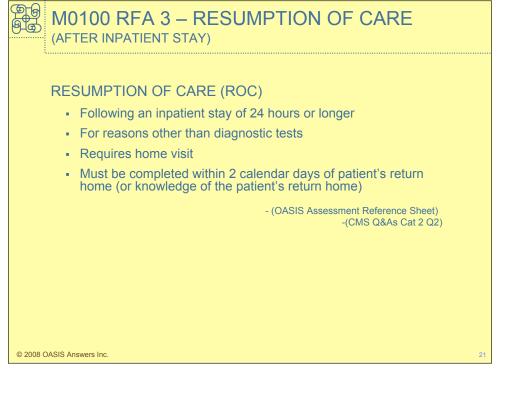
DIFFERENTIATING TERMS: SOC ORDERS: RN+ ... SUN MON TUF WFD THU FRI SAT INITIAL ASSESSMENT VISIT x RN START OF CARE VISIT/DATE X RN COMPREHENSIVE **COMPLETE WITHIN 5 CALENDAR** ASSESSMENT DAYS FROM SOC X RN - (CMS: Q&As Cat 2 Q20) © 2008 OASIS Answers Inc









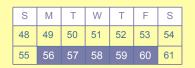




M0100 RFA 3 - RESUMPTION OF CARE

(AFTER INPATIENT STAY)

RETURN HOME FROM INPATIENT STAY DURING THE LAST 5 DAYS OF AN EPISODE



EFFECTIVE OCTOBER 1, 2004

- If patient returns home during the last 5 days of the current episode, complete the RFA 3, ROC only
- Recertification assessment not required
- ROC determines case mix assignment for subsequent 60-day episode
 - Answer M0110 & M0826 accordingly

- (OASIS Considerations for Medicare PPS Patients)

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M0100 RFA 4 - RECERTIFICATION

(FOLLOW-UP) REASSESSMENT

COMPREHENSIVE ASSESSMENT (REASSESSMENT)
DURING THE LAST FIVE DAYS OF THE 60-DAY
CERTIFICATION PERIOD

REQUIRES A HOME VISIT

IF AGENCY MISSES RECERT WINDOW, BUT STILL PROVIDES CARE:

- Do not discharge & readmit
- Make a visit and complete Recertification assessment as soon as oversight identified
- M0090 = the date the assessment completed
- A warning message will result
- Explain circumstances in clinical documentation

- (CMS Q&As Cat 3 Q11)

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M0100 RFA 5 – OTHER FOLLOW-UP

COMPREHENSIVE ASSESSMENT (REASSESSMENT) DUE TO MAJOR DECLINE OR IMPROVEMENT IN PATIENT CONDITION

- At time other than during the last 5 days of the episode
- Requires home visit
- May indicate need to update the patient's plan of care
- Policies regarding criteria for RFA 5 must be determined by individual agencies

- (CMS Q&As Cat 3 Q12)

MUST BE COMPLETED WITHIN 2 CALENDAR DAYS OF IDENTIFYING A MAJOR IMPROVEMENT OR DECLINE IN PATIENT'S HEALTH STATUS

-(OASIS Assessment Reference Sheet)

SCIC PAYMENT ADJUSTMENT REMOVED FROM 2008 PPS MODEL

-Must still complete the Other Follow-Up comprehensive assessment when patient experiences a major in their health status

-(CMS OASIS OCCB Q&As 4/08)



M0100 RFA 6 – TRANSFER TO AN INPATIENT

FACILITY PATIENT NOT DISCHARGED FROM AGENCY

TRANSFERRED TO INPATIENT FACILITY

- Transferred and_admitted to inpatient bed of inpatient facility
- Stay of 24 hours or longer
- For reasons other than diagnostic tests
- Does not require a home visit
- Must be completed within 2 calendar days of Transfer date (M0906) or knowledge of transfer that meets criteria
- Agency's choice to place on "hold" (vs. DC)
- If patient does not return to agency after inpatient admission, no further assessment required

- (OASIS Considerations for MC PPS Patients)

- (CMS Q&As Cat 2 Q41)



M0100 RFA 6 – TRANSFER TO AN INPATIENT FACILITY PATIENT NOT DISCHARGED FROM AGENCY

YOU MAKE A ROUTINE VISIT AND DISCOVER THE PATIENT HAD A QUALIFYING STAY IN AN INPATIENT FACILITY AND YOU HAD NOT BEEN INFORMED

- Within 2 calendar days of knowledge of transfer
 - Complete the RFA 6 Transfer to Inpatient Facility
 - Then, complete the RFA 3 Resumption of Care

