DATE: **October 16, 2001**

FROM: Director
Survey and Certification Group
Center for Medicaid and State Operations

SUBJECT: Outcome and Assessment Information Set (OASIS) Requirements in New Home
Health Agencies (HHAs) Seeking Medicare Certification Including HHAs
Seeking Deemed Status Through an Approved Accrediting Organization (AO)

TO: Associate Regional Administrators, DMSO
State Survey Agency Directors

The purpose of this letter is to clarify the application of the OASIS requirements to HHAs
seeking initial Medicare certification, either through certification by the state survey agency (SA)
or electing deemed status through the accreditation process.

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 SA OASIS automation coordinator (OAC) in
order to 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 <u>test</u> mode. <u>HHA survey staff must communicate with the OASIS coordinators to determine
this aspect of compliance prior to the initial onsite survey</u>.

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

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**The Health Care Financing Administration (HCFA) was renamed to the *Centers for
Medicare & Medicaid Services* (CMS). We are exercising fiscal restraint by exhausting our
stock of stationery.**

(HAVEN) software, which will allow them to access the MDCN. This software, i.e., the AT&T Global Network Dialer for Windows software is available by download from the AT&T Global Network Website (www.attbusiness.net/softctr/dialer95.html). Instructions for downloading and installing this software are attached. They are also available on the OASIS website at www.hcfa.gov/medicaid/oasis/hhregs.htm.

Alternatively, HHAs can call the HAVEN help desk at 1-877-201-4721 for help in obtaining and installing this software. The OAC in each SA should assist the new HHA in obtaining the temporary user identification numbers and passwords 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 state OASIS system by 1) making a test transmission of any start of care or resumption of care OASIS data that passes Centers for Medicare & Medicaid Services (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 their 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 the OAC at the SA 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

Depending on the method of transmission the HHA chooses, the SA needs to determine compliance in one of the following ways:

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

(2)   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 OASIS 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 the OAC in order to establish connectivity with the state OASIS system. As described in number (1) above, the state HHA survey team and OAC must communicate with each other to establish that the software vendor, on behalf of the new HHA, has successfully transmitted test OASIS data using the appropriate temporary user identification numbers and passwords, prior to onsite survey. The HHA should obtain copies of all validation reports from its software vendor for its records.

(3)   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 OASIS system via the other established certified HHA. The new HHA or other HHA must apply for temporary user identification numbers and passwords, unique to the new agency, from the OAC, 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

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 AOs with deeming authority - the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) and the Community Health Accreditation Program (CHAP). HHAs seeking initial certification through the deemed status option still must apply to the SA for user identification numbers and passwords in order to demonstrate compliance with OASIS submission requirements prior to approval.

When the SA receives a request from an HHA interested in seeking Medicare deemed status through accreditation by JCAHO or CHAP, please ensure that the HHA understands its obligation to meet the OASIS requirements, even when the AO conducts the initial certification survey. This includes compliance with the OASIS collection and transmission requirements.

If you receive a certification packet from an HHA seeking Medicare certification based on its accreditation through a deemed status program, it is the SA's responsibility to determine that the HHA meets its OASIS transmission responsibilities. The OASIS transmission responsibility may be met in one of the three ways described above.

A new question and answer about HHA's seeking Medicare certification through a deemed status program is now available on the OASIS Web site at *http://www.hcfa.gov/medicaid/oasis/hhqcat08.htm*.

Exceptions to Demonstrating Compliance with OASIS Submission Requirements Prior to Approval

New HHAs that intend to admit or treat <u>only</u> 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 HHA's 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.

Scheduling Initial Surveys

SAs and AOs should not schedule initial surveys until the SA or AO has determined the HHA's status with the OASIS transmission requirement. 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 are found on the OASIS web site at *http://www.hcfa.gov/medicaid/oasis/hhoac.pdf*.

Initial Denial

If the SA recommends the initial denial of Medicare participation for an HHA or the termination of an existing HHA based on non-compliance of any OASIS CoPs, the survey and certification packet submitted to the CMS regional office (RO) must clearly demonstrate how the HHA failed to meet the statutory/regulatory requirements. The survey packet must contain:

- A comprehensive survey narrative that clearly shows the process the surveyor has taken to determine the HHA non-compliance with the OASIS requirements.
- A summary of HHA staff interviews if not included in the narrative.
- Copies of pertinent HHA policies and procedures that relate to non-compliance findings.
- Copies of OASIS final validation reports, as applicable.
- Copies of initial feedback reports, as applicable.
- HCFA-2567 (Statement of Deficiencies).
- HCFA-1539.

Effective Date: The information presented in this memorandum is current policy and is in effect.

Training: This policy should be shared with all OASIS Educational and Automation coordinators, HHA surveyors, their managers, the state/regional office training coordinators and home health providers.
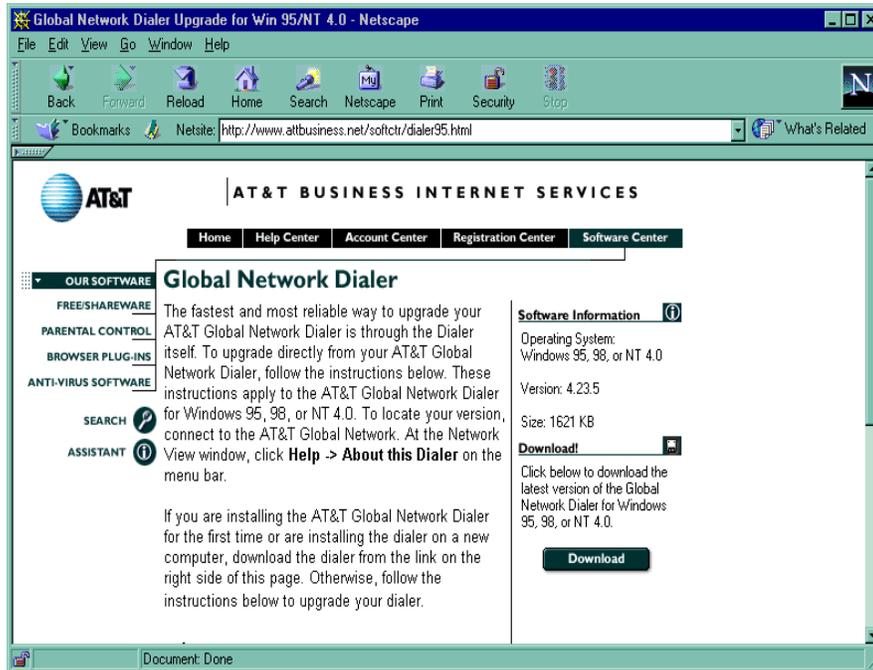
If you have any questions about this issue, please contact Mary Weakland at (410) 786-6835 or Tracey Mummert at (410) 786-3398.

