

Home Health Coding and OASIS Expert

OASIS-C2: CMS Issues OASIS-C2 For January 2017 Implementation

Start your preparation now for the revamped assessment tool, expert urges.

Just as you're getting used to the OASIS-C1/ICD-10, CMS has announced plans to change the OASIS assessment tool once again. On Dec. 22, the **Centers for Medicare & Medicaid Services** issued its OASIS-C2. The new form includes changes designed "to comply with requirements for standardized, cross-setting measures for post-acute care under the Improving Medicare Post-Acute Care Transformation (IMPACT) Act of 2014," CMS notes in its announcement on its website.

The form introduces three new items (see story, p. 18), modifies and renumbers wound and medication items (see story, p. 20), changes the lookback period for five items (see story, p. 20), and includes formatting changes throughout the document. In a podcast reviewing the changes, physical therapist and consultant **Cindy Krafft, PT, MS**, noted how quickly OASIS changes have been coming lately. The initial OASIS form stayed the same for a long time. But in a little over a year, HHAs have had to move from the OASIS-C to the OASIS-C1/ICD-9 in January 2015 to the OASIS-C1/ICD-10 in October 2015. And now it's time to prepare for another new version. "After that long period of relative stability in the items, we now see changes happening much quicker," noted Krafft of **Kornetti & Krafft Health Care Solutions** in the podcast posted Dec. 28, "OASIS-C2 □ Overview of Key Changes."

This time, it's not even home health-specific issues that are driving the OASIS update. It's the IMPACT Act, which seeks to standardize data collection across the post-acute provider continuum, notes the **National Association for Home Care & Hospice** in its member newsletter.

HHAs are actually the last post-acute provider type affected to come on board with the IMPACT Act changes, notes **Judy Adams, RN, BSN, HCS-D, HCS-O, AHIMA Approved ICD-10-CM Trainer**, with **Adams Home Care Consulting** in Asheville, N.C. The changes CMS has set forth are "not earth shattering," Krafft reassured in the podcast. "They haven't blown it up and started over."

Get ready: But that doesn't mean you can sit back and wait until almost 2017 before you take any action on the new form. "We ... encourage early engagement in facilitating a smooth transition to OASIS-C2," says **Linda Krulish, PT, MHS, COS-C**, of consulting firm and CMS OASIS contractor **OASIS Answers Inc.** on its website.

First: HHAs should get an "initial lay of the land before we start pushing any sort of panic buttons," Krafft counseled. Aside from the new items, Krafft thinks agencies will see that the changes are mostly format-related, not content-focused. And stay tuned for more developments as information comes out, Krafft tells **Eli**.

Next: Look at the transition to OASIS-C2 as a "positive opportunity to enhance our data collection," Krafft recommended.



Use the training opportunity to boost the accuracy of the unchanged OASIS items as well as the new and modified ones.

Finally: Don't wait until the last minute to implement process changes supporting the new and modified OASIS items. For example, you should set up and test out a standardized policy and procedure for collecting weight for M1060, and hammer out a process for setting discharge goals for GG0170c, Krafft urged.

This batch of OASIS revisions take place next January, but there will be more IMPACT Act related changes coming down the pike, NAHC reminds agencies. "Resource use and other measures such as total Medicare spending per beneficiary, discharge to community, and potentially preventable hospital readmission rates are also part of the quality measures required by the IMPACT Act," the agency notes. CMS recently took informal comments on the measures.

Note: A link to the OASIS-C2 item set, as well as a CMS statement outlining additions and changes in OASIS-C2, is at www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/HomeHealthQualityInits/OASIS-Data-Sets.html. For more tips and strategies on running a successful home health agency, see Eli's Home Care Week. Information on subscribing is online at www.codinginstitute.com/newsletters/eli-home-care-week.html.