

OASIS Alert

OASIS C: CLEAR SPACE ON YOUR LATE FALL SCHEDULE FOR OASIS C WHIRLWIND

Software vendors are next on OASIS C plan.

Home health agencies looking to the **Centers for Medicare & Medicaid Services** for more guidance on OASIS C training are left hanging.

The OASIS C User's Manual, which includes the step-by-step guidance for each OASIS C assessment item, will be available to agencies "in September or October following the OASIS C Coordinator's Conference," CMS's **Pat Sevast** advised the 440 participants at the June 30 Home Health, Hospice and DME Open Door Forum. CMS will post the OASIS C manual on the Web site in place of the current OASIS B manual, she said. And providers must use OASIS C data sets on all assessments with a start of care date after Jan.1, 2010, CMS reiterated.

This means agencies will likely have only two or three months to get up to speed on the vast changes in the OASIS assessment instrument. The manual will more likely be out in October, not September, industry experts predict.

Background: When it submitted the OASIS C documentation to the **Office of Management and Budget** on March 9, CMS said it expected the new form would add no additional workload for HHAs beyond "brief initial training." Training on OASIS C would take four hours per staff member, CMS estimated.

Agencies and industry experts disagreed, predicting training to take two hours per staff member per month, said the **National Association for Home Care & Hospice**. Agencies will require additional time to put in place policies, procedures, and tools to support the new process measures and to create and implement systems to gather the data on process interventions during the episode (see Eli's OASIS Alert, Vol. 10, No. 4, p. 32).

Until the OASIS C User's Manual is released, HHAs won't have the guidance on scoring individual items needed to train clinicians. "Agencies will be busy over the holidays" this winter, predicts consultant **Judy Adams**, president and CEO of Chapel Hill, N.C.-based **Adams Home Care Consulting**. New outcome measures will also be out in October, and OBQM, OBQI and Risk Adjustment manuals and reports will not be out until sometime next year, she notes.

Software Vendor Outreach Moves Forward

Although the actual final version of OASIS C will not be available until OMB gives its approval, CMS plans to post a draft vendor specification document and an "almost final" OASIS C data collection form the week of July 6, Sevast said.

This will allow CMS to hold conference calls with software vendors. The first call, July 15 at 2 p.m. ET, will be to discuss the OASIS C data specifications and the second, tentatively scheduled for July 22 at 1 p.m. ET, will cover HHA Grouper changes required by the new ICD-9 codes effective Oct. 1 as well as upcoming OASIS C changes. More vendor call information is available at www.qtso.com.

Don't Look for Further Attachment D Updates

The Attachment D component of Chapter 8 of the OASIS User's Manual, available in the download section of the OASIS Web site, is still in draft form, CMS's **Kathy Walch** told forum attendees. The final revision for use with OASIS C will be released as part of the updated OASIS C Manual in the fall, she said.

Only diagnoses supported in the medical record and the OASIS assessment should be included as patient diagnoses, Walch reiterated. This is in keeping with the long-standing requirement to only code secondary diagnoses that affect the

patient's response to treatment, she said. "We rarely see agencies code more than three diagnoses on the OASIS," she added.

Expect 6-Month 'Grey Out Window' for OBQI Reports

Risk adjustment models for outcomes will need updating, agreed CMS's **Debbie Terkay** in response to a forum question from the **National Association for Home Care & Hospice' Mary St. Pierre**. This won't take place until CMS collects a certain amount of data its contractors can use to update prediction models, she explained.

CMS is working out details for transitioning outcome based quality improvement and Home Health Compare, Terkay said. The data HHAs see at the beginning of 2010 will still be from OASIS B-1. CMS should post some OASIS C data by December 2010, but it may be just process measures, she explained, because risk adjustment may not be completed at that point. There will probably be a sixmonth "grey out window," she added.

One more change: Prepare for a new OASIS data submission rule to take effect Jan. 1, Walch reported in the forum. After that date, CMS will accept OASIS data transmission only if either Medicare or Medicaid are indicated as a payer on the OASIS.