- (CMS OASIS Q&As Cat 4b Q23.3)

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M0100 RFA 7 – TRANSFER TO AN INPATIENT FACILITY PATIENT DISCHARGED FROM AGENCY

TRANSFERRED TO INPATIENT FACILITY

- Transferred and admitted to inpatient bed of inpatient facility
- Stay of 24 hours or longer
- For reasons other than diagnostic tests
- Does not require a home visit
- Must be completed within 2 calendar days of Transfer date (M0906) or knowledge of transfer that meets criteria
- Agency's choice to discharge (vs. "hold")

- (CMS Q&As Cat 2 Q8; OASIS Considerations for MC PPS Patients)

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M0100 RFA 8 – DEATH AT HOME

RFA 8 DEATH AT HOME

DEATH ANYWHERE EXCEPT IN AN INPATIENT FACILITY OR IN THE EMERGENCY DEPARTMENT

 Examples: Patient dies at home, at church, in an ambulance, is pronounced DOA in ER

MUST BE COMPLETED WITHIN 2 CALENDAR DAYS OF DEATH DATE (M0906)

DOES NOT REQUIRE A HOME VISIT

- (CMS Q&As Cat 2 Q22)

- (OASIS Assessment Reference Sheet)



M0100 RFA 9 – DISCHARGE FROM AGENCY

DISCHARGE

NOT DUE TO AN INPATIENT FACILITY ADMISSION

NOT DUE TO DEATH

MUST BE COMPLETED WITHIN 2 CALENDAR DAYS OF DISCHARGE DATE (M0906) OR KNOWLEDGE OF NEED TO DISCHARGE

VISIT IS REQUIRED TO COMPLETE THIS ASSESSMENT

- (OASIS Assessment Reference Sheet)



UNPLANNED OR UNEXPECTED DISCHARGES

IF DISCHARGE IS UNPLANNED – THE REQUIREMENTS MUST STILL BE MET

DISCHARGE ASSESSMENT MUST REPORT PATIENT STATUS AT AN ACTUAL VISIT – Not information gathered on a telephone call

- (CMS Q&As Cat 2 Q37[3])

ASSESSMENT DATA SHOULD BE BASED ON THE LAST VISIT CONDUCTED BY A QUALIFIED ASSESSING CLINICIAN— RN, PT, OT, OR SLP

- (CMS OASIS Q&As Cat 4b Q37)

- Explain this in the clinical documentation

DON'T INCLUDE ANY EVENTS - GOOD OR BAD - THAT OCCURRED AFTER THE LAST VISIT BY A QUALIFIED CLINICIAN, E.G. ER VISIT, FOLEY DC'D, CHANGE IN MEDICAL TREATMENT

- (CMS OASIS Q&As Cat 4b Q181.3)

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UNPLANNED OR UNEXPECTED DISCHARGES

DATES:

M0090 DATE ASSESSMENT COMPLETED

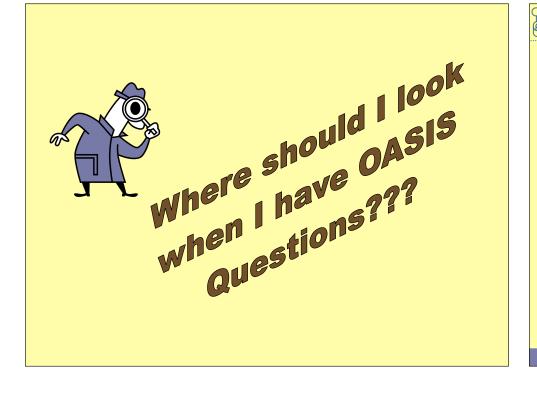
Actual date agency completed assessment

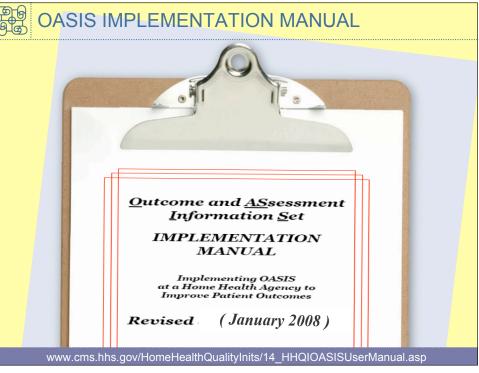
M0903 DATE OF THE LAST (MOST RECENT) HOME VISIT

- Date of the last visit by agency staff
- •Visit by any agency staff included on the plan of care

