

## **Presenters**

Megan Bernier, MSPT RAC-CT COS-C Post-Acute Care Senior Clinical Manager

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## **SESSION HANDOUTS:**

OAI Quarterly OASIS Update Slides OASISANSWERS



CMS July 2024 OASIS Quarterly Q&As



**Application Scenarios** 





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## AGENDA:

## **OASIS Answers Updates**

## **CMS Updates**

Home Health Quality Reporting Program (HHQRP)

Home Health Value-Based Purchasing (HHVBP) Model

CY 2025 Home Health PPS - Proposed Rule Summary - HHQRP and HHVBP

## **Highlights**

COVID-19 vaccination

OASIS item: O0350. Patient's COVID-19 vaccination is up to date

HHQRP Quality Measure: COVID-19 Vaccine: Percent of Patients/Residents Who Are Up to Date

#### **Feature Presentation**

Review of NEW July 2024 CMS Quarterly OASIS Q&As

Application Scenarios – July 2024 CMS Quarterly OASIS Q&As

## **Participant Questions and Answers**



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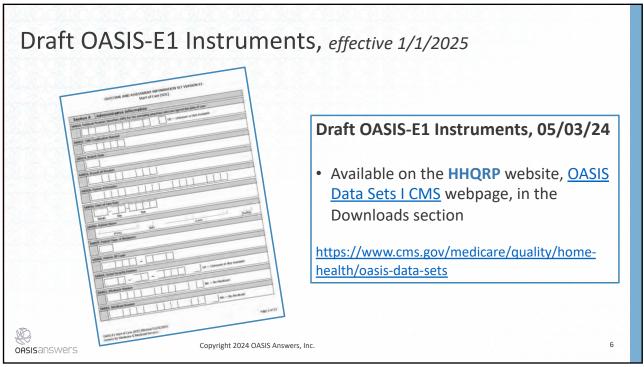
## Home Health Quality Reporting Program (HHQRP)

**CMS Updates** 



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## Draft OASIS-E1 Instruments, effective 1/1/2025 Changes to OASIS – Additions and Removals

### **OASIS Items Removed:**

- M0110 Episode Timing
- M2200 Therapy Need
- GG Discharge Goals,
  - o GG0130 Self-Care column 2
  - o GG0170 Mobility column 2

### **OASIS Items Added:**

O0350 Patient's COVID-19 vaccination is up to date

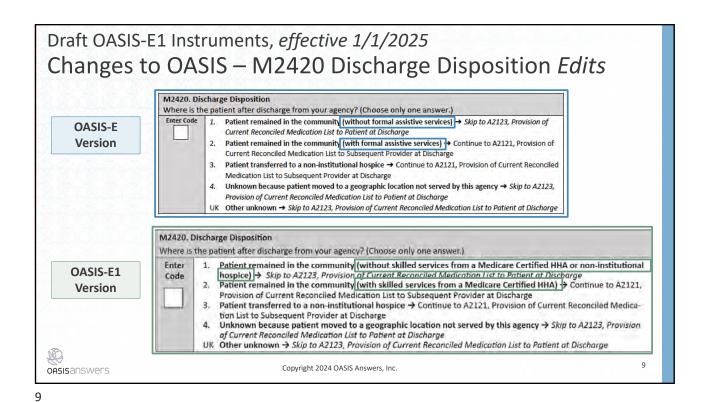


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#### Draft OASIS-E1 Instruments, effective 1/1/2025 Changes to OASIS - D0150 Patient Mood Interview Edits D0150. Patient Mood Interview (PHO-2 to 9) D0150. Patient Mood Interview (PHQ-2 to 9) Say to patient: "Over the last 2 weeks, have you seen bothered by any of the following severity Score blank. Otherwise, say to patient: "Over the last 2 weeks, have you been bothered by any of the following severity Score blank." D0150. Patient Mood Interview (PHQ-2 to 9) If symptom is present, enter 1 (yes) in column 1, Symptom problems?" If symptom is present, enter 1 (yes) in column 1, Symptom is present, enter 1 (yes) in column 1, Symptom is present, enter 1 (yes) in column 1, Symptom Presence. Read and show the patient a card with the symptom from If symptom 1, Symptom Presence and show the patient a card with the symptom Frequency choices. Indicate response in column 2, Symptom Presence 1. Symptom Presence 2. Symptom Presence 2. Symptom Presence 3. Symptom Presence 4. Symptom Presence 5. Symptom Presence 6. Symptom Presence 8. Symptom Presence 9. Symptom Presence 1. Symptom Presence 2. Symptom Presence 3. Symptom Presence 4. Symptom Presence 5. Symptom Presence 6. Symptom Presence 1. Symptom Presence 2. Symptom Presence 3. Symptom Presence 4. Symptom Presence 5. Symptom Presence 6. Symptom Presence 1. Symptom Presence 2. Symptom Presence 3. Symptom Presence 4. Symptom Presence 5. Symptom Presence 1. Symptom Presence 2. Symptom Presence 3. Symptom Presence 4. Symptom Presence 5. Symptom Presence 6. S 1. Symptom Presence 0. No (enter 0 in column 2) 1. Symptom Presence 2. Symptom Frequency **OASIS-E** 0. No (enter 0 in column 2) 0. Never or 1 day **OASIS-E1** 1. Yes (enter 0-3 in column 2) 1. Yes (enter 0-3 in column 2) 2-6 days (several days) 7-11 days (half or more of the days) 9. No response (leave column Version Version 2 blank). 9. No response (leave column 2 blank) 3. 12-14 days (nearly every day) A. Little interest or pleasure in doing things A. Little interest or pleasure in doing things B. Feeling down, depressed, or hopeless B. Feeling down, depressed, or hopeless If either D0150A2 or D0150B2 is coded 2 or 3, CONTINI If both D0150A1 and D0150B1 are coded 9, OR both D0150A2 and D0150B2 are coded 0 or 1, END the continue. C. Trouble falling or staying asleep, or sleeping too | C. Trouble falling or staying asleep, or sleeping too much E. Poor appetite or overeating F. Feeling bad about yourself - or that you are a fail F. Feeling bad about yourself - or that you are a failure or have let yourself or your family down G. Trouble concentrating on things, such as reading | G. Trouble concentrating on things, such as reading the newspaper or watching television H. Moving or speaking so slowly that other people c being so fidgety or restless that you have been moving around a lot more than u fidgety or restless that you have been moving arc Thoughts that you would be better off dead, or oj . Thoughts that you would be better off dead, or of hurting yourself in some way Copyright © Pfizer Inc. All rights reserved. Reproduced w Copyright © Pfizer Inc. All rights reserved. Reproduced with permission. Copyright 2024 OASIS Answers, Inc oasisanswers



Draft OASIS-E1 Guidance Manual,

O4/28/24

• Available in the Downloads section of the

OASIS User Manuals I CMS webpage of the

HHQRP website

https://www.cms.gov/medicare/quality/homehealth/oasis-user-manuals

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## Draft OASIS-E1 Guidance Manual, effective 1/1/2025 High Level Updates to Guidance Manual

## **Chapter 1:**

OASIS will be submitted for all payers

Section 1.5.1 Who does OASIS data collection apply to?

To be updated with finalization of the HH CY 2025 rule, and process of the HH CY 2025 rule.

To be updated with finalization of the HH CY 2025 rule, and provided in the Final Guidance Manual

## **Chapter 3:**

- Removal of guidance for M0110 Episode Timing, M2200 Therapy Need, and GG 0130 & GG0170 Discharge Goals -- all to be removed with OASIS-E1
- Addition of guidance for O0350 Patient's COVID-19 vaccination is up to date -- to be added with OASIS-E1



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## HHQRP Updated Quick Reference Guide, 04/25/2024



#### Contents:

Regard the quality reporting requirements as created for HHAs by the HH QRP:

- · FAQs (submission deadlines and verification)
- Help Desk information
- Helpful Links (training, listservs, references)

https://www.cms.gov/files/document/pac-hhquickreferenceguide-20240425.pdf

- ✓ HHAs must report OASIS data and HHCAHPS Survey data
- ✓ Medicare claims data also gathered

If required quality data is not reported by each designated submission deadline, the HHA will be subject to a 2% reduction in their Annual Payment Update (APU).

