

OASIS Alert

Compliance: Be On Guard For OIG Hot Spots

Therapy issues are still under the microscope.

If reimbursement and outcomes don't have your agency getting serious about OASIS accuracy, maybe the promise of the **HHS Office of Inspector General's** eagle eye will.

Heads up: Home health agencies face a new level of scrutiny of the calculations making up the home health resource group and the reimbursement it directs. In its 2007 Work Plan, released Sept. 25, the OIG introduced a new project to be addressed during the new fiscal year.

"The review will determine the extent to which Medicare HHAs accurately code the HHRG in the Outcome and Assessment Information Set," the watchdog group notifies providers. "We will also determine the extent to which providers improperly code HHRGs and the level of inappropriate payments made as a result of any miscoding," the OIG cautions. The group plans to issue results in fiscal year 2008, the Work Plan projects.

The OIG Work Plan outlines projects the group plans to address during the 2007 fiscal year, the report says. The home health portion includes six topics.

Therapy Focus Continues

The watchdog group continues its reviews of therapy and the increased reimbursement high-therapy episodes command (see OASIS Alert, Vol. 6, No. 12). "The OIG seems convinced there is a real problem in this area," says Burtonsville, MD health care attorney **Elizabeth Hogue**.

In an ongoing project, the OIG "will analyze the number and duration of therapy visits provided per episode period," the OIG states. This is a work in progress, with various reviews and an expected issue date of this fiscal year, the group says.

In addition, they will begin a new project focused on a number of areas:

- The medical necessity of rehabilitation therapy services.
- Whether appropriate personnel provide the therapy.
- The correlation between the plan of care and the therapy provided.
- The amount of reimbursement resulting from "medically unnecessary HHA therapy."

The OIG seems to be searching for home health issues at "the bottom of the proverbial barrel," Hogue observes. But not having pressing fraud and abuse issues is right where the industry wants to be, she adds.

Home Health Compare Joins As A New Target

A new OIG concern for FY 2007 is whether the Home Health Compare Web site -- maintained by the **Centers for Medicare & Medicaid Services** -- provides accurate and complete data. "We will also examine how CMS identifies and updates missing and incorrect information on the database," the OIG states. The group expects to complete this review in FY 2007, the Work Plan indicates.

Other challenges: Two other areas of scrutiny for the OIG in FY 2007 are outlier payments and cyclical noncompliance by HHAs.

Note: The 2007 Work Plan is at <http://oig.hhs.gov/publications/docs/workplan/2007/Work%20Plan%202007.pdf>.

