



May 22, 2017

Re: "Auto-waiver" regarding admission and discharge documentation for providers operating multiple bedded programs: Parts 816, 818, 819 and 820.

Dears Provider:

Providers operating multiple bedded programs have requested waivers in order to facilitate intra-agency clinically justified patient transfers between modalities with reduced documentation for admissions and discharge. Moving patients from one level of care to another as part of the same episode of care is clinically sensible, however, it is not accommodated by OASAS' current reporting and regulatory requirements.

Therefore, while we develop amendments to our regulations the following rules will apply **only to providers operating multiple bedded programs (816 crisis, 818 inpatient rehab, 819 and 820 residential services)**.

When a patient has been first admitted pursuant to regulatory requirements with complete admission documentation and a treatment/recovery plan, and subsequent treatment progress indicates the patient should move to another modality, whether that move is to a higher or lower level of care, then:

- **Transferring/discharging program** must provide a notation in the patient's clinical record indicating the patient has been "discharged" to another level of care and the treatment/recovery plan has been updated; submit the appropriate PAS form to OASAS for discharge;
- **Transferring/discharging program** must ensure that updated patient documentation follows the patient to the new program **on the same date** (if EMR, then in real time);
- **Receiving/admitting program** must provide a notation in the patient's record indicating the patient has been "admitted" with an up-to-date treatment/recovery plan and then update the psycho social assessment with additional clinical information needed to comply with regulations of the receiving/admitting program and ensure quality clinical care; submit the appropriate PAS form to OASAS for admission;
- A full discharge summary and discharge documentation pursuant to regulatory requirements must be prepared when the patient leaves treatment with this provider; submit the appropriate PAS form to OASAS for discharge.

To ensure appropriate application of this waiver for audit and site review purposes OASAS suggests providers keep a copy of this letter in any patient chart where this regulatory waiver has been implemented.

Thank you,

Robert A. Kent
General Counsel