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## **HHQRP**

## Quality of Patient Care (QoPC) Star Ratings - Overview

- Based on OASIS assessments and Medicare claims data
- Updated quarterly, based on new data posted on Care Compare
- Requires at least 20 quality episodes for each OASIS-based measure reported (EOC date within the 12-month reporting period)
- Requires reported data for 5 of the 7 measures used in the QoPC Star Rating
- Provider Preview Report showing QoPC Star Ratings provided to each HHA about 3.5 months before the ratings are posted on Care Compare

## **QoPC Star Rating** 7 quality measures

- 1. Timely Initiation of Care (process)
- 2. Improvement in Ambulation (outcome)
- 3. Improvement in Bed Transferring (outcome)
- 4. Improvement in Bathing (outcome)
- 5. Improvement in Shortness of Breath (outcome)
- 6. Improvement in Management of Oral Medications (outcome)
- 7. Acute Care Hospitalization (claimsbased) (outcome)

Care Co

CMS Home Health Star Ratings: https://www.cms.gov/medicare/quality/home-health/home-health-star-ratings Care Compare: https://www.medicare.gov/care-compare/?providerType=HomeHealth

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### **HHORP**

## Quality of Patient Care (QoPC) Star Ratings - Updates

## Plan for Updates

#### Home Health Within-Stay Potentially Preventable Hospitalization (PPH)

- Publicly Reported as of October 2024 Care Compare
- Replacing Acute Care Hospitalization During the First 60 Days of Home Health (ACH) measure
- Update begins with the July 2024 QoPC Provider Preview Report

#### **Acute Care Hospitalization quality measure:**

· No longer publicly reported as of October 2024

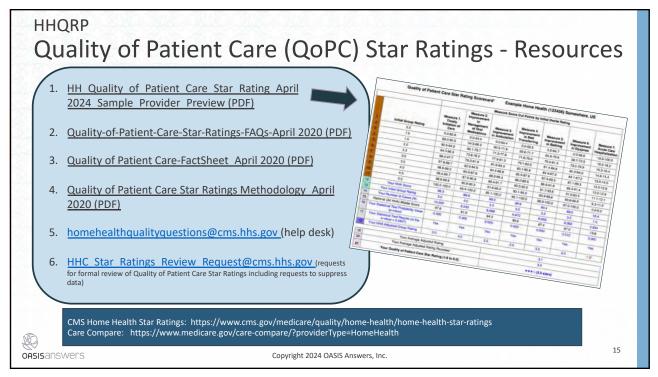
#### **HHQRP – Home Health Star Ratings – Upcoming Resources**

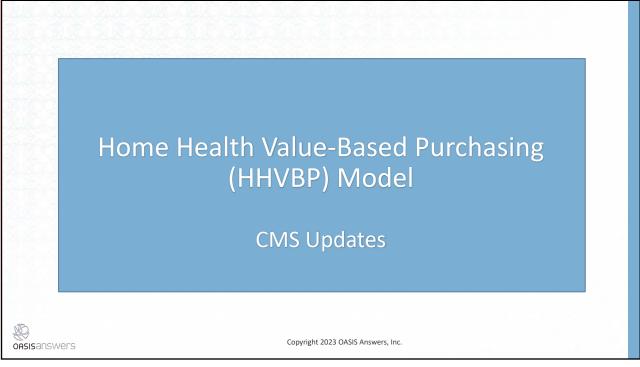
- Updated methodology, FAQs
- Learning event
- Q&A Session

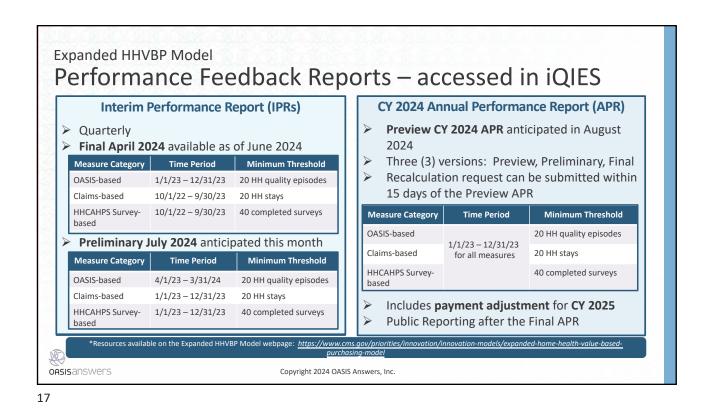
CMS Home Health Star Ratings: https://www.cms.gov/medicare/quality/home-health/home-health-star-ratings Care Compare: https://www.medicare.gov/care-compare/?providerType=HomeHealth



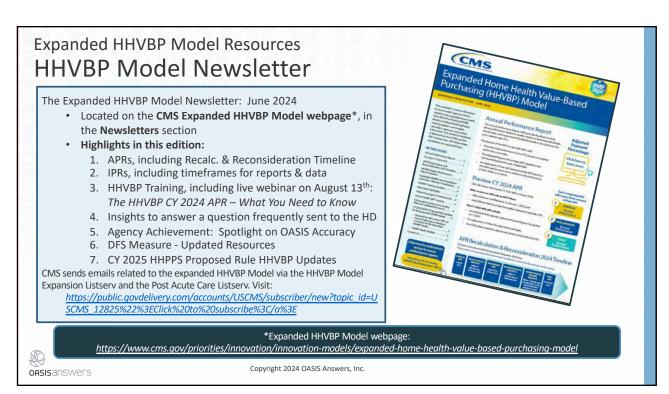
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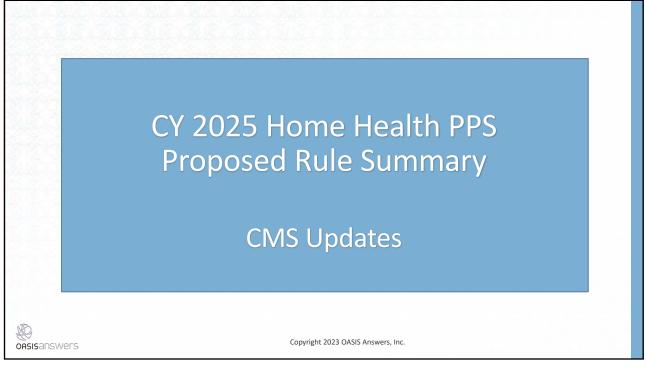


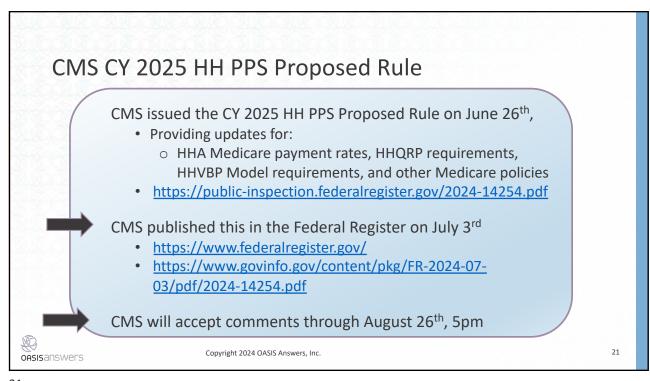


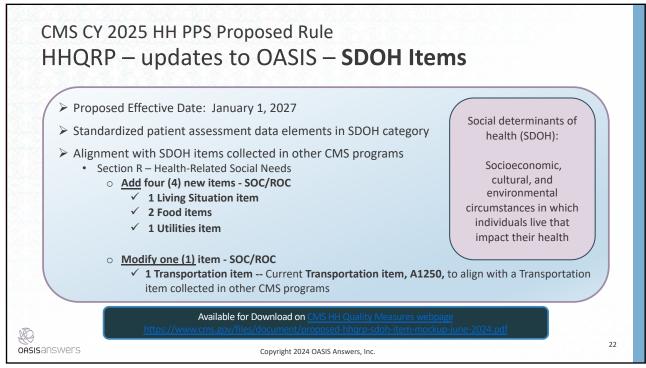


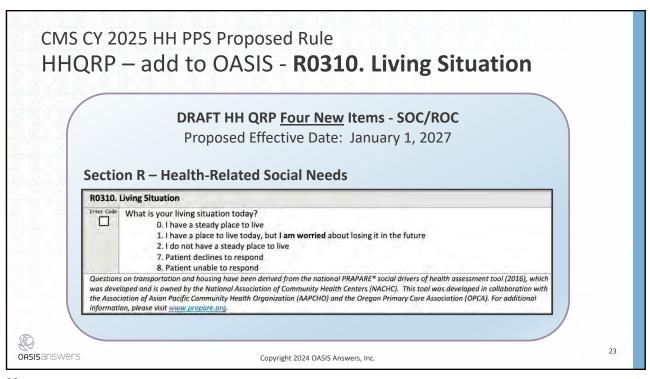
**Expanded HHVBP Model Resources** HHVBP Model Frequently Asked Questions (FAQs) The Expanded HHVBP Model FAQs: Published May 2024 Located on the CMS **Expanded HHVBP Model** webpage\*, in the FAQs & Model Guide section Provides additional Model information beginning with the CY 2025 Performance Year, NEW and UPDATED FAQs, and updated **Appendices** \*Expanded HHVBP Model webpage: https://www.cms.gov/priorities/innovation/innovation-models/expanded-home-health-value-based-purchasing-model Copyright 2024 OASIS Answers, Inc. oasisanswers

