

Home Health ICD-9/ICD-10 Alert

OASIS-C: Brace for More Change with OASIS-C

Heads up: You may need to start listing procedure codes.

You've probably settled into a coding groove now that all the PPS revisions and the new 2009 ICD-9 codes are implemented. But get ready to shake things up again -- OASIS-C is on it's way.

Even though the proposed change to OASIS includes enough spaces for the ICD-10-CM codes, the coding data items still refer to ICD-9-CM, confirms **Lisa Selman-Holman, JD, BSN, RN, HCS-D, COS-C**, consultant and principal of Selman-Holman & Associates in Denton, Texas. So there are some loose ends to tie up. To complete the update so that changes don't have to be made later, the Centers for Medicare & Medicaid Services needs to change the reference to ICD-9-CM to something like "appropriate diagnosis code," Selman-Holman says.

Also, the language on the data items that replace M0230/M0240 and M0246 (they have been renumbered) still refers to case mix diagnoses in M0246 despite guidance from CMS that non-case mix diagnoses can be listed in M0246 without penalty and may even provide risk adjustment, Selman-Holman says.

More troublesome is a new data item requiring inpatient procedure codes, Selman-Holman notes. Inpatient procedure codes are difficult to find, and you must have access to the op report to code the procedures correctly.

But CMS has not provided information regarding the purpose of adding the inpatient procedure codes yet, Selman-Holman says. Procedure codes are not a part of the home health claim. If procedure codes are added to the final version of OASIS, then they should not be inpatient diagnoses, she says.

Official Coding Guidelines require that an appropriate procedure code accompany any aftercare V code. If CMS insists on adding procedure codes to the OASIS, then it should reflect the procedures home health personnel are performing, such as procedure codes for therapies, changing foley catheters, and giving injections, Selman-Holman says.