# Decoding OASIS M1800 and GG Items:

## Enhancing Quality

Lisa Selman-Holman, JD, BSN, RN
VP Clinical Services
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# Title

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# Agenda

- Common Problems with M1800s (even after all these years)
- M1800s still used for Risk adjustment
- M1800s still used for Star reporting
- M1800s still used for payment
- And there are the GGs!

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## 1.5.5.2 Conventions Specific to OASIS M1800 ADL/IADL Items

- Report the patient's physical and cognitive **ability to perform a task**. Do not report on the patient's preference or willingness to perform a specified task.
- The **level of ability** refers to the level of assistance (if any) that the patient requires to safely complete a specified task. Assistance includes verbal cues, reminders, supervision and/or stand-by or hands-on assistance.
- While the presence or absence of a **caregiver** may impact the way a patient carries out an activity, it **does not impact the assessing clinician's ability to assess the patient** to determine and report the level of assistance the patient requires to safely complete a task.
- Understand **what tasks are included and excluded** in each item and select the OASIS response based only on included tasks.
- If the patient's ability varies between the different tasks included in a multi-task item, report what is true in a **majority of the included tasks**, giving more weight to tasks that are more frequently performed.
- Consider **medical restrictions** when determining ability. For example, if the physician/allowed practitioner has ordered activity restrictions, consider this when selecting the best response to functional items related to ambulation, transferring, bathing, etc.

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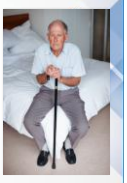
## Limitations

Ability can be temporarily or permanently limited by:

- **physical impairments** (for example, limited range of motion, amputations, contractures, impaired balance)
- **emotional/cognitive/behavioral impairments** (for example, memory deficits, impaired judgment, fear)
- **sensory impairments** (for example, impaired vision or pain)
- **environmental barriers** (for example, stairs, narrow doorways, location where items are stored or location of sink, shower, toilet)



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## M1800, M1810, M1820

**Majority of Tasks**

**M1800. Grooming**
Current ability to tend safely to personal hygiene needs (specifically: washing face and hands, hair care, shaving or make up, teeth or denture care, or fingernail care).

| Enter Code | |
|---|---|
| ☐ | 0. Able to groom self unaided, with or without the use of assistive devices or adapted methods.<br>1. Grooming utensils must be placed within reach before able to complete grooming activities.<br>2. Someone must assist the patient to groom self.<br>3. Patient depends entirely upon someone else for grooming needs. |

**M1810. Current Ability to Dress Upper Body safely (with or without dressing aids) including undergarments, pullovers, front-opening shirts and blouses, managing zippers, buttons, and snaps.**

| Enter Code | |
|---|---|
| ☐ | 0. Able to get clothes out of closets and drawers, put them on and remove them from the upper body without assistance.<br>1. Able to dress upper body without assistance if clothing is laid out or handed to the patient.<br>2. Someone must help the patient put on upper body clothing.<br>3. Patient depends entirely upon another person to dress the upper body. |

**M1820. Current Ability to Dress Lower Body safely (with or without dressing aids) including undergarments, slacks, socks or nylons, shoes.**

| Enter Code | |
|---|---|
| ☐ | 0. Able to obtain, put on, and remove clothing and shoes without assistance.<br>1. Able to dress lower body without assistance if clothing and shoes are laid out or handed to the patient.<br>2. Someone must help the patient put on undergarments, slacks, socks or nylons, and shoes.<br>3. Patient depends entirely upon another person to dress lower body. |

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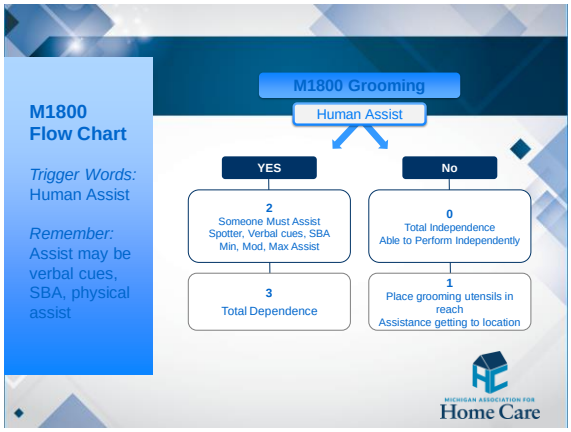
M1800
Flow Chart
Trigger Words:
Human Assist
Remember:
Assist may be verbal cues, SBA, physical assist
M1800 Grooming
Human Assist
YES
No
2
Someone Must Assist
Spotter, Verbal cues, SBA
Min, Mod, Max Assist
0
Total Independence
Able to Perform Independently
3
Total Dependence
1
Place grooming utensils in reach
Assistance getting to location
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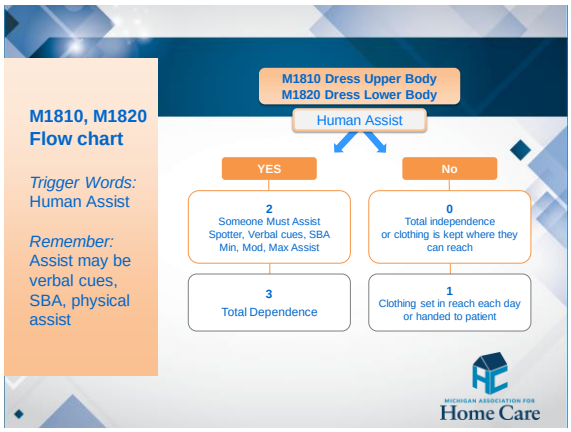
M1810, M1820
Flow chart
Trigger Words:
Human Assist
Remember:
Assist may be verbal cues, SBA, physical assist
M1810 Dress Upper Body
M1820 Dress Lower Body
Human Assist
YES
No
2
Someone Must Assist
Spotter, Verbal cues, SBA
Min, Mod, Max Assist
0
Total independence
or clothing is kept where they can reach
3
Total Dependence
1
Clothing set in reach each day
or handed to patient
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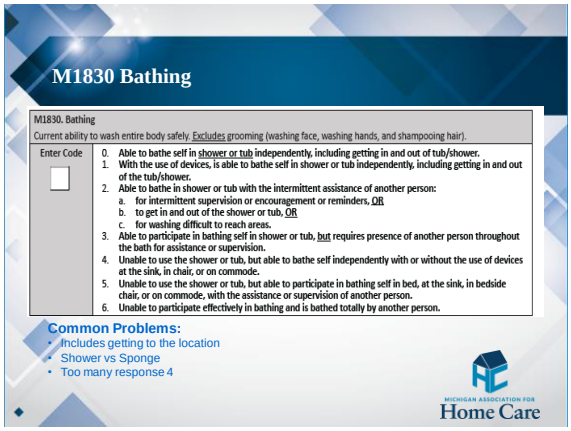
M1830 Bathing
M1830. Bathing
Current ability to wash entire body safely. Excludes grooming (washing face, washing hands, and shampooing hair).
Enter Code
0. Able to bathe self in shower or tub independently, including getting in and out of tub/shower.
1. With the use of devices, is able to bathe self in shower or tub independently, including getting in and out of the tub/shower.
2. Able to bathe in shower or tub with the intermittent assistance of another person:
a. for intermittent supervision or encouragement or reminders, OR
b. to get in and out of the shower or tub, OR
c. for washing difficult to reach areas.
3. Able to participate in bathing self in shower or tub, but requires presence of another person throughout the bath for assistance or supervision.
4. Unable to use the shower or tub, but able to bathe self independently with or without the use of devices at the sink, in chair, or on commode.
5. Unable to use the shower or tub, but able to participate in bathing self in bed, at the sink, in bedside chair, or on commode, with the assistance or supervision of another person.
6. Unable to participate effectively in bathing and is bathed totally by another person.
Common Problems:
Includes getting to the location
Shower vs Sponge
Too many response 4
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## M1830 Bathing