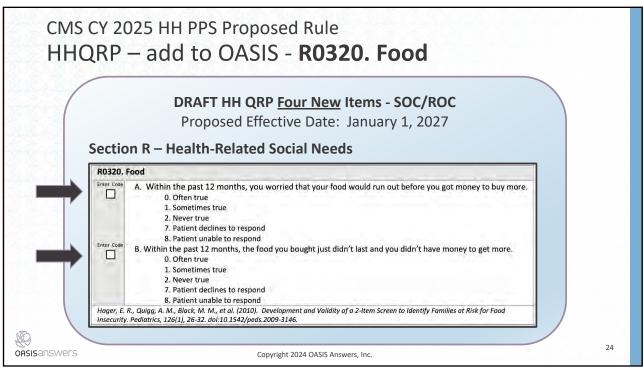


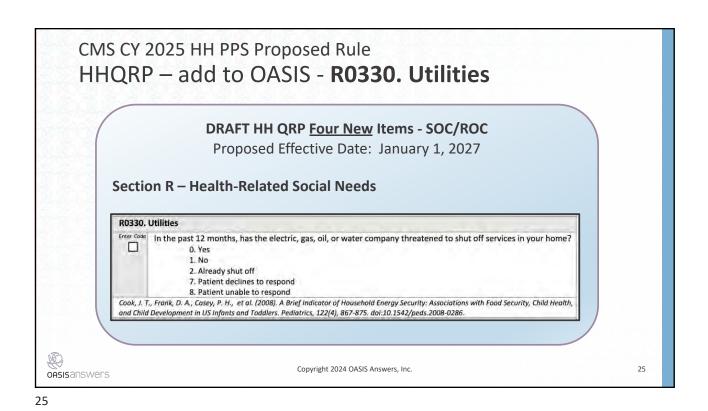












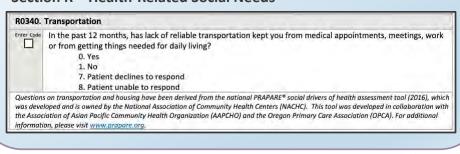
CMS CY 2025 HH PPS Proposed Rule
HHQRP — modified OASIS item - **R0340. Transportation** 

DRAFT HH QRP One Modified Item - SOC/ROC

A1250. Transportation → R0340. Transportation

Proposed Effective Date: January 1, 2027

#### Section R - Health-Related Social Needs



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# CMS CY 2025 HH PPS Proposed Rule HHQRP – All-Payer

- Proposed update to the end of the suspension of OASIS all-payer data collection:
  - Change all-payer data collection to begin with the Start of Care (SOC) OASIS timepoint instead of the Discharge OASIS timepoint.
- ➤ The SOC = first assessment that can be submitted for a non-Medicare/non-Medicaid patient:
  - On or after January 1, 2025 for the phase-in (voluntary) period
  - On or after July 1, 2025 for the mandatory period
- CMS will use the M0090 Date Assessment Completed date in SOC assessment
  - To identify non-Medicare/non-Medicaid patient assessments in the phase-in and mandatory periods



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# CMS CY 2025 HH PPS Proposed Rule HHQRP – Rehabilitative Therapists

- CMS is requesting input on permitting rehabilitative therapists (OT, PT, and SLP) to conduct the initial and comprehensive assessment
  - For referrals that have both therapy and nursing services ordered as part of the plan of care
- Specifically, CMS is soliciting comment regarding the following:
  - Mentorship/Preceptorship/Training relevant to conducting the initial and comprehensive assessment
  - Current HHA processes and/or skill and competency requirements for assigning staff to conduct initial
    assessments and comprehensive assessments
  - Potential education or skill gaps for therapists in conducting initial assessments and comprehensive assessments
  - HHA experiences under the PHE waiver with therapists conducting initial assessments and comprehensive assessments
  - Current HHA barriers/challenges in meeting patient needs at the beginning of care
- CMS also seeking public comment on other factors that influence the patient referral and intake processes



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## CMS CY 2025 HH PPS Proposed Rule HHQRP and HHVBP Updates - Request for Information Purpose: Obtain feedback on potential new performance measures and measure concepts for potential future rulemaking **HHQRP HHVBP**

CMS is inviting public comment on 4 measure concepts:

- Composite of vaccinations
- Depression
- □ Pain management
- Substance use disorders

CMS is requesting public comments on:

- ☐ New measure concepts, such as family caregiver measure
- ☐ The measure Medicare Spending per Beneficiary (MSPB)
- New OASIS-based and claims-based measures

CMS is providing an **update to RFI** published in the CY 2023 & CY 2024 final rules: Future Approaches to Health Equity in the Expanded HHVBP Model

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## CMS CY 2025 HH PPS Proposed Rule Comment Period – through August 26th, 5pm ET

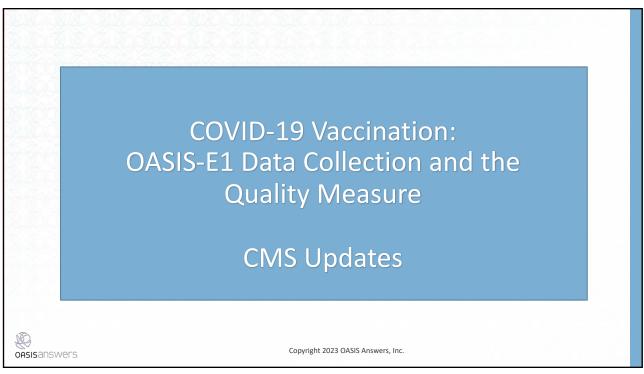
In commenting, refer to file code CMS-1803-P

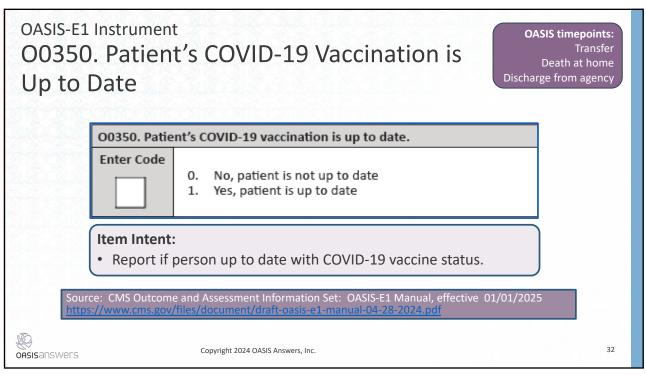
Comments may be submitted via any one of the following ways

_		
1	Electronically	https://www.regulations.gov
2	Regular mail	Centers for Medicare & Medicaid Services Department of Health and Human Services Attention: CMS-1803-P P.O. Box 8013 Baltimore, MD 21244-8013
3	Express or overnight mail	Centers for Medicare & Medicaid Services Department of Health and Human Services Attention: CMS-1803-P Mail Stop C4-26-05 7500 Security Boulevard Baltimore, MD 21244-1850

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## O0350. Patient's COVID-19 Vaccination is Up to Date Patient Assessment Scenarios

What do we need to know to code O0350?

