

CMS Policy Change for Accurate Coding Of OASIS Pressure Ulcer Items

Based on the current advances in wound care research, CMS will follow the recently-issued opinion of the National Pressure Ulcer Advisory Panel (NPUAP) regarding healing status of Stage 1 and Stage 2 pressure ulcers for accurate coding of OASIS wound items by home health agencies.

“It is the opinion of the NPUAP that stage 1 pressure ulcers that heal to normal appearing skin are not at increased risk for future ulcer development. Similarly, NPUAP believes that Stage 2 pressure ulcers generally heal to nearly normal skin, but may result in some scar tissue formation. It is our opinion that healed stage 2 ulcers only minimally increase the future risk of pressure ulcers at that location, and do not result in the same increased risk of future ulcerations as does a healed stage 3 or stage 4 pressure ulcer where the underlying skin architecture is dramatically and permanently altered.” NPUAP, June 30, 2004.

OASIS Implications:

This opinion statement means that prior guidance on healed pressure ulcers to not "reverse stage" a Stage 1 or Stage 2 pressure ulcer no longer applies. Instead, clinicians and agencies should follow the new guidance identified below.

During the SOC or subsequent comprehensive assessments of the patient, if it is found that a patient has a healed Stage 1 or 2 pressure ulcer, the responses for OASIS data items are as follows:

(M0440) Does this patient have a Skin Lesion or Open Wound?

- If the patient has a healed Stage 1 pressure ulcer (and no other pressure ulcers OR skin lesions/wounds), the response would be 'No'.
- If the patient has a healed Stage 2 pressure ulcer (and no other pressure ulcers OR skin lesions/wounds), the response may be either 'No' or 'Yes' depending on the clinician's physical assessment of the healed wound site.
 - If the patient has no scar tissue formation from the healed Stage 2 pressure ulcer, the accurate response is 'No'.
 - If the patient has some residual scar tissue formation, the response is 'Yes'.

(M0445) Does this patient have a Pressure Ulcer?

- If the patient has a healed Stage 1 or 2 pressure ulcer (and no other pressure ulcers), the accurate response is 'No', following the skip pattern as indicated.

Reverse staging during the healing process is still not appropriate, i.e., a stage 2 pressure ulcer does not become a stage 1 pressure ulcer; it remains a stage 2 pressure ulcer until it is healed. Documentation in the clinical record will show healing.

NOTE: For accurate coding responses for healed Stage 3 and healed Stage 4 pressure ulcers, the guidance remains unchanged as noted in the OASIS Implementation Manual under the assessment strategies for (M0450) Current Number of Pressure Ulcers.

Since the underlying skin architecture of a healed stage 3 or stage 4 pressure ulcer is dramatically and permanently altered, there is increased risk of future ulcerations. Therefore, the correct responses for documenting a healed Stage 3 or 4 pressure ulcer on the OASIS assessment is:

- M440 = 1, 'Yes', patient has a skin lesion
 - M0445 = 1 'Yes', patient has a pressure ulcer
 - M0450 and 460 = appropriate stage when ulcer was deepest
 - M0464 = 1, fully granulated (currently best response)

This policy guidance for accurate coding of these items will become effective September 1, 2004.