

Centers for Medicare & Medicaid Services  
Questions and Answers  
Open Door Forum: Rural Health  
Thursday, July 18, 2024

1. Question: My question is in regard to the care management services changes proposed, are you anticipating that Rural Health Clinics and FQHCs would still be billed on the UB-04 for those care management services, or?
  - a. Answer: Yes, that's correct.
2. Question: I just had a question regarding the assessments. In the criteria, do you have examples of the different types of assessments that are used for assigning the hours? I'm assuming that's what you were talking about for the home health. And if not, are there proposed assessments to be used?
  - a. Question back to participant: Are you talking about the OASIS-D to E crosswalk?
    - i. Answer from participant: I think you said that you wanted comprehensive assessments that would be like, used to improve it further. I'm assuming that the assessment is the type of assessment. I could be wrong—that is used to determine the hours of service for home health care. Is that not, correct? If it's not, I'm sorry.
      1. Answer to participant: No, the OASIS is the assessment tool that's already required to be used by home health agencies when they assess a patient. When claims are submitted, that's usually when the units of time are included on the claim. But the OASIS itself is not used in terms of the amount of time. I know the OASIS is oftentimes incorporated into the bigger body of a home health agency assessment, which could include the health agencies could include the time in and out. But in terms of for the purposes of reporting to Medicare, the time in, especially for the calculation of outlier payments, is done going on the clinic.
3. Question: The discussion about allowing home health services in the home for acute kidney injury in the rural setting, my experience. I'm from CommonSpirit in California. My experience has been home health services in the outlying rural areas are very difficult to contract to go all the way out. Is there any consideration given to rates that would maybe encourage home health services to go a little further out of their normal route, if that makes sense?
  - a. Answer: Yes. This is for payment for the dialysis facility to provide home dialysis, not for home health agencies.
    - i. Question: OK. So, then the dialysis agencies would actually go to these very remote places to deliver the dialysis or at least provide the home health units and those types of things and educate. So, they would be responsible for that?
    - ii. Answer: Correct.

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