/s/
Steven A. Pelovitz

*** If you received a diskette please turn to page 3 ***

A. Internet Download Instructions for the IBM/AT&T Global Network Dialer.

1A. Connect to the Internet. Using your browser, go to www.attbusiness.net/softctr/dialer95.html

2A. Select **Download**. You will be prompted to Save this program to disk. Do not try to copy it to a floppy disk as the dialer program is too large. (Recommended: C:\). Click **OK**.

Note: Do not select **Run this program from its current location**.

3A. Select the drive location where the file will be saved on your system. Click **<u>Save</u>**.
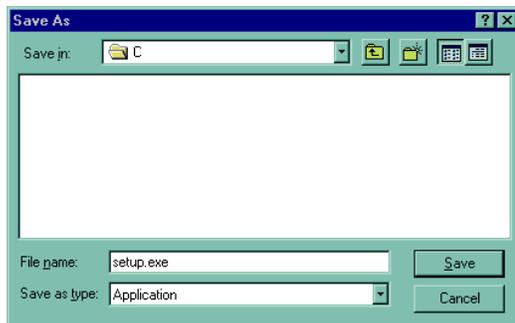
4A. File download will begin. You may select **Cancel** at any time to end the file download.
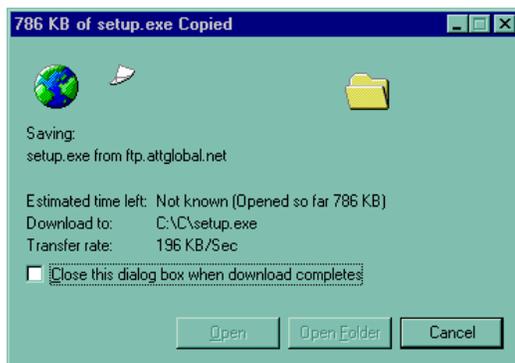
5A. When download is complete, click **OK**. The IBM/AT&T Global Network Dialer is now available to be installed.
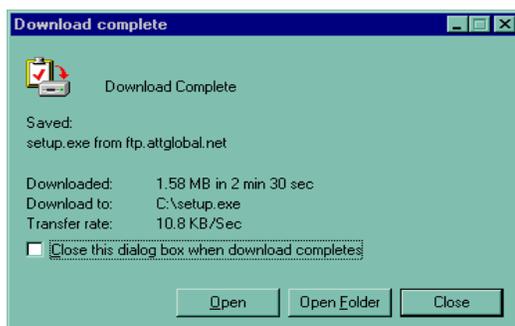
B.   Installation Instructions for the IBM/AT&T Global Network Dialer.

1B. Select **Start** and **Run…** In Open:, type the drive and location of the file **Setup.exe**.
Click **OK**.
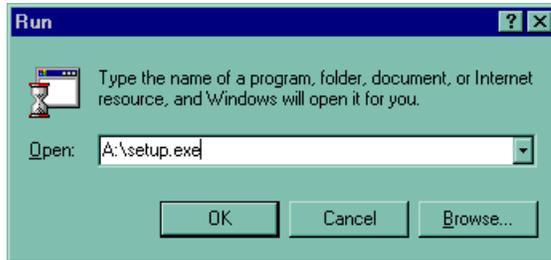
2B. Click **Next>** to continue installation. You may select **Cancel** at any time to end the
installation process.

> **NOTE:** The IBM Global Network Dialer and the AT&T Global Network Dialer are the
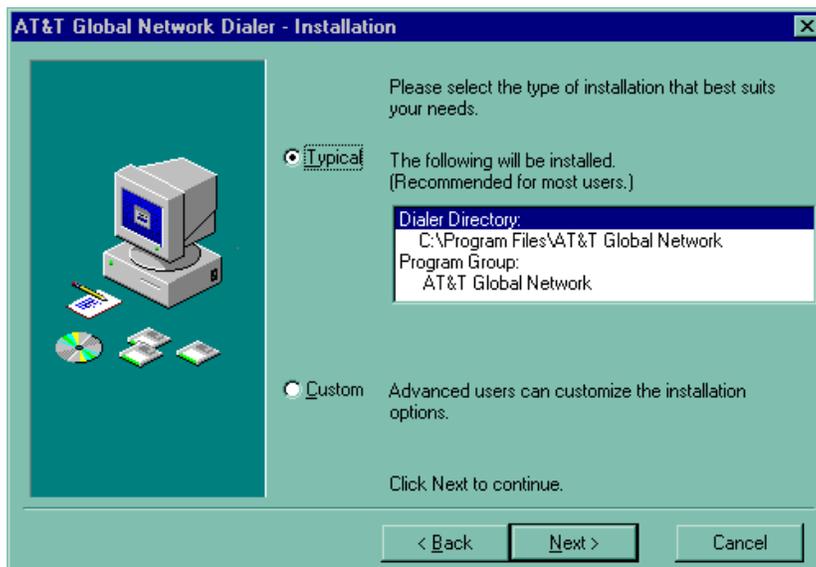> same software. For documentation purposes, only the AT&T logo appears in the
> screen prints.

