

OASIS Alert

Item Focus: M2400: Get All the Credit You Deserve for Plan of Care Best Practices

Plus: Find out how to safeguard your agency against dings when you must answer 'No.'

OASIS-C process measure items give your agency an opportunity to take credit for the best practice care you provide. Make sure you're giving the **Centers for Medicare & Medicaid Services** an accurate idea of the work you do by understanding how to complete OASIS item M2400 -- Intervention Synopsis.

Important: Making sure you're answering this question correctly now will have a big pay-off in the future. Once home health implements pay-for-performance or value-based purchasing, your payment rates will depend on scores drawn from answers to this item.

M2250 asks you to report whether interventions for diabetic foot care, falls prevention, depression, pain, pressure ulcer prevention, or pressure ulcer treatment were both included on the physician-ordered plan of care and implemented since the previous OASIS assessment.

Your response options for M2400 are "No," "Yes," or "Not Applicable."

You'll complete M2400 when your patient is transferred to an inpatient facility -- with or without agency discharge -- or when a patient is discharged from your agency, but not to an inpatient facility.

Look Back for Answers

OASIS item M2400 is used to calculate process measures to capture the agency's use of best practices following the completion of the comprehensive assessment, says **Judy Adams, RN, BSN, HCS-D, COS-C** with **Adams Home Care Consulting** in Chapel Hill, N.C.

When responding to M2400, "since the previous OASIS assessment" means "at the time of the last OASIS assessment or since that time," Adams says.

Tip: While you aren't required to perform the formal assessments tracked in M2400 during the 60-day recertification OASIS, it's a best practice to assess these risks if your next OASIS will be the discharge, Adams says. That way, you will have the appropriate information to respond "since the previous OASIS assessment."

The last column of rows b--e refers to "formal assessments." Exactly what constitutes the corresponding formal assessment is defined in the OASIS items for M1240 -- Has this patient had a formal pain assessment?, M1300 -- Pressure Ulcer assessment, M1730 -- Depression Screening, and M1910 -- Fall Risk assessment, Adams says.

Not quite: An evaluation of clinical factors is not considered a formal assessment for pressure ulcer item M1300, Adams cautions.

Begin Your Search with 'NA'

When answering M2400, it's best to start by considering whether each item is pertinent to your patient by reading the "Not Applicable" guidelines.

For example: Answer M2400d "NA" if a formal pain assessment was conducted at the time of or since the last OASIS, and it revealed no pain.

Know When to Say 'Yes'

Once you've ruled out "NA" as a potential M2400 response, move on to consider the "Yes" selection. You'll answer "Yes" to an M2400 item only when both of these items are true, Adams says:

- The appropriate clinical intervention is included in the POC and
- The clinical intervention was implemented at the time of the previous OASIS assessment or since that time.

Tip: M2400 items a (diabetes), and d (pain) require that both interventions outlined in the item are ordered and implemented, Adams says.

Example: You have physician-ordered intervention for diabetic foot care including monitoring and patient education on proper foot care in the physician-ordered POC. The clinician documents that she provided the foot care and monitored the feet throughout the episode, but when evaluating the patient's knowledge base prior to educating, discovered there was no identified need for education.

"If the education component of the intervention was ordered, attempted and not provided because of a documented lack of need for the education, the clinician can answer 'Yes' to the Intervention Synopsis item," CMS says in the January 2012 OASIS Q&As annual update. "The intervention was implemented when the attempt to provide it was made, and the lack of need identified."

On the other hand, if the documentation indicates that an attempt was made to educate and the patient refused or otherwise declined to receive the needed instruction and no further attempt was made to provide the education, you cannot respond that the intervention was "implemented" in M2400, CMS says.

Answer 'No' When Something is Missing

Once you've ruled out the "NA" and "Yes" responses, it's time to consider answering "No." "No" is the correct response if either of the following is true, Adams says:

- There are no interventions in POC or
- The clinical record does not document that interventions were implemented.

Tip: Be sure to document the rationale behind not having or not implementing interventions on the POC.

Example scenario: How should you answer M2400c in the following situation? Your patient scored a 3 on the depression screen tool PHQ2. You contacted the doctor who acknowledges receiving the information but doesn't take any action. You try a few more times to get the physician to see him or refer him, but the doc is not responsive. The patient has never indicated that he was a risk to others or himself. At the last visit, you do the PHQ2 again and the patient scores "1" so you aren't worried about discharging him.

Situations like this are frustrating, CMS says in an online training video about completing M2400. For M2400c, mark "No" for this patient because there were no orders and nothing was implemented. You must have orders in the physician-ordered plan of care and they must be implemented in order to mark "Yes."

Critical: Be sure to document your conversations with the doctor -- this is essential in preventing survey trouble. Show that you brought things to his attention but that he wouldn't provide additional orders.

Don't miss: The flow chart on page 89 will help you work through your M2400 answers with ease.

See the CMS training video on M2400 here: www.youtube.com/watch?v=XrPJ85GQJVg.