*Trigger Words:*
-Can patient get in Tub or Shower?
-With or Without Device?
-Continuous or Intermittent assist?

### M1830 Bathing

Tub or Shower?

**YES**

- 0 Independent (NO Device)
- 1 Independent (WITH Device)
- 2 Intermittent Assist
- 3 Continuous Assist
- 6 Unable to Participate

**No**

- 4 Independent Sponge—Has to be able to draw own water
- 5 Assist Sponge—Intermittent or Continuous
- 6 Unable to Participate

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## M1840 Toilet Transferring

| M1840. Toilet Transferring<br>Current ability to get to and from the toilet or bedside commode safely and transfer on and off toilet/commode. | |
|---|---|
| Enter Code | 0. Able to get to and from the toilet and transfer independently with or without a device.<br>1. When reminded, assisted, or supervised by another person, able to get to and from the toilet and transfer.<br>2. Unable to get to and from the toilet but is able to use a bedside commode (with or without assistance).<br>3. Unable to get to and from the toilet or bedside commode but is able to use a bedpan/urinal independently.<br>4. Is totally dependent in toileting. |

- Do they have a bedside commode? Bedpan?
- Can they get to the bathroom? Option 1 is all kinds of assistance.
- Are you documenting that they are unable to get to the bathroom and on and off the toilet safely even with help?
- >50% of the time

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## M1840 Toilet Transfers

*Trigger Words:*
-Toilet?
-Commode?
-Bed Pan?

### M1840 Toilet Transfers

- 0
  - Independent with OR without Device
  - NO Human Assist
- 1
  - Can get to/from Toilet AND transfer WITH Human Assist
  - Assist may be verbal cues, SBA, physical assist
- 2
  - Cannot get to the Toilet
  - Able to use Bedside Commode with or without assist
- 3
  - Cannot use Toilet or Commode
  - Can use Bedpan/Urinal Independently
- 4
  - Cannot use toilet, commode or bedpan/urinal
  - Equipment not present to allow assessment

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## M1850 - Underscoring

| M1850. Transferring<br>Current ability to move safely from bed to chair, or ability to turn and position self in bed if patient is bedfast. | |
|---|---|
| Enter Code | 0. Able to independently transfer.<br>1. Able to transfer with minimal human assistance or with use of an assistive device.<br>2. Able to bear weight and pivot during the transfer process but unable to transfer self.<br>3. Unable to transfer self and is unable to bear weight or pivot when transferred by another person.<br>4. Bedfast, unable to transfer but is able to turn and position self in bed.<br>5. Bedfast, unable to transfer and is unable to turn and position self. |

**Common Problems:**
- Too many 1s when should be a 2
- Not using 3 when appropriate

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## M1850 Transfers

***Trigger Words:***
-Device?
-Human Assist?

*Min Assist <25% of effort

*Weight bearing and pivoting can be done with arms!

*Ability can be limited by physical, cognitive, and sensory impairments as well as environmental barriers.

**M1850 Transfers**

0
- Complete Independence
- **NO** Human Assist OR Device

1
- Transfer WITH Minimal Human Assist **OR** Device NOT BOTH
- Assist may be verbal cues, SBA, physical assist

2
- Transfer with BOTH Device **AND** Assist
- Assist may be verbal cues, SBA, physical assist
- Transfer with Weight Bearing **AND** Pivot
- May be with No Device but MORE than Min Human Assist

3
- Unable to Bear Weight OR Pivot
- Hoyer Lift transfers captured here

4
- Bedfast
- Able to help turn

5
- Bedfast
- Unable to help turn

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## M1860 – Payment vs Quality

| M1860. Ambulation/Locomotion<br>Current ability to walk safely, once in a standing position, or use a wheelchair, once in a seated position, on a variety of surfaces. | |
|---|---|
| Enter Code | 0. Able to independently walk on even and uneven surfaces and negotiate stairs with or without railings (specifically: needs no human assistance or assistive device).<br>1. With the use of a one-handed device (for example, cane, single crutch, hemi-walker), able to independently walk on even and uneven surfaces and negotiate stairs with or without railings.<br>2. Requires use of a two-handed device (for example, walker or crutches) to walk alone on a level surface and/or requires human supervision or assistance to negotiate stairs or steps or uneven surfaces.<br>3. Able to walk only with the supervision or assistance of another person at all times.<br>4. Chairfast, unable to ambulate but is able to wheel self independently.<br>5. Chairfast, unable to ambulate and is unable to wheel self.<br>6. Bedfast, unable to ambulate or be up in a chair. |

**Common Problems:**
- Difference between 2 and 3
- When to score chairfast
- Quality Vs Reimbursement

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## M1860 Ambulation

*Trigger Words:*
-1 handed or 2 handed device?
-Intermittent or Continuous Assist?

