OASIS Alert

Compliance: Follow 6 Tips To Get Ready for OASIS-C1

Don't delay your training plans.

It's been a long time coming, but OASIS-C1 is closer than ever before. Heed this expert advice to make sure you're on track for the transition.

Background: The **Centers for Medicare & Medicaid Services** originally planned to implement OASIS-C1 along with the ICD-10 diagnosis coding set Oct. 1, 2013. When the ICD-10 date got pushed back to Oct. 1, 2014, so did the OASIS-C1 date. But when Congress pushed the ICD-10 date even further back to Oct. 1, 2015, CMS decided to implement OASIS-C1 by Jan. 1, 2015 (see related story, p. 76).

Consider these tips to get up to speed on the new requirement:

1. Educate yourself on the changes. A CMS source tells Eli that the revised OASIS-C1 guidance manual and form should be out "soon." But even before they come out, you can take a look at the previously finalized form and get an idea of the changes ⬜ just disregard the new coding items, which will be reverting back to the old ones (for item numbers, see story, p. 76).

Resource: The previously finalized form is at www.cms.gov/Regulations-and-Guidance/Legislation/PaperworkReductionActof1995/PRA-Listing-Items/CMS-R-245.html?DLPage=1&DLFilter=OASIS&DLSort=1&DLSortDir=descending in azip file, or you can email editor Jan Milliman at janm@codinginstitute.com with "OASIS-C1" in the subject line for a free PDF copy and link to the tool.

At this time, your point person for the OASIS-C1 transition should be the only staffer who needs to be very familiar with the changes, advises **Lisa Selman-Holman, JD, BSN, RN, COS-C, HCS-D, HCS-O**, AHIMA Approved ICD-10-CM Trainer/Ambassador of **Selman-Holman & Associates, LLC, CoDR⬜Coding Done Right** and **Code Pro University** in Denton, Texas. Clinical staff may benefit from a quick preview of what's coming up to your, but they shouldn't start intensive training until the new form and guidance are out.

2. Set your training schedule. Once CMS issues the form and guidance manual, it's time for you to take action, says Chicago-based regulatory consultant Rebecca **Friedman Zuber.** Home health agencies should start training "right away," Zuber tells **Eli**. "You can't train on this stuff just once ⬜ it is a process of reiteration."

Keep in mind that implementation will occur Jan. 1, right at the end of the busy holiday season. "Having the 4th quarter of calendar year 2014 to prepare gives them a little more time," Zuber says. "But waiting until then to do training would be troublesome because of the holidays."

3. Mark your calendar for CMS training. CMS is tentatively planning an OASIS-C1 education webinar for Sept. 3, it says in a statement. But that shouldn't delay your training schedule.

Providers "might need to make some adjustments after the Sept. 3 session," Zuber allows. "But efforts to at least plan training should start now."

4. Touch base with your vendor. Make sure your OASIS vendor is going to be ready to go when you are. Most agencies should be good shape, Zuber predicts. "Lots of the vendors have been working on this already, as it was a likely scenario," she observes.

5. Don't forget the operational component. Educating your clinicians who fill out OASIS on the content changes is key. But you also need to train them on which form they need to use when, Selman-Holman reminds providers. That's

always a pitfall during transitional times.

Effective dates apply based on the M0090 date for the assessment, reminds **Linda Krulish, PT, MHS, COS-C**, on the company's website.

6. Get ready for ASAP. To prepare to submit your OASIS data through the new Assessment Submission and Processing (ASAP) system, instead of your state server. Hospices are already registering to submit their Hospice Item Set data through ASAP, and they have to register for multiple user IDs, etc. Don't get to the day of implementation and realize you can't submit data because you forgot to prepare.

If your vendor handles your data submission, check with them to make sure you'll be ready.