**Scenario 1:** Mr. Summer, age 80, is being discharged, June 1<sup>st</sup>, by the RN, following 5 weeks of SN, PT, and OT post CHF exacerbation; no evidence patient is immunocompromised. The discharge RN reviewed Mr. Summer's vaccination card and confirmed with patient: Pfizer vaccines through November 2022, in October 2023, and in March 2024. *Up to date?* 

**Scenario 2:** In completing the Transfer OASIS for 65 year-old Mrs. Sunshine, a post-lung transplant patient, the RN reviews the home health record. At the SOC 2 weeks earlier, May 15<sup>th</sup>, the admitting RN recorded the following: Patient received 2 Moderna vaccines through April 2023, followed by 1 dose of the updated Moderna vaccine in October 2023. *Up to date?* 

**Scenario 3:** On the day of Discharge, July 1st, the PT asks 63 year-old Mr. Field, not immunocompromised, about his COVID-19 vaccination status. Mr. Field responds that he stayed up to date per his vaccination card and that his last Pfizer vaccine was November 2022. He states his next COVID-19 vaccination is scheduled in 2 weeks as that is when his daughter will be driving him to the pharmacy. *Up to date?* 

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# OO350. Patient's COVID-19 Vaccination is Up to Date OASIS Coding Tips



Coding:	O0350. Patient's COVID-19 vaccination is up to date.				
	Enter Code	O. No, patient is not up to date Or Yes, patient is up to date			

**Code 0:** No, patient is not up to date if CDC definition of up to date is *not* met. Includes patients:

- Who have not received one or more recommended COVID-19 vaccine doses for any reason including medical, religious, or other qualified exemptions
- For whom vaccination status cannot be determined

Code 1: Yes, patient is up to date if patient meets the CDC definition of "up to date".\*

**Dash (-):** Valid response, indicating item was *not* assessed.

CMS. Outcome Assessment Information Set, OASIS-E1 Manual, effective January 1, 2025, draft https://www.cms.gov/files/document/draft-oasis-e1-manual-04-28-2024.pdf



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# O0350. Patient's COVID-19 Vaccination is Up to Date OASIS Coding — Sources of Information



### Code based on:

#### **Sources of Information:**

Vaccination status may be determined based on information from *any available source*, including:

- Vaccination cards provided by the patient and/or caregivers
- Interviews of patient, family, other caregivers, and/or healthcare providers
- · Referrals and medical records
- Proxy response

CMS. Outcome Assessment Information Set, OASIS-E1 Manual, effective January 1, 2025, draft https://www.cms.gov/files/document/draft-oasis-e1-manual-04-28-2024.pdf



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How should I code O0350. if there is conflicting information during the assessment?

## If conflicting information:

 Use *clinical judgement* to determine if patient is up to date with COVID-19 vaccines based on information from *any available source*.

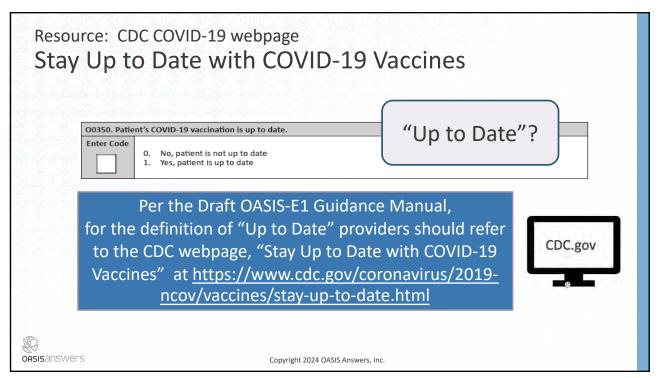
CMS. Outcome Assessment Information Set, OASIS-E1 Manual, draft,

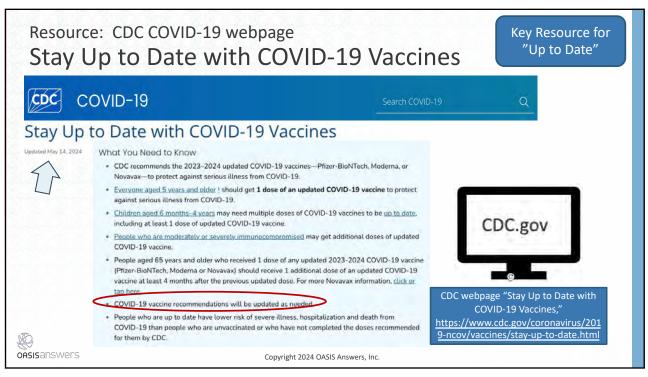
Effective January 1, 2025.

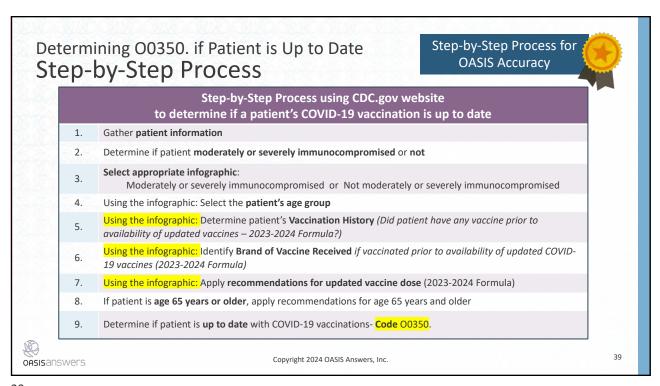


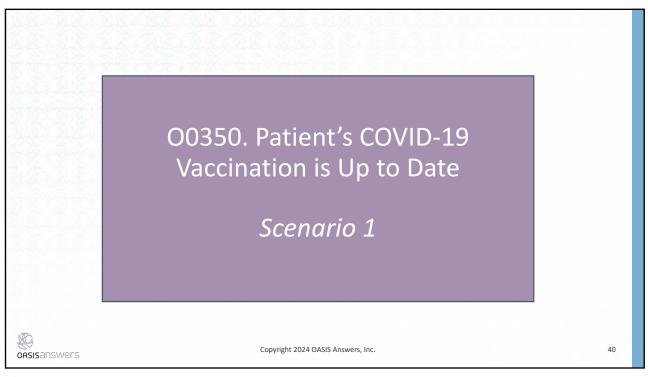
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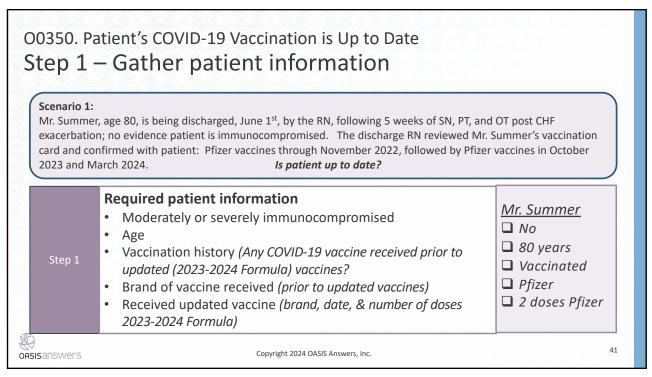
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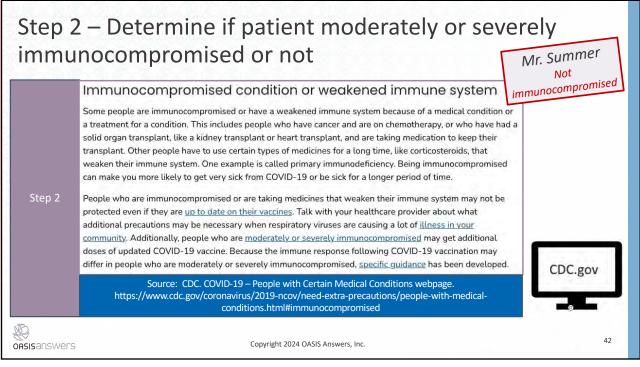


