

## OASIS Alert

### Survey & Certification: 4 Ways To Prepare For Lock-Free Data Transmission

**You might want to keep this a secret from your clinicians.**

Now that you won't have to lock OASIS data quickly, you'd better start planning for potential glitches.

**Deadline:** The final OASIS reporting regulation published Dec. 23, 2005 will take effect June 21--and the joy you feel now may be replaced by frustration if you don't prepare carefully for the change.

While you might be relieved to avoid the lock date stress, you could also find that lack of this deadline slows down your billing, predicts billing consultant **M. Aaron Little** with **BKD** in Springfield, MO.

Both nursing and data entry will need to make changes, says consultant **Pam Warmack** with Ruston, LA-based **Clinic Connections**.

Warmack and Little offer these tips for a smoother transition in June:

**1. Consider who needs to know.** Agencies must decide who will use what portion of the 30-day period between OASIS assessment completion and data submission, Warmack advises. You could choose to tell managers but not field staff about the lock date removal, she adds. Many agencies will choose to retain the clinician deadlines they created for the seven-day lock rule and use the rest of the 30-day period to check for coding and OASIS accuracy and enter the data, she expects.

Prompt billing is another reason for leaving clinicians' deadlines as they are. You need to have the data for the home health resource group before you can submit the request for anticipated payment, Warmack notes. "You don't want to submit a RAP using the wrong HHRG," she adds. "And you don't want to wait 30 days to bill the RAP."

**Option:** Clinicians know about the seven-day rule, so one way to reduce billing delays is to use this as agency policy, Little suggests.

**2. Review your transmission schedule.** Transmit the OASIS data "no less than twice a month," Warmack warns.

The new regulation requires the HHA to transmit the data within 30 calendar days of the date the assessment is completed--rather than by the end of the month after the month in which the assessment was locked, Warmack explains. Larger agencies often send data in a batch once a month, but following that pattern may miss the new deadline.

**3. Expect survey changes.** Currently, the **Centers for Medicare & Medicaid Services** requires surveyors to increase their scrutiny of an agency if more than 20 percent of the assessments are locked after the seven-day period ends. Once the locking requirement disappears, so will the related error-message concern.

Many of these errors result when an agency unlocks the OASIS data to correct a mistake, Warmack says. Now they will have a better chance of having accurate data before transmitting it. And agencies will save time by not having to track down the reasons for the late locks, she adds.

**4. Beware of data creep.** Even if OASIS assessment data is not transmitted for 30 days, remember the data should reflect the assessment at the time it was performed, Warmack stresses.

You can't go in and change the data just because you later discover a problem that you didn't see on the initial assessment, such as incontinence or a cognition problem, Warmack says. And remember that the assessing clinician is responsible for any changes to the OASIS, she adds.