

**CMS Response to Public Comments on the Testing of a Revised OASIS Instrument**

**Changes from OASIS-C Published in Federal Register, July 2007**

Revised OASIS-C page #	Item #	Revision based on Public Comment/Internal Review	Reason for Change
2	M0150	Added the words "Advantage plan" to response 2	Response to public comment requesting this option be included in response
3	Items to be Used at Specific Time Points	<p><b>SOC &amp; ROC:</b> M1100 changed to M1102;</p> <p><b>Follow-up:</b> M1030 changed to M1031; M0447, M0448, M0469, M0489, M1070, M1073 added;</p> <p><b>Transfer:</b> M1030 changed to M1031; M1070, M1073 added;</p> <p><b>Discharge:</b> M1030 changed to M1031; M0200, M0210, M0220, M0384, M0550, M0715, M0717, M0775, and M0805 deleted; M0822, M0823, M0824, M0896, M0900, M1070, M1073, M1120, M1130, and M1140 added</p>	Revised to reflect items added, deleted or changed in response to public comments and internal review.
3	M0102	Wording has been changed to: "Indicate the date <u>this</u> referral for home health services was made."	Response to public comment requesting clarification of wording
4	M0104	Wording has been changed to read: "If the physician indicated a specific start of care date when the patient was referred for home health services, record the date specified."	Response to public comment requesting clarification of wording
5	M0230/240/246	Letters have been placed in front of ICD-9 items in column 2 to improve the usability of the grid; e.g.: a. ( ____ . ____ )	Internal review indicated need to improve clarity of grid.
7	M0275	<p>Wording has been changed as follows:</p> <ul style="list-style-type: none"> <li>- Underlined wording added to the item stem: "Which of the following signs or symptoms characterize this patient <u>as at risk for major decline or hospitalization?</u>";</li> <li>- Underlined wording has been added to response 6: "History of falls (<u>2 or more falls - or any fall with an injury - in the past year</u>)"</li> <li>- Response option added: "7 - Other"</li> </ul>	Response to public comments requesting a change in the wording of the title, clarification of time frame for history of falls, and inclusion of additional risk indicators.
7	M0285	Replaced proposed item with new (CARE-based) item with same number.	Response to public comment and internal review to use a format and language common to the CARE instrument.
7	M1020	<p>Wording has been changed as follows:</p> <ul style="list-style-type: none"> <li>- Underlined wording changed in the item stem: "Has the patient received an influenza vaccination <u>during this year's recommended time period?</u>";</li> <li>- Underlined wording changed in response 3: "NA - Does not apply. <u>SOC/ROC date is not within time period.</u>"</li> </ul>	Response to public comments and internal review suggesting that the time period identified for administration of vaccines should be modified to reflect the fact that recommended times for influenza vaccination may vary from year to year and to document whether flu vaccine was received, regardless of who provided vaccine.

