

OASIS Alert

Education: New OASIS Pressure Ulcer Q&A Relieves Months Of Confusion

NPUAP guidance prevails.

Question: Are you allowed to stage a pressure ulcer for M0450 (Current number of pressure ulcers at each stage) and M0460 (Stage of most problematic [observable] pressure ulcer) if eschar or slough partly obscures the ulcer, but bone is visible?

Answer: Yes, says the **Centers for Medicare & Medicaid Services**. The surprise reversal is in a new question and answer set. Nineteen Q&As are contained in a July 10 letter from **Patricia Sevast** of CMS' Survey and Certification Group to **Linda Krulish** of the **OASIS Certificate and Competency Board** and posted to the OCCB Web site.

"You can stage a pressure ulcer when some eschar or slough is present as long as the wound bed is visible and you can see the extent of tissue involved," CMS clarifies in the Q&A number seven. This retraction of the previous CMS OCCB Q&A number 24, dated July 2006, is in response to the February 2007 update to the **National Pressure Ulcer Advisory Panel's** guidance on pressure ulcer staging, CMS says.

Background: In the July 2006 Q&A, CMS stated that "any pressure ulcer with any amount of eschar or slough present, even an ulcer with bone visible, would be considered non-observable and therefore could not be staged." The July 2006 **Wound Ostomy Continence Nurses** guidance on OASIS skin and wound M0 items did not specifically support that view. It said that "a pressure ulcer cannot be accurately staged until the deepest viable tissue layer is visible; this means that wounds covered with eschar and/or slough cannot be staged and should be documented as non-observable."

Then in February the NPUAP released its guidance stating that in a Stage III pressure ulcer "slough may be present but does not obscure the depth of the tissue loss." In a Stage IV pressure ulcer "slough or eschar may be present on some parts of the wound bed." Since then, CMS has been reconsidering its response.

Note: For the OCCB Q&As, go to www.oasiscertificate.org and select "resources." The NPUAP guidance is at www.npuap.org and the WCON guidance is at www.wocn.org. For more information on pressure ulcer risks, staging and care sign up for **Dorothy Doughty's** Sept. 6 **Eli**-sponsored audioconference "7 Ways to Recover Your Pressure Ulcer Program" by calling 800-874-9180.