

Toolkit for Data Quality Checks for Reporting Facilities

Table of Contents

Section I. Annual Data Quality Assessment Activities
NHSN Data Quality Guidance and Toolkit2
Who Needs the Data Quality Toolkit
How the Toolkit Works
I. Annual Data Quality Assessment Activities
Development of Annual HAI surveillance and Validation Plan
Determine Facility's Surveillance Program Competencies
CLABSI and CAUTI
VAE
SSI
LabID Event
Facility Self-Validation Guidance7
II. Data Quality Survey Tools17
Appendix A: CLABSI/CAUTI/VAE/SSI/LABID Surveillance Coordinator Survey
Appendix B: Documentation of Electronic CLABSI/CAUTI/VAE Denominator Validation Template20
Appendix C: CLABSI, CAUTI, and VAE Denominator Counting Survey (with Key)23
Appendix D: Surgical Procedure and SSI Surveillance Methods Survey (with Key)
Appendix E: LabID Event Surveillance Methods Survey (with Key)
Appendix F: LabID Event Facility-Wide Inpatient (FacWideIN) Denominator Validation Template
III. Quarterly/Monthly Data Quality Assessment Activities
Monthly HAI reporting plan
Data Quality Checklists
Appendix G: Data Quality Checklist – CLABSI/CAUTI/VAE Data
Appendix H: Data Quality Checklist - MDRO/CDI Data
Appendix I: Data Quality Checklist - SSI Events/Procedures
IV. Facility/Provider to Facility/Provider Communications under HIPAA: Questions and Answers46





NHSN Data Quality Guidance and Toolkit

Healthcare facilities participate in healthcare-associated infections (HAI) surveillance via Centers for Disease Control and Prevention's (CDC) National Healthcare Safety Network (NHSN) for several purposes:

- Monitor HAIs and the impact of their own prevention efforts
- Benchmark facility performance against risk-adjusted national data
- Fulfill state-mandated reporting requirements, and/or to comply with the Centers for Medicare and Medicaid Services (CMS) Hospital Inpatient Quality Reporting Program requirements

Data Quality of HAI surveillance reflects the consistency, completeness, and timeliness of HAI data reported to NHSN and overall builds confidence in the user for their own facility's data. Hence for the above-mentioned reasons, data quality is an integral part of the HAI surveillance via NHSN. Regardless of the reasons for participation, facilities that report to NHSN are required to follow NHSN methods and to use NHSN definitions and criteria. The principal source of information on NHSN methods, definitions, and criteria for reporters is the NHSN <u>Patient Safety Component (PSC)</u> <u>Manual</u>. This data quality toolkit describes implementation practices for reporting facilities that support high quality surveillance data when reporting to NHSN.

Who Needs the Data Quality Toolkit?

The intended audience of the data quality toolkit are nurses, infection preventionists, or quality of care professionals at facilities, including acute care hospitals, inpatient rehabilitation hospitals, and long-term acute care facilities, reporting selected data to NHSN. Routine planned data quality checks are useful for several purposes:

- Identify and understand systematic weaknesses in facility specific HAI reporting
- Assure that the facility's surveillance data are of high quality: complete, timely, and accurate
- Promote building coordination and partnership with stakeholders
- Build confidence in your own facility data

How the Toolkit Works

This toolkit provides guidance for data quality activities suggested to be conducted annually, quarterly/monthly, and routinely by healthcare facilities to ensure that data reported to NHSN are accurate. The data quality components and tools are specific to the following seven HAI metrics: Central Line-Associated Bloodstream Infections (CLABSI), Catheter-Associated Urinary Tract Infections (CAUTI), selected Surgical Site Infections (SSI), (following colon (COLO) and abdominal hysterectomy (HYST) procedures), Methicillin-resistant *Staphylococcus aureus* (MRSA) Bacteremia LabID Event, *Clostridioides difficile* infection (CDI) LabID Event, and Ventilator-Associated Event (VAE). Data quality checklists for each of the HAI metrics listed above provide a list of metrics which facilities are encouraged to implement and review on their data prior to quarterly data submission deadline. Data Quality survey tools for the HAI metrics are encouraged to be implemented annually to understand the knowledge and practices of HAI data collection at the facility and identify gaps and needs for additional staff training in NHSN protocol and methods.

