

## OASIS Alert

### Compliance: PROVIDERS PROTEST SURPRISE OASIS INSTRUCTION CMS RESPONDS

Clinicians going into shock at the implications of a CMS staffer's pronouncement in New Orleans in April can finally relax.

An attentive audience of state officials and agency executives in New Orleans for intensive OASIS training was stunned when a **Centers for Medicare & Medicaid** official told them HHAs should check with a patient's referring physician every time they choose an ICD-9 diagnosis code to represent the patient's primary and secondary diagnoses.

Plus, CMS wants specific documentation of that consultation over the codes that HHAs enter in OASIS items M0230 and M0240, the official added.

Attendees expressed astonishment when the CMS official insisted that HHAs have always been required to go to such lengths. "This has not been the routine expectation or practice in the past," says OASIS expert **Linda Krulish** with Redmond, WA-based **Home Therapy Services**.

Coding veteran **Joan Usher** with **JLU Health Services** in Pembroke, MA says she has never heard of a home health requirement to verify the specific ICD-9 code with physician.

In situations where the physician has failed to provide a diagnosis upon referral, the agency should confirm it with a verbal order, Usher tells **Eli**. But generally the physician receives the plan of care with the ICD-9 code already on it based on the narrative description of the diagnosis she's provided.

Agency attendees were incredulous at the instruction and wasted no time letting CMS know it. Such a requirement would harass physicians, who aren't particularly well-versed in ICD-9 coding guidelines anyway, and would significantly burden HHAs, attendees protested.

In response to the outcry, CMS issued a clarification stating the government will NOT require agencies to check diagnosis code choices for patients with their physicians for every case, every time, a CMS spokesperson says. Nor will agencies have to document the interactions, since they won't be required.