Operational Guidance for Outpatient Dialysis Facilities to Report Healthcare Personnel (HCP) Influenza Vaccination Data to CDC’s National Healthcare Safety Network (NHSN) to Fulfill CMS’s End-Stage Renal Disease (ESRD) Quality Incentive Program (QIP) Requirement

Summary
The Centers for Medicare and Medicaid Services (CMS) published an End-Stage Renal Disease (ESRD) Quality Incentive Program (QIP) final rule in the *Federal Register* on November 6, 2014 that included a requirement for outpatient dialysis facilities to report healthcare personnel (HCP) influenza vaccination summary data via the Centers for Disease Control and Prevention’s (CDC’s) National Healthcare Safety Network (NHSN) beginning with the 2015-2016 influenza season. Specifically, the rule requires dialysis facilities to report HCP influenza vaccination summary data beginning with the 2015-2016 influenza season (October 1 through March 31) to NHSN by May 15. 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., dialysis 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).

Data Collection & Reporting
The CMS ESRD QIP NHSN HCP influenza vaccination reporting measure does not have patient census or modality eligibility requirements. All outpatient dialysis facilities, including those that offer only home hemodialysis and/or peritoneal dialysis services must report these data. Furthermore, all ESRD facilities will need to report HCP influenza vaccination data separately in NHSN, even if they share the exact same CMS Certification Number (CCN) as an associated acute care facility. Therefore, every ESRD facility that is not yet enrolled in NHSN will need to enroll separately from their acute care facility in order to report HCP influenza vaccination data. If an in-center hemodialysis facility is already enrolled in NHSN, they will need to activate the Healthcare Personnel Safety (HPS) Component in order to report HCP influenza vaccination data separately from their associated acute care facility.

The specific guidance and definitions for reporting HCP influenza vaccination summary data are found in the NHSN Influenza Vaccination Summary Protocol: [http://www.cdc.gov/nhsn/PDFs/HPS-manual/vaccination/HPS-flu-vaccine-protocol.pdf](http://www.cdc.gov/nhsn/PDFs/HPS-manual/vaccination/HPS-flu-vaccine-protocol.pdf). Required summary numerator data include counts of 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, from October 1 (or when the vaccine became available) through March 31. Required summary denominator data include counts of HCP who physically worked in the dialysis facility for at least 1 working day between October 1 through March 31 of an influenza season, regardless of their clinical responsibility or patient contact. All data are reported separately for employees, licensed independent practitioners, and adult students/trainees and volunteers. Reporting summary data from other contract personnel is optional at this time.

NHSN is divided into surveillance components. To report HCP influenza vaccination summary data, the NHSN HPS Component must be activated. The component can be activated during NHSN enrollment or, if the facility is already enrolled, in NHSN via the “Facility” option on the navigation bar (available only to users with administrator rights). Within the HPS Component, monthly reporting plans must be created or updated to indicate the facility is participating in HCP influenza vaccination summary data reporting according to the NHSN protocol, i.e., HCP influenza vaccination must be “in-plan” in order for data to be shared with CMS. Once the “Influenza Vaccination Summary” box is checked on a monthly reporting plan, 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 required numerator and denominator data must be submitted to NHSN, by means of manual data entry into the NHSN web-based application.

CDC/NHSN strongly encourages facilities to update HCP influenza vaccination summary counts on a monthly basis, within 30 days of the end of each month (e.g., all October data should be added by November 30), for reporting to have 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. To maintain monthly records, users should make copies of each data entry separate from NHSN.

For the CMS ESRD QIP, the HCP influenza vaccination summary report will be submitted once to CMS on May 15. All in-plan HCP influenza vaccination summary data submitted to NHSN by May 15 will be reported by CDC to CMS for each dialysis facility CCN. CDC will provide a HCP influenza vaccination percentage for each reporting dialysis facility CCN.
1 US Department of Health and Human Services. Medicare Program; End–Stage Renal Disease Prospective Payment System Quality Incentive Program and Durable Medical Equipment, Prosthetics, Orthotics, and Supplies; Final Rule Federal Register 2014; 79: 66206-66208.