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7	M1021	Wording has been changed as follows: - Underlined wording changed in the item stem: "Did the patient receive an influenza vaccination from your agency <u>during this year's recommended time period?</u> "; - Underlined wording changed in response 3: "NA - Does not apply. SOC/ROC date is <u>outside this year's recommended time period.</u> "	Response to public comments and internal review suggesting that the time period identified for administration of vaccines should be modified to reflect the fact that recommended times for influenza vaccination may vary from year to year.
8	M1025	Added the words "Not Indicated" to response 2	Response to public comment requesting this option be included in response
8	M1030	Item is now collected at SOC/ROC only. Skip patterns were removed from options "0" and "1"	Response to public comments requesting clarification of timepoints when vaccine items are collected.
8	M1031	Item added to Follow-up, Transfer and Discharge in place of M1030.	Response to public comments requesting clarification of timepoints when vaccine items are collected.
8	M1035	Added the words "Not Indicated" to response 2	Response to public comment requesting this option be included in response.
8	M0382	Deleted and replaced with M0822/M0823, a CARE-based item. This new item is moved to new section entitled "Support Need" located just prior to "Therapy Need" on page 20 of the revised OASIS-C.	Response to public comment and internal review to improve coordination with the CARE instrument and allow documentation of care provided by a family member, caregiver needs and care gaps.
8	M0384	Deleted and replaced with M0824. This new item is moved to new section entitled "Support Need" located just prior to "Therapy Need" on page 20 of the revised OASIS-C.	Response to public comment and internal review to improve coordination with the CARE instrument and allow documentation of care provided by a family member, caregiver needs and care gaps.
9	M0420	Wording has been changed to divide first response category into: "0 - Patient has no pain (Go to M1070)"; and "1 - Patient has pain that does not interfere with activity or movement"	Response to public comment to allow clinicians to skip pain assessment questions for patients who do not have pain.
9	M1050	Wording change to item stem - deleted "administered within the timeframe specified by the tool". Skip patterns removed from options "0" and "1".	Wording change in item stem based on internal review indicating phrase was unnecessary. Skip pattern deletion based on internal review to allow documentation of pain assessment for all patients with pain.
9	M1065 Change Direction	Direction changed to "Complete M1065 if M1050 = "1" or if M0420 is greater than "1".	Response to public comments seeking clarification of timepoints/conditions for collecting this item.
9	M1070	M1070 previously documented pressure ulcer prevention plans. It now collects data on whether the patient was assessed for the risk of developing pressure ulcers.	Based on public comments about confusion on time points for collection and difficulty answering "combined" questions. M0446 has been split into a "process" item (M1070) and an "assessment" item (M0446).

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9	M0446	M0466 previously collected data on whether the patient was assessed for the risk of developing pressure ulcers. It now documents whether the patient was assessed to be at <u>high risk</u> of developing pressure ulcers.	Previously M0446 tried to measure both assessment and process simultaneously, which may have contributed to the confusion about this section. This change also allows clinicians to skip M1072 (at SOC) and M1073 at other time points if the patient is assessed to be not at risk of developing pressure ulcers.
9	M1072	New item replaces M1070. To be collected at SOC/ROC only.	
10	M1073	New item replaces M1070. To be collected at Follow-up, Transfer and Discharge.	
10	M0448	Wording change to item stem - added "(non-epithelialized) "	Response to public comments seeking clarification of the term "unhealed".
10	M0452	Wording change to item stem - added "(non-epithelialized)" Rows b.i, b.ii, c.i, and c.ii referencing eschar removed	Response to public comments seeking clarification of the term "unhealed" and consistency in the use of the terms "unhealed" and "non-epithelialized". Response to public comments and internal review indicating that language separating ulcers with and without eschar should be removed.
10	M0454 & M0456 Change direction	Wording change to item stem - added "(non-epithelialized)" and changed measurement from millimeters to centimeters.	Response to public comments seeking clarification of the term "unhealed" and consistency in the use of the terms "unhealed" and "non-epithelialized". Response to public comments indicating wound length and width are typically measured in centimeters.
10	M0454	___   ___   .   ___   (cm)	Response to public comments indicating wound length and width are typically measured in centimeters.
10	M0456	___   ___   .   ___   (cm)	Response to public comments indicating wound length and width are typically measured in centimeters.
10	M0461	Wording change to response 0 - added words "or healed"	Response to public comments seeking clarification and consistency in the use of the terms "healed" and "re-epithelialized".
10	M0465	Wording changes to skip pattern direction in item stem - [If patient has no pressure ulcers (M0447 = "0" and M0448 = "0", skip to M0469] Wording changes to responses 3 and 4 - references to "without eschar" and "with eschar" removed Sequence of responses renumbered to accommodate changes.	Response to public comments skip patterns to allow this item to be skipped if there is no pressure ulcer. Response to public comments and internal review indicating that language separating ulcers with and without eschar should be removed.
11	M1080 Change direction	Directions changed to indicate item should be completed only if patient has an <u>open</u> Stage II or higher pressure ulcer or a pressure ulcer that is designated as "not stageable", regardless of whether eschar is present.	Internal review indicated need to clarify that moisture retentive dressings are only appropriate if ulcer is open.