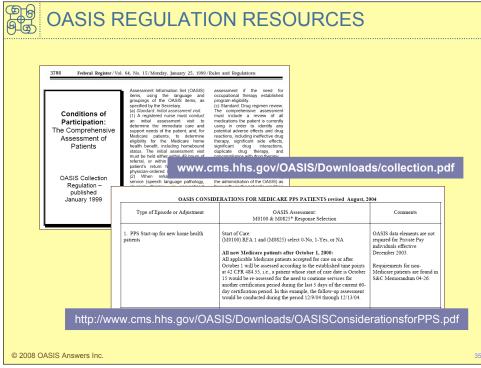
M0906 DISCHARGE DATE

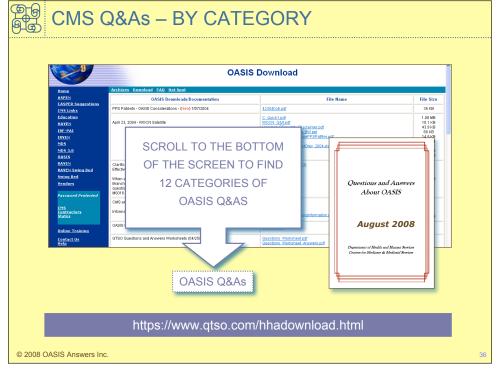
- Determined by agency policy
- Can't be before the last visit





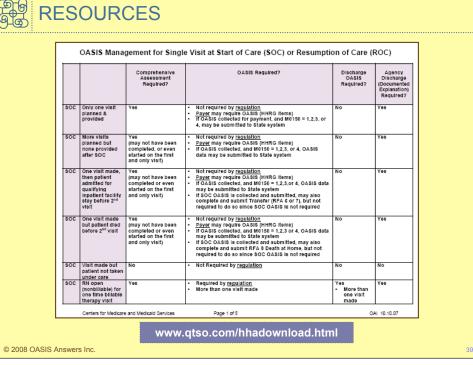
















Conditions of Participation:

The Comprehensive Assessment of Patients

> OASIS Collection Regulation – published January 1999

§484.55 Condition of participation: Comprehensive assessment of patients.

Each patient must receive, and an HHA must provide patient-specific, comprehensive assessment accurately reflects the patient's current health status and includes information that may be used to demonstrate the patient's progress toward achievement desired outcomes. comprehensive assessment must identify the patient's continuing need for home care and meet the patient's medical, nursing, rehabilitative, social, and discharge planning needs. For Medicare beneficiaries, the HHA must verify the patient's eligibility for the Medicare home health benefit including homebound status, both at the time of the initial assessment visit and at the time of the comprehensive assessment. The comprehensive assessment must also incorporate the use of the current version of the Outcome

Assessment Information Set (OASIS) items, using the language and groupings of the OASIS items, as specified by the Secretary.

- (a) Standard: Initial assessment visit.
- (1) A registered nurse must conduct initial assessment visit determine the immediate care and support needs of the patient; and, for Medicare patients, to determine eligibility for the Medicare home health benefit, including homebound status. The initial assessment visit must be held either within 48 hours of referral, or within 48 hours of the patient's return home, or on the physician-ordered start of care date. When rehabilitation therapy service (speech language pathology, physical therapy, or occupational therapy) is the only service ordered by the physician, and if the need for that service establishes program eligibility, the initial assessment visit may be made by the appropriate rehabilitation skilled professional.
- (b) Standard: Completion of the comprehensive assessment.
- (1) The comprehensive assessment must be completed in a timely manner, consistent with the patient's immediate needs, but no later than 5 calendar days after the start of care.
- (2) Except as provided in paragraph (b)(3) of this section, a registered nurse must complete the comprehensive assessment and for Medicare patients, determine eligibility for the Medicare home health benefit, including homebound status.
- (3) When physical therapy, speechlanguage pathology, occupational therapy is the only service ordered by the physician, a speechphysical therapist, language pathologist occupational therapist may complete the comprehensive assessment, and for Medicare patients, determine eligibility for the Medicare home health benefit, including homebound status. The occupational therapist mav complete the comprehensive

assessment if the need for occupational therapy established program eligibility.