3B. The **Legal Agreement** screen will appear listing the license terms governing your use of the IBM/AT&T Global Network Dialer. Click **I Agree**.
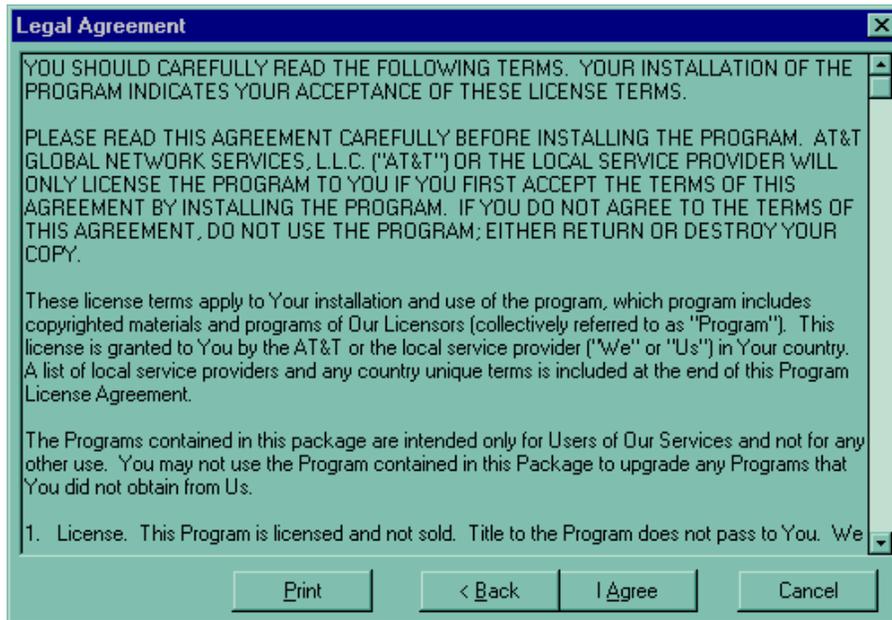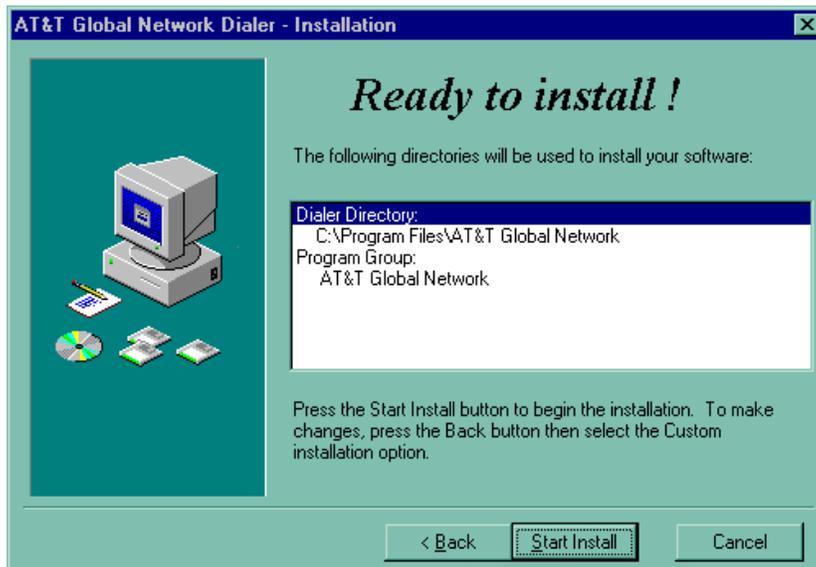

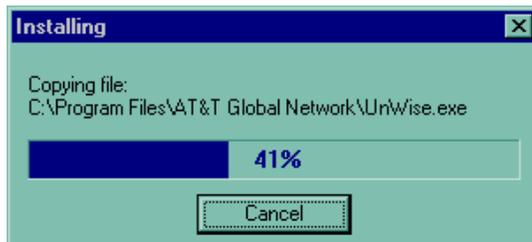4B. Click **Next>** to do a **Typical** installation.

  NOTE: The IBM Global Network Dialer will install to C:\Program Files\IBM Global Network.

5B.   Click **<u>S</u>tart Install** to begin the installation process.
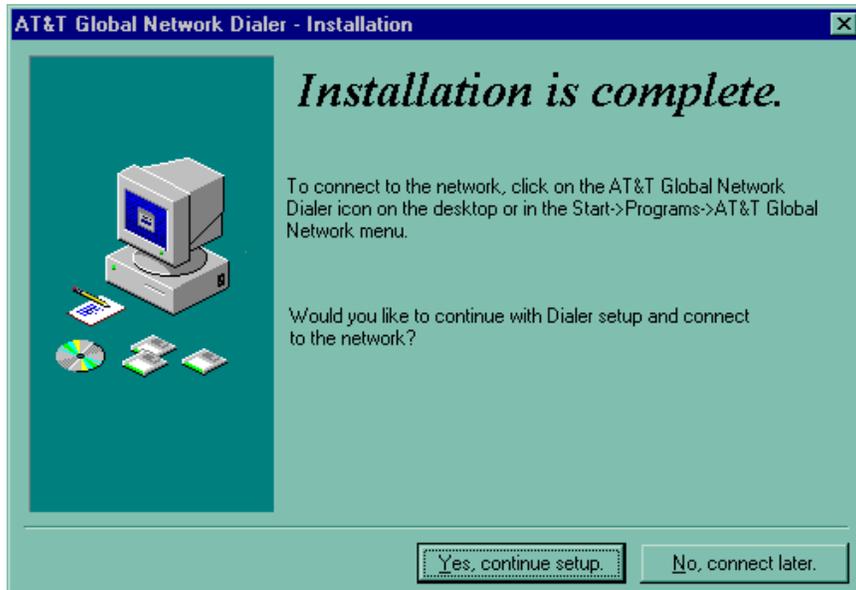

6B. The installation program will begin copying files.

7B.   If you received diskettes you will be prompted to insert disk 2.

8B.   When installation is complete, select **Yes, continue setup**. You may now begin the setup of the
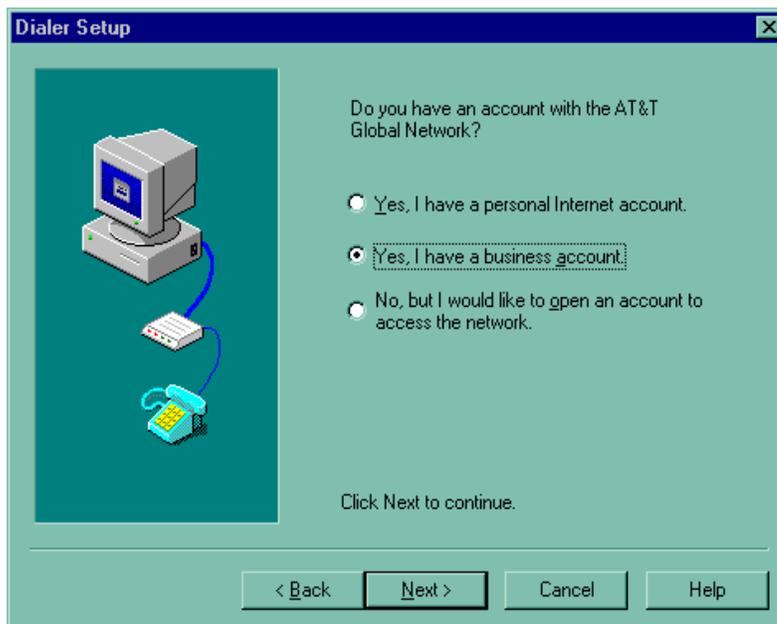IBM/AT&T Global Network Dialer.

