

MEMORANDUM

Texas Department of Human Services * Long Term Care/Policy

TO: Long Term Care -Regulatory
Regional Directors, State Office Section Managers and
HCSSA Program Administrators

FROM: Marc Gold, Director
Long Term Care Policy
State Office MC: W-519

SUBJECT: Regional Survey & Certification Letter #01-08

DATE: May 18, 2001

The attached RS&C Letter is being provided to you for information purposes and should be shared with all professional staff.

- RS&C Letter No. 01-08 -- Comprehensive assessment of home health patients; Call Deborah Guinn, HCSSA, at (806) 791-7511.

~Original Signature on File~

Marc Gold

Attachment



DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
Division of Medicaid and State Operations, Region VI

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April 9, 2001

REGIONAL SURVEY AND CERTIFICATION LETTER NO: 01-08

To: All State Survey Agencies
All Title XIX Single State Agencies

(Action)
(Information)

Subject: Comprehensive assessment of home health patients

The purpose of this letter is to provide clarification on the requirements of the comprehensive assessment of home health patients

The Condition of Participation (CoP) at 42CFR 484.55: Comprehensive Assessment of Patients regulation requires the Outcome and Assessment Information Set [OASIS] data items to be incorporated into the home health agency's [HHA's] own assessment. The regulation further requires that each patient must receive a patient-specific comprehensive assessment that accurately reflects the patient's current health status. The comprehensive assessment must also incorporate the use of the current version of the OASIS items, using the language and groupings of the OASIS items. The regulation does not determine or specify the format for the incorporation in the HHA's own assessment.

The regulation for the incorporation of OASIS data items at Tag G342 [42CFR484.55(e)] in the Interpretative Guidelines does not address the electronic environment. The electronic environment is discussed for survey in Tag G236 at 42CFR 484.48. The CoP at 42CFR 484.48: Clinical Records requires that a clinical record containing pertinent past and current findings in accordance with accepted professional standards is maintained for every patient receiving home health services. Assessment of the individual patient is an accepted standard in home health and those assessment records must be maintained in the clinical record. The guidelines at Tag G236 specifically state that "HHAs that have created the option for an individual's record to be maintained by computer, rather than hard copy, may use electronic signatures as long as there is a process for reconstruction of the information." Records may be kept in an electronic format; however, the agency must be able to produce a hard copy that includes all information contained in the current OASIS data set as approved by the Secretary (OMB form number 0938-0760 and 0938-0761). These are available on the HCFA web site at:

<http://www.hcfa.gov/medicaid/oasis/oasisdat.htm>.

For example, the start of care comprehensive assessment must include the exact language and groupings of the applicable OASIS items, all possible responses, including the selected response, as well as the agency's additional assessment items. Please see the sample comprehensive assessment forms found in Appendix C in the OASIS User's Manual, available at: <http://www.hcfa.gov/medicaid/oasis/oasishmp.htm>.

If a surveyor requests a hard copy record for a specific period of time, the agency must be able to retrieve and produce the record upon request. This is important for several reasons. The most important reason is that the comprehensive assessment must be available to staff members who need to review this information in order to coordinate and provide care to the patient. Additionally, the surveyor must be able to have a readily accessible comprehensible assessment document about a selected patient(s) and any other pertinent information necessary for the surveyor to refer as they complete their home visit and clinical record reviews during the course of the survey. Finally, the surveyor must verify that the OASIS is incorporated into the agency's own comprehensive assessment.

All software vendors who intend to be a business associate of an HHA provider are advised by HCFA that the software product must meet the data format specifications available on the HCFA web site at <http://www.hcfa.gov/medicaid/oasis/datasubm.htm>. If not, the HHA's use of the product may lead to the provider's exclusion from participation in the Medicare program.

If you have any questions, please contact Dodjie B. Guioa at 214-767-6179 or through E-mail at dguioa@hcfa.gov.

Sincerely,

~Signature on File~

Molly Crawshaw, Chief
Survey and Certification Operations Branch