Note that while not included in this document, validation guidance for the Antimicrobial Use and Resistance (AUR) Module is available here:

• AU Implementation Validation: <u>https://www.cdc.gov/nhsn/pdfs/ps-analysis-resources/aur/AU-Option-Implementation-Data-Validation-P.pdf</u>

• AU Annual Validation: <u>https://www.cdc.gov/nhsn/pdfs/ps-analysis-resources/aur/annual-au-data-validation-508.pdf</u>.

AR Validation: https://www.cdc.gov/nhsn/pdfs/ps-analysis-resources/aur/ar-validation-508.pdf







I. Annual Data Quality Assessment Activities Development of annual HAI surveillance and validation plan

Healthcare facilities are recommended to develop an annual surveillance and data validation plan. This activity should be conducted at the beginning of the year and the annual surveillance plan should be the framework of the monthly HAI reporting plan. An annual validation plan should list the frequency and types of data quality checks and identify individuals responsible for implementing these activities.

Determine facility's surveillance program competencies

Quality HAI surveillance requires rigorous adherence to standard NHSN protocols, surveillance methods, and NSHN definitions as written. Facilities assuring data quality must be trained in NHSN specifications; remain up to date when changes are made; and commit to using appropriate NHSN methods and definitions to validate HAI data reported to the system. The infection prevention program should assure the facility-level competencies for NHSN CLABSI, CAUTI, VAE, SSI, and LabID events surveillance and validation activities.

CLABSI and CAUTI

- Completion of annual facility survey and accurate collection of risk-adjustment information:
 - Assurance of appropriate collection of facility-specific risk-adjustment elements (for example, facility bed size, location mapping, and teaching hospital affiliation). If new units have been added in a facility, they must be accurately mapped and if units are no longer in operation, they must be inactivated in NHSN. These variables must be checked annually for accuracy and entered completely in the annual facility survey. (Additional details about risk-adjustment factors for CLABSI and CAUTI are available in the NHSN's Guide to the SIR, https://www.cdc.gov/nhsn/pdfs/ps-analysis-resources/nhsn-sir-guide.pdf).
- Denominators: Ability to generate correct denominator data (CLABSI: central line days and patient days; CAUTI: indwelling urinary catheter days and patient days)
 - Assurance that persons counting patient days, central line days, and/or indwelling urinary catheter days have good knowledge of NHSN methods and definitions pertaining to denominators
 - For manual denominator counting, determine the facility's infrastructure and capacity for daily or sampled method (once/week) for locations other than specialty care areas/oncology (SCA/ONC) and NICUs (for example, ICUs, step-down units, wards). Additional details are available in the NHSN PSC Manual Chapter 4 (BSI) and Chapter 7 (UTI) (available at https://www.cdc.gov/nhsn/pdfs/pscmanual/pcsmanual_current.pdf)
 - Before reporting electronically counted denominator data, document validation of accuracy (within 5% of manual counts for at least 3 consecutive months for every reporting location). Use <u>Appendix B</u>
 Documentation of Electronic CLABSI/CAUTI/VAE Denominator Validation Template, to document validation of accuracy prior to reporting electronic data
 - Use the CLABSI/CAUTI/VAE Surveillance Coordinator Survey (<u>Appendix A</u>) to determine current denominator counting practices and training needs for staff
- Numerators CLABSI: Ability to identify CLABSI events correctly and completely in real time
 - Awareness and investigation of all positive blood specimens among patients with central lines
 - Capacity to reproduce a complete list of positive blood specimens collected from patients assigned to facility surveillance location(s) to facilitate internal or external audits
 - o Documentation of candidate CLABSI events and relevant decisions leading to reporting outcomes





- Ability to correctly apply BSI case definitions, including ability to differentiate between primary and secondary bloodstream infections, in accordance with NHSN protocols in the NHSN PSC Manual Chapter 4 (BSI) (available at https://www.cdc.gov/nhsn/pdfs/pscmanual/pcsmanual_current.pdf)
 - Current rules for assigning a bloodstream isolate to an alternative primary site-specific infection are detailed in Chapter 4 (BSI) Appendix B: Secondary BSI Guide
 - Of note, NHSN definitions for alternative primary infection sites must be met to assign bloodstream infections as secondary. Up-to-date alternative primary infection site definitions are available in the NHSN PSC Manual Chapter 17 (available at https://www.cdc.gov/nhsn/pdfs/pscmanual/pcsmanual_current.pdf)
- Numerators CAUTI: Ability to identify CAUTI events correctly and completely in real time
 - Awareness and investigation of all positive urine cultures among patients with indwelling urinary catheters
 - Capacity to reproduce a complete list of positive urine cultures collected from patients assigned to facility surveillance location(s) to facilitate internal or external audits
 - Documentation of candidate CAUTI events and relevant decisions leading to reporting outcomes
 - Ability to correctly apply UTI case definitions in accordance with NHSN protocols in the NHSN PSC Manual Chapter 7 (UTI) (available at https://www.cdc.gov/nhsn/pdfs/pscmanual/pcsmanual_current.pdf)