Assist may be verbal cues, SBA, or physical

**M1860 Ambulation**

0
- Complete Independence
- NO Human Assist OR Device on any surface or on stairs

1
- One Handed Device
- NO Human Assist
- Even and Uneven surfaces and stairs

2
- 2 Handed Device With or Without assistance
- With or without a device requiring INTERMITTENT Human Assistance on Stairs or uneven surfaces

3
- CONTINUOUS Human Assist (verbal, SBA, or physical) with OR without device
- Pt has NO Device and is not safe walking alone
- Ambulatory – not for chairfast or Bedbound patients

4
- Unable to ambulate safely with human assist and/or device
- 1 or 2 steps only = CHAIRFAST
- Able to wheel self INDEPENDENTLY

5
- Unable to ambulate safely with human assist and/or device
- 1 or 2 steps only = CHAIRFAST
- UNABLE to wheel self INDEPENDENTLY or does not have a wheelchair

6
- Unable to ambulate
- Unable to tolerate being out of bed

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## Quiz Time

Mr. J uses his walker with moderate assistance from you to get to the restroom, sit on the toilet, and stand back up with maximum assistance. Mr J has a bedside commode in his bedroom so he does not have to go down the hall during the night. **What should you score Mr. J on M1840 Toileting?**

1. **When reminded, assisted, or supervised by another person, able to get to and from the toilet and transfer.**
2. **Unable to get to and from the toilet but is able to use a bedside commode (with or without assistance).**
3. **Unable to get to and from the toilet or bedside commode but is able to use a bedpan/urinal independently.**
4. **Is totally dependent in toileting.**

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## What are M1800s used for?

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## Which OASIS Items in 2025?

| Star (Outcome/Process) | PDGM (Payment) | VBP (Outcomes) | 2025 VBP (Outcomes) |
|---|---|---|---|
| • M0102/M0104<br>• M1860<br>• M1850<br>• M1830<br>• M1400<br>• M2020 | • M1033<br>• M1800<br>• M1810<br>• M1820<br>• M1830<br>• M1840<br>• M1850<br>• M1860 | • M1800, M1810, M1820, M1830, M1845, M1870<br>• M1840, M1850, M1860<br>• M2420<br>• M1400<br>• M2020<br>+/- 5% | • M1400<br>• M2020<br>• GG0130A<br>• GG0130B<br>• GG0130C<br>• GG0170A<br>• GG0170C<br>• GG0170D<br>• GG0170E<br>• GG0170F<br>• GG0170I<br>• GG0170J<br>• GG0170R<br>+/- 5% |

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## CHANGES in HH VBP Quality Measures

| Current Measure Category | Measures Removed | Replacement Measure Category | Replacement Measures 2025 |
|---|---|---|---|
| OASIS-based | TNC Change in Self-Care<br>TNC Change in Mobility | OASIS-based | Discharge Function Score (DC Function) |
| OASIS-based | Discharged to Community | Claims-based | Discharge to Community – Post Acute Care (DTC-PAC) |
| Claims-based | Acute Care Hospitalization (ACH)<br>Emergency Department Use without Hospitalization (ED Use) | Claims-based | Home Health Within-Stay Potentially Preventable Hospitalization (PPH) |

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## DC Function Measure: OASIS Items

| Item | Item Description |
|---|---|
| GG0130A | Eating |
| GG0130B | Oral Hygiene |
| GG0130C | Toileting Hygiene |
| GG0170A | Roll Left and Right |
| GG0170C | Lying to Sitting on Side |
| GG0170D | Sit to Stand |
| GG0170E | Chair/Bed-to-Chair Transfer |
| GG0170F | Toilet Transfer |
| GG0170I | Walk 10 Feet |
| GG0170J | Walk 50 Feet with 2 Turns |
| GG0170R | Wheel 50 Feet with 2 Turns |

- 10 GG items used to score 10-60
- The observed discharge function score is the sum of individual function items at discharge if scored with a 1-6.
- If an ANA score is used the imputation occurs
- Different locomotion items are used if the patient uses a wheelchair than for the remaining patients.

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To have a Quality of Patient Care Star Rating, HHAs must have submitted data to calculate at least 5 of 7 measures

Effective May 2024, CMS replaced the Acute Care Hospitalization measure with the Home Health Within-Stay Potentially Preventable Hospitalization measure.

July Reports: OASIS data from July 1, 2024 to March 31, 2025 ; claims data from January 1, 2024 to December 31, 2024.(Your April report included 2024 OASIS data)

For a measure to be reported on Care Compare, HHAs must have data for at least 20 completed quality episodes or stays with end dates within the 12-month reporting period.

Completed episodes for the OASIS-based measures are paired start or resumption of care and end of care OASIS assessments.

