

Eli's Rehab Report

Home Health: Is Your Documentation Jeopardizing Your Payment?

Check here to see who can complete the OASIS in therapy only cases.

Accurately completing the start of care (SOC) comprehensive assessment and OASIS is important not only for securing payment, but for establishing a baseline for quality data. Make certain you're not damaging your agency's finances or reputation by falling prey to one of these common SOC assessment misconceptions.

Myth: A skilled nurse must always complete the SOC comprehensive assessment and OASIS.

Truth: Condition of Participation, 484.55, Comprehensive Assessment of Patients requires that if nursing orders exist at SOC, the registered nurse must complete the SOC comprehensive assessment including the OASIS.

The COP also says, "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."

So, when physical therapy is the only service ordered, assuming physical therapy services establish program eligibility for the payer, the PT can conduct both the initial assessment visit and the SOC comprehensive assessment including the OASIS, according to the Centers for Medicare & Medicaid's OASIS Q&A Category 2 Q12.2.

In addition, if speech pathology services were also a qualifying service for the payer, the SLP could conduct the initial assessment visit and/or complete the comprehensive assessment including the OASIS for a PT-only case, even if there is no skilled SLP need or related orders.

And the reverse is true -- a PT can admit, and complete the initial assessment visit and comprehensive assessment for a SLP-only patient, when both PT and SLP are primary qualifying services as they are under the Medicare home health benefit.

If it's your agency's policy to have an RN conduct all comprehensive assessments, whether or not there is a skilled need for nursing, that's acceptable as well. However, that one nursing visit made to complete the comprehensive assessment and OASIS for a therapy-only case isn't billable, says **Lisa Selman-Holman** of Selman-Holman & Associates and CoDR -- Coding Done Right in Denton, Texas.

Caution: The RN should perform the assessment on or after the therapist's SOC date (within five days to be compliant with the regulation).

Bottom line: It's acceptable under Medicare home health to have an RN, SLP, or PT conduct a visit solely to complete the initial assessment and comprehensive assessment tasks when there is no medically necessary need for the discipline. However, such visits aren't reimbursable and do not establish the SOC date for the home care episode.