

# Home Health Quality Reporting Requirements Archive

## 2017

However, to date, the quantity of OASIS assessments each HHA must submit to meet this requirement has never been proposed and finalized through rulemaking or through the sub-regulatory process.

In the CY 2015 Home Health Final Rule (available in Related Links section below), CMS proposed to establish a new “Pay-for-Reporting Performance Requirement” with which provider compliance with quality reporting program requirements can be measured. This proposal was made for several reasons.

First, we believe that defining a more explicit performance requirement for the submission of OASIS data by HHAs would better meet section 5201(c)(2) of the Deficit Reduction Act of 2005 (DRA), which requires that “each home health agency shall submit to the Secretary such data that the Secretary determines are appropriate for the measurement of health care quality. Such data shall be submitted in a form and manner, and at a time, specified by the Secretary for purposes of this clause.”

Second, in February 2012, the Department of Health & Human Services Office of the Inspector General (OIG) performed a study to: (1) Determine the extent to which home health agencies (HHAs) meet Federal reporting requirements for the Outcome and Assessment Information Set (OASIS) data; (2) to determine the extent to which states meet federal reporting requirements for OASIS data; and (3) to determine the extent to which the Centers for Medicare & Medicaid Services (CMS) oversees the accuracy and completeness of OASIS data submitted by HHAs. In a report entitled, “Limited Oversight of Home Health Agency OASIS Data” (available in the Download section below) the OIG made a finding that “CMS did not ensure the accuracy or completeness of OASIS data.” The OIG recommended that CMS “identify all HHAs that failed to submit OASIS data and apply the 2-percent payment reduction to them.” We believe that establishing a performance requirement for submission of OASIS quality data would be responsive to the recommendations of the OIG.