

Operational Guidance for Inpatient Rehabilitation Facilities to Report Healthcare Personnel (HCP) Influenza Vaccination Data to CDC's National Healthcare Safety Network (NHSN) for the Purpose of Fulfilling CMS's Inpatient Rehabilitation Facility Quality Reporting Program (IRF QRP) Requirements

The Centers for Medicare and Medicaid Services (CMS) published a final rule in the *Federal Register* on August 6, 2013 that included healthcare personnel (HCP) influenza vaccination summary reporting from inpatient rehabilitation facilities via the Centers for Disease Control and Prevention's (CDC's) National Healthcare Safety Network (NHSN) in the CMS Inpatient Rehabilitation Facility Quality Reporting Program (IRF QRP) requirements beginning with the 2014-2015 influenza season.¹ More specifically, the rule announced a requirement for inpatient rehabilitation facilities to report HCP influenza vaccination summary data beginning on October 1, 2014. Beginning with the 2014-2015 influenza season, inpatient rehabilitation facilities must submit data for the entire influenza vaccination season (October 1 through March 31) to NHSN. This operational guidance provides additional information about reporting HCP influenza vaccination to NHSN as part of the IRF QRP. The requirements for HCP influenza vaccination reporting to NHSN for this CMS program do not preempt or supersede any state mandates for HCP influenza vaccination reporting to NHSN (i.e., inpatient rehabilitation facilities in states with a HCP influenza vaccination reporting mandate must also abide by their state's requirements, even if they are more extensive than the requirements for this CMS program). Inpatient rehabilitation facilities located as patient care units within an acute care or critical access hospital and free-standing inpatient rehabilitation facilities are required to report HCP influenza vaccination summary data.

NHSN guidance and definitions for reporting HCP influenza vaccination summary data can be found in the NHSN Influenza Vaccination Summary Protocol: <http://www.cdc.gov/nhsn/PDFs/HPS-manual/vaccination/HPS-flu-vaccine-protocol.pdf>. The NHSN protocol provides guidance for inpatient rehabilitation facilities to report HCP influenza vaccination summary data from October 1 (or when the vaccine became available) through March 31, which includes all influenza vaccinations administered during the influenza season at the facility or elsewhere, influenza vaccine declinations, and determinations of a medical contraindication to influenza vaccination. Users must also report associated denominator data for HCP physically working in the inpatient rehabilitation facility for at least 1 working day between October 1 through March 31 of an influenza season, regardless of clinical responsibility or patient contact. This means that free-

standing inpatient rehabilitation facilities should collect data on HCP physically working in the facility for at least 1 working day between October 1 through March 31 to fulfill the CMS IRF QRP requirements. And, inpatient rehabilitation facilities located as patient care units within an acute care or critical access hospital should collect data for HCP physically working in the unit for at least 1 working day between October 1 through March 31 to fulfill the CMS IRF QRP requirements. Data should be reported separately for employees, licensed independent practitioners, and adult students/trainees and volunteers. Reporting summary data for other contract personnel is optional at this time.

In order to report HCP influenza vaccination summary data, the NHSN HPS Component must be activated. Within the HPS Component, monthly reporting plans must be created or updated to include HCP influenza vaccination summary reporting, i.e., HCP influenza vaccination must be “in-plan” in order for data to be shared with CMS. Inpatient rehabilitation facilities located as patient care units within an acute care or critical access hospital must designate this reporting in the monthly reporting plan separately from the affiliated hospital’s HCP influenza vaccination summary reporting. Once the “Influenza Vaccination Summary” box is checked on a monthly reporting plan, then the system will auto-check that same box on every monthly reporting plan throughout the entire NHSN-defined influenza season (defined as the 12 months from July 1 – June 30). All data fields required for both numerator and denominator data collection must be submitted to NHSN. If the inpatient rehabilitation facility is a patient care unit located within an acute care or critical access hospital, then the HCP influenza vaccination summary data must be submitted on a report form separate from the affiliated hospital. Data must be reported to NHSN by means of manual data entry into the NHSN web-based application.

CDC/NHSN strongly encourages that HCP influenza vaccination summary counts be updated on a monthly basis and encourages healthcare facilities to update new counts within 30 days of the end of each month (e.g., all October data should be added by November 30) so it has the greatest impact on influenza vaccination activities. HCP influenza vaccination summary reporting in NHSN consists of a single data entry screen per influenza season, so each time a user enters updated data for a particular influenza season, all previously entered data for that season will be overwritten and a new modified date will be auto-filled by the system. Facilities wishing to maintain monthly records should save their own copies of each data entry. For the purposes of fulfilling CMS quality measurement reporting requirements, this summary report will only be submitted once to CMS. The summary report must be entered by May 15 for data to be shared with CMS.

HCP influenza vaccination summary data submitted to NHSN by May 15 will be reported from CDC to CMS for each inpatient rehabilitation facility CMS Certification Number (CCN). CDC will share all in-plan HCP influenza vaccination summary data with CMS. CDC will provide a HCP influenza vaccination percentage for each reporting inpatient rehabilitation facility CCN.

¹ US Department of Health and Human Services. Medicare Program; Inpatient Rehabilitation Facility Prospective Payment System for Federal Fiscal Year 2014; Final Rule Federal Register 2013; 78:47905-47906.

<http://www.gpo.gov/fdsys/pkg/FR-2013-08-06/pdf/2013-18770.pdf>