OASIS Cracks Down on Home Care

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by Jennifer E. Carpenter, RRA

January 25, 1999, brought the publication of the final rule on the assessment and use of the Outcomes and Assessment Information Set (OASIS) in the Federal Register. This rule requires that each patient receive a patient-specific, comprehensive assessment that identifies the patient's need for home care from the home care agency. The assessment also must show that the agency is meeting its patients' medical, nursing, rehabilitative, social, and discharge planning needs. Finally, the rule directs the home care agency to use a standard core assessment data set as part of the comprehensive assessment. The rule, initiated in January, began full implementation April 26, 1999, at which point home care agencies were required to collect and report all OASIS data. The data, which must be collected and transmitted to HCFA on a monthly basis, will reflect all information collected for the previous month. (See the OASIS time line below.)

Home Care Requirements

Home care agencies are required to encode and transmit the OASIS data using software available from HCFA or software that conforms to HCFA's standard electronic record layout, edit specifications, and data dictionary. This requirement is detailed in Section 484.20(a) of the Federal Register as follows:

Standard: Encoding OASIS Data—The data must be encoded/entered into the computer system at the home care agency within seven days of collecting and completing the OASIS data set. The data must be collected by authorized clinical staff in accordance with the Conditions of Partici-pation, Section 484.55. Non-clinical staff may perform the data entry of the OASIS data into the computer system. The clinical record items section of the OASIS data, which includes patient identification, agency identification, and start of care date, may be collected initially by clerical staff and should be verified by the clinician completing the patient assessment. The data also must be collected in a timely manner—the assessment must be completed within five days after the start of care.

The home care agency must utilize the Home Assessment Validation Entry (HAVEN) software program or another HCFA-approved software to make the OASIS data transmission ready. The HAVEN software checks the data for accuracy and consistency, makes any necessary changes, and finalizes data. HCFA specifies that home care agencies have seven days to encode, edit, and lock (finalize data entry) the OASIS data. The seven-day window includes any time needed to correct data that is identified as missing or incorrect or does not meet the HCFA-specified edits. This time frame is consistent with the seven-day encoding time frame for the long term care Minimum Data Set (MDS).

Once the data is entered and finalized in the home care agency's computer system, the data will be locked to ensure accuracy. This is an automatic safeguarding feature, which will protect the data from future overwriting. Home care agencies must protect the confidentiality of the patient assessment information, and the locking mechanism of the software keeps the information from being altered. In addition, the home health agency should implement password protection, access controls, and policies and procedures to ensure the confidentiality of the patient information.

The OASIS data must be transmitted electronically to the state agency or HCFA contractor on a monthly basis, but the agency may choose its transmission date and develop its own monthly transmission schedule. This requirement is outlined in the Conditions of Participation, Section 484.20(c), as follows:²

Standard: Transmittal of OASIS Data—This is a requirement for all qualifying patients based on the exceptions listed above. A header should appear at the beginning of the transmission and should identify the location and description of the home care agency and the identity of the person submitting the data. In addition, a trailer must be included at the end of the transmission file that states the number of records in the transmission. The HAVEN software will create an export file in which the selected records will be sent, along with the header and the trailer. This export file is then transmitted to the state via standard dial-up communication software. The dial-up network must be secure and private to ensure patient confidentiality. Prior to the

end of the connection, the OASIS data is validated and checked for conformance with HCFA's format requirements. Finally, a message is instantly sent back to the home care agency indicating the acceptance or rejection of the transmitted file.

For more information on OASIS and the reporting requirements, please refer to the *Federal Register* or go to HCFA's Web site at http://www.hcfa.gov.

OASIS time line	
January 25, 1999	Final rule published in the Federal Register.
February 24, 1999	Home care agencies required to begin collecting OASIS data for all patients (excluding patients under the age of 18, maternity patients, and patients who only received
	housekeeping services). Data includes start of care, resumption of care, follow-up, discharge to the community, transfer to an inpatient facility (with or without dis-
	charge), and death at home.
March 26, 1999	Home care agencies required to collect and encode (enter OASIS data into a computer using HAVEN or other HCFA-
	approved software) OASIS data for the start of care, resumption of care, follow-up, discharge to the community, transfer to an inpa-
	tient facility (with or without dis- charge) and death at home. This data encompasses all patients under the care of the agency as of March 26, 1999. It was not required for patients admitted prior to this date.
March 26, 1999 to April 25, 1999	Home care agencies required to conduct tests between themselves and their state agencies. The state
	agencies provided user name, pass- word, and URL to the home care agencies. The home care agencies tested dial-in transmission systems by sending at least one start of care or resumption of care OASIS file. HCFA required that the data be
	identified as test data.
April 26, 1999 and thereafter	Home care agencies required to transmit all OASIS data collected and encoded from the previous month to the state agency. As of April 26, home care agencies are required to report this data on a monthly basis. Monthly transmis-
	sions should include all OASIS data collected and encoded in the previous month.

Notes

- 1. Department of Health and Human Services. "Medicare and Medic-aid Programs: Reporting Out-come Assessment Information Set (OASIS) Data as Part of the Conditions of Participation for Home Health Agencies." *Federal Register* 64, no. 15 (January 25, 1999): 3750.
- 2. *Ibid*, p. 3751.

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