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11	M1080	Wording change to item stem - added "open"	Internal review indicated need to clarify that moisture retentive dressings are only appropriate if ulcer is open.
11	M1085	Wording change to item stem - added "open"	Internal review indicated need to clarify that moisture retentive dressings are only appropriate if ulcer is open.
11	M0478	Wording change to item stem - clarified to direct skip to M0483. Wording change to response 0 - added words "or healed"	Response to internal review recommending clarification of skip patterns and public comments seeking consistency in the use of the terms "healed" and "re-epithelialized".
11	M0487	Wording change to item stem - clarified to direct skip to M0489. Wording change to response 0 - added words "or healed"	Response to internal review recommending clarification of skip patterns and public comments seeking consistency in the use of the terms "healed" and "re-epithelialized".
11	M0489	Wording change to item stem - added words "excluding bowel ostomy"	Response to public comment questioning whether ostomies are included in this item.
12	M0490	Wording change to response 0 - Deleted word "never".	Response to public comment requesting deletion of the word "never".
12	M1102/1105/1110 Change direction	Wording change as indicated by underline: Complete <u>M1102</u> (or M1105) & M1110 if patient has a diagnosis of heart failure .	Rewording needed to accommodate renumbering of item M1100.
12	M1102	Numbering of M1100 changed to M1102	Response to public comment requesting renumbering of item to avoid confusion between the visually similar M1100 and M1110.
14	M0590/M1120 Order revision	Order revised--M1120 placed after M0590	Response to public comment allowing depression screening and intervention items to be skipped if no signs or symptoms of depression are observed or reported.
14	M0590	Skip directions added to response 7 - "(Go to M0610)"	Response to public comment allowing depression screening and intervention items to be skipped if no signs or symptoms of depression are observed or reported.

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15	M0672	<p>Response option wording change as indicated by underline:            "3 - <u>Able to participate in</u> bathing self in shower or tub, but requires presence of another person throughout the bath for assistance or supervision.</p> <p>Response option 4 split into responses 4 and 5:            4 - Able to bath self independently or with the use of devices in chair or on commode, but unable to use the shower or tub.;            5 - Able to participate in bathing self in bed, bedside chair, or on commode, but requires presence of another person throughout the bath for assistance or supervision and is unable to use the shower or tub.</p> <p>Response sequence renumbered.</p>	Response to public comment requesting ability to document progress when patient achieves ability to bathe self in chair or commode. A response category was added to document a patient's ability to bath self independently or with the use of devices in a chair or on the commode.
16	M0715	<p>Wording change to item stem as indicated by underline: Is the patient's ability to transferring and/or ambulate better or worse than <u>it was before the onset of the illness or injury that initiated this episode of care?</u>;</p> <p>Wording change to responses as indicated by underline:            0 - Patient at least as able to transfer and ambulate now as <u>s/he was before the onset of the illness or injury that initiated this episode of care.</u>; 1 - Patient is less able to transfer and ambulate now than <u>before the onset of the illness or injury that initiated this episode of care.</u></p>	Response to public comment requesting clarification of the term "prior to the current illness or injury".
16	M0717	<p>Wording change to item stem as indicated by underline: Is the patient's ability to perform self-care activities (grooming, dressing, and bathing) better or worse than <u>it was before the onset of the illness or injury that initiated this episode of care?</u>;</p> <p>Wording change to responses as indicated by underline:            0 - Patient is at least as able to perform self-care activities now as <u>s/he was before the onset of the illness or injury that initiated this episode of care.</u>;            1 - Patient is less able to perform self-care activities now than <u>before the onset of the illness or injury that initiated this episode of care.</u></p>	Response to public comment requesting clarification of the term "prior to the current illness or injury".
17	M0732	Item eliminated	Response to public comment requesting elimination of items to minimize burden.