C.	Setup Instructions for the IBM/AT&T Global Network Dialer.

1C.   Click **Next** to begin the setup program. You may select **Cancel** at any time to end the setup
program.

Dialer Setup

This setup program will help you connect to the
network. The only items you need to connect are:

1. A modem and phone line connected to your
    computer.

2. The networking programs included in Windows.

3. An account, user ID, and password to access
    the network. (You can open a new account
    using the following windows if needed.)

Click Next to continue.

< Back   Next >   Cancel   Help

2C.   Select the option **Yes, I have a business account**. Click **Next**.

Dialer Setup

Do you have an account with the AT&T
Global Network?

○ Yes, I have a personal Internet account.

◉ Yes, I have a business account.

○ No, but I would like to open an account to
    access the network.

Click Next to continue.

< Back   Next >   Cancel   Help

3C.   Type your AT&T Global Network **Account** and **User ID** as listed on the cover page of this documentation. Click **Next**.

4C.   Select the option **My company's private intranet**. Accept the default **Standard, secure IP**. Click **Next**.

5C.	Accept the default **Web, e-mail, and other TCP/IP servers**. Click **Next**.

Dialer Setup

What types of computers would you like to access?

☑ Web, e-mail, and other TCP/IP servers

☐ LAN servers and printers (via NetBIOS over IP)

☐ Mainframes (SNA 3270 via Passport/IP)

Click Next to continue.

< Back	Next >	Cancel	Help
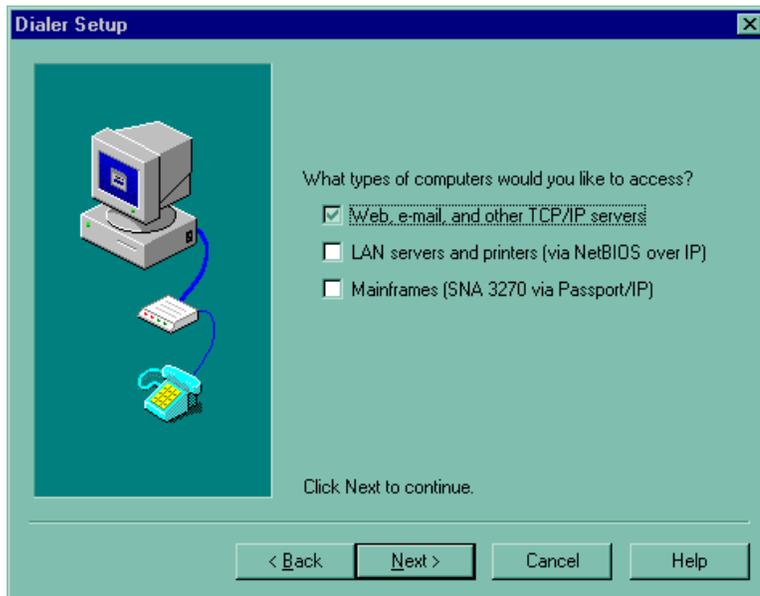
6C.	Do not enter a **Primary** or **Secondary DNS**. Leave blank. Click **Next**.

Dialer Setup

What are the addresses of your company's name servers (DNS)? (example: 165.87.194.244)

Primary

Secondary

Click Next to continue.

< Back	Next >	Cancel	Help
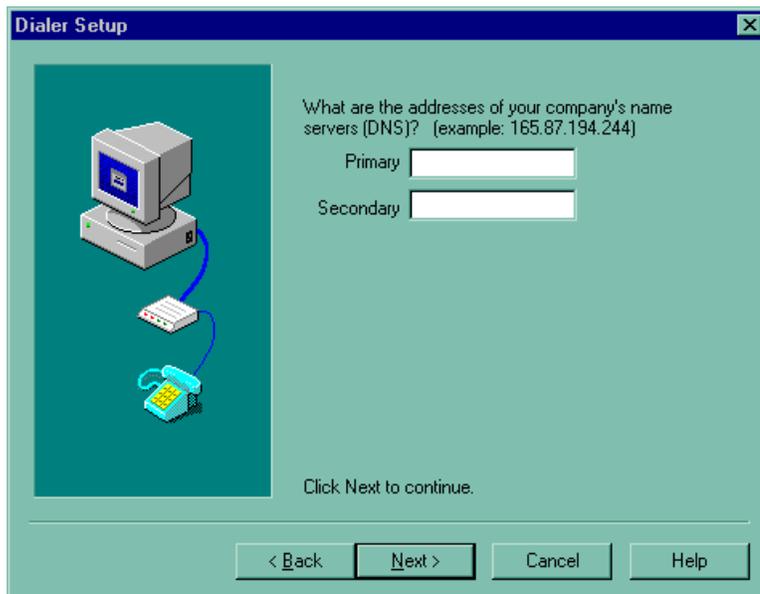
7C.   You will be asked **Is a name server needed on your network?** Click **No**.
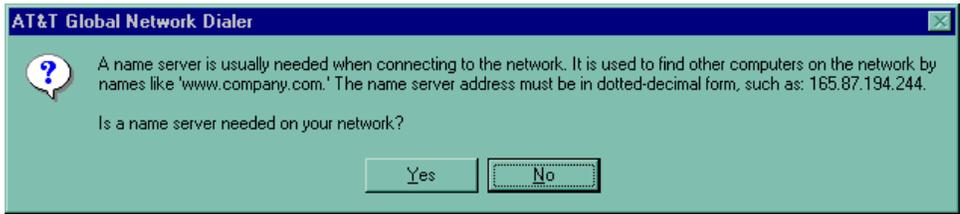
8C.   Click **Next>** to accept the modem highlighted.

