

OASIS Alert

Regulations: CMS ALLOWS ABBREVIATED OASIS ASSESSMENTS FOR DISASTER VICTIMS

Some requirements suspended, but documentation is still vital.

With chaos still reigning after Hurricane Katrina and Hurricane Rita, home health agencies are scrambling to care for displaced patients without the usual staff and supports. The **Centers for Medicare & Medicaid Services** is doing its best to help, agency staff reiterated during the Sept. 22 Home Health, Hospice and DME Open Door Forum.

Questions are coming in faster than CMS can answer them, but providers should keep an eye on its Web site, which the agency will update as soon as possible, a CMS spokesperson told listeners.

Providers in the affected areas are seeing some relief from the mountains of OASIS paperwork required for Medicare home health patients. Secretary **Michael Leavitt** signed an order on Aug. 31 to waive specific Medicare, Medicaid and HIPAA requirements--including some conditions of participation for health care providers who want to provide medical care to the hurricane victims.

Leavitt included this waiver in his order declaring a public health emergency for Louisiana, Mississippi, Alabama and Florida.

Documentation is Still Important

For home health agencies in the public health emergency areas that serve hurricane evacuees, CMS has announced:

- The start of care assessment (RFA 1) may be abbreviated to include the Patient Tracking Sheet and the 24 payment items. This abbreviated assessment does not have to meet the five-day completion date or the seven-day lock date. In addition, the OASIS transmission requirements at 42 CFR 484.20 are suspended for those Medicare-approved HHAs that are serving qualified home health patients in the affected areas, CMS instructs.
- The resumption of care assessment (RFA 3) and the recertification assessment (RFA 4) may be abbreviated to the 24 payment items.
- The discharge assessment (RFA 8 or RFA 9) and the transfer assessment (RFA 6, RFA 7) are suspended during the waiver period.

"Agencies should maintain adequate documentation to support provision of care and payment," CMS warns, and they are expected to use the exceptions "only as needed, and to return to business as usual as soon as possible."

HHAs won't be able to submit their abbreviated SOC assessments to the state OASIS system, so they won't have outcome reports for those episodes, CMS explains. And they'll receive warnings for their assessments that are submitted late due to the deferment.

In addition, Katrina-affected HHAs having difficulty with M0175 recoupments should contact their intermediary, CMS recommended in the forum.

Note: CMS' hurricane information is online at www.cms.hhs.gov/katrina.

