

OASIS Alert

Therapy: DONT LET M0030 PRECEDE M0090

Just as you have to crawl before you can walk, you have to assess a patient before you can develop a plan of care.

If the date your home health agency fills in on OASIS item M0030 (start of care date) precedes the date marked on M0090 (assessment date) by more than five days, you could have some explaining to do.

Agencies often become confused about what to do when a nurse fills out the start of care OASIS for a patient who is receiving physical therapy only. "If the nurse doesn't provide a billable visit on the assessment visit, the therapist would have to visit on the same day and provide a billable visit to have the OASIS be considered valid," explains Chapel Hill, NC-based consultant **Judy Adams** with the **Larson-Allen Healthcare Group**.

The therapist should not make her first billable visit before the nurse begins her assessment, emphasizes consultant **Pam Warmack** with **Clinic Connections** in Ruston, LA. "The OASIS assessment is what identifies a need for the patient, so a plan of treatment can be written. Therefore, your first billable visit shouldn't be until that assessment has been initiated," she explains.

This has been the case all along in home care, Warmack reminds agencies. Before OASIS came along, "a patient evaluation assessment was to be conducted prior to initiating services to determine the needs of the patient and to drive the written plan of care or treatment," she notes. "In the best interest of patient care and cost-effectiveness, home care agencies attempted to combine both tasks." That is, the clinician conducted the assessment and initiated the care all on the same visit. Thus, the SOC date always has been the date of the first billable visit, she notes.

Unfortunately for agencies, "OASIS regulations have muddied the waters and clouded logical thinking," Warmack laments.

If the nurse and PT visit the patient on the same day with the nurse completing the SOC OASIS assessment and the therapist providing the billable visit and the nurse isn't able to complete the assessment, that's OK, Warmack notes. Sometimes the nurse simply doesn't have access to all the information she needs during that SOC visit. "For this reason, the OASIS authors allowed a five-day window to complete all the data collection and assign M0090," she explains. In this case, agencies are in the clear as long as the date on M0090 is within five days of M0030, she says.

Of course, a surefire way to eliminate confusion about nurses completing SOC OASIS assessments for PT-only patients and to save some money in the process is to train therapists to complete the OASIS instrument themselves, Warmack insists.