

OASIS Alert

Reader Question: Don't Skimp on Assessments with Inpatient Stay

Question: How should we handle an unexpected hospitalization that occurs after the start of care (SOC) but before we have completed the comprehensive assessment and OASIS?

For example: Suppose we completed an initial assessment and skilled service SOC on April 24. We began the SOC comprehensive assessment and OASIS, but did not complete it. Later that same day, the patient was admitted to the hospital. She returned home on April 26. We completed the comprehensive assessment and OASIS data collection on April 26, within the five-day window.

We didn't do a transfer or resumption of care (ROC) for this patient because we completed the comprehensive assessment after the hospital admission. Did we handle this situation correctly?

Answer: You're right that you need to complete the SOC comprehensive assessment within five days of the SOC date in order to bill for the April 24 visit. But you also need to complete transfer and ROC assessments for this patient within two days of learning about a qualifying stay in an inpatient facility, CMS says in the April 2014 Quarterly OASIS Q&As.

The assessing clinician has up to five days after the SOC date to complete the SOC comprehensive assessment. In your case, your agency made the initial assessment visit, provided a billable service (establishing the SOC), and began the SOC comprehensive assessment. But the SOC comprehensive assessment wasn't completed before the patient's qualifying stay in an inpatient facility.

When the patient returned to your care on April 26 which was within the allowed five-day assessment time frame, the same assessing clinician could complete the SOC comprehensive assessment that was begun on the first visit, CMS says. That includes updating previously completed items as necessary and completing the rest of the items. Your response to M0030 □ Start of Care Date would remain the date of the first billable visit. But your M0090 □ Date Assessment Completed response is the actual date the single clinician completed the assessment.

Caution: "If the original assessing clinician could not complete the SOC comprehensive assessment that he/she began on the first visit, another qualified clinician would have to visit and complete a new SOC comprehensive assessment from beginning to end, within 5 days after the SOC date," CMS says.

Unless someone else has already completed it, the clinician who completes the SOC assessment on April 26 may also complete the RFA 6 □ Transfer. You have two calendar days from the patient's inpatient facility discharge to complete the ROC assessment, so it can also be completed on the April 26 visit, by the same clinician who completes the SOC assessment and the OASIS Transfer data collection, CMS says.

Note: Read all of the April 2014 Quarterly OASIS Q&As at www.oasisanswers.com/aboutoas_links.htm. Scroll down to the OASIS Questions and Answers section and click on the link for CMS Quarterly Q&As □ April 2014.