

Acute Care Facilities: CMS Reporting Requirements

Should acute care facilities separate healthcare personnel (HCP) working in the outpatient areas from the inpatient areas when reporting HCP influenza vaccination summary data?

CMS published a final rule in November 2018 eliminating the requirement for hospital outpatient departments to report HCP influenza vaccination summary data through NHSN beginning with the 2018-2019 influenza season. On February 7, 2019, CMS and CDC issued guidance to clarify that this measure does not separate out HCP who only work in the inpatient or outpatient areas, or work in both:

“The IQR program Healthcare Personnel Influenza Vaccination measure is a facility-wide measure and does not separate out employees who only work in the inpatient or outpatient areas or work in both. Due to the burden of trying to separate out the counts for inpatient and outpatient, CMS allows facilities to collect and submit a single vaccination count to include all employees hospital-wide that meet the criteria, regardless of whether they work inpatient or outpatient. The hospital-wide or combined counts should be entered on one single influenza vaccination summary data form in NHSN. This includes all units/departments, inpatient and outpatient, that share the same CMS Certification Number (CCN) as the hospital and are affiliated with the acute care facility.”

The CMS Final Rule can be accessed here:

US Department of Health and Human Services. Medicare Program: Changes to Hospital Outpatient Prospective Payment and Ambulatory Surgical Center Payment Systems and Quality Reporting Programs.

<https://www.federalregister.gov/documents/2018/11/21/2018-24243/medicare-program-changes-to-hospital-outpatient-prospective-payment-and-ambulatory-surgical-center>

How should acute care facilities report HCP influenza vaccination summary data, beginning with the 2018-2019 influenza season?

Facilities should follow the guidance below when making determinations about which areas of the acute care facility to include when reporting HCP influenza vaccination summary data to NHSN as part of the CMS Hospital Inpatient Quality Reporting (IQR) Program:

- **Include** all inpatient units/departments of the acute care facility sharing the exact same CMS Certification Number [CCN] (100% identical) as the acute care facility, regardless of distance from the facility.
- **Include** all outpatient units/departments of the acute care facility sharing the exact same CCN (100% identical) as the acute care facility, regardless of distance from the facility.



	<ul style="list-style-type: none"> • Exclude all inpatient and outpatient units/departments of the acute care facility with a different CCN (even if different by only one letter or number) from the acute care facility.
Where can I find the operational guidance for acute care hospitals to report HCP influenza vaccination summary data for fulfilling CMS’s IQR Program requirements?	The operational guidance for the IQR Program requirements for HCP influenza vaccination reporting can be found under “CMS Supporting Materials” at http://www.cdc.gov/nhsn/acute-care-hospital/hcp-vaccination/index.html .
Why are free-standing inpatient rehabilitation facilities (IRFs) required to enroll in NHSN, while IRF units having CCNs from their acute care or critical access facilities usually do not need to do so?	IRF units do not need to enroll nor activate the Healthcare Personnel Safety Component in NHSN unless their affiliated acute care or critical access facility is not already enrolled in NHSN <u>or</u> the IRF unit is not physically located within the walls of the affiliated acute care or critical access facility. IRF units located within hospitals should be mapped as locations of the already-enrolled acute care or critical access facility. Once the IRF unit is added as a location of the facility, the IRF unit-specific CCN can be associated with the facility so all HCP influenza vaccination data entered into NHSN for the IRF can be sent to CMS appropriately. More information about how to add a CCN to an IRF unit can be found here: http://www.cdc.gov/nhsn/PDFs/irf/Updating-IRF-locations-within-NHSN.pdf .
I am reporting data for my acute care facility and for my CMS IRF unit that has a separate CCN. How should I report my data, now that the acute care facility reporting requirements have changed, beginning with the 2018-2019 influenza season?	You should continue to report data separately for the IRF unit. HCP working <u>only</u> in the IRF unit should be counted in the IRF unit report, but not in the acute care facility report. HCP working in <u>both</u> the IRF unit and acute care facility should be counted in both the IRF unit and acute care facility reports.
If my IRF unit has the exact same CCN as my acute care or critical access facility, do I need to report the IRF unit data separately from my acute care or critical access facility data?	No. If the IRF unit CCN is 100% identical to the CCN of its affiliated acute care or critical access facility, then separate HCP influenza vaccination summary data reporting is not required by CMS. Therefore, the IRF unit data can be included in the HCP influenza summary vaccination data report for the inpatient units of the acute care or critical access facility. However, IRF units whose CCNs differ from the acute care or critical access facility CCN by even one letter or number – for example, having a “T” or “R” in the third position – must either be mapped as locations of the parent facility or enrolled as a separate NHSN facility, and their data must be reported separately.
I used to report data for my CMS inpatient psychiatric facility (IPF) unit that is located within my acute care facility. How should I report data, now that CMS has suspended the requirement for	HCP working only in the IPF unit should not be counted in the acute care facility report. Vaccination status of these HCP does not have to be reported to NHSN for CMS purposes, although reporting may be required by the state or locality of the facility. However, HCP working in both the IPF unit and in other units of the acute care facility should be counted in the acute care facility report.