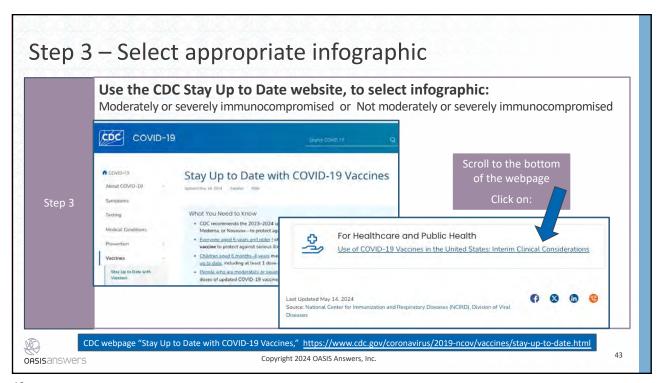


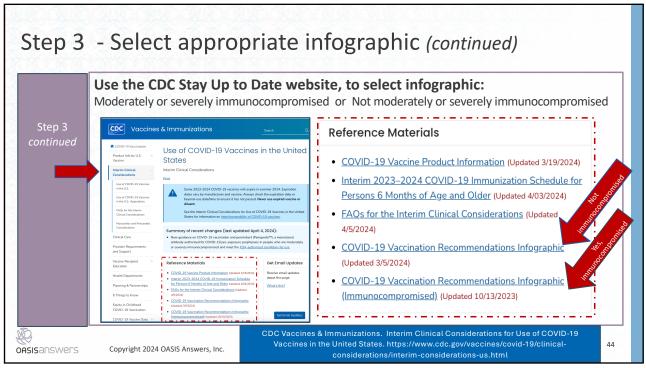


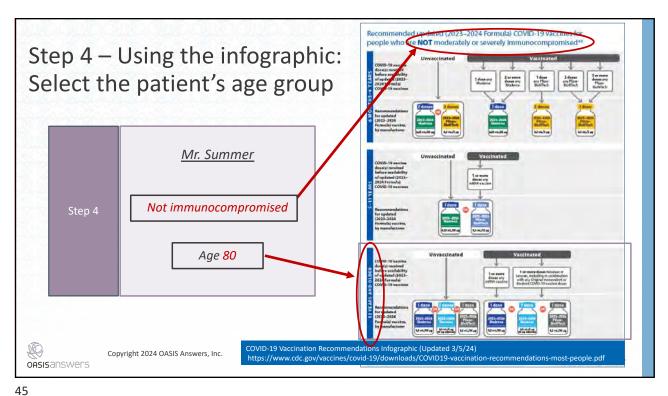


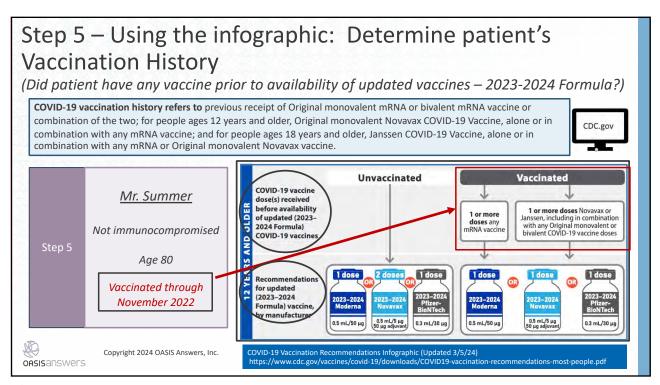


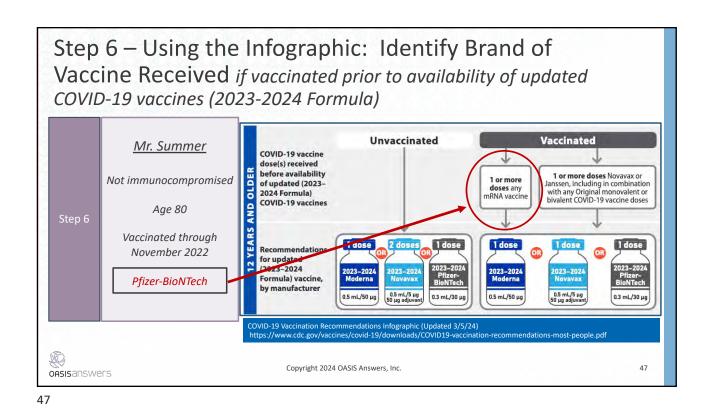




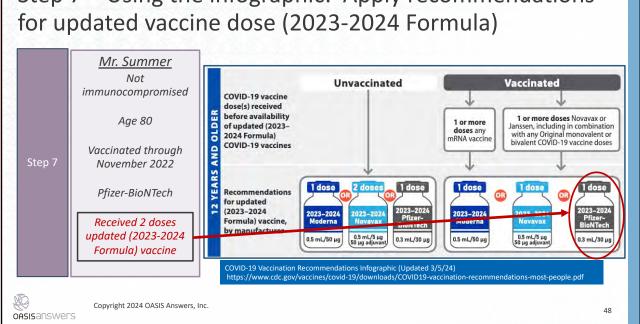


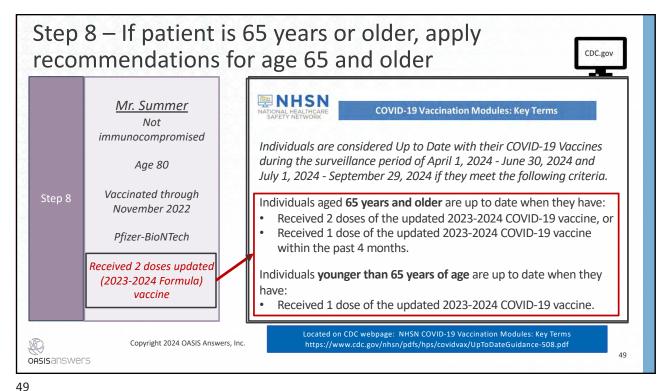


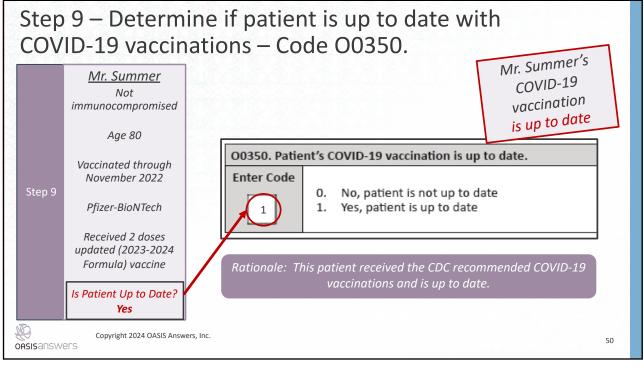


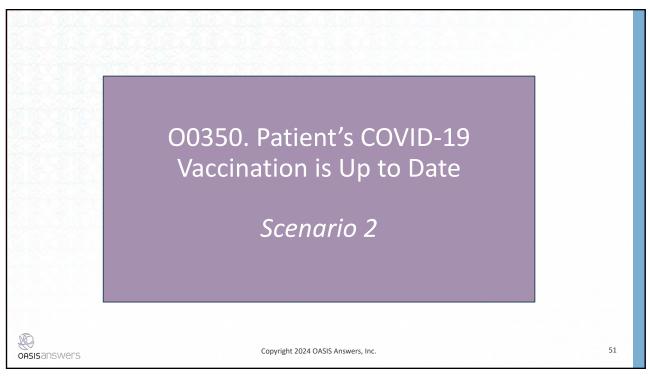


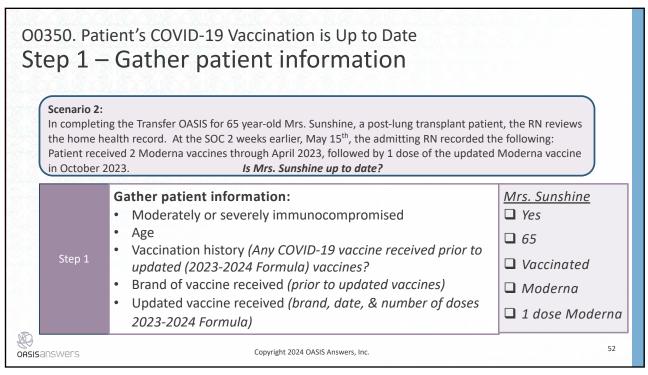
Step 7 – Using the infographic: Apply recommendations