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## Sample Star Rating

| | | Measure Score Cut Points by Initial Decile Rating | | | | | | |
|---|---|---|---|---|---|---|---|---|
| 1 | Initial Group Rating | Measure 1. Timely Initiation of Care | Measure 2. Improvement in Management of Oral Medications | Measure 3. Improvement in Ambulation | Measure 4. Improvement in Bed Transferring | Measure 5. Improvement in Bathing | Measure 6. Improvement in Dyspnea | Measure 7. Home Health Within-Stay Potentially Preventable Hospitalization (PPH) |
| 2 | 0.5 | 0.0-82.6 | 0.0-55.0 | 0.0-61.7 | 0.0-59.9 | 0.0-66.2 | 0.0-62.1 | 14.0-100.0 |
| 3 | 1.0 | 82.7-90.0 | 55.1-67.5 | 61.8-73.2 | 60.0-72.6 | 66.3-77.3 | 62.2-75.5 | 12.4-13.9 |
| 4 | 1.5 | 90.1-94.1 | 67.6-75.4 | 73.3-79.6 | 72.7-80.0 | 77.4-82.9 | 75.6-82.2 | 11.3-12.3 |
| 5 | 2.0 | 94.2-96.2 | 75.5-80.4 | 79.7-83.4 | 80.1-84.5 | 83.0-86.4 | 82.3-86.2 | 10.5-11.2 |
| 6 | 2.5 | 96.3-97.7 | 80.5-83.9 | 83.5-86.2 | 84.6-87.2 | 86.5-88.7 | 86.3-88.8 | 9.8-10.4 |
| 7 | 3.0 | 97.8-98.7 | 84.0-86.9 | 86.3-88.5 | 87.3-89.2 | 88.8-90.8 | 88.9-90.9 | 9.2-9.7 |
| 8 | 3.5 | 98.8-99.3 | 87.0-89.2 | 88.6-90.6 | 89.3-90.9 | 90.9-92.6 | 91.0-92.6 | 8.6-9.1 |
| 9 | 4.0 | 99.4-99.7 | 89.3-91.7 | 90.7-92.8 | 91.0-92.8 | 92.7-94.5 | 92.7-94.5 | 7.9-8.5 |
| 10 | 4.5 | 99.8-99.9 | 91.8-95.7 | 92.9-95.7 | 92.9-95.4 | 94.6-97.4 | 94.6-97.7 | 7.1-7.8 |
| 11 | 5.0 | 100.0-100.0 | 95.8-100.0 | 95.8-100.0 | 95.5-100.0 | 97.5-100.0 | 97.8-100.0 | 0.0-7.0 |
| 12 | Your HHA Score | 99.2 | 90.9 | 89.9 | 92.2 | 92.4 | 90.2 | 12.9 |
| 13 | Your Initial Group Rating | 3.5 | 4.0 | 3.5 | 4.0 | 3.5 | 3.0 | 1.0 |
| 14 | Your Episodes in the Numerator | 3,235 | 1,965 | 1,995 | 2,026 | 2,068 | 1,776 | 133 |
| 15 | Your Episodes in the Denominator | 3,260 | 2,129 | 2,189 | 2,191 | 2,196 | 1,938 | 1,022 |
| 16 | National (All HHA) Middle Score | 97.8 | 83.9 | 86.3 | 87.2 | 88.8 | 88.9 | 9.8 |
| 17 | Your Statistical Test Probability Value (p-value) | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.036 | 0.001 |
| 18 | Your Statistical Test Results (Is the p-value < 0.057) | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| 19 | Your HHA Adjusted Group Rating | 3.5 | 4.0 | 3.5 | 4.0 | 3.5 | 3.0 | 1.0* |

| | | |
|---|---|---|
| 20 | Your Average Adjusted Rating | 3.2 |
| 21 | Your Average Adjusted Rating Rounded | 3.0 |
| 22 | **Your Quality of Patient Care Star Rating (1.0 to 5.0)** | **(3.5 stars)** |

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## OASIS Points Table CY2025 - FINAL

| OASIS Item | OASIS Answer | CY2023 | CY2024 | CY2025 |
|---|---|---|---|---|
| M1800 | 0 or 1 | 0 | 0 | 0 |
| | 2 or 3 | 3 | 3 | 3 |
| M1810 | 0 or 1 | 0 | 0 | 0 |
| | 2 or 3 | 5 | 5 | 5 |
| M1820 | 0 or 1 | 0 | 0 | 0 |
| | 2 | 4 | 3 | 3 |
| | 3 | 12 | 11 | 11 |
| M1830 | 0 or 1 | 0 | 0 | 0 |
| | 2 | 2 | 0 | 3 |
| | 3 or 4 | 10 | 7 | 10 |
| | 5 or 6 | 17 | 14 | 18 |
| M1840 | 0 or 1 | 0 | 0 | 0 |
| | 2, 3 or 4 | 6 | 6 | 5 |
| M1850 | 0 | 0 | 0 | 0 |
| | 1 | 3 | 3 | 1 |
| | 2,3,4 or 5 | 6 | 6 | 4 |
| M1860 | 0 or 1 | 0 | 0 | 0 |
| | 2 | 6 | 6 | 6 |
| | 3 | 5 | 4 | 2 |
| | 4,5, or 6 | 20 | 20 | 18 |
| M1033 | 4 or more items checked | 10 | 11 | 12 |

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## CY2024-CY2025 Clinical Group Threshold

| Clinical Group | Low 2023 | Low 2024 | Low 2025 | Med 2023 | Med 2024 | Med 2025 | High 2023 | High 2024 | High 2025 |
|---|---|---|---|---|---|---|---|---|---|
| MS Rehab | 0 - 33 | 0-28 | 0-29 | 34 - 45 | 29-41 | 30-43 | 46+ | 42+ | 44+ |
| Neuro Rehab | 0 - 35 | 0-34 | 0-33 | 36 - 51 | 35-49 | 34-49 | 52+ | 50+ | 50+ |
| Wound | 0 - 33 | 0-28 | 0-32 | 34 - 51 | 29-49 | 33-48 | 52+ | 50+ | 49+ |
| Complex Nursing | 0 - 33 | 0-28 | 0-29 | 34 - 54 | 29-52 | 30-52 | 55+ | 53+ | 53+ |
| Behavioral Health | 0 - 31 | 0-28 | 0-28 | 32 - 43 | 29-41 | 29-44 | 44+ | 42+ | 45+ |
| MMTA Aftercare | 0 - 33 | 0-28 | 0-27 | 34 - 43 | 29-39 | 28-40 | 44+ | 40+ | 41+ |
| MMTA Cardiac | 0 - 31 | 0-28 | 0-27 | 32 - 43 | 29-41 | 28-40 | 44+ | 42+ | 41+ |
| MMTA Endocrine | 0 - 30 | 0-27 | 0-27 | 31 - 43 | 28-39 | 28-40 | 44+ | 40+ | 41+ |
| MMTA GI/GU | 0 - 33 | 0-31 | 0-32 | 34 - 49 | 32-46 | 33-47 | 50+ | 47+ | 48+ |
| MMTA Infection | 0 - 33 | 0-28 | 0-31 | 34 - 45 | 29-43 | 32-44 | 46+ | 44+ | 45+ |
| MMTA Respiratory | 0 - 33 | 0-29 | 0-32 | 34 - 46 | 30-44 | 33-44 | 47+ | 45+ | 45+ |
| MMTA Other | 0 - 32 | 0-28 | 0-28 | 33 - 43 | 29-41 | 29-43 | 44+ | 42+ | 44+ |

