

Board Statement:

OASIS Medical Drug Regimen Review

The Mississippi State Board of Physical Therapy (Board) has received several inquiries regarding the Medication section of the Outcome and Assessment Information Set (OASIS–E) used by Home Health Agencies serving the Medicare and Medicaid populations. Under federal regulations, 42 C.F.R. Section 484.55, the Medication section consists of a drug regimen review.

The drug regimen review involves a “review of all medications the patient is currently using in order to identify any potential adverse effects and drug reactions, including ineffective drug therapy, significant side effects, significant drug interactions, duplicate drug therapy, and noncompliance with drug therapy.” The drug regimen review also requires that the patient and caregiver receive education on high risk education and reporting problems that may occur.

It is the opinion of the Board that the drug regimen review is generally outside of the scope of practice of the physical therapist. However, the physical therapist may complete the drug regimen review and education items of OASIS-E if the agency for which he or she is working has established policies and procedures allowing the physical therapist to work collaboratively with other appropriate practitioners in order to complete the Medication section of OASIS-E. Such procedures must include protocols requiring supervisory review and control over the Medication portion of the OASIS-E and supervisory documentation of the drug regimen review performed on each patient.

With the above-described procedures in place, the physical therapist is authorized to carry out the following tasks in completing the Medication section of OASIS-E:

- Gather information on all medications used by the patient.
- Document the medication information and report the information to a designated agency drug regimen reviewer.
- Document the receipt of findings from the drug regimen reviewer and record on the OASIS assessment the action(s), if any, taken to address issues identified by the agency drug regimen reviewer.

The Board would remind physical therapists that, in completing the assessment under OASIS-E, the physical therapist must not only act within the scope of practice but also must be competent to provide a service. Competency means that the service is also within the scope of the physical therapist’s abilities and expertise.