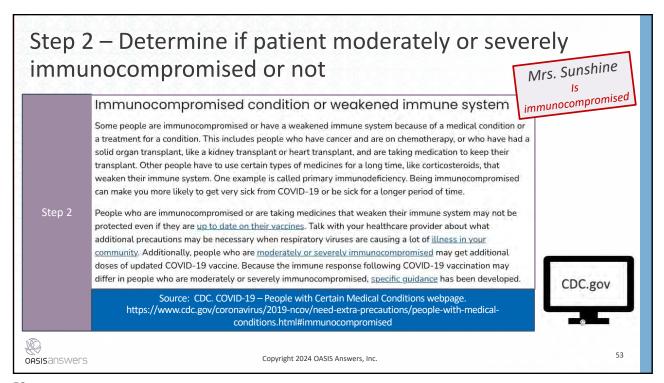


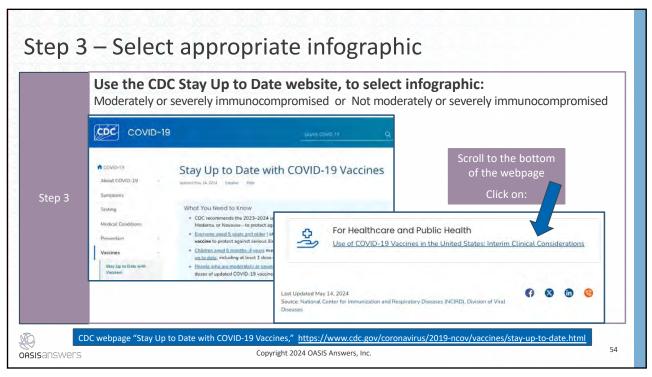


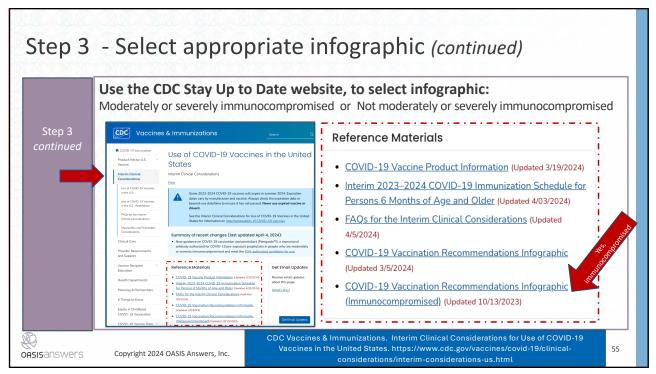


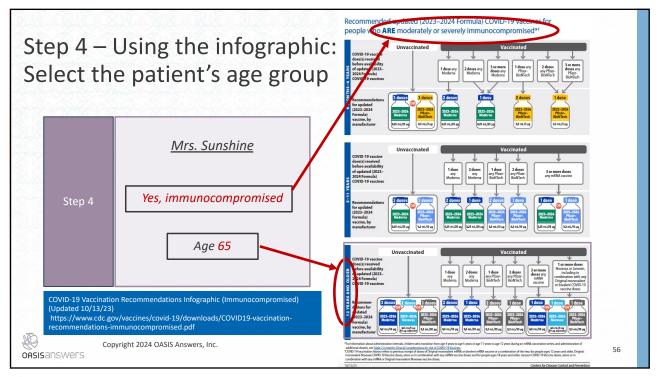


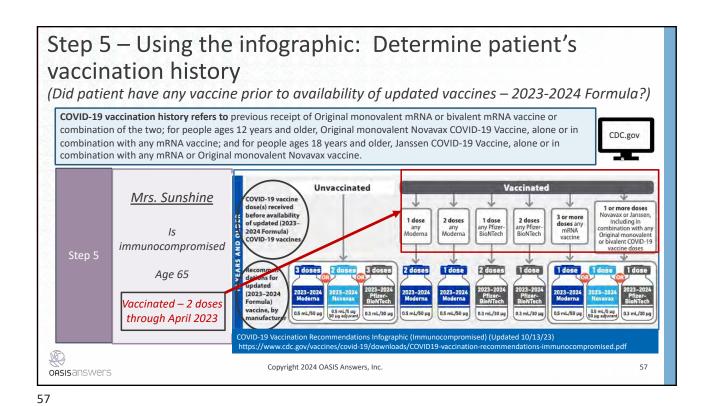




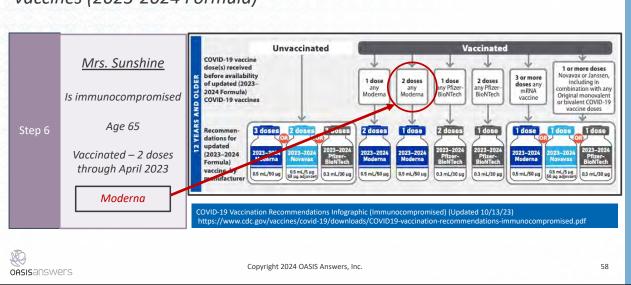


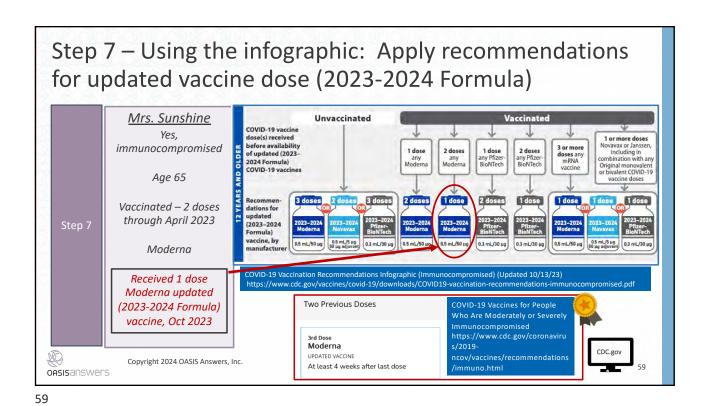


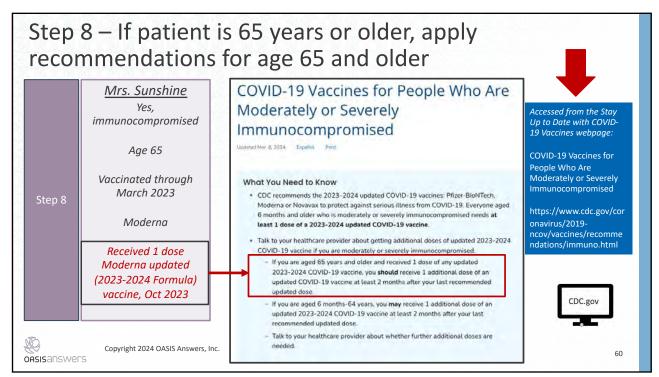


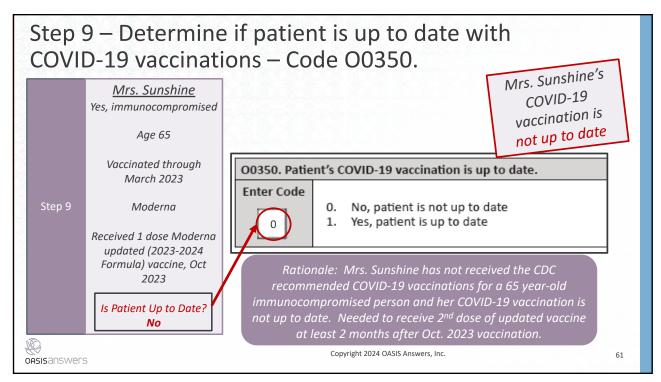


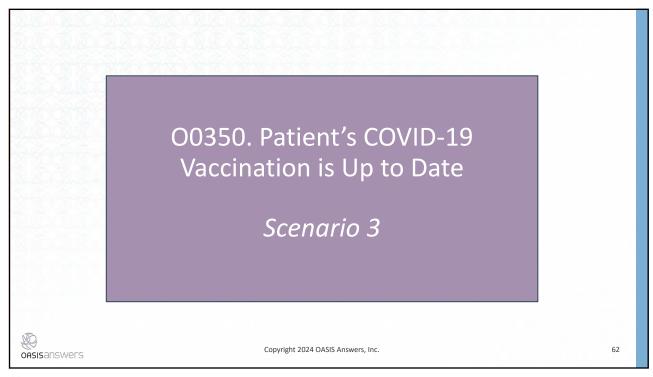
Step 6 – Using the infographic: Identify brand of vaccine received if vaccinated prior to availability of updated COVID-19 vaccines (2023-2024 Formula)

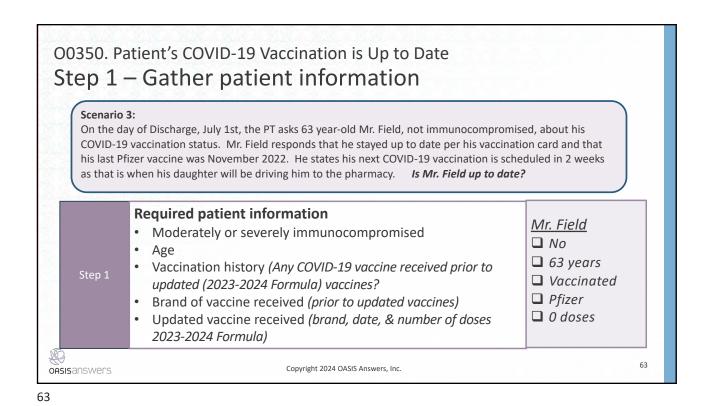












Step 2 - Determine if patient moderately or severely immunocompromised or not Mr. Field

Immunocompromised condition or weakened immune system

Some people are immunocompromised or have a weakened immune system because of a medical condition or a treatment for a condition. This includes people who have cancer and are on chemotherapy, or who have had a solid organ transplant, like a kidney transplant or heart transplant, and are taking medication to keep their transplant. Other people have to use certain types of medicines for a long time, like corticosteroids, that weaken their immune system. One example is called primary immunodeficiency. Being immunocompromised can make you more likely to get very sick from COVID-19 or be sick for a longer period of time.

