

OASIS All-Payer Data Collection Transition

[Access the certificate of Completion here.](#)

[Access the Ohio Department of Health OASIS Training Videos webpage here.](#)

[Access the OASIS E1 Manual here.](#)

[Access the OASIS All Payer Transition Fact Sheet December 2024 here.](#)

[Access the CMS Home Health OASIS All Payer Q&As November 2024 here.](#)

[Access the OASIS Q&As here.](#)

[Access the Home Health QRP Spotlight and Announcement webpage.](#)

[Access the CMS Expanded HHVBP Model webpage.](#)

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[Access the Ohio Department of Health Outcome and Assessment Information Set \(OASIS\) webpage here.](#)

OASIS All-Payer Data Collection Transition

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Important Information

- This training is current as of the date of this recording.
- Information in this training is not all inclusive and is not a substitute for current regulations, Centers for Medicare and Medicaid Services (CMS) publications, and/or instructions outlined in the current Outcome and Assessment Information Set (OASIS) E1 Guidance Manual.



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Resources

- [OASIS-E1 Manual.](#)
- [OASIS All Payer Transition Fact Sheet December 2024.](#)
- [CMS Home Health OASIS All Payer Q&As November 2024.](#)
- [OASIS Q&As.](#)
- [Home Health QRP Spotlight and Announcement webpage.](#)
- [CMS Expanded HHVBP Model webpage.](#)



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OASIS All-Payer Data Collection and Submission

- Medicare Prescription Drug, Improvement and Modernization Act of 2003 suspended OASIS data collection for non-Medicare/non-Medicaid patients.
- **Suspension** of OASIS for non-Medicare/non-Medicaid patients **ending**.
- Planned **transition to all-payor** data collection and submission beginning in 2025.



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January 1, 2025 – June 30, 2025

- OASIS data collection/submission **continues** for skilled Medicare and/or Medicaid patients.
- OASIS data collection/submission **optional**.
 - Non-Medicare/non-Medicaid patients.
 - Home health care services begin Jan. 1, 2025, through June 30, 2025.
 - Not exempt.
- Subsequent OASIS assessments **optional**.
 - Not required to complete subsequent assessments.
 - Includes on or after July 1, 2025.



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July 1, 2025, and After

- OASIS data collection/submission **required**.
 - **All payor** sources if not exempt.
 - Start of Care (SOC) M0090 date on or after July 1, 2025.
 - Any subsequent OASIS relevant to the patient's home health stay also **required**.
 - Resumption of Care (ROC).
 - Recertification.
 - Other follow-up.
 - Transfer.
 - Discharge.
 - Death at home.



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Exclusions

Patients **excluded** from OASIS collection and submission requirements.

- Patients under the age of 18.
- Patients receiving maternity services.
- Patients receiving only personal care, housekeeping, and/or chore services.




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Impact

- Increased data collection.
- Better understanding of the overall quality of care provided.
- Future uses for quality or payment purposes.
- Any additional uses will be announced via.
 - [Home Health QRP Spotlight and Announcement webpage.](#)
 - [CMS Expanded HHVBP Model webpage.](#)
 - Future rulemaking.



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TRANSITION TO ALL-PAYER OASIS DATA COLLECTION AND SUBMISSION

In the Calendar Year (CY) 2025 Home Health (HH) Prospective Payment System (PPS) final rule, the Centers for Medicare & Medicaid Services (CMS) finalized the end of the temporary suspension of Outcome and Assessment Information Set (OASIS) data collection on non-Medicare/non-Medicaid Home Health Agency (HHA) patients. Additionally, CMS established the requirement for HHAs to submit all-payer OASIS data for the HH Quality Reporting Program (QRP), starting with the CY 2027 Program Year (87 FR 66862 through 66865).

PURPOSE:
This resource provides further information on the requirement to collect and submit OASIS data on all patients, regardless of payer.