<p>IPFs to report data through NHSN, beginning with the 2018-2019 influenza season?</p>	
<p>My acute care hospital includes a long-term acute care unit that has its own CCN. Should HCP working in this unit be counted in the acute care facility vaccination data report?</p>	<p>Because the long-term acute care unit has its own CCN, it should be enrolled in NHSN as a separate HOSP-LTAC facility. HCP who work in this unit would not be included in the vaccination summary report for the acute care hospital, unless they also work in the hospital during the reporting period. CMS reporting requirements for long-term acute care hospitals are separate from requirements for short-stay acute care hospitals.</p>
<p>Can I review my facility's HCP influenza vaccination summary data in NHSN before they are sent to CMS?</p>	<p>Yes, acute care facilities may review the HCP influenza vaccination summary data report that will be sent to CMS. Instructions on generating the report in NHSN can be found at: CMS Reporting: Healthcare Personnel Influenza Vaccination (Acute Care Hospitals) [http://www.cdc.gov/nhsn/cms/index.html].</p>
<p>How will the data collected through the measure be used?</p>	<p>The tracking and reporting of HCP influenza vaccination status will help healthcare facilities identify and target unvaccinated HCP. This may result in reduced morbidity and mortality related to influenza virus infection among HCP and patients. HCP influenza vaccination summary data submitted to NHSN by May 15 will be reported by CDC to CMS for each acute care hospital. CDC will provide a hospital-specific HCP influenza vaccination percentage for each reporting hospital that has entered in-plan HCP influenza vaccination summary data into NHSN. Public reporting of the data from acute care hospitals on Hospital Compare began with the 2013-2014 influenza season.</p>
<p>Acute Care Facilities: Denominator</p>	
<p>My facility has an outpatient surgery unit that is physically part of the acute care facility and shares the exact same CCN as the acute care facility. Should I include individuals working in this outpatient unit in the acute care facility HCP influenza vaccination summary report?</p>	<p>Yes. You can include all outpatient units/departments of the acute care facility sharing the exact same CCN (100% identical) as the acute care facility, regardless of distance from the facility.</p>
<p>My acute care hospital owns several outpatient provider practices that are physically separate from the main hospital campus and have separate CCNs. Employees of these clinics are on the hospital's payroll, so should I include them in HCP influenza vaccination summary report for the hospital?</p>	<p>No. These employees should not be counted in HCP influenza vaccination summary reports for the acute care facility unless they also physically work in the acute care hospital for at least 1 day from October 1 through March 31.</p>



My facility has an administrative building that is physically connected to the acute care facility by a skywalk. This building is only used for administrative duties and not patient care. Should I count HCP working in this building in the HCP influenza vaccination summary report?	Yes, you should count HCP working in the administrative building, as it is considered part of the acute care facility.
Should HCP who are employees of a healthcare system (e.g., university employees), but who are not hospital employees, be included in the acute care facility HCP influenza vaccination summary report?	Non-hospital employees should only be included if they physically work in the acute care facility for at least 1 day from October 1 through March 31 and meet the criteria for either the licensed independent practitioner category or the adult student/trainee and volunteer category. They would not be counted in the employee category since they are not on the hospital's payroll.
Should employees who always work off-site or out-of-state be counted, such as employees practicing telemedicine?	No. Only HCP physically working in the acute care facility for at least one day or more from October 1 through March 31 should be included in the HCP influenza vaccination summary report.
Critical Access Facilities: Reporting Requirements	
Where can I find information on the HCP influenza vaccination summary reporting requirements for critical access hospitals (CAHs)?	Information can be found at the following link, under the "Supporting Materials" tab: http://www.cdc.gov/nhsn/acute-care-hospital/hcp-vaccination/index.html .
Are the reporting requirements for CAHs the same as acute care hospitals?	Yes, CAHs should follow the same reporting requirements that apply to acute care hospitals that report HCP influenza vaccination summary data to NHSN.
Are CAHs required to submit separate vaccination reports for HCP working in outpatient units and HCP working in inpatient units?	No. Just as with acute care hospitals, beginning with the 2018-2019 influenza season, CAHs should submit a single report on the vaccination status of HCP working in inpatient and outpatient departments of the facility.