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17	M0775	<p>Wording change to item stem as indicated by underline: Is the patient's ability to perform routine household tasks (light housekeeping, light meal preparation, laundry) better or worse now than it was <u>before the onset of the illness or injury that initiated this episode of care?</u>;</p> <p>Wording change to responses as indicated by underline:  0 - Patient is at least as able to perform routine household tasks now as <u>s/he was before the onset of the illness or injury that initiated this episode of care.</u>; 1 - Patient is less able to perform routine household tasks now than <u>before the onset of the illness or injury that initiated this episode of care.</u></p>	Response to public comment requesting clarification of the term "prior to the current illness or injury".
18	M1140	Wording change to item stem as indicated by underline: Has this patient had a multi-factor Fall Risk Assessment ( <u>such as</u> falls history, use of multiple medications, mental impairment, toileting frequency, general mobility/transferring impairment, environmental hazards)?	Response to internal review indicating clarification of wording was needed and and public comment requesting choice of assessment tools should be the agency choice
18	M1160	Wording change to item stem - added "omissions" and "dosage errors"	Internal review indicated need to include these relevant terms.
18	M1170	<p>Item title changed from "Medication Reconciliation" to "Medication Follow-up":</p> <p>Wording change to item stem as indicated by underline: Was the patient's physician (or other primary care practitioner) contacted within one calendar day to resolve <u>clinically significant</u> medication issues?</p>	Response to public comments and internal review indicating that the title was confusing because it is inconsistent with JCAHO definition of Medication Reconciliation. Response to public comment requesting ability to deal with non-urgent medication issues.
19	M0792	Wording change to item stem as indicated by underline: Patient's current ability to prepare and take all prescribed inhalant/mist medications (nebulizers, metered dose devices, <u>oxygen</u> ) reliably and safely, including administration of the correct dosage at the appropriate times/intervals.	Response to public comment requesting that oxygen be explicitly stated in question to avoid confusion.
19	M0805	<p>Wording change to item stem as indicated by underline: Is the patient's ability to prepare and take all prescribed medications (oral and, if applicable, inhalant or injectable medications) reliably and safely (including administration of the correct dosage at the appropriate times/intervals.) better or worse than <u>before the onset of the illness or injury that initiated this episode of care?</u></p> <p>Wording change to responses as indicated by underline:  0 - Patient is at least as able to prepare and take all prescribed medications now <u>than before the onset of the illness or injury that initiated this episode of care;</u>  1 - Patient is less able to prepare and take all prescribed medications now <u>than before the onset of the illness or injury that initiated this episode of care.</u></p>	Response to public comment requesting clarification of the term "prior to the current illness or injury".

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19	M0810	Delete direction for response option "NA" [ If NA, go to M0826 ]	Response to public comments indicating confusion over timepoints for data collection.
19	M0820	Deleted; information incorporated into new item M0822	Response to public comment and internal review to improve coordination with the CARE instrument and allow documentation of care provided by a family member, caregiver needs and care gaps.
20	M0822	Revised version of M0382 based on CARE item added to new "Support Need" section	
20	M0823	Revised version of M0382 based on CARE item added to new "Support Need" section	
20	M0824	Renumbered M0384 moved to "Support Need" section	Response to public comments and internal review indicating chemotherapy and scheduled surgical procedures were inappropriate options for this item. . Response to public comment requesting addition of wound deterioration.
21	M0845	Wording added to response as indicated by underline: 15 - Wound infection or <u>deterioration</u> ; Options 19 and 20 eliminated and list renumbered	
21	M0870	Skip pattern simplified - skip directions for responses 2, 3 and 4 eliminated and a single skip direction added to item	Response to internal review indicating need for clarification.
22	M0896	Wording added to response as indicated by underline: 15 - Wound infection or <u>deterioration</u> ; Options 19 and 20 combined as "Scheduled treatment or procedure" and list renumbered	Response to public comments and internal review indicating that other procedures beyond chemotherapy and scheduled surgical procedures should be documented. Response to public comment requesting addition of wound deterioration.