

Home Health Coding and OASIS Expert

Reader Question: Ambulation Counts with Medication Management

Question: How should we respond to M2020 □ Management of oral medications and M2030 □ Management of injectable medications for a patient with unsteady gait? My understanding is that when a patient requires ambulation assistance in order to safely access her medication, the appropriate response for these items would be "3 □ Unable to take medication unless administered by another person." I think response "0 □ Able to independently take the correct medication(s) and proper dosage(s) at the correct times" is only appropriate for such patients when an environmental change has been made to address the unsteady gait. My colleague disagrees. Can you help?

California subscriber

Answer: A patient who needs assistance to get to medications safely should not be scored with a "0" for these items. Is it possible your colleague is overlooking the physical impairments your patient faces and only considering cognitive barriers?

The Item Intent for both M2020 and M2030 advises:

The patient must be viewed from a holistic perspective in assessing ability to perform medication management. Ability can be temporarily or permanently limited by:

- physical impairments (for example, limited manual dexterity)
- emotional/cognitive/behavioral impairments (for example, memory deficits, impaired judgment, fear)
- sensory impairments (for example, impaired vision, pain)
- environmental barriers (for example, access to kitchen or medication storage area, stairs, narrow doorways).

The CMS OASIS Q&As also address the situation you describe. In response to a question about how to score M2020 for a patient who is unsteady and requires supervision when ambulating, CMS advises "M2020 reports a patient's ability on the day of the assessment to take the correct oral medications at all the correct times." CMS goes on to explain that this includes:

- Accessing the medications from the location where they are routinely stored in the home;
- Preparing the medications (including opening containers or mixing oral suspensions);
- Selecting the correct dose; and
- Safely swallowing the medications; which typically requires access to a beverage.

"If someone other than the patient must do some part of the task(s) that are required for the patient to access and/or take the medication at the prescribed times, then the patient would not be considered independent (Response 0)," CMS says.

Costly: Answering these items incorrectly will lead to poor results on medication outcomes.