People who are immunocompromised or are taking medicines that weaken their immune system may not be protected even if they are up to date on their vaccines. Talk with your healthcare provider about what additional precautions may be necessary when respiratory viruses are causing a lot of illness in your community. Additionally, people who are moderately or severely immunocompromised may get additional doses of updated COVID-19 vaccine. Because the immune response following COVID-19 vaccination may differ in people who are moderately or severely immunocompromised, specific guidance has been developed.

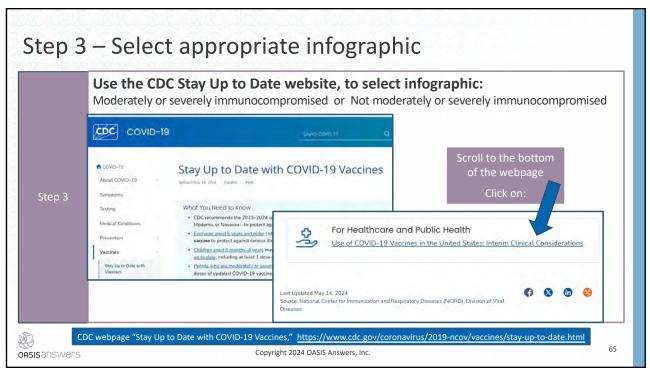
Source: CDC. COVID-19 – People with Certain Medical Conditions webpage. https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medicalconditions.html#immunocompromised

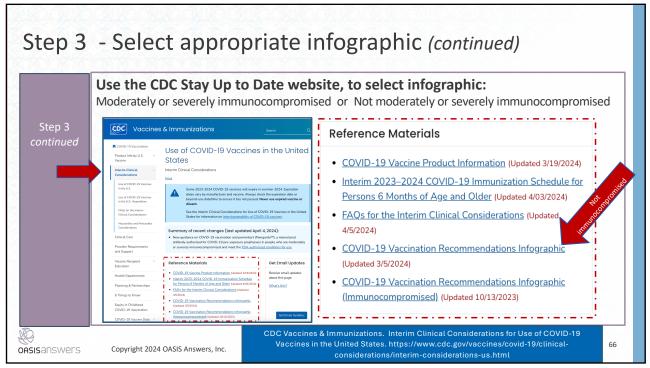
immunocompromised

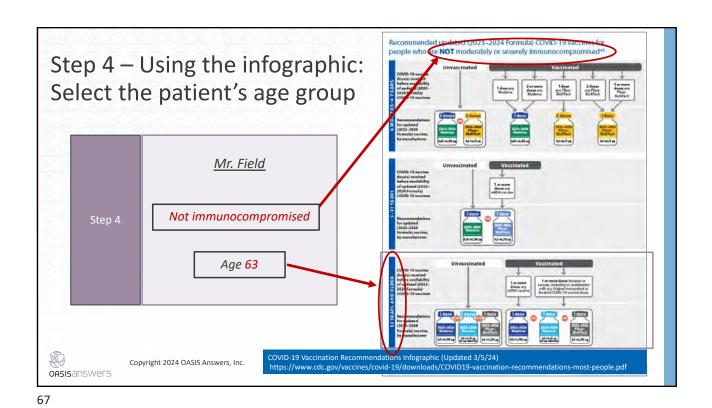
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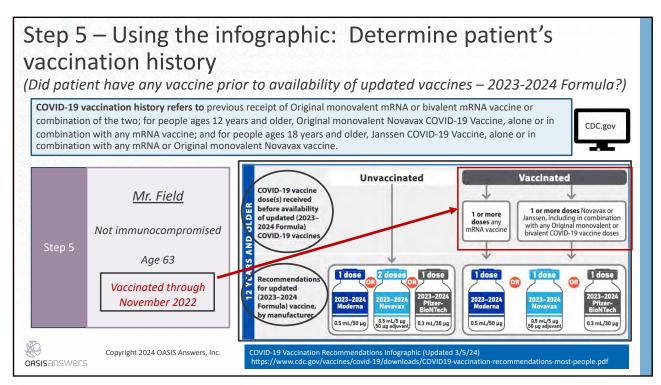
Step 2

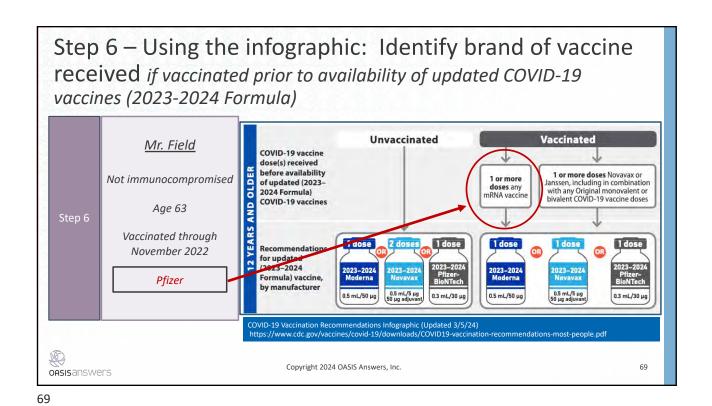
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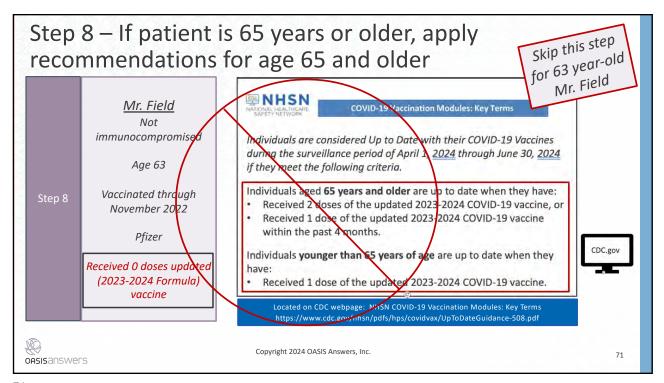


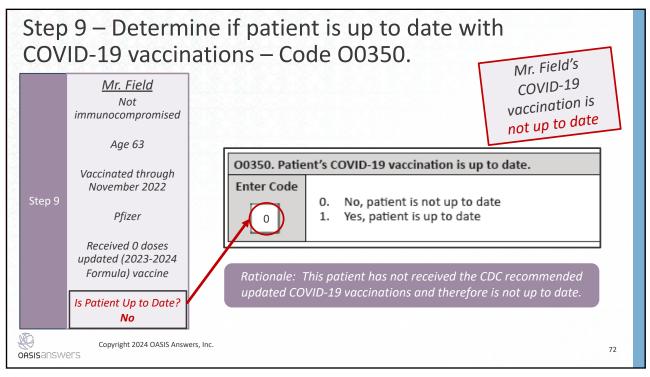




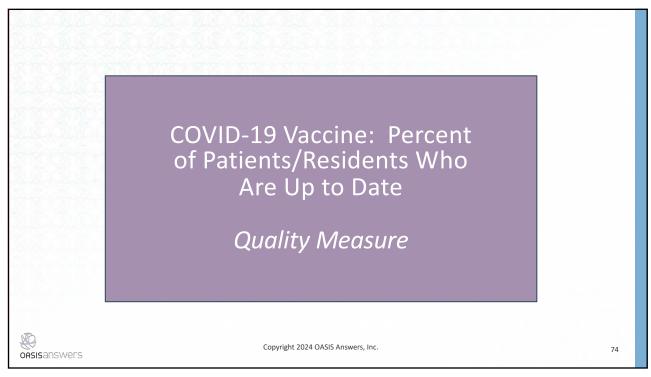


Step 7 – Using the infographic: Apply recommendations for updated vaccine dose (2023-2024 Formula) Mr. Field Not Unvaccinated **Vaccinated** immunocompromised COVID-19 vaccine dose(s) received before availability of updated (2023-1 or more doses Novavax or Age 63 1 or more Janssen, including in combination with any Original monovalent or bivalent COVID-19 vaccine doses 2024 Formula) **COVID-19 vaccines** Vaccinated through Step 7 November 2022 Pfizer Recommendations for updated (2023-2024 2023-2024 Moderna Received 0 doses Formula) vaccine updated (2023-2024 0.3 mL/30 µc Formula) vaccine COVID-19 Vaccination Recommendations Infographic (Updated 3/5/24) https://www.cdc.gov/vaccines/covid-19/downloads/COVID19-vaccination-recommendations-most-people.pdf Copyright 2024 OASIS Answers, Inc. 70 oasisanswers