    Note: If the modem you wish to use is not listed, do not attempt to **Add modem…** Cancel
        installation and use the Windows operating system Add New Hardware option. When
   done, start the installation process from the beginning.
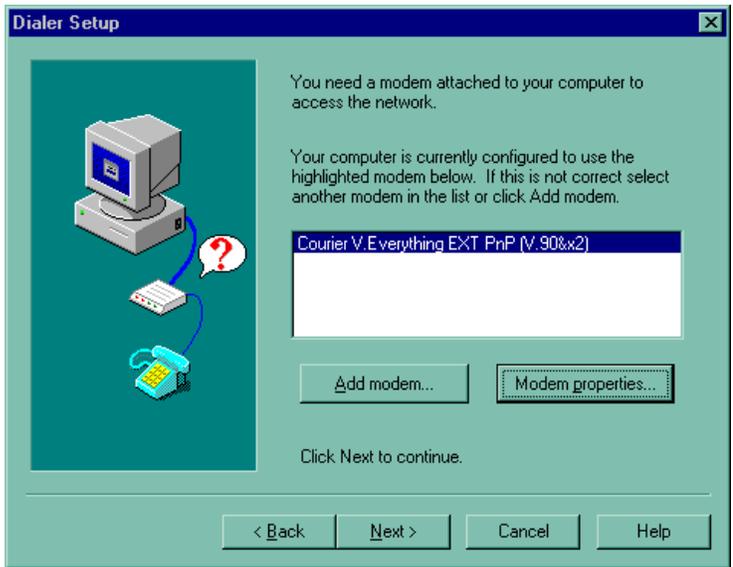
9C.   Select **Change…** next to the question **Which location would you like to call?** The **Select a phone number to call** screen will appear.


10C.   Enter the Area Code for your facility and the Exchange (or prefix). The setup program will show the closest phone number to your facility in the first row. Under the heading "Call Type", make sure Local is displayed.   Highlight the number and Click **OK**.

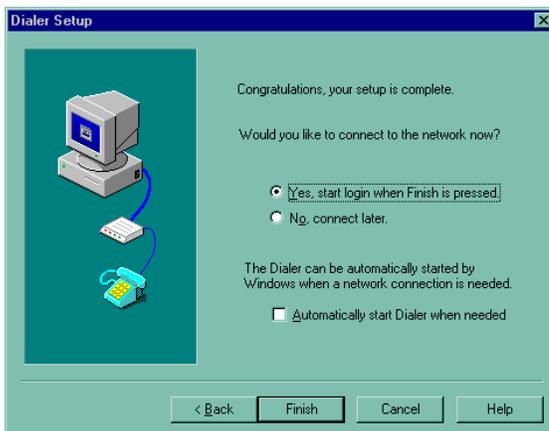If a Local number is **NOT** available, choose **Nationwide Toll.**
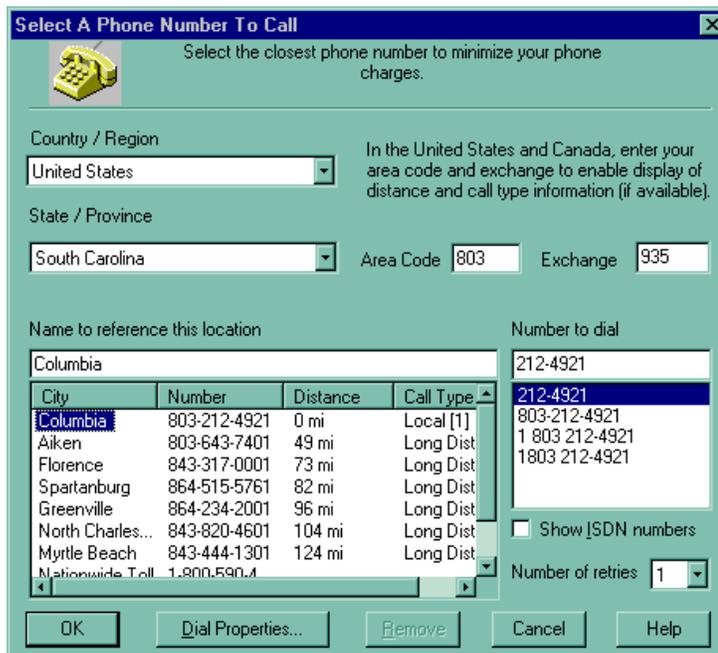
11C. If **Nationwide Toll** is selected, the following screen will appear. Click **<u>Yes</u>**. You will not be charged for this call.
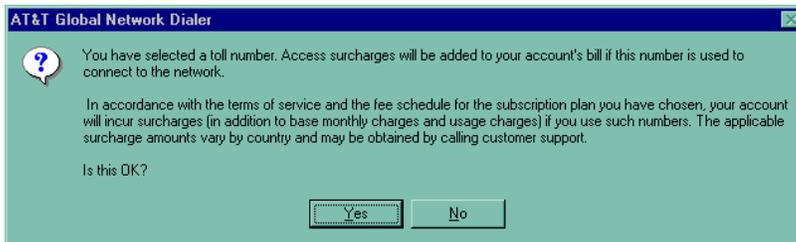
12C. Click **Next>**.

13C. Select **Yes, start login when Finish is pressed**. Click **Finish**. You may proceed to login instructions.

D.   Login Instructions for the IBM/AT&T Global Network Dialer.

1D. Type your password and click **Connect**. <u>Do not</u> check the box labeled **Save password**. This is a security violation.

Note: <u>For new HHAs seeking Medicare certification</u>, contact your state OASIS automation coordinator for temporary user identification and password information. You will need this information to demonstrate compliance with the OASIS transmission requirements prior to your initial Medicare certification survey. After Medicare approval, contact the MDCN helpdesk at
1-800 905-2069 for instructions on obtaining permanent user identification and password information.

<u>For Medicare certified HHAs</u>, for your **initial** login, your password is **the same as your User Id**.

2D. The first time you connect to AT&T Global Network Services, your password will expire. Type your new password and confirm it in the appropriate boxes. Click **OK**.

