OASIS Requirements in New and Accredited HHAs Seeking Medicare Certification

Any HHA seeking Medicare certification is required to meet the Medicare Conditions of Participation (CoPs) prior to certification. This includes compliance with the OASIS collection and transmission requirements. New HHAs must demonstrate they can transmit OASIS data prior to the initial certification survey. Specifically, new HHAs must apply for temporary user identification numbers and passwords from the Office of Healthcare Licensing and Surveys (OHLS). This is so the new HHA can electronically transmit to the state OASIS system any encoded and locked start of care or resumption of care OASIS assessment record(s) for applicable Medicare and Medicaid patients in a test mode.

To meet the OASIS transmission requirements prior to the initial certification survey, new HHAs need two different sets of temporary user identification numbers and passwords; one set to access the Medicare Data Communications Network (MDCN) and one set to access the state OASIS system. The MDCN is how HHAs transmit their OASIS data. 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 MDCN.

HHAs can call the HAVEN help desk at 1-877-201-4721 for help in obtaining and installing this software.

Once the communications software and access are in place, the new HHA must demonstrate that it can transmit OASIS data to the state OASIS system by (1) making a test transmission of any start of care or resumption of care OASIS data that passes CMS edit checks; and 2) receiving validation reports back from the state OASIS system confirming data transmission.

Once Medicare approval has been determined, the OAC assigns a permanent user identification number and password for the new HHA's access to the state OASIS system. The HHA must apply for permanent user identification numbers and passwords for access to the MDCN by contacting the MDCN help desk at 1-800-905-2069.

Alternatives to Direct Transmission to the State OASIS System

HHAs choosing to use another established HHA (or vendor) to transmit OASIS data on behalf under arrangement with that HHA, must still establish connectivity to the state OASIS system. While the established HHA or vendor will already have the MDCN in place, the appropriate temporary user ids and passwords need to be obtained from OHLS in order to submit the test transmissions on behalf of the new HHA. Permanent user identification numbers and passwords will be assigned when compliance has been determined, as stated above.

Determining Compliance with the OASIS Transmission Requirements

OHLS can determine the HHAs compliance with the OASIS transmission requirements from our office location; however, the HHA should maintain all copies of validation reports for its own 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 HHA or its software vendor must apply for the applicable temporary user identification numbers and passwords from OHLS in order to establish connectivity with the state OASIS 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 apply for temporary user identification numbers and passwords from OHLS in order to establish connectivity with the state OASIS 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 state OASIS system and the sharing of feedback reports from the state OASIS system with the new HHA.

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

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 two OAs with deeming authority; the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) and the Community Health Accreditation Program (CHAP). HHAs seeking initial certification through JCAHO or CHAP may be required to meet additional accreditation program requirements. However, they still must apply to the state survey agency for 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 SA. 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 SA and MDCN for the applicable user identification numbers and passwords.

Initial Surveys

State survey agencies and AOs will not schedule initial surveys until the state survey agency or AO has determined the HHAs status with the OASIS transmission requirement. HHAs and AOs may contact OHLS directly to determine the status of the new HHA's activities concerning the OASIS transmission process prior to scheduling the onsite survey.