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## MEMORANDUM

**TO:** Community Services Members

**FROM:** Patrick Cucinelli, Senior Director of Public Policy Solutions

**DATE:** March 2, 2012

**SUBJECT:** Home Health Agency OASIS

**ROUTE TO:** Administrator

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ABSTRACT: OIG reports on compliance with HHA OASIS data submission.

### Introduction

The federal Office of Inspector General (OIG) has completed a study of home health agency (HHA) compliance with Outcome and Assessment Information Set (OASIS) data submission requirements. In this study, [Limited Oversight of Home Health Agency OASIS Data, \(Mar. 1, 2012\)](#), OIG concluded that HHA did not submit the required OASIS data for 6 percent of all claims in 2009.

### Background

Under the Deficit Reduction Act (DRA) of 2005, HHAs are required to submit OASIS data or incur a 2-percent payment reduction to the home health market basket index increase for one year. The OASIS data are the basis for HHA payment, quality measures, and consumer information on the Home Health Compare Web site. State survey staff also uses OASIS data in the survey and certification of HHAs.

### OIG Findings

The report summarizes the OIG findings as follows:

*HHAs did not meet all Federal reporting requirements. They did not submit required OASIS data for 392,180 (6 percent) of claims in 2009, which represented over \$1 billion in Medicare payments. Only 199 HHAs were penalized by CMS with the 2-percent payment reduction from 2007 through 2010. Furthermore, HHAs submitted 15 percent of OASIS data sets late. Some States provided training and technical support to HHAs and almost all restricted access to OASIS data. States conducted limited data analysis and review of the accuracy of OASIS data. Finally, CMS did not ensure the accuracy or completeness of OASIS data and did not validate States' processes for monitoring submitted OASIS data.*

## **OIG Recommendations**

The OIG report makes the following recommendations:

- Identify all HHAs that failed to submit OASIS data and apply the 2-percent payment reduction to them.
- Establish and implement enforcement actions for HHAs that submit OASIS data after the 30-day deadline.
- Develop clear guidelines that delineate expectations for states regarding timely and accurate OASIS data.

CMS concurred with the first OIG recommendation, but did not concur with the second or third recommendations.

Please contact me with any questions at [pcucinelli@leadingageny.org](mailto:pcucinelli@leadingageny.org) or call 518-867-8827.