Password rules:
- Passwords can contain alpha or numeric characters (No special characters).
- A password must begin with an alphabetic character.
- Passwords are a minimum of 5 characters and a maximum of 8 characters.
- You may not reuse a password for six months.
- Passwords <u>are not</u> case sensitive.
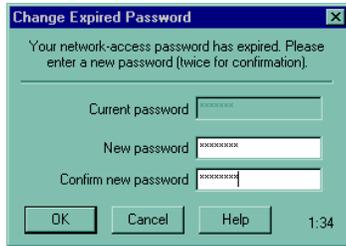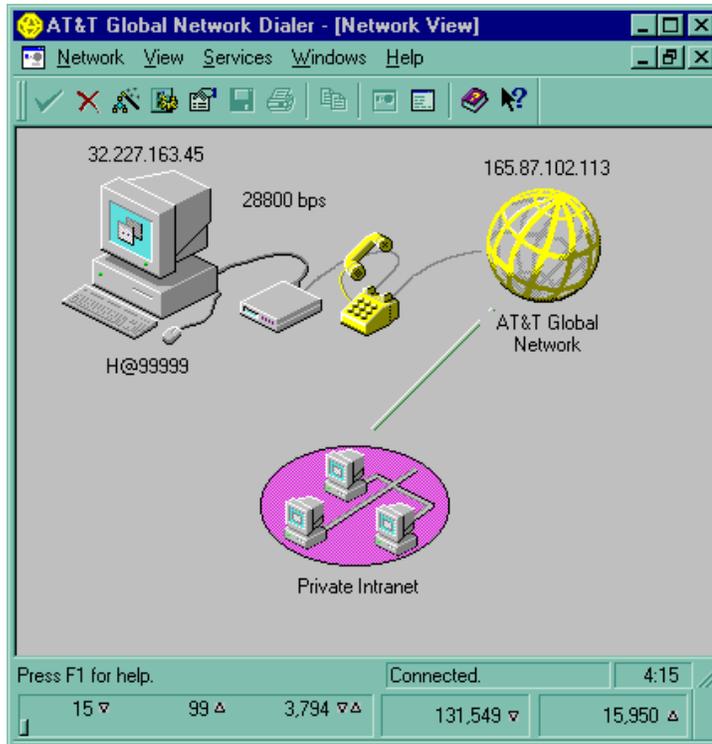
Note: **Your password will expire every 60 days.**
Note: The first time you login, you will be prompted to establish a current profile. Click **Done** to accept
the default.
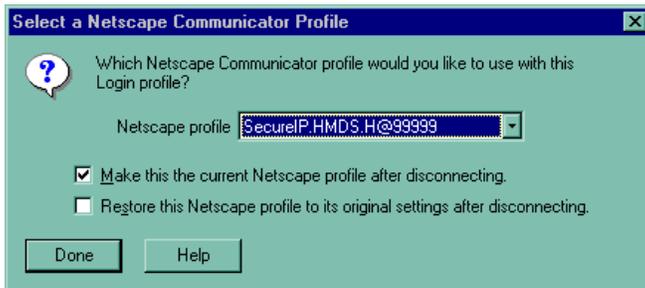
3D.   Once the following window appears, click OK.

4D.   When connected, the following screen will appear:

5D.   The IBM/AT&T Global Network Dialer is designed to automatically download upgrades when

available. **It is <u>mandatory</u> that you complete the downloads**. The dialer will download both a recent phone list and an upgrade of the dialer (If a newer version is available for download). This process takes approximately 10-20 minutes depending on the speed of your connection. You cannot continue with the instructions until this process is
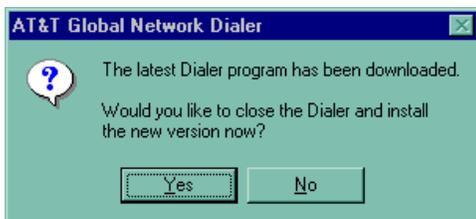
complete.

6D.   You will be prompted when the upgrade download is complete. Click **OK**.

7D.   If the latest version of the dialer is downloaded, you will be prompted to install the new
        version now. Select **Yes** and the dialer will disconnect you and begin the installation
process.
   When finished, you are ready to reconnect and use the upgrade of the software.

Note: Installing an upgrade version of the IBM/AT&T Global Network Dialer <u>will not</u> change
   your default settings.

E: Loading the browser and connecting to the HCFA Web Site

The following section will show you how to set up your **IBM/AT&T Global Network Dialer** to load your browser (**Netscape Navigator** or **Microsoft Internet Explorer**) upon connection. You should set this up to use the browser used for your submissions before setting up the AT&T Global Network. If you are not sure which browser you are currently using, please contact your facility systems administrator.

1E.   From the Network View Screen, select Network**, then click on** Login Properties**.**
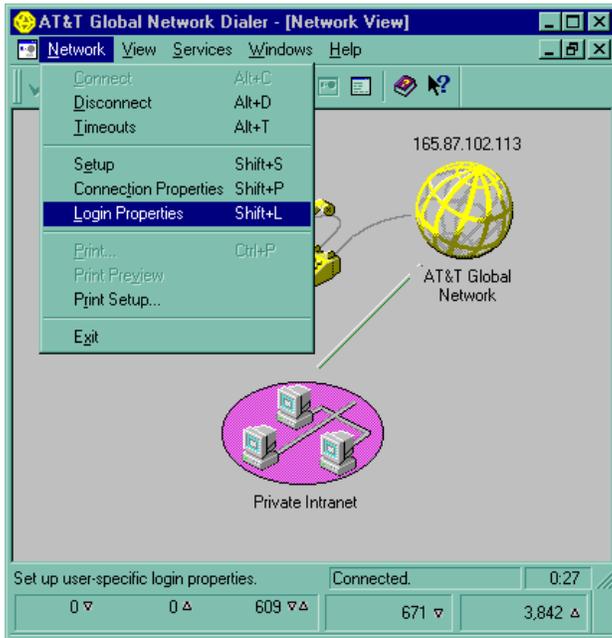
2E.   Click on the tab titled **Programs**. Place a check mark in the field **Override default**
       settings. Then at the bottom section click **Add**.
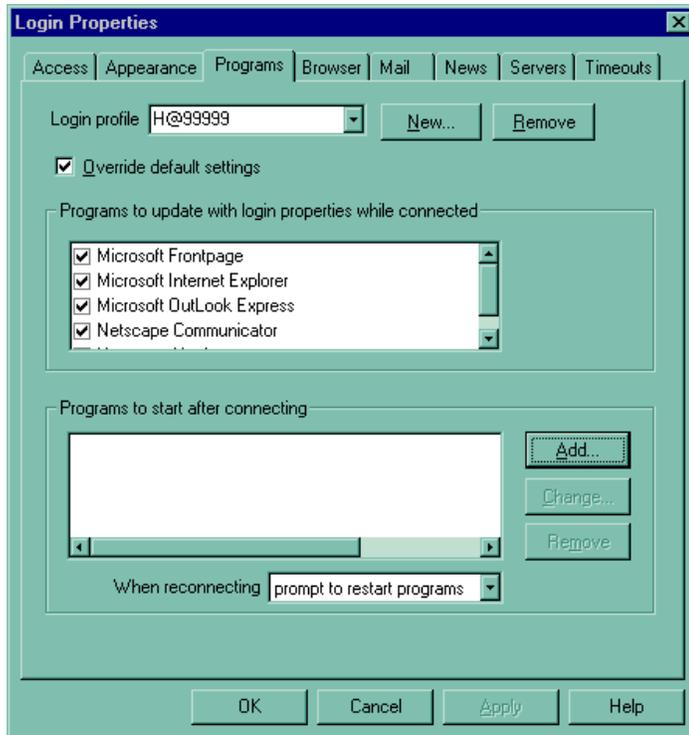
3E.   Select your preferred browser, **Netscape** or **Internet Explorer**. The version
       of either browser **MUST** be at least **4.0** or higher. It is recommended that
       your browser be 128-bit SSL Encrypted.
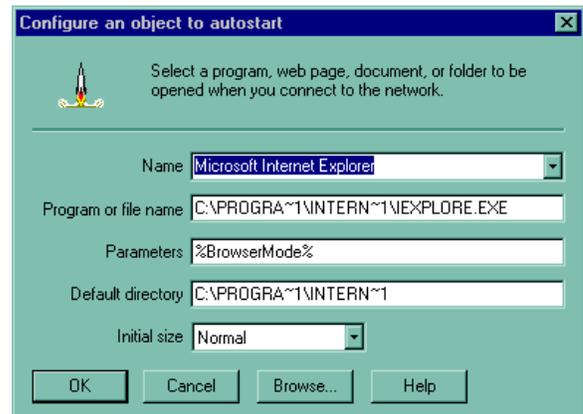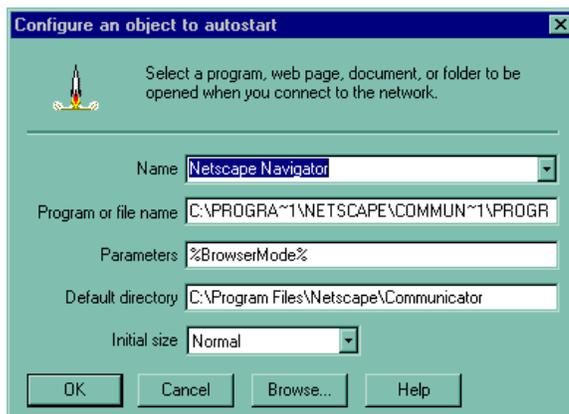
4E.   Click on the tab titled Browser. Place a check mark in the section **Override default**

