



TRANSITION TO ALL-PAYER OASIS DATA COLLECTION AND SUBMISSION

In the Calendar Year (CY) 2023 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 [HQRP 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.

HHA ACTION ITEMS:



Prior to January 1, 2025

- **Validate Understanding of New Data Collection and Submission Requirements:**
 - Collect and submit OASIS data for all skilled Medicare and/or Medicaid patients.
 - Exclude patients under the age of 18, those receiving maternity services, and those receiving only personal care, housekeeping, or chore services.
 - Verify any requirements to submit OASIS data to other entities for excluded patients.

January 1 – June 30, 2025

- **Continue Medicare/Medicaid OASIS Data Collection and Submission:**
 - Maintain OASIS data collection and submission for all skilled Medicare and/or Medicaid patients.
- **Collect and Submit Voluntary All-Payer OASIS Data:**
 - OASIS data collection and submission for non-Medicare/non-Medicaid patients is voluntary. HHAs may choose to collect and submit OASIS data if a patient begins receiving home health care services with an OASIS SOC M0090 date from January 1–June 30, 2025.
 - HHAs decide whether to complete any or all subsequent OASIS time point assessments for non-Medicare/non-Medicaid patients who start OASIS data collection during this period, including those assessments occurring on or after July 1, 2025.
- **Continue Exclusions:**
 - Continue to exclude patients under the age of 18, those receiving maternity services, and those receiving only personal care, housekeeping, and/or chore services from OASIS data collection and submission requirements.

Effective July 1, 2025

- **Collect and Submit Mandatory OASIS Data:**
 - Collect and submit OASIS data for all patients with any pay source who are not exempt from OASIS data collection and who begin receiving home health care services with an OASIS SOC M0090 date on or after July 1, 2025.
 - Include all subsequent OASIS time point assessments (resumption of care, recertification, other follow-up, transfer, discharge, and death at home).
- **Continue Exclusions:**
 - Continue to exclude patients under the age of 18, those receiving maternity services, and those receiving only personal care, housekeeping, and/or chore services from OASIS data collection and submission requirements.

RESOURCES:

[OASIS-E1 Manual](#) and CMS Home Health OASIS All Payer Q&As.

Contact the Home Health Quality Help Desk with questions: HomeHealthQualityQuestions@cms.hhs.gov