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## Final CY2025 Functional Impairment Threshold Visual Chart

| Points | MMTA AFTER | MMTA CARDIAC | MMTA ENDO | MMT GI/GU | MMTA INFECT | MMTA RESP | MMTA OTHER | Neuro Rehab | Wound | Complex | MS Rehab | BH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 0 - 27 | Low | Low | Low | Low | Low | Low | Low | Low | Low | Low | Low | Low |
| 28 | Medium | Medium | Medium | Low | Low | Low | Low | Low | Low | Low | Low | Low |
| 29 | Medium | Medium | Medium | Low | Low | Low | Medium | Low | Low | Low | Low | Medium |
| 30 | Medium | Medium | Medium | Low | Low | Low | Medium | Low | Low | Medium | Medium | Medium |
| 31 | Medium | Medium | Medium | Low | Low | Low | Medium | Low | Low | Medium | Medium | Medium |
| 32 | Medium | Medium | Medium | Low | Medium | Low | Medium | Low | Low | Medium | Medium | Medium |
| 33 | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Low | Medium | Medium | Medium | Medium |
| 34 | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium |
| 35 | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium |
| 36 | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium |
| 37 | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium |
| 38 | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium |
| 39 | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium |
| 40 | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium |
| 41 | High | High | High | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium |
| 42 | High | High | High | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium |
| 43 | High | High | High | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium | Medium |
| 44 | High | High | High | Medium | Medium | Medium | High | Medium | Medium | Medium | High | Medium |
| 45 | High | High | High | Medium | High | High | High | Medium | Medium | Medium | High | High |
| 46 | High | High | High | Medium | High | High | High | Medium | Medium | Medium | High | High |
| 47 | High | High | High | Medium | High | High | High | Medium | Medium | Medium | High | High |
| 48 | High | High | High | High | High | High | High | Medium | Medium | Medium | High | High |
| 49 | High | High | High | High | High | High | High | Medium | High | Medium | High | High |
| 50 | High | High | High | High | High | High | High | High | High | Medium | High | High |
| 51 | High | High | High | High | High | High | High | High | High | Medium | High | High |
| 52 | High | High | High | High | High | High | High | High | High | Medium | High | High |
| 53+ | High | High | High | High | High | High | High | High | High | High | High | High |

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## Example of Impact of Poor Coding and OASIS

Percent of Periods by Clinical Grouping
Provider

| | |
|---|---|
| MMTA Cardiac | 4.30% |
| MMTA Endocrine | 8.38% |
| MMTA GI/GU | 0.00% |
| MMTA Infectious | 3.23% |
| MMTA Other | 4.30% |
| MMTA Respiratory | 4.30% |
| MMTA Surgical | 6.45% |
| MS Rehab | 30.11% |
| Complex | 12.90% |
| Behavioral | 1.08% |
| Neuro | 17.20% |
| Wound | 11.76% |

Percent of Periods by Clinical Grouping
National

| | |
|---|---|
| MMTA Cardiac | 17.79% |
| MMTA Endocrine | 6.91% |
| MMTA GI/GU | 4.68% |
| MMTA Infectious | 4.69% |
| MMTA Other | 3.68% |
| MMTA Respiratory | 7.27% |
| MMTA Surgical | 3.46% |
| MS Rehab | 21.37% |
| Complex | 2.74% |
| Behavioral | 2.17% |
| Neuro | 10.99% |
| Wound | 14.24% |

Percent of Periods by Co-Morbidity
Provider

| | |
|---|---|
| None | 44.09% |
| Low | 47.31% |
| High | 8.60% |

Percent of Periods by Co-Morbidity
National

| | |
|---|---|
| None | 30.82% |
| Low | 52.50% |
| High | 16.68% |

Agency

| | |
|---|---|
| Percent Functional Low | 60.22% |
| Percent Functional Medium | 13.98% |
| Percent Functional High | 25.81% |

National

| | |
|---|---|
| Percent Functional Low | 29.79% |
| Percent Functional Medium | 31.81% |
| Percent Functional High | 38.39% |

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## Functional Score Percentages

**2025 Star Rating Data**

| | |
|---|---|
| Periods per Episode | 1.67 |
| Revenue per Period | $1,937 |
| Revenue per Episode | $3,225 |
| Visits per Period | 7.84 |
| Visits per Episode | 13.06 |
| Percent Early Periods | 32.59% |
| Average Early Case Mix | 1.26 |
| Average Case Mix | 0.99 |
| LUPA Rate | 7.25% |
| Percent Outliers | 3.72% |
| Percent Functional Low | 25.02% |
| Percent Functional Medium | 32.22% |
| Percent Functional High | 42.76% |
| Average Wage Index | 0.99 |
| Recert Rate | 28.00% |
| Total Revenue 2025 | $2,979,070,403 |

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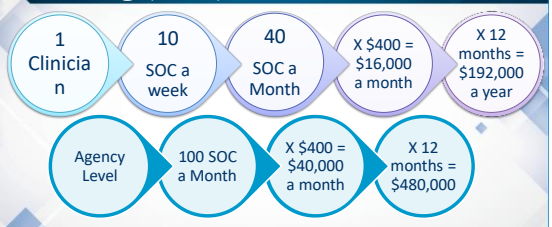
## Impact of Inaccurate OASIS Scoring ($400)

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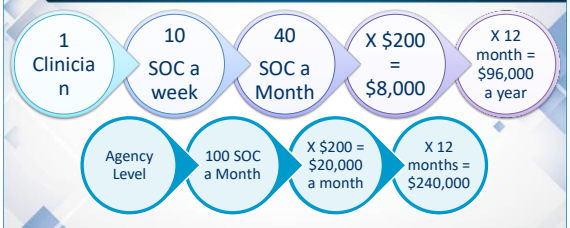
## Impact of Inaccurate OASIS Scoring ($200)