CHANGES:
All-Payer OASIS Data Requirement. Starting with the CY 2027 Program Year, HHAs must submit all-payer OASIS data for the HH QRP.


IMPACT:


 **Increased Data Collection:** HHAs will need to collect and submit OASIS data for a broader range of patients, including those with non-Medicare/non-Medicaid payer sources and those who self-pay.


CMS expects to use this all-payer data to gain a better understanding of the overall quality of care provided by Medicare-certified HHAs to the patients they serve, regardless of payer source. CMS will monitor the all-payer OASIS data and will notify providers when decisions are made for future uses for quality or payment purposes.

At this time, CMS has not announced if, when or how non-Medicare/non-Medicaid OASIS data will be used for the expanded Home Health Value-Based Purchasing (HHVBP) Model.

Any additional uses will be announced on the [HQR Spotlight and Announcement webpage](#), the expanded [HHVBP Model webpage](#) and/or through future rulemaking.

 **Training and Resources:** Additional training and resources may be required to ensure staff are prepared for the expanded data collection requirements.

 **Operational Adjustments:** HHAs will need to adjust their workflows and systems to accommodate the new data submission requirements.



CMS Home Health OASIS All Payer Q&As

November 2024

CMS use of all-payer data

Question 1. How will providers know what CMS is using all-payer OASIS data for?

Answer: CMS expects to use this all-payer data to gain a better understanding of the overall quality of care provided by Medicare-certified providers to the patients they serve, regardless of the patient's payer source. CMS will monitor the all-payer OASIS data and will notify providers when decisions are made for future uses for quality or payment purposes. CMS plans to update the following non-QRP QIES reports to include all-payer OASIS data. This update is planned to occur in late 2025-early 2026 as mandatory all-payer data is available for these reports:

- Agency Patient-Related Characteristics (Case Mix) Report
- Agency Patient-Related Characteristics (Case Mix) Tally Report
- Potentially Avoidable Events (PAE) Report
- Potentially Avoidable Events Patient (PAE) Listing Report

Any additional uses will be announced via the [HQR Spotlight and Announcement](#) webpage, the expanded [HHVBP Model](#) webpage, and/or through future rulemaking.

Use of all-payer data in the expanded HHVBP Model

Question 2. Will the collected all-payer OASIS data be used in the expanded HHVBP Model measure calculations?

Answer: At this time, CMS has not announced if, when or how non-Medicare/non-Medicaid OASIS data will be used for the expanded HHVBP Model. Any changes will be announced on the expanded HHVBP Model webpage and/or through future rule making.


OASIS Privacy Notice

Question 3. Will the OASIS privacy notice continue to be required once all-payer OASIS data collection becomes mandatory?

Answer: As required by the HH Conditions of Participation (COP), an OASIS privacy notice must be provided to all patients for whom the OASIS data is collected. Effective January 1, 2025, all patients for whom the HHA collects OASIS, regardless of payer, should be provided Attachment A – Statement of Patient Privacy Rights, and the Privacy Act Statement – Health Care Records. These documents are available on the Home Health Agency (HHA) Center page at <https://www.cms.gov/medicare/enrollment-renewal/providers-suppliers/home-health-agency-center>. Both documents are available in English and Spanish. Beginning January 1, 2025 and until further notice, Attachment C – Notice About Privacy for Patients Who Don't Have Medicare or Medicaid should not be provided to patients.

This document is intended to provide guidance on all-payer OASIS data collection and submission. Responses verified in this document may be time-limited and may be superseded by guidance published by CMS at a later date.

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Certificate of Completion

- Let us know what you think.
- Complete a short post-training evaluation to receive your certificate of completion.

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Contact Information

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The Ohio Department of Health takes every effort to protect personal health information (PHI). If it is necessary to exchange PHI about a resident with an RAI/MDS inquiry, please contact Cheryl Moya at 419-245-2440 for instructions on the safest way to accomplish this.



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