Accurately code	2 2 2 2 2 2 2 2 2				ection a	illu C	DC guil	iance
Moderately or Severely Immunocompromised	No No				Yes			
Age	65 years or older		12-64 years		65 years or older		12-64 years	
Vaccination history	Yes	No	Yes	No	Yes	No	Yes	No
Brand of vaccine received prior to updated (2023-2024 Formula) vaccines	☐ Moderna ☐ Novavax ☐ Pfizer- BioNTech	NA	☐ Moderna ☐ Novavax ☐ Pfizer- BioNTech	NA	☐ Moderna ☐ Novavax ☐ Pfizer- BioNTech	NA	☐ Moderna ☐ Novavax ☐ Pfizer- BioNTech	NA
Recommendations for updated 2023-2024 vaccine doses, at least 4 months apart 2023-2024 vaccine doses, at least 4 months apart 3 fro previous vaccination and choose Novavax, need 2 doses, followed by 1 updated 2023-2024 vaccine dose		➤ Need 1 updated 2023-2024 vaccine dose ➤ If no previous vaccination and choose Novavax, need 2 doses		Complete 3-dose series, & should receive 1 or more updated 2023-2024 vaccine, at least 2 months apart     If no previous vaccination, need 3 homologous updated 2023-2024 mRNA vaccine doses or 2 updated 2023-2024 Novavax vaccine doses		➤ Complete 3-dose series, & may receive 1 or more updated 2023-2024 vaccine ➤ If no previous vaccination, need 3 homologous updated 2023-2024 mRNA vaccine doses or 2 updated 2023-2024 Novavax vaccine doses		



# COVID-19 Vaccine: Percent of Patients/Residents Who Are Up to Date Quality Measure Description

Description: Percentage of home health (HH) quality episodes in which patients were up to date with their COVID-19 vaccinations as defined by Centers for Disease Control and Prevention (CDC) guidelines on current vaccination.<sup>1</sup>

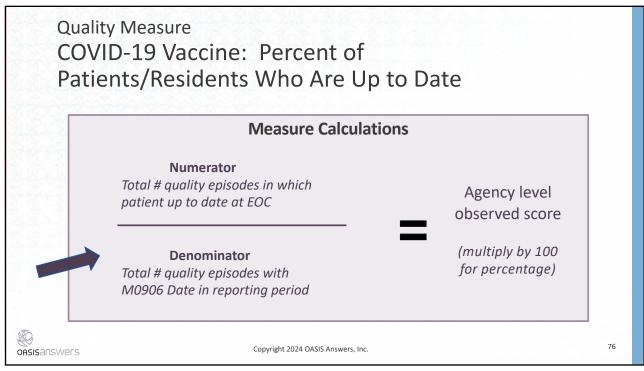
	, , ,
OASIS-E1 Items Used	M0100. Reason for Assessment M0906. Discharge/Transfer Date (determines reporting period) O0350. Patient's COVID-19 vaccination is up to date
Numerator	Number home health quality episodes in which the patient was determined to be up to date with the COVID-19 vaccination during the reporting period/at the end of the quality episode
Denominator	<b>Number of home health quality episodes</b> ending with a discharge, transfer to an inpatient facility, or death at home during the reporting period <b>(one quarter).</b> Include <b>all quality episodes</b> for any one patient.
Measure-specific Exclusions	None
Measure Type	Process Measure – not risk-adjusted Cross-setting The measure would be reported using one quarter of data, and updated quarterly based on data obtained through the OASIS assessment instrument.

<sup>1</sup>The definition of "up to date" may change based on the CDC's latest guidance, and can be found on the CDC webpages "Stay Up to Date with COVID-19 Vaccines, updated 05/14/2024," <u>https://www.cdc.gov/coronavirus/2019- ncov/vaccines/stay-up-to-date.html</u> (last accessed 07/08/24) and "NHSN COVID-19 Vaccination Modules: Key Terms," https://www.cdc.gov/nhsn/pdfs/hps/covidvax/UpToDateGuidance-508.pdf.

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## Measure Strategies

Establish a process for field staff/clinicians to:

- ☐ Understand how to **define "Up-to-Date" COVID-19 vaccinations** and **determine** whether or not a patient is "Up-to-Date"
- Assess vaccination status at SOC and ROC, even though O0350 isn't collected until the end of the quality episode
- ☐ Encourage/support **COVID-19 vaccination** during the home health stay for patients not "Up-to-Date"

Develop agency processes for:

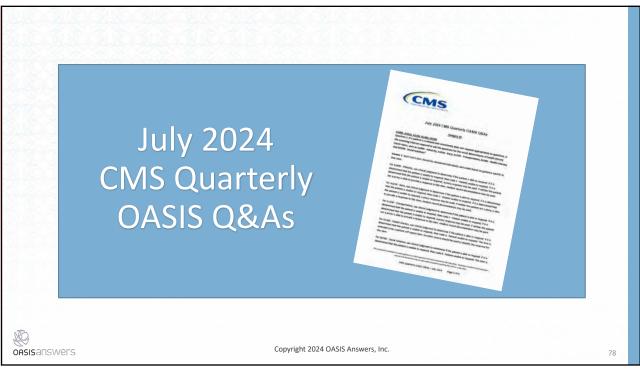
□ Documenting the patient's COVID-19 vaccination status in a standardized place in patient record, to facilitate coding accuracy at Transfer/Death/Discharge

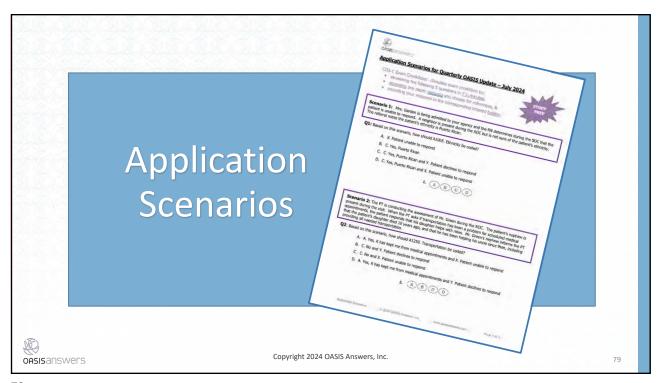


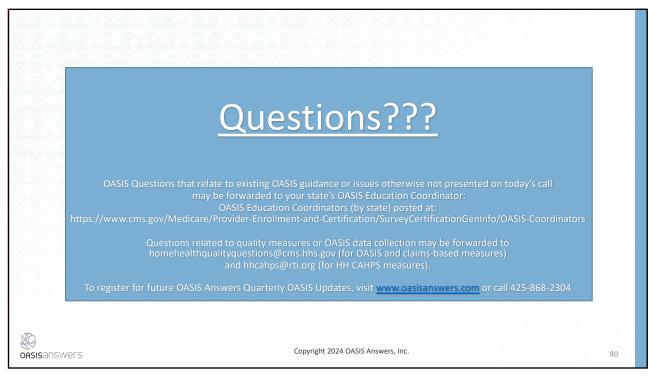
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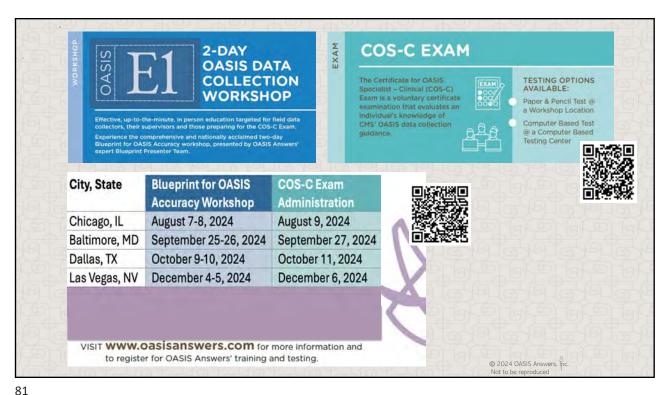
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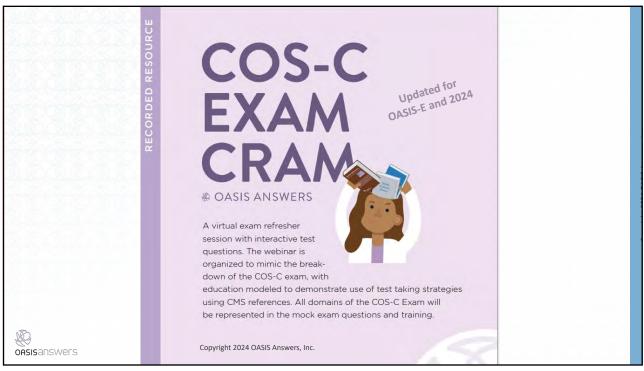








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