

## **CATEGORY 9 - VENDORS**

### **Q1. What should be in a contract with a reporting vendor, if an HHA chooses to use one?**

A1. JCAHO-accredited HHAs that are also Medicare approved must meet the data reporting requirements for both OASIS and JCAHO. An HHA may use a single vendor for both OASIS and JCAHO data reporting, if the vendor provides both services. According to 42 CFR §484.11 condition of participation: Release of patient identifiable OASIS information, the HHA must have a written contract with a vendor for reporting of OASIS data, and the HHA must ensure that all individual patient OASIS data is not released to the public. The HHA is ultimately responsible if the vendor violates this condition and is liable for any enforcement action. The HHA also should address HIPAA compliance issues with their vendor.

### **Q2. What is the process for software vendors seeking to be approved for OASIS data collection and transmission?**

A2. CMS does not approve vendors who develop OASIS-related software nor do we keep an inventory of current vendors with OASIS-like software. Some home health related trade publications may contain this type of information. It is up to each home health agency to make sure that the software they use is CMS-specified format. There are many criteria that can be used to evaluate OASIS-like software including the suitability of the package to the agency's assessment process, ease of use, data management and reporting capabilities, etc. However, the primary purpose of such software is to allow agencies to accurately enter data according to CMS's data specifications. Therefore, at a minimum, every vendor's software must be able to create submission files which are error-free and which will be accepted by State data systems. HAVEN can be used to test other vendor software applications by using the HAVEN error check function on vendor-generated OASIS submission files. Thus HHAs may find HAVEN to be a useful tool in the software evaluation process.