The Only Constant is Change... and Documentation

PDGM

HEALTHPRO HERITAGE at Home

The Home Health industry continues to evolve, first with the updated Conditions of Participation (CoPs) in 2018, then OASIS-D and the Review Choice Demonstration (RCD) in 2019, and now the Patient Driven Groupings Model scheduled for 2020, just to name a few! Change can be exhausting, so it is comforting to know that some things aren't changing, like documentation!

Through all of these regulatory developments, the need to justify the services we provide via our documentation has remained the same. The basics – like establishing Home Health eligibility, supporting homebound status, the Medicare Benefit Policy Manual, and OASIS time points have not been altered. So in the midst of all this change and uncertainty, fine tuning the basics surrounding documentation can provide the groundwork for success in this ever-changing world, for example:

1. Know the Regulations!

The Medicare Benefit Policy Manual Chapter 7 has provided us with specific instructions on what to include in the documentation from everything from homebound status, to face-to-face encounters, to specific requirements for therapy and nursing documentation. For example, Chapter 7: Section 40.2.1 states that the therapy home health clinical notes must document *the plan for the next visit based on rationale of prior results*. Knowing the specifics that are housed in the manual, and then ensuring your clinicians are documenting them correctly, will help to lay that framework for success.

The OASIS-D Guidance Manual gives item specific instruction to ensure we are coding the OASIS correctly. Moving into the new world of PDGM, ensuring that the documentation contained in nursing notes and therapy evaluations is in line with what is coded on the OASIS becomes even more important than it is now due to the functional items impacting reimbursement. Home Health Agencies may want to have a team member certified in OASIS coding to ensure accuracy with coding that aligns with the clinical documentation.

2. Use QA!

As we prepare for the changes coming with PDGM in 2020, home health agencies need to master processes to review documentation, address areas needing improvement, and implement comprehensive training. With less than 5 months until PDGM, now is the time for home health agencies to evaluate their quality assurance processes. What type of documentation review is happening? And if there is not any, adding this type of audit to a QAPI plan (as long as its data driven) would help get the ball rolling. Another question home health agencies should be asking is of their therapy partners: what type of QA are they doing on their therapist's notes?

3. Fix What's Broken – NOW!

Once agencies have evaluated their processes and identified any problem areas, then implementing training and change immediately will help prepare for the changes coming with PDGM. Strong defensible documentation now will only help come 2020.   Home health agencies can use information available to them to determine which areas need improvement. For example, using PEPPER and CASPER reports can help agencies identify outliers like high therapy utilization, which can lead to targeted audits on high volume therapy charts to ensure those visits are supported via the documentation. Additionally, if agencies have been through denials or TPEs (Targeted Probe and Educate audits), then they will have concrete information on what needs to be addressed. Fix what's broken now!

4. Find Strong Partners

More than ever before, it is imperative that home health agencies align themselves with strong partners that have the same mission and values as we move into this world of PDGM. This is especially true with the therapy partner that agencies choose. In today's world, a good therapy partner needs to be more than just a therapy staffing company. A partnered therapy company will have QA process in place for assessing quality of therapy documentation, be well versed in OASIS documentation, work with agencies though the challenges of TPEs and RCD, and will prepare, execute and succeed in a PDGM world.

If you would like more information about HealthPRO® Heritage as a therapy partner, please email us at info@healthpro-heritage.com. Currently, HealthPRO® Heritage leads the industry in the number of OASIS certified therapists, has strong QA and documentation processes, and is well versed in denial prevention and management.