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DATE: March 29, 2004

TO: ALL MEDICARE-CERTIFIED HOME HEALTH AGENCIES
AND ALL CERTIFIED NURSING FACILITIES

FROM: DEBBY RANSOM, R.N., R.H.I.T., Chief
Bureau of Facility Standards

SUBJECT: COMPUTER BACKUP OF MDS AND OASIS DATA

CMS has requested that the states remind nursing facility and home health agency administrators of their responsibility to assure that their local MDS and OASIS data is backed up. Backing up these files is part of making sure that medical records are safe. A number of unexpected problems can occur with any electronic data, including MDS and OASIS records: A hard drive may fail or a computer may be stolen. Files can be mistakenly overwritten or deleted. A natural disaster such as fire, flood, or earthquake may damage software/hardware. CMS expects nursing facility and home health agency administrators to make sure that their staff back up computer data regularly.

1.   **Backup** – Backup means to make an electronic copy of computer files and to store the copy in a safe location. It is the responsibility of the nursing facilities and home health agencies to have a regular backup plan for all locally stored assessment data. Some additional terms and concepts are presented to assist users to appreciate the issues associated with protecting and recovering lost computer data.

National Repository – MDS and OASIS data are transmitted by the state to a national repository. Nursing facilities and home health agencies cannot depend on the national repository to restore lost facility files. 1) The national repository doesn't contain all the same data as the state does, due to state specific requirements. 2) The data is stored in a different manner at the

national repository than at the local level. CMS contractors will attempt to restore data, but it cannot always be done. The outcome can be very disappointing, as it is difficult, and many times impossible, to restore this sort of information from the national repository.

Media – Use a reliable media such as ZIP drive, tape drive, CD writer, or FTP off-site storage. MDS and OASIS software or other mechanisms that create an automatic backup on the user's hard drive is helpful, but is not a substitute for a comprehensive backup strategy. Do not just backup to another location on your computer hard drive, as your data will still be lost if the hard drive 'crashes.'

Software – Backup can be accomplished through a variety of software programs and your MDS or OASIS software vendor may be prepared to assist you. Also, MS Windows, which you are likely to own already, includes a backup program, MS Backup. Clicking 'Start,' 'Programs,' 'Accessories,' 'System Tools,' and 'Backup' can find MS Backup. MS Backup includes online instructions.

Unique File Name – When creating an MDS or OASIS file to submit, always create a unique name for each MDS file submission. Do not write over the previous file, because then you have lost the previous assessment submission. Consult your submission software vendor for additional guidance.

Restore – If you ever need to restore lost or corrupted data from a backup file, ensure that files are restored in the same order as submitted.

2. **IT Policies/Practices** – Nursing facilities and home health agencies determine their own information technology policies and practices, with the advice/assistance of their information technology staff and/or software vendor. It is the responsibility of nursing facility and home health agency administrators to be sure a set of policies is in place and adhered to. The following is offered as a few examples of some desirable policies and practices:

4 **File Naming Conventions** – Develop a naming convention that will make it easy to identify files over a long period of time and train staff to use it. For instance, you may want to list Year, Month, Day, # for the day (in the case of multiple submissions in a day), and the initials of your facility. Always create a unique name for each MDS or OASIS file submission.

4 **Backup Schedule** – Institute a regular procedure of backing up the MDS or OASIS database nightly to another computer via a secure network or a reliable

portable media device such as ZIP drive, Tape Back-up, or CD Writer. Store the dated backup in a secure remote location, multiple locations if possible. It is a typical practice to backup data nightly on an incremental basis and to conduct a total replacement backup on a weekly basis that is stored off-site.

4 **If Moving Equipment** – Include a procedure to create a retrievable copy of data before moving equipment.

4 **Periodically Test Backups** – Retrieve backed up data to be sure the data is not corrupted and that the mechanism used to conduct the backup is, in fact, really backing up data, rather than creating empty files. If you use tape backup, rotate tapes.

4 **Backup People Too** – If you have a computer network and only one staff person with administrator access, that person needs a backup person. Consider the alternative if the administrative person 'disappears' – you could lose just about everything. Some businesses lock the administrator password in a safe.

4 **Develop Off-Site Standards and Utilize Off-Site Storage** – Develop off-site standards and utilize off-site storage for copies of essential records. Off-site storage minimizes the chance for total destruction of records, since the possibility that a disaster will strike in a different geographic area with the same severity is small.

4 **Stick to a Schedule** – If you don't have consistency, you don't really have backup. Set a schedule and stick to it. Consider automation of backup.

If you have questions regarding this information, please contact your information technology staff or software vendor/consultant for clarification or assistance.

[*original signed by Debby Ransom*]

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DR/nah
cc: Idaho Health Care Association
       Idaho Association of Home Health Agencies