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## IPR/APR

Performance Summary for TNC Change Measures [b]

| Your HHA's count of eligible quality episodes [c] | 102 | | | | | |
|---|---|---|---|---|---|---|
| OASIS Item [d] | Changes in OASIS Item Responses between SOC/ROC and EOC as a Percent of Eligible Quality Episodes [e] | | | | | |
| | YOUR HHA | | | AVERAGE FOR YOUR HHA'S COHORT [f] | | |
| | % No Change | % Positive Change | % Negative Change | % No Change | % Positive Change | % Negative Change |
| **Total Normalized Composite (TNC) Change in Mobility** | | | | | | |
| M1840 Toilet Transferring (0-4) | 16% | 81% | 3% | 28% | 71% | 1% |
| M1850 Transferring (0-5) | 15% | 82% | 3% | 21% | 78% | 1% |
| M1860 Ambulation/Locomotion (0-6) | 14% | 81% | 5% | 19% | 79% | 1% |
| **Total Normalized Composite (TNC) Change in Self-Care** | | | | | | |
| M1800 Grooming (0-3) | 8% | 92% | 0% | 19% | 80% | 1% |
| M1810 Current Ability to Dress Upper Body (0-3) | 7% | 93% | 0% | 18% | 81% | 1% |
| M1820 Current Ability to Dress Lower Body (0-3) | 8% | 92% | 0% | 19% | 80% | 1% |
| M1830 Bathing (0-6) | 11% | 89% | 0% | 16% | 83% | 1% |
| M1845 Toileting Hygiene (0-3) | 9% | 91% | 0% | 20% | 79% | 1% |
| M1870 Feeding or Eating (0-5) | 31% | 68% | 1% | 44% | 54% | 2% |

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## Quiz Time

**In 2025, the M1800s will be used for:**

A. VBP, Star Ratings, and Payment
B. Payment only
C. Star Ratings and Payment
D. VBP and Star Ratings

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## What should you be doing now?

- Know your data! Look at your Interim Performance Reports, Annual Performance Reports, Star Rating reports, PDGM Impact Reports
- Educate staff on accurate and complete documentation and OASIS scoring
- Educate staff on PDGM, Star Ratings, and VBP….why what they do matters and how the OASIS can help guide them in care planning

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## Which OASIS Items?

| Star (Outcome/Process) | PDGM (Payment) | 2023/2024 VBP | 2025 VBP (Outcomes) |
|---|---|---|---|
| • M0102/M0104<br>• M1860<br>• M1850<br>• M1830<br>• M1400<br>• M2020 | • M1033<br>• M1800<br>• M1810<br>• M1820<br>• M1830<br>• M1840<br>• M1850<br>• M1860 | • M1800, M1810, M1820, M1830, M1845, M1870 M1840, M1850, M1860<br>• M1400<br>• M2020<br>• M2420<br>+/- 5% | • M1400<br>• M2020<br>• GG0130A<br>• GG0130B<br>• GG0130C<br>• GG0170A<br>• GG0170C<br>• GG0170D<br>• GG0170E<br>• GG0170F<br>• GG0170I<br>• GG0170J<br>• GG0170R<br>+/- 5% |

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## M1800 and the GGs

**M1800s**

- A. Payment
- B. Star (M1830, M1850, M1860)
- C. Risk adjustment is based on Functional levels (Low. Medium. High)

**GG**

- Discharge Function 20% of the Total Performance Score Beginning January 2025

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## Discharge Function

*20% of Total Performance Score*

| | |
|---|---|
| Measure Category | **OASIS-based** |
| Data Source | **Section GG** – Self-Care [GG0130 three (3) items], Mobility [GG0170 eight (8) items] |
| Measure Description | Proportion of HHA's episodes where a patient's observed discharge score meets or exceeds their expected discharge score. |
| Measure Calculation | **Numerator:** Number of quality episodes in an HHA with an observed discharge function score that is equal to or higher than the calculated expected discharge function score.<br>**Observed score: Sum of the individual items at discharge.**<br>**Expected score: Determined by applying a regression equation determined from risk adjustment to each home health episode.**<br>**Denominator:** Total number of home health quality episodes with an OASIS record in the measure target period [four (4) quarters] that do not meet the exclusion criteria.<br>**Measure-specific Exclusions:** Episodes that end with unexpected inpatient facility transfer, death, or discharge to hospice; patient less than 18 years old; coma or vegetative state; episodes less than three (3) days. |
| Measure Type | End Result Outcome – Health |

Observed ≥ Expected

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## Simplified

**Observed Score**

- Actual score at DC from responding to 10 (or 9 with wheeling counted twice) GG items with ANAs imputed to 1-6

**Expected Score**

- All imputed based on responses to ALL GG items and other OASIS items at SOC or ROC.

**Observed ≥ Expected**

$$\frac{\text{Number of HHA's quality episodes where observed discharge score} \geq \text{expected discharge score}}{\text{Total number of HHA's episodes}} * 100$$

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## DC Function Measure: OASIS Items

| Item | Item Description |
|---|---|
| GG0130A | Eating |
| GG0130B | Oral Hygiene |
| GG0130C | Toileting Hygiene |
| GG0170A | Roll Left and Right |
| GG0170C | Lying to Sitting on Side |
| GG0170D | Sit to Stand |
| GG0170E | Chair/Bed-to-Chair Transfer |
| GG0170F | Toilet Transfer |
| GG0170I | Walk 10 Feet |
| GG0170J | Walk 50 Feet with 2 Turns |
| GG0170R | Wheel 50 Feet with 2 Turns |

- 10 GG items used to score 10-60
- The observed discharge function score is the sum of individual function items at discharge if scored with a 1-6.
- If an ANA score is used, the imputation occurs
- Different locomotion items are used if the patient uses a wheelchair than for the remaining patients.

CMS has RFI

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## Walking vs Wheeling

- **If:**
  - Walk 10 Feet (GG0170I) has an activity not attempted (ANA) code at both admission **and** discharge **AND**
  - (ii) either Wheel 50 Feet with 2 Turns (GG0170R) or Wheel 150 Feet (GG0170S) has a code between 1 and 6 at either admission or discharge.
- **Then:**
  - Multiply the wheel 50 feet score x2
- Otherwise use scores from Walk 10 feet + Walk 50 feet
- In either case, 10 items are used to calculate a patient's total observed discharge score and score values range from 10 – 60.