- (c) Standard: Drug regimen review. The comprehensive assessment must include a review of all medications the patient is currently using in order to identify any potential adverse effects and drug reactions, including ineffective drug therapy, significant side effects, significant drug interactions, duplicate drug therapy, and noncompliance with drug therapy.
- (d) Standard: Update of the comprehensive assessment. The comprehensive assessment must be updated and revised (including the administration of the OASIS) as frequently as the patient's condition warrants due to a major decline or improvement in the patient's health status, but not less frequently than—
- (1) Every second calendar month beginning with the start of care date;
- (2) Within 48 hours of the patient's return to the home from a hospital admission of 24 hours or more for any reason other than diagnostic tests:
- (3) At discharge.
- Standard: Incorporation of OASIS data items. The OASIS data items determined by the Secretary must be incorporated into the HHA's own assessment and must include: clinical record items, demographics and patient living arrangements, history, supportive assistance. sensory status. integumentary status. respiratory status, elimination status, neuro/ emotional/behavioral status, activities of daily living, medications, equipment management, emergent care, and data items collected at inpatient facility admission or discharge only. [64 FR 3784, Jan. 25, 1999]

(Source:www.access.gpo.gov/su_d ocs/fedreg/a990125c.html)

COMPREHENSIVE ASSESSMENT REQUIREMENTS FOR MEDICARE-APPROVED HHAS

PATIENT CLASSIFICATION/PAYER	Does OASIS Apply?	Comprehensive Assessment Only Excluding OASIS ¹	Timing of Follow-up Comprehensive Assessment
SKILLED Medicare (traditional fee-for service) Medicare (HMO/Managed Care) Medicaid (traditional fee-for-service) Medicaid (HMO/Managed Care)	Yes	NA	Day 56-60 ²
SKILLED Non-Medicare/Non-Medicaid: Workers' Compensation Title Programs Other Government Private insurance Private HMO/Managed Care Self-pay; other; unknown	No ³	Yes	Anytime after SOC assessment up to day 60; subsequent Follow-up assessment must be within 60 days. ⁴
PERSONAL CARE ONLY Medicaid (traditional fee-for service) Medicaid (HMO/Managed Care) Waiver service or home health aide services without skilled services Non-Medicaid: Workers' Compensation Title Programs Other Government Private insurance Private HMO/Managed Care Self-pay; other; unknown	No	Yes	Anytime after SOC assessment up to day 60; subsequent Follow-up assessment must be within 60 days.
OASIS EXCLUDED Patients under age 18; regardless of payer source Patients receiving pre & post partum maternity services; regardless of payer source	No ⁵	Yes	Anytime after SOC assessment up to day 60; subsequent Follow-up assessment must be within 60 days.
OASIS EXCLUDED Patients receiving only chore and housekeeping services ⁶	No	No	NA

¹ HHAs may develop own comprehensive assessment for each time point excluding OASIS.
² 42 CFR 484.55(d).
³ HHAs may collect OASIS information for their own use.
⁴ S&C Memo 04-45, published 9/9/04.

Source: www.cms.hhs.gov/oasis/patientclas.pdf

⁵ HHAs expecting payment for a pediatric or maternity Medicare patient must collect payment items to provide a HIPPS code.

⁶ S&C Memo 05-06, published 11/12/04



OASIS ASSESSMENT REFERENCE SHEET

RFA * Type	RFA Description	Assessment Completed	Locked Date	Submission Timing
01	SOC - further visits planned	Within 5 calendar days after the SOC Date (SOC = Day 0)	Effective 6/21/2006 No required lock date	Effective 6/21/2006 Transmission required within 30 calendar days of completing the assessment (M0090)
03	ROC - after inpatient stay	Within 2 calendar days of the facility discharge date or knowledge of pt's return home		
04	Recertification - F/U	The last 5 days of every 60 days, i.e., days 56-60 of the current 60-day period.		
05	Other F/U	Complete assessment within 2 calendar days of identification of significant change of patient's condition		
06	Transferred to Inpatient Facility - not discharged from agency	Within 2 calendar days of the disch/trans/death date or knowledge of a qualifying transfer to inpatient facility		
07	Transferred to Inpatient Facility - discharged from agency	Within 2 calendar days of the disch/trans/death date or knowledge of a qualifying transfer to inpatient facility		
08	Died at home	Within 2 calendar days of the disch/trans/death date		
09	Discharged from agency: Not to Inpatient Facility	Within 2 calendar days of the disch/trans/death date	 	•

* RFA= Reason for Assessment

RFA 02 and RFA 10 are no longer required records and are rejected by the state system

(Source: www.cms.hhs.gov/apps/hha/hharefch.asp Modified 7/19/06 to reflect change posted in Federal Register/Vol. 70, #246/Friday, December 23,2005/Rules and Regulations, pg. 76199)

Revisions for RFA 3, 6, & 7 based on CMS 6/05Q&As Cat 2, Questions 2& 8 and 8/06 OCCB Q&As. Revisions to RFA 1 based on OASIS-B1 Data Specification Notes July 24, 2003 pg. 6