

OASIS Alert

Reader Question: Leave Initial Assessment Visits to Skilled Clinicians

Question: Our agency is exploring options that will help us to run more efficiently. One change in process we are considering is having intake staff who are non-clinicians do the initial visit to a patient's home after he is referred. Intake staff would explain forms, get signatures on consent, HIPAA, and patient rights forms, and gather demographic information that would be shared with the assessing clinician. The assessing clinician would then visit the patient (within 48 hours of the referral) to do the initial assessment visit and the comprehensive assessment. Do you see any problems we might run into with this change?

Answer: As a home health provider, you're not alone in looking for ways to keep your agency afloat during difficult financial times. But the initial visit with the patient isn't the place to cut corners.

The Comprehensive Assessment of Patients Condition of Participation (484.55) requires that an RN complete the initial assessment visit if nursing orders exist at the start of care. An appropriate, qualified therapist may conduct the initial assessment visit if there are no nursing orders at the initial assessment visit.

Sending an employee who isn't qualified to perform assessments to the patient's home before the skilled clinician who will perform the initial assessment doesn't measure up to the requirements of this condition, the Centers for Medicare & Medicaid Services says in OASIS Q&A Q20.1.

Requiring a skilled clinician to conduct the initial assessment visit makes certain that "the patient's immediate needs can be assessed and met," CMS says. Sending a non-clinical employee to gather signatures and demographic information before a skilled clinician assesses the patient could result in a potentially life threatening condition going undetected and not cared for.

Your agency could opt to have a non-clinical person contact the patient by phone prior to the initial assessment visit to gather demographic data or share information about your services. But you must conduct the initial assessment visit as required by the CoPs.