

CDC Guidance Regarding the Use of COVID-19 Module Data by NHSN Health Department Groups

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The Centers for Disease Control and Prevention (CDC), through the National Healthcare Safety Network (NHSN) is supporting the nation's COVID-19 response by enabling long-term care facilities (LTCF) (e.g., nursing homes/skilled nursing facilities, long-term care for the developmentally disabled, and assisted living facilities) to report information to the new LTCF COVID-19 Module. The NHSN Group functionality is a technical feature within the NHSN application that enables healthcare facilities to share some or all of their NHSN data with a NHSN group user, i.e., a third party (other than the facility and CDC) such as a state or local health department, quality improvement organization, or healthcare system. In addition, this NHSN group function enables state and local health departments to access the data reported by facilities in their jurisdictions. The following information provides guidance on the roles and responsibilities for health department users that access LTCF COVID-19 data via the NHSN group function.

Important information for Health Department (HD) Group users:

- COVID-19 data reported to NHSN COVID-19 module is not covered by the data use agreements (DUAs) that some state and local health departments have with NHSN dating from before the COVID-19 response. Those pre-existing DUAs typically cover access to healthcare-associated infection (HAI) and antimicrobial use and resistance (AUR) data.
- CDC provides COVID-19 information to health departments in accordance with provisions of the NHSN Agreement to Participate and Consent form completed by each facility.
- The confidentiality protections that CDC commits to providing healthcare facilities that participate in NHSN cover CDC's custodianship and use of the NHSN data for the purposes listed in the NHSN Agreement to Participate and Consent Form. For purposes of sharing data from the COVID-19 module, the NHSN Agreement to Participate and Consent provides that data may be shared with health departments for outbreak investigation. CDC has provided access to COVID-19 data to Health Department Groups for these purposes. Once this data is with the respective Health Department Group, that Group is responsible for assuring the confidentiality of the data to which they gain access.
- Once a NHSN Group has gained access to COVID-19 data reported in NHSN, users of that Group assume data governance responsibilities for how analysts and researchers within and external to their organizations gain access to and use the accessible NHSN data. This governance encompasses establishing, using, and maintaining appropriate administrative, technical, and physical safeguards to prevent unauthorized access or use of the NHSN data to which a Health Department Group has gained access.
- Facilities participating in a Health Department Group should have a clear and accurate understanding of how their NHSN data will be used and by whom. Questions related to a Health Department Group's access to and use of data should be referred to that Group's administrator.
- Users can access the NHSN LTCF COVID-19 Module webpage for additional COVID-19 Module resources.

How COVID-19 data accessed via an NHSN Health Department Group can be used:

- Data that identifies the facility may be used by the health department for public health emergency surveillance and prevention activities (e.g., identifying priority areas for state and local response activities, providing technical assistance for data quality and validation efforts)
- Aggregate data that does not identify facilities can be posted publicly on a health department website or in reports published by the health department
- All information that identifies facilities may be shared for purposes of surveillance and prevention with local, state and federal government agencies involved in the public health emergency response

COVID-19 data identifying facilities accessed via an NHSN Health Department Group should NOT be used in the following manners unless the included facilities have provided informed consent of such use:

- Punitive or regulatory actions against healthcare institutions
- public reporting of institution-specific data
- scientific abstracts
- presentations
- manuscripts

CDC retains the right to discontinue providing such information and/or cease collaboration on future projects if a health department uses the provided patient and/or facility identifiable information in any of the aforementioned prohibited manners.