

## OASIS Alert

### Compliance: LOCK AND LOAD

Do lock dates have a sly way of sneaking up on you, or even slipping past you altogether? If so, you could wind up staring down the barrel of a condition-level deficiency on your next survey.

Home health agencies have seven days from the time they complete the OASIS data set to "encode and finalize data entry" or "lock" the OASIS data. The **Centers for Medicare & Medicaid Services** believes "this is a reasonable amount of time to expect agencies to complete this task while ensuring accuracy of the data," according to the OASIS reporting rule. But as HHAs know all too well, CMS and providers often have different views about what constitutes reasonableness.

"The time frame has been a problem for many home health agencies since the advent of OASIS," reports Chapel Hill, NC-based consultant **Judy Adams** with the **Larson Allen Health Group**. In many agencies, staff don't come into the office every day to hand in their paperwork, Adams notes. Other common issues are "limited office staff to input the OASIS into HAVEN or other software and a lack of computerized medical records," she continues.

Further, that seven-day window includes any time an agency might have to spend backtracking, CMS makes clear. If HAVEN identifies a problem with your data set, such as missing information, data entry personnel have to go back and extract that information from clinicians before they can lock the data. That means if you wait until day seven to get on the ball, and then discover data elements are missing or incomplete, you'll be in a tough spot scrambling to make the date.

And missing the lock date puts you in an even tougher spot, experts warn. "If the agency misses the lock date, it will receive an error message on its OASIS validation report" for each late assessment, Adams reminds agencies.

But the buck doesn't stop there. The state sends this information on to CMS, so it'll know you're not playing by the rules and surveyors will too. If you consistently miss lock dates and aren't actively working to correct the problem come survey time, the surveyor could slap you with a condition-level deficiency, warns consultant **Laura Slataper**, president of **Home Health Care Consulting** in Houston.

To help ensure that your agency stays firmly on top of lock dates, experts offer the following tips:

**Take a close look** at your current OASIS collection and transmission process, advises Adams. Identify who is involved, how long each person has to complete his / her task(s), where the snags are occurring and how to fix them.

**"Establish a time frame** for each step of the process from assessment to transmission of the OASIS data to the state," Adams counsels.

**Use tracking sheets** that show each step on the path from OASIS collection to transmission, suggests **Estelle Wolf** with **Sharp Home Health** in San Diego, CA. And write the lock date where everyone can see it, so it won't sneak up on you.

**Consider forming mixed teams of clerical and clinical staffers**, and have the clerical staff be responsible for transmitting the OASIS data for clinicians on their team, Adams offers.

**"Look at incorporating automation** within the home health system to decrease the amount of manual data entry that needs to be repeated," Adams suggests.

If all else fails, you can try bribery. "Some agencies have had success attaching a bonus system to reward clinical and



clerical staff who meet timeliness goals with OASIS," according to Adams. (For more information on timely paperwork submission, see Elis OASIS Alert, Vol. 3, No. 9, p. 97).