VAE

- Completion of annual facility survey and accurate collection of risk-adjustment information:
 - Assurance of appropriate collection of facility-specific risk-adjustment elements (for example, facility bed size, location mapping, and teaching hospital affiliation). If new units have been added in a facility, they must be accurately mapped and if units are no longer in operation, they must be inactivated in NHSN. These variables must be checked annually for accuracy and entered completely in the annual facility survey. (Additional details about risk-adjustment factors for VAE are available in the NHSN's Guide to the SIR, https://www.cdc.gov/nhsn/pdfs/ps-analysis-resources/nhsn-sir-guide.pdf)
- Denominators: Ability to generate correct denominator data (ventilator days and patient days)
 - Assurance that persons counting patient days, ventilator days have good knowledge of NHSN methods and definitions pertaining to denominators
 - Before reporting electronically counted denominator data, document validation of accuracy (within 5% of manual counts for at least 3 consecutive months for every reporting location). Use <u>Appendix B</u>, Documentation of Electronic CLABSI/CAUTI/VAE Denominator Validation Template, to document validation of accuracy prior to reporting electronic data
 - Use the CLABSI/CAUTI/VAE Surveillance Coordinator Survey (<u>Appendix A</u>) to determine current denominator counting practices and training needs for staff
- Numerators VAE: Ability to identify VAE events correctly and completely in real time
 - Awareness of all mechanically ventilated patients in adult surveillance locations, and ability to monitor daily ventilator settings, accurately determine daily minimum PEEP and FiO₂ values, review antimicrobial administration data, and have access to review eligible laboratory test results
 - Ability to identify patients on excluded modes of ventilation and those on Airway Pressure Release Ventilation (APRV) and similar modes of mechanical ventilation





- Capacity to reproduce a complete list of mechanically-ventilated patients assigned to facility surveillance location(s) to facilitate internal or external audits
- Documentation of candidate VAE and relevant decisions leading to reporting outcomes
- Ability to correctly apply VAE algorithms, in accordance with NHSN protocols in the NHSN PSC Manual Chapter 10 (VAE) (available at <u>https://www.cdc.gov/nhsn/pdfs/pscmanual/pcsmanual_current.pdf</u>)

SSI

- Risk-adjustment: Ability to correctly report SSI risk-adjustment variables (for example, ASA score, diabetes, closure technique) for all operative procedures. (Additional details about risk-adjustment factors for SSI are available in the NHSN's Guide to the SIR, https://www.cdc.gov/nhsn/pdfs/ps-analysis-resources/nhsn-sir-guide.pdf)
- Denominators: Ability to generate and report monthly procedure denominators completely and correctly for procedures under surveillance
- Numerators: Evaluation of all potential admission and readmission infections in real time during the prescribed SSI surveillance period (30 or 90 days, based on the procedure category); post-discharge surveillance tracking outpatient SSI events and reports of re-admissions to other facilities during the SSI surveillance period
 - Ability to identify all readmissions among patients undergoing surveillance procedures during the SSI surveillance period (30 or 90 days, based on the procedure; for COLO and HYST the SSI surveillance period is 30 days)
 - Ability to correctly classify SSI cases in accordance with NHSN definitions as either Superficial Incisional, Deep Incisional, or Organ/Space SSI Events in accordance with the NHSN protocols in the NHSN PSC Manual Chapter 9 (SSI) (available at

https://www.cdc.gov/nhsn/pdfs/pscmanual/pcsmanual_current.pdf)

• Ability to correctly apply the NHSN Principal Operative Procedure Category Selection Lists when attributing SSI events in the context of multiple concurrent NHSN operative procedures

LabID Event

- Risk-adjustment: Assurance of accurate collection of risk-adjustment elements. (Additional details about riskadjustment factors for MDRO/CDI are available in the NHSN's Guide to the SIR, https://www.cdc.gov/nhsn/pdfs/ps-analysis-resources/nhsn-sir-guide.pdf)
- Denominators: Ability to generate correct monthly summary denominator data (FacWidelN patient days, admissions to inpatient locations, and encounters from the emergency department, 24-hour observation units, and other affiliated outpatient locations)
- Numerators: Ability to