settings. Under that section, beside **Web browser start page**, place the dot in the

far right under Manually Update. In the space provided, place the

IP address listed for <u>your state agency</u> on the front of your
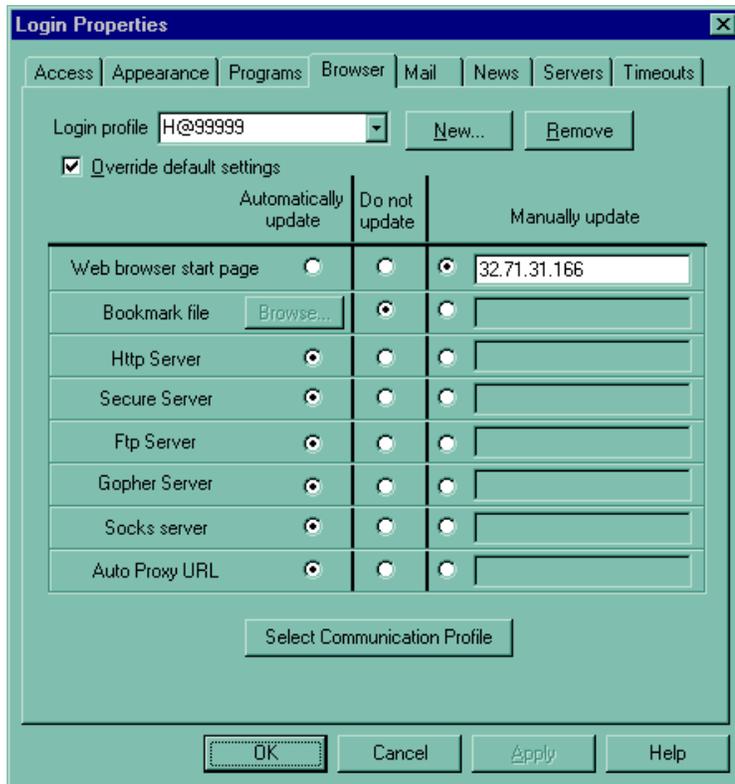
packet.

5E.   Click OK, You must disconnect, close all programs and reconnect before the changes will take effect.
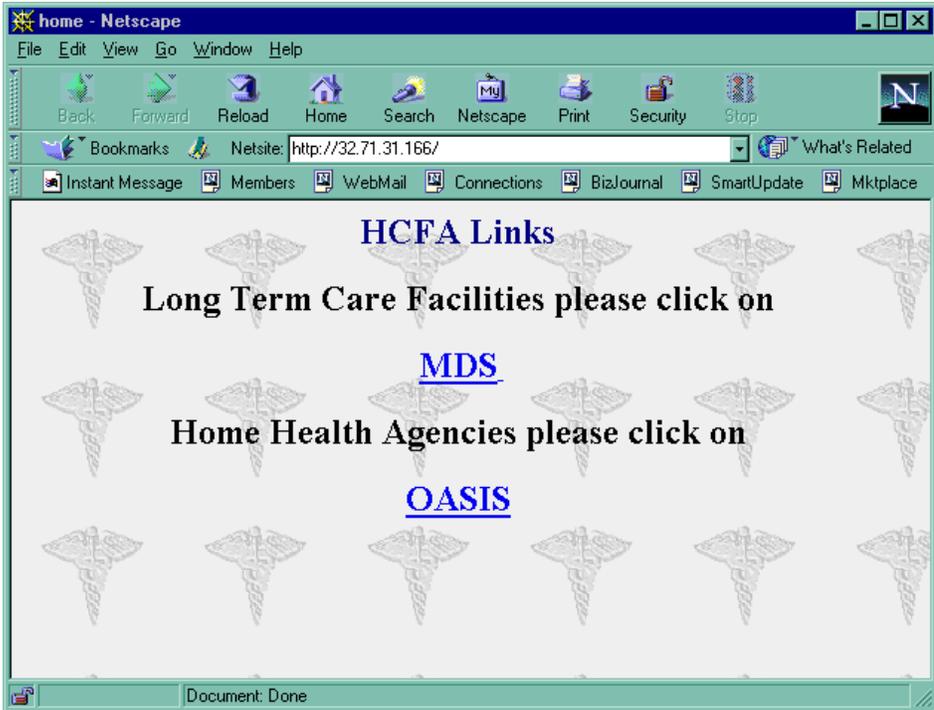
Note: If your default browser is Netscape® version 4.0 or above, you will be prompted to select a profile each time you connect.

