2011 OASIS Requirements in New and Accredited HHAs Seeking Medicare Certification

HHAs wanting to become Medicare approved must seek guidance and application information from their respective State Survey Agency (SSA)/Health Department.

Any HHA seeking Medicare certification is required to meet the Medicare Conditions of Participation (CoP) prior to certification. This includes compliance with the OASIS collection and transmission requirements. New HHAs must demonstrate that they can transmit OASIS data prior to the initial certification survey. Specifically, new HHAs must apply for a user identification number and password to electronically transmit to the OASIS State System any encoded Start of Care (SOC) or Resumption of Care (ROC) OASIS assessment record(s) for applicable Medicare and Medicaid patients in a test mode. New HHAs should communicate with the OASIS Automation Coordinator (OAC) in their state to comply with this aspect of the Medicare requirements prior to the initial onsite survey.

To meet the OASIS transmission requirements prior to the initial certification survey, new HHAs need two different sets of user identification numbers and passwords; one set to access the CMSNet and one set to access the OASIS State System.

The CMSNet is a private communications network which allows data submitted to the OASIS State System to be encrypted during the transmission process precluding any unauthorized sources from intercepting identifiable data. The HHA must apply for a user identification number and password for access to the CMSNet by contacting the CMSNet Help Desk at 1-800-905-2069. New HHAs need to install the communications software, which is separate from the Home Assessment Validation Entry (HAVEN) software, which will allow them to access the CMSNet.

The new HHA must register for an individual user identification and password to access the OASIS State System. The HHA must complete and submit the OASIS Individual User Account Request form which is available on the QIES Technical Support Office (QTSO) website at the web link under **Related Links Outside CMS**.

The OAC in each SSA should assist the new HHA in obtaining the user identification number and password for CMSNet and guide HHAs through registration for an individual user identification and password for access to the OASIS State System prior to the initial certification survey.

Once the communications software and access are in place, the new HHA must demonstrate that it can transmit OASIS data to the OASIS State System by (1) making a test transmission of any SOC or ROC OASIS data that passes CMS edit checks; and (2) receiving validation reports back from the OASIS State System confirming data transmission. The OAC in each state can assist new HHAs with this process.

Determining Compliance with the OASIS Transmission Requirements

The OAC at the SSA can determine the HHAs compliance with the OASIS transmission requirements from their locations; however, the HHA should maintain all copies of validation reports for its own records.

If the new HHA chooses to independently transmit OASIS data from its own office, the State HHA survey team and the OAC must communicate with each other to establish that the new HHA has successfully transmitted test OASIS data using the appropriate user identification numbers and passwords prior to onsite survey. The HHA should maintain all copies of the validation reports for its records.

If the new HHA chooses to use a software vendor to meet the OASIS encoding and/or transmission requirement on its behalf, the HHA must still establish connectivity to the state system via the software vendor. The HHA should have a written contract that describes this arrangement. The vendor must apply for access to the new agency as a Third Party submitter. Forms are available on the QTSO website at www.qtso.com. The HHA or its software vendor must contact the OAC and CMSNet Help Desk for the appropriate user identification numbers and passwords to establish connectivity with the OASIS State System. The HHA should obtain copies of all validation reports from its software vendor for its records.

If the new HHA chooses to use another certified HHA to meet its transmission requirements, for example, another established HHA in the chain or other established but non-related HHA, the HHA must still demonstrate connectivity to the state system via the other established certified HHA. The new HHA or other HHA must contact the OAC and CMSNet Help Desk for the appropriate user identification numbers and passwords in order to establish connectivity with the OASIS State System. The new HHA must have clearly written policies outlining the procedures in place with the other HHA with regard to OASIS collection, encoding, and submission to the OASIS State System and the sharing of feedback reports from OASIS State System with the new HHA.

HHAs Seeking Initial Certification Through an Approved Accreditation Organization (AO) with Deeming Authority

An HHA may choose to obtain initial Medicare certification by electing the deemed status option through an approved AO that has been granted deeming authority for Medicare requirements for HHAs. There are currently three AOs with deeming authority for HHAs: The Joint Commission, the Community Health Accreditation Program and the Accreditation Commission for Health Care, Inc.

HHAs seeking initial certification through the deemed status option must install the necessary communications software and contact the SSA and CMSNet Help Desk for the appropriate user identification numbers and passwords in order to demonstrate compliance with OASIS submission requirements prior to approval.

Exceptions to Demonstrating Compliance with OASIS Submission Requirements Prior to Approval

New HHAs that intend to admit or treat only patients to whom OASIS currently does not apply, i.e., patients under 18, maternity, and patients receiving only unskilled care or chore services are not expected to demonstrate compliance with OASIS submission requirements prior to approval.

These HHAs must attest this intention to the SSA. After certification, if there is a change in the HHAs policies that includes the acceptance of patients to whom OASIS applies, the HHA is expected to install the necessary communications software and contact the SSA and CMSNet for the appropriate user identification numbers and passwords.

Initial Surveys

State Survey Agencies and AOs will not schedule initial surveys until the SSA or AO has determined the HHAs status with the OASIS transmission requirement. HHAs and AOs may contact the state OAC directly to determine the status of the new HHA's activities concerning the OASIS transmission process prior to scheduling the onsite survey. The names and phone numbers of the OACs can be found at the web link **Related Links Inside CMS.**