

OASIS Alert

OASIS-C1: Will the ICD-10 Delay Impact the OASIS-C1 Transition?

The ICD-10 deadline is extended, but don't let your preparations stall out.

If you've been ramping up for your agency's OASIS-C1 transition, you may want to slow your preparations down. In a move that surprised providers throughout the healthcare industry, on April 1 **President Obama** signed into law a doc fix bill that also extends the ICD-10 code set transition until at least Oct. 1, 2015.

Background: On March 27, Congress attempted to dodge the March 31 expiration of a delay to a pending physician pay cut by introducing the Protecting Access to Medicare Act of 2014. This bill halts the planned 24 percent pay cut for the rest of the year. However, the temporary doc fix wasn't the only feature of the legislation. It also included a controversial addition that caught the eye of almost everyone who has been working hard to prepare for ICD-10.

At the recent **National Association for Home Care & Hospice** March on Washington conference, **Pat Sevast** with the **Centers for Medicare & Medicaid Services** recounted how last year's ICD-10 delay led to the postponement of OASIS-C1 to this Oct. 1. The need to transition from the current OASIS-C to the new OASIS-C1 was originally inspired by the need to accommodate new, alphanumeric, seven-character ICD-10 codes.

Now many observers expect to see another OASIS-C1 delay to match ICD-10 again. CMS cancelled an OASIS-C1 implementation webinar planned for April 30, bolstering this line of thinking.

On one hand: Home health agencies that have been dragging their feet on OASIS C-1 and/or ICD-10 training are happy to have more time before they have to ramp up for implementation. "This gives providers another year to learn the changes," says **Patricia Jump** with Rice Lake, Wis.-based **Acorn's End Training & Consulting**.

"Although some agencies have invested a substantial amount of time and money into preparing for the ICD-10 transition, many agencies have not," says coding expert **Andrea L. Manning** with Manning Healthcare Group in Talkeetna, Alaska. Those agencies are breathing a sigh of relief, she says.

On the other hand: "This is very frustrating for providers" who have started their ICD-10 implementation already or are trying to plan ICD-10 and OASIS-C1 implementation, **Jump** notes. Many providers have begun the coding training, but not necessarily the OASIS C-1 training, she adds.

"Those who have been preparing all along are disappointed," **Manning** agrees. "Providers are very leery about starting training because this same type of situation has occurred many times over the years □ Medicare mandates changes and then changes are delayed or eliminated," **Jump** observes.

Delay Takes Home Care Agencies By Surprise

Home health coders expressed shock at the sudden extension of an ICD-10 deadline they believed was unchangeable. But experts expect some agencies to benefit from the delay.

"As an industry, we seem to habitually be behind the times and late adopters," **Manning** says.

Home health agencies should "continue training and extend [their] implementation calendar to include another year of practice," says certified coder **Delaine Henry** with **Health Care Management and Billing Services** in Lafayette, La. "This takes the pressure off of smaller agencies who had a hard time finding funds to attend seminars with the larger consulting groups. This delay will give those agencies a chance to utilize the free training set up by CMS that is available via their site and YouTube."

"The projected changes will still happen at some point," Jump cautions. "The changes are not eliminated, just delayed."

Wait and see: And CMS hadn't officially called off the OASIS-C1 deadline at press time. The agency hasn't made the call yet, a CMS source told Eli at that time.

Coding Questions Remain

Although the ICD-10 delay is a fact, how long it will last is undecided.

"AHIMA will seek immediate clarification on a number of technical issues such as the exact length of the delay," says **AHIMA CEO Lynne Thomas Gordon**. "AHIMA will continue our work with various public sector organizations and agencies such as the Centers for Medicare and Medicaid Services (CMS), the Office of the National Coordinator for Health IT, and the National Center for Health Statistics (NCHS) along with our industry partners such as the ICD-10 Coalition so that ICD-10 will realize its full potential to improve patient care and reduce costs. These are goals that AHIMA and other healthcare stakeholders and our government leaders all share," Thomas Gordon said in a Journal of AHIMA web post.

"Although ICD-10 has been delayed, the need for operational efficiencies, regardless of the coding set, is a must in order to meet the ongoing financial challenges and payment cuts that we face in the home health industry," Manning says. As home health agencies face a 3.5 percent annual payment cut over the next four years, taking a closer look at the operational and financial processes that will be impacted by ICD-10 can lead to greater efficiency in the meantime, she says.

Juggle ICD-9 And ICD-10 Training, Experts Advise

Coders should also continue to seek out ICD-10 training, experts agree. Plus, now there's likely to be a need for additional training in ICD-9. "Coders still need training," say coding experts and CMS OASIS contractors **Linda Krulish** and **Sparkle Sparks** in an **OASIS Answers** blog post. "Since many seasoned ICD-9 coders left our ranks because they weren't interested in 'enduring one more change,' a large influx of brand new coders are making the coding decisions in our agencies and for our industry."

"Don't drop ICD-10 training but instead, based on the needs of the coders in your agency, consider adding ICD-9 training back into the mix to support your newer coders," Krulish and Sparks say.

Do this: "For those that have prepared already, the impact is possibly losing some of newly acquired ICD-10 coding skills for lack of use," warns coding expert **Laureen Jandroep**, senior instructor at CodingCertification.org in Oceanville, N.J. "I recommend keeping up their skills by practicing ICD-10 coding a little each week. Brushing up on anatomy and practicing ICD-10 coding will make the transition much smoother and with less of a loss of productivity that has been projected."

"Despite the mixed response to the news of a delay, the **National Association for Home Care & Hospice** (NAHC) strongly encourages providers and training partners to continue to prepare for the ICD -10 diagnosis coding transition with the same vigor as if the deadline was still October 1, 2014," NAHC said in its member newsletter.

"NAHC has become increasingly aware of home health and hospice agencies that were nowhere near the readiness level they needed to be for an October 1, 2014 implementation date. Therefore, education sessions, dual coding efforts, communication with referral sources, and testing with vendors should proceed as planned," NAHC urged members.