From: Wally Stephens [wstephens@professionalhc.com]

Sent: Monday, April 06, 2009 3:07 PM

To: FN-OMB-OIRA-Submission Subject: OASIS - C comments

CMS Officer,

I would like to suggest that for MO item 780 (Management of Oral Medications) assessment strategies, it would be better not to use the convention "most of the time". A person may take all of his or her supplements correctly, but not coumadin, for instance. They would then be taking most of their medications correctly, but not a very important medication. The OASIS answer would then indicate a "0" response, when that would not really reflect their ability and safety with all medications.

My suggestion is then to do away with the convention "most of the time" for this MO item to more accurately reflect their ability with all medications.

Thanks.

Wally Stephens, RN

Director of Quality Improvement

Professional Healthcare at Home