

OASIS Alert

OASIS-C1: Prepare to Move Forward with OASIS-C1

New assessment form will go into effect before ICD-10.

If you've been looking forward to the many improvements the OASIS-C1 form will bring to home health data collection, you'll be happy to know that the ICD-10 delay hasn't entirely derailed the new assessment form. But you'll have to wait a little longer for the new diagnosis coding items to change.

Ever since April 1, when Congress passed a law delaying the ICD-10 diagnosis coding set change until Oct. 1, 2015, home health agencies have been left hanging on what the change would do to the OASIS-C1 timeline. Now the **Centers for Medicare & Medicaid Services** has delivered the verdict by setting a Jan. 1, 2015 implementation date for the modified OASIS-C1 form, which it's calling the "OASIS-C1/ICD-9 Version."

Change: In that version, "the 5 items that use ICD-10 codes (i.e. - M1011, M1017, M1021, M1023, M1025) will be replaced with the corresponding ICD-9 based items from OASIS-C (i.e. □ M1010, M1016, M1020, M1022, M1024)," CMS explains in a statement. All other changes to the OASIS form will proceed as planned.

The OASIS-C1/ICD-9 Version will stay in effect until ICD-10 is implemented, CMS says. Right now, that's scheduled for Oct. 1, 2015.

Think of the change as tiered implementation, advises **Linda Krulish, PT, MHS, COS-C**, with Medicare OASIS contractor **OASIS Answers**, on the company's blog. Krulish acknowledges "confusion and frustration that the impacts of the ICD-10 and OASIS-C1 delays have had on home health providers and those in our industry that support them." This concrete deadline should help alleviate some of agencies' problems.

This schedule will continue to sow confusion, though, believes **Patricia Jump** with **Acorn's End Training & Consulting** in Rice Lake, Wis. Jump was "hoping CMS would make it a little simpler for providers by delaying everything until the new ICD-10 implementation date," she says. "Having to move to OASIS C-1 in phases will cause additional work for providers and will result in confusion."

Home health agencies should be happy to see OASIS-C1 implementation proceeding, since it will mean an improvement in many OASIS items that have troubled them, says **Lisa Selman-Holman, JD, BSN, RN, COS-C, HCS-D, HCS-O**, AHIMA Approved ICD-10-CM Trainer/Ambassador of Selman-Holman & Associates, LLC, CoDR□Coding Done Right and Code Pro University in Denton, Texas. "OASIS-C1 is so much better than what we have right now," Selman-Holman tells **Eli**.

"Though this will result in implementation of two sets of changes instead of just one, I think many providers will view it as an overall positive," says Chicago-based regulatory consultant Rebecca Friedman Zuber. "There are items in OASIS-C that are eliminated or simplified in OASIS-C1 that will be to agencies' advantage."

However, "implementing two updates to OASIS is more costly than doing it all at once," Zuber points out.

CMS likely decided not to hold off for ICD-10 implementation for a number of reasons, Selman-Holman says. For one, the improvements in OASIS-C1 are beneficial. For another, who knows when ICD-10 will actually take effect? Although an October 2015 start date is slated, the powerful physician lobby could get lawmakers to bump it again, industry veterans point out.

While the non-coding OASIS-C1 changes are needed, CMS could also not stick with its original Oct. 1, 2014 implementation date, experts agree. Agencies had basically halted preparations while they waited to see what CMS would do with the timeline and form. And CMS has yet to issue the modified version of the form or the OASIS-C1

Guidance Manual. Training can't start until agencies have those documents, so the timeline would be too short to make the Oct. 1 window.

Bumping to Jan. 1 "just makes sense," Selman-Holman concludes. Agencies are also used to making OASIS changes with the new year, she adds.

Mark your calendar: CMS tentatively plans to offer a Sept. 3 webinar on the new tool, a CMS source says. It replaces the April 30 session that CMS canceled when ICD-10 was delayed.

Other Changes

In addition to the OASIS-C1 form, agencies will be changing the system under which they submit OASIS data, CMS notes in its statement. As CMS explained in its March Open Door Forum, you'll submit your OASIS data via CMS's new national server, the Assessment Submission and Processing (ASAP) system, instead of your state server. The new date for that switchover is also Jan. 1.

Payment: New PPS groupers are also on deck. CMS will issue a grouper effective Oct. 1, 2014 based on OASIS-C and ICD-9 codes. Then it will issue another grouper effective Jan. 1, 2015 based on OASIS-C1 and ICD-9 codes. When ICD-10 is finally implemented, CMS will issue a grouper based on OASIS-C1 and ICD-10 codes — right now that would be effective Oct. 1, 2015.