



**NATIONAL CORE
INDICATORS**
NASDDDS & HSRI

Considerations When Selecting a Contractor

Some things matter more than others

Responsibilities of the State

- Management of NCI – assure policies are implemented- survey methodology, sampling, confidentiality of respondents
- Data Collection: - protocols regarding proxies, documentation, timeliness and accuracy, access to accurate contact information
- Data Submission: entering raw data within timeframes; Background information, maintain original files until verified; Completion of survey samples size NLT June 30 of data cycle.
- Training of Interviewers
- Additional Question Management
- Communicate with NCI National Staff re: changes; revisions to state work plan, reviewing draft reports for accuracy and feedback
- Trademark and Copyright protections: reproduce the tools for data collection and porting of state data exclusively;



Key Decisions

- Sample size and distribution across geography
- Type of survey – face to face or mail out?
- Timeline – for data collection and data entry (this may also drive the number of interviewers needed)
- Validation practices
- Experience of interviewers - peers? Prior experience with people with I/DD? Background checks? Other qualifications?
- Travel reimbursement methodology
- Data collection requirements – Paper? Electronic? Combination? Wifi?
- Data entry – double recording increases potential errors– but single entry may be more costly
- Is this quality strategy, or research? Customer satisfaction, or system performance? Or both? (may impact IRB decisions, as well as reimbursement options)



Assurance of Protocols and Clarity of Roles:

- Consent- written? Oral? Both – timing and responsible party (be specific)
- Background information collection prior to ACS –
- Entry of Pre Survey information prior to ACS
- Sharing of data – confidentiality/HIPPA protections and timeliness
- Scheduling of interviews
- Alternative communication options –
- Mandatory Reporting Requirements (state Specific)



Mail Out Surveys?

- Sample size plus, or 100% of population
- Additional documents with mail out ?
- Collaboration with other stakeholders?
- Ease of recognition of survey and purpose
- Second mailing?
- Guaranteed response rate from vendor?



Vendor Processes you may want to know about

- Internal quality assurance
- Validation techniques
- Periodic reports on progress in data collection and entry, refusal rates, unable to contact;
- Scheduling of interviews – time of day, accessibility
- Data entry training and staffing
- Feedback on their interviewers



Administrative considerations

- Making a decision on the vendor – consider in addition to costs, the qualifications and demonstrated capabilities of the vendor
- Terms of payment – per survey? Total cost?
- Timelines
- Incomplete survey sample consequences
- Reporting requirements



**NCI Team Available- Call or write to
us:**



Business Associates Agreement

Why?

- Health Insurance Portability and Accountability Act of 1996 (“HIPAA”)
- Final Rule for Standards for Privacy of Individually Identifiable Health Information adopted by the United States Department of Health and Human Services (“HHS”) and codified at 45 C.F.R. part 160 and part 164, subparts A & E (the “Privacy Rule”)
- the HIPAA Security Rule (the “Security Rule”), codified at 45 C.F.R. Part 164 Subpart C, and Subtitle D
- Health Information Technology for Economic and Clinical Health Act (“HITECH”), including C.F.R. Sections 164.308, 164.310, 164.312, 164.316, and 164.402
- These statutes, rules and regulations are collectively referred to as the Privacy and Security Rules.



New



Business Associate -

- Doing business on behalf of the state agency , which may involve transmission of PHI

Components of Business Associate Agreement (BAA)

- ✓ Agree not to disclose
- ✓ Safeguard accidental disclosure
- ✓ Assure necessary steps in case of accidental disclosure
- ✓ Agree to steps in case of intentional disclosure by employee
- ✓ Keep documentation
- ✓ Report to state
- ✓ Assure all sub-contractors comply
- ✓ No remuneration for disclosure
- ✓ State obligations



What is Protected Health information?

Protected health information (PHI) under US law is any information about health status, provision of health care, or payment for healthcare that is created or collected by a "Covered Entity" (or a Business Associate of a Covered Entity), and can be linked to a specific individual

Alone or in any combination:

- Name
- Address (all geographic subdivisions smaller than state, including street address, city, county, or ZIP code)
- All elements (except years) of dates related to an individual (including birth date, admission date, discharge date, date of death, and exact age if over 89)
- Telephone numbers
- FAX number
- Email address
- Social Security number
- Medical record number
- Health plan beneficiary number
- Account number
- Certificate/license number
- Vehicle identifiers and serial numbers, including license plate numbers
- Device identifiers or serial numbers
- Web URLs
- IP address
- Biometric identifiers, including finger or voice prints
- Full-face photographic images and any comparable images
- Any other unique identifying number, characteristic, or code



The Just in Case Clause.....

- “This Business Associate Agreement shall be effective only if Business Associate’s services to Covered Entity involve sharing, using, or accessing PHI and if so, this Business Associate Agreement shall be effective as of the Effective Date set forth above.”

