

Home Health Line Tool

Updated CMS guidance for J1800 and J1900

Changes to response guidance for J1800 and J1900 were reportedly effective Jan. 1, 2026, according to CMS' Quarterly OASIS Q&As released Nov. 20. However, CMS has yet to publish the specifics on the changes in an errata. A draft update to the OASIS Guidance Manual, effective with OASIS-E2 on April 1, 2026, does include new guidance for the measures.

Here's a breakdown of the key pieces of new information in the draft manual update, released Dec. 18.

J1800 (Any falls since SOC/ROC)

Definition

A fall due to an overwhelming external force (e.g., a patient pushes another patient) **is considered a fall**.

An intercepted fall is considered a fall. An intercepted fall occurs when the patient would have fallen if they had not caught themselves or had not been intercepted by another person. However, an anticipated loss of balance resulting from a supervised therapeutic intervention where the patient's balance is being intentionally challenged during balance training is not considered an intercepted fall.

- **An exception** is if a major injury results from a fall or intercepted fall that occurs when a clinician is intentionally challenging a patient's balance during balance training. This would be reported as both a fall and a major injury in J1800 (Any falls since SOC/ROC) and J1900 (Number of falls since SOC/ROC).

J1900 (Number of falls since SOC/ROC)

Examples of injury and major injury are removed in the instrument and replaced with "As described in the OASIS manual."

Definition

INJURY (EXCEPT MAJOR): Includes **but is not limited to** skin tears, abrasions, lacerations, superficial bruises, hematomas and sprains; or any fall-related injury that causes the patient to complain of pain.

MAJOR INJURY: Includes **but is not limited to** bone fractures, joint dislocations/subluxations, internal organ injuries, amputations, spinal cord injuries, head injuries and crush injuries.

Example

The therapist had a patient, who has Parkinson's disease, stand on one foot during their therapy session to intentionally challenge the patient's balance. Despite safety precautions, including contact guard assistance and safety mats, the patient fell while standing on one foot and landed on their left side. Due to pain and swelling in their left wrist, the physician ordered a left wrist X-ray for the patient. The X-ray confirmed a distal radius fracture (non-displaced) of the left wrist.

- **Coding:** J1800 would be coded "1, Yes" and J1900C would be coded "1, One."
- **Rationale:** Despite the safety precautions in place the patient sustained a radius fracture, a major injury, during a therapeutic intervention with physical therapy where their balance was being intentionally challenged. This is considered a fall as there was a major injury even though the fall and major injury occurred when the patient's balance was being intentionally challenged.

Differentiating Traumatic versus Pathological Fractures

A home health patient with osteoporosis falls, resulting in a right hip fracture. The emergency department physician confirms that the fracture is a result of the patient's bone disease and not a result of the fall.

- **Coding:** J1800 would be coded "1, Yes" and J1900C would be coded "0, None."
- **Rationale:** The physician determined that the fracture was a pathological fracture and was a result of osteoporosis. Because it is not considered a traumatic fracture it would not be considered a major injury.

A home health patient with osteoporosis falls, resulting in a right hip fracture. The physician in the acute care hospital confirms that the fracture is a result of the patient's fall and not due to the patient's history of osteoporosis.

- **Coding:** J1800 would be coded "1, Yes" and J1900C would be coded "1, One."
- **Rationale:** Because the physician determined that the fracture was a result of the fall it would be considered a traumatic fracture and therefore would be considered a major injury. — *Greg Hambrick (greg.hambrick@decisionhealth.com)*

Editor's note: See the full draft of the OASIS Guidance Manual update at <https://tinyurl.com/w3r2vh6>.