Each subsequent connection will prompt you to select a profile. Select the profile corresponding to **SecureIP** and click **Start Communicator**.
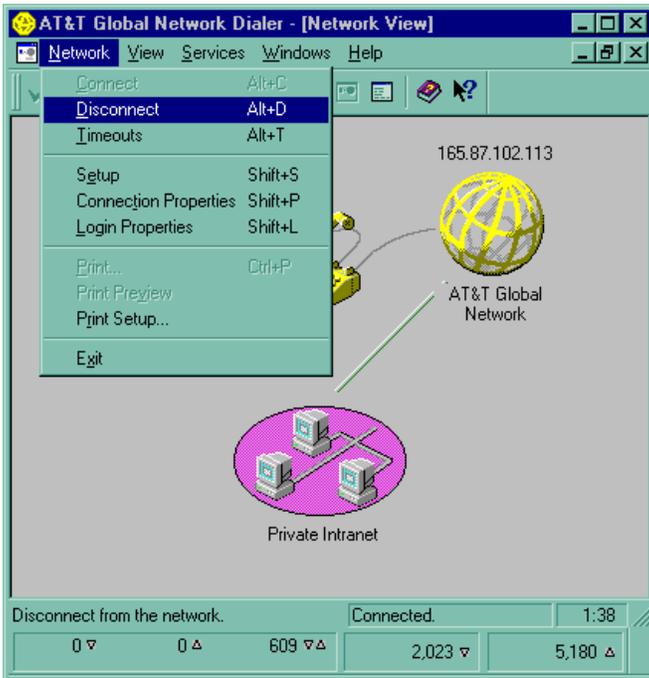

6E.   You will be connected to the home page of your state server. You are now ready to proceed as
usual.

home - Netscape

File Edit View Go Window Help

Back Forward Reload Home Search Netscape Print Security Stop

Bookmarks Netsite: http://32.71.31.166/ What's Related

Instant Message Members WebMail Connections BizJournal SmartUpdate Mktplace

HCFA Links

Long Term Care Facilities please click on

MDS

Home Health Agencies please click on

OASIS

Document: Done

F.   Disconnect Instructions for the IBM/AT&T Global Network Dialer.

AT&T Global Network Dialer - [Network View]

Network View Services Windows Help

Connect   Alt+C
Disconnect   Alt+D
Timeouts   Alt+T

Setup   Shift+S
Connection Properties Shift+P
Login Properties Shift+L

Print...   Ctrl+P
Print Preview
Print Setup...

Exit

165.87.102.113

AT&T Global
Network

Private Intranet

Disconnect from the network.   Connected.   1:38

0 ▽   0 △   609 ▽△   2,023 ▽   5,180 △

1F.   To disconnect, select **Network**. From the pull down menu, select **Disconnect**.

2F.   You will be asked to confirm your desire to disconnect. Click **Yes**.
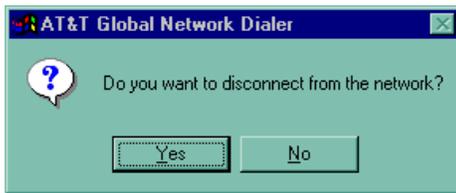
3F.   To exit, select **Network**. From the pull down menu, select **Exit**.

| **G.**	**Adding additional users to the AT&T Global Network**
	You are required to have a login specific to each individual in your organization accessing your state agency via the Medicare Data Communications Network (MDCN). If the same machine is used by more than one individual, you will need to set up a login profile specific to each user. If you don't have additional user ID's but require them, please fax on **Company Letterhead** the following information: **Facility ID, Contact Name, User to be Added** and **User to be deleted** (if any), to 803-935-0194. The information will be processed and mailed to your facility.
G1.	Execute your IBM/AT&T Global Network Dialer. Select **Setup**.

G2.   Select **Review or change <u>u</u>ser login properties**. Click **<u>N</u>ext>**.

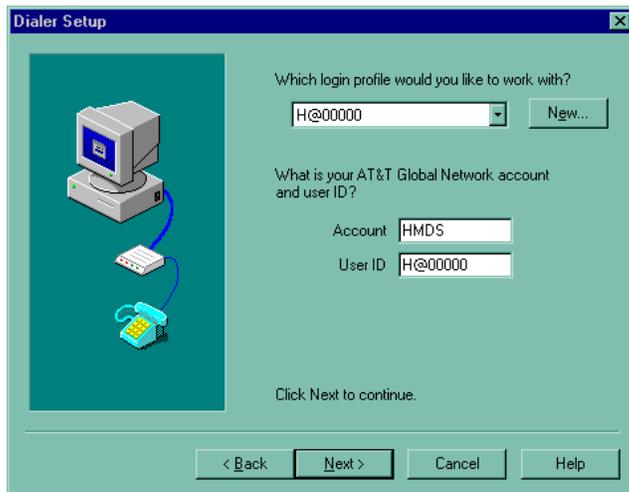G3. Select **Yes, I have a business account**. Click **Next>**.

G4. Select **New…**
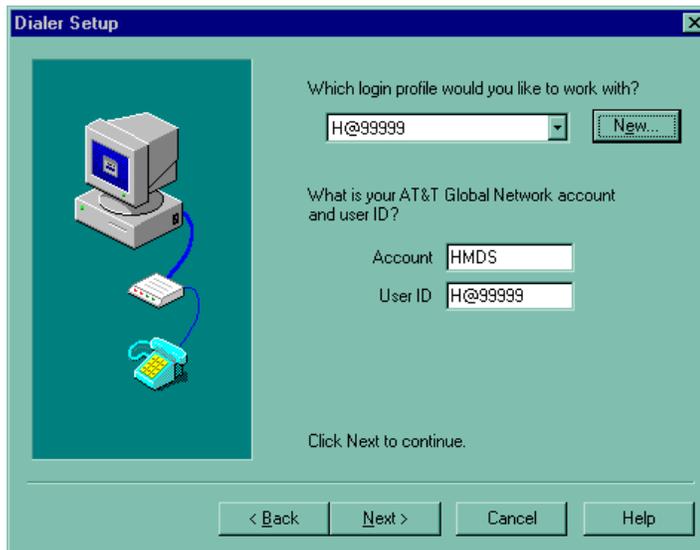
G5. Type the User ID as listed on the cover page of this documentation. Click **OK**.

G6.	Type the **Account** and **User ID** as listed on the cover page of this documentation. **Make sure the**
	User ID number matches the Login Profile. Click **Next>**.

G7.	Complete set up as instructed in steps 4C through 7C on pages 8-10 of the Setup Instructions.
	You can only add one user at a time and must complete the setup before new users are added. If
		you have more than two users you will have to do the above for each Users ID.