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## Knee Surgery – Both start as a 29 – What is the expectation?

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Expectation 58

| Item | Item Description | |
|---|---|---|
| GG0130A | Eating | 6 |
| GG0130B | Oral Hygiene | 6 |
| GG0130C | Toileting Hygiene | 3 |
| GG0170A | Roll Left and Right | 2 |
| GG0170C | Lying to Sitting on Side | 2 |
| GG0170D | Sit to Stand | 2 |
| GG0170E | Chair/Bed-to-Chair Transfer | 2 |
| GG0170F | Toilet Transfer | 2 |
| GG0170I | Walk 10 Feet | 2 |
| GG0170J | Walk 50 Feet with 2 Turns | 2 |
| GG0170R | Wheel 50 Feet with 2 Turns | |

Expectation 48

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## Covariate Groups Used to Risk-Adjust DC Function Score

| | |
|---|---|
| Age Category (M0066 DOB) | Admission Source (M0100 RFA, M1000) |
| Admission Function Score (Same as DC) | ALL GG0130 & GG0170 used for Imputation |
| Body Mass Index (M1060) | Risk for Hospitalization (M1033) |
| Prior surgery (Z40-Z53) | HCC Comorbidities (M1021, M1023) |
| Prior Function (GG0100) | Prior Device Use (GG0110) |
| Pressure Ulcers (M1311) | Incontinence (M1610, M1620) |
| Cognitive Function (M1700) | Confusion (M1710) |
| Oral Medication Management Needs (M2020) | Supervision and Safety Sources of Assistance (M2102f) |
| Availability of Assistance and Living Arrangement (M1100) | |

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## Risk Adjustment for DC Function Score

- Utilizes a different risk model
- Captured at SOC/ROC and DC
- SOC/ROC coefficients are different
- Includes imputation model
- Began in HHVBP Jan 2025
- Began collecting data in 2023

| | GG0130A3 | |
|---|---|---|
| OASIS | SOC/ROC | DC |
| Bladder Incontinence: Incontinent | 0.0286 | 0.0242 |
| Bladder Incontinence: Catheter | 0.0221 | -0.0133 |

https://www.cms.gov/medicare/quality/home-health/home-health-quality-measures

DC-Function-Imputation-Appendix-HH (XLSX)

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## Largest Pitfall of the GGs

- Overuse of 'Activity Not Assessed' (ANA) Codes
- Mixing guidance between M1800s and GGs
  - Majority of Tasks applies only to 3 items—M1800, M1810, and M1820
  - Assistance and Device vs Assistance
  - Stand-by, Supervision and any amount of Assistance in one score vs different scores for different amounts of assistance
- General Bias
  - "I answer all those an 88 because I think the therapist should be answering those."

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## GG Item Response Options

| Category | GG Items Response | Response Description |
|---|---|---|
| Patient Functional Status Assessed | 6 | Independent |
| | 5 | Setup or clean-up assistance |
| | 4 | Supervision or touching assistance |
| | 3 | Partial/moderate assistance |
| | 2 | Substantial/maximal assistance |
| | 1 | Dependent |
| Activity Not Attempted (ANA) codes | 7 | Patient refused |
| | 9 | Not applicable |
| | 10 | Not attempted due to environmental limitations |
| | 88 | Not attempted due to medical condition or safety concerns |
| Other NA codes | ^ | Skip pattern |
| | - | Not assessed/no information |

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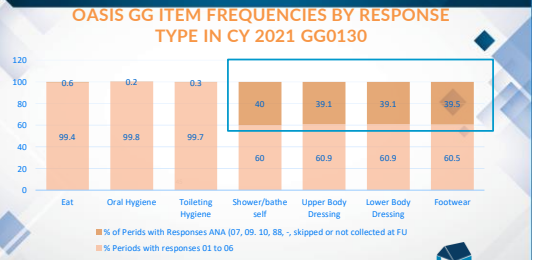
## ANA Problems

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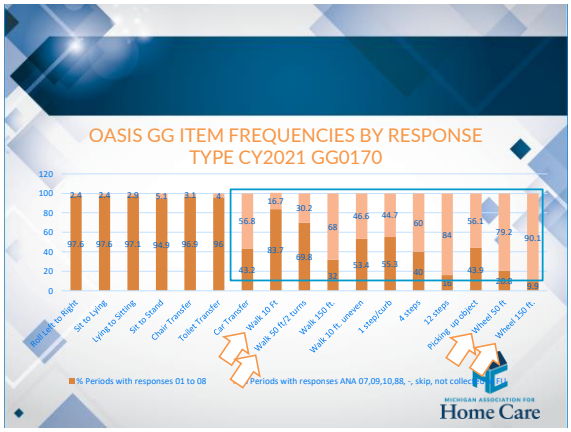


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## ANA

- **Code 07, Patient refused,** if the patient refused to complete the activity and no other Performance or "activity not attempted" code is applicable.
  - Allows for collection a different day in the timeframe
- **Code 09, Not applicable,** if the patient did not attempt to perform the activity and did not perform this activity prior to the current illness, exacerbation, or injury.
- **Code 10, Not attempted due to environmental limitations,** if the patient did not attempt this activity due to environmental limitations. Examples include lack of equipment, and weather constraints.
  - Determine by interview, completion of similar activities
- **Code 88, Not attempted due to medical condition or safety concerns,** if the activity was not attempted due to medical condition or safety concerns, and the activity was completed prior to the current illness, exacerbation, or injury.
- **A Dash** is a valid response for this item. Dash indicates "no information." CMS expects dash use to be a rare occurrence.

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## Example

Patient with recent shoulder surgery. Requires walker for safety. Now has platform walker.

| Item | Item Description |
|---|---|
| GG0130A | Eating |
| GG0130B | Oral Hygiene |
| GG0130C | Toileting Hygiene |
| GG0170A | Roll Left and Right |
| GG0170C | Lying to Sitting on Side |
| GG0170D | Sit to Stand |
| GG0170E | Chair/Bed-to-Chair Transfer |
| GG0170F | Toilet Transfer |
| GG0170I | Walk 10 Feet |
| GG0170J | Walk 50 Feet with 2 Turns |
| GG0170R | Wheel 50 Feet with 2 Turns |

| Score | Points |
|---|---|
| 06 | 6 |
| 05 | 5 |
| 04 | 4 |
| 88 | Imputed |
| 03 | 3 |
| 03 | 3 |
| 03 | 3 |
| 03 | 3 |
| 05 | 5 |
| 88 | Imputed |
| NA | |

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+
Imputed

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## Example

Patient with recent stroke. Requires helper to wheel wheelchair.
Requires verbal cues for most ADLs with variation of assistance.

| Item | Item Description |
|---|---|
| GG0130A | Eating |
| GG0130B | Oral Hygiene |
| GG0130C | Toileting Hygiene |
| GG0170A | Roll Left and Right |
| GG0170C | Lying to Sitting on Side |
| GG0170D | Sit to Stand |
| GG0170E | Chair/Bed-to-Chair Transfer |
| GG0170F | Toilet Transfer |
| GG0170I | Walk 10 Feet |
| GG0170J | Walk 50 Feet with 2 Turns |
| GG0170R | Wheel 50 Feet with 2 Turns |

| Score | Points |
|---|---|
| 04 | 4 |
| 04 | 4 |
| 03 | 3 |
| 03 | 3 |
| 02 | 2 |
| 02 | 2 |
| 01 | 1 |
| 03 | 3 |
| 88 | Imputed |
| 88 | Imputed |
| 01 | 1x2 |

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ANA at SOC and DC

Count this score twice

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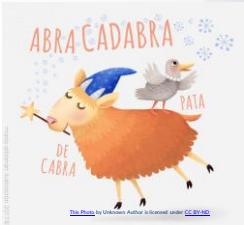
## Answering the GG Items is a BIG DEAL!

- Activity Not Assessed (ANA) responses are IMPUTED to a 01 to 06 response
- Discharge responses are imputed (what should the score be, based on the other info in the assessment?) and compared to the agency response
- We do not want CMS guessing for us!

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## 2025 Achievement Thresholds and Benchmarks

Preliminary Achievement Thresholds and Benchmarks

| Measure | Data Period [b] | Achievement Threshold [c] | | Benchmark [c] | |
|---|---|---|---|---|---|
| | | Smaller-volume Cohort | Larger-volume Cohort | Smaller-volume Cohort | Larger-volume Cohort |
| **OASIS-based Measures** | | | | | |
| Discharge Function (DC Function) | 12-31-2023 | 51.355 | 62.350 | 91.426 | 83.179 |
| Improvement in Dyspnea | 12-31-2023 | 83.260 | 89.672 | 100.000 | 99.422 |
| Improvement in Management of Oral Medications | 12-31-2023 | 73.666 | 85.175 | 99.997 | 98.746 |
| **Claims-based Measures** | | | | | |
| Discharge to Community – Post Acute Care (DTC-PAC) | 12-31-2023 | 71.390 | 80.510 | 88.390 | 90.123 |
| Potentially Preventable Hospitalizations (PPH) | 12-31-2023 | 9.750 | 9.760 | 7.254 | 6.081 |
| **HHCAHPS Survey-based Measures** | | | | | |
| Care of Patients | 12-31-2023 | - | 89.507 | - | 94.585 |
| Communications Between Providers and Patients | 12-31-2023 | - | 86.821 | - | 93.192 |
| Specific Care Issues | 12-31-2023 | - | 82.373 | - | 91.297 |
| Overall Rating of Home Health Care | 12-31-2023 | - | 86.328 | - | 94.687 |
| Willingness to Recommend the Agency | 12-31-2023 | - | 80.226 | - | 91.391 |

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## January IPR

| Measure | Baseline Year Data Period [b] | Your HHA's Improvement Threshold | Your HHA's Percentile Ranking Within Your HHA's Cohort [c] | Your HHA's Cohort Statistics [d] | | | |
|---|---|---|---|---|---|---|---|
| | | | | 25th Percentile | 50th Percentile | 75th Percentile | 99th Percentile |
| **OASIS-based Measures** | | | | | | | |
| Discharge Function (DC Function) | 12-31-2023 ⚠ | 71.430 | ≥75 | 51.180 | 62.350 | 70.090 | 91.260 |
| Improvement in Dyspnea | 12-31-2023 | 88.000 | 25-49 | 81.109 | 89.672 | 94.382 | 100.000 |
| Improvement in Management of Oral Medications | 12-31-2023 | 86.040 | 50-74 | 75.179 | 85.175 | 91.280 | 100.000 |
| **Claims-based Measures** | | | | | | | |
| Discharge to Community – Post Acute Care (DTC-PAC) | 12-31-2023 | 90.780 | ≥75 | 73.550 | 80.510 | 84.980 | 92.670 |
| Potentially Preventable Hospitalizations (PPH) | 12-31-2023 | 8.170 | 50-74 | 11.720 | 9.760 | 8.110 | 5.080 |
| **HHCAHPS Survey-based Measures** | | | | | | | |
| Care of Patients | 12-31-2023 | 88.798 | 25-49 | 87.076 | 89.507 | 91.524 | 96.319 |
| Communications Between Providers and Patients | 12-31-2023 | 86.546 | 25-49 | 83.649 | 86.821 | 89.355 | 95.125 |
| Specific Care Issues | 12-31-2023 | 85.364 | 50-74 | 77.812 | 82.373 | 86.020 | 93.984 |
| Overall Rating of Home Health Care | 12-31-2023 | 86.092 | 25-49 | 82.336 | 86.328 | 89.659 | 97.805 |
| Willingness to Recommend the Agency | 12-31-2023 | 79.242 | 25-49 | 74.880 | 80.228 | 84.714 | 95.268 |

Your score in 2023

Median of Peers in 2023

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## Strategies

- First and foremost—educate your staff on responding to GG items accurately
- Answer ANA only in limited circumstances
- Utilize therapies
- Quit NBD, BOD, DDC

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## Questions??

- LisaSelman-Holman@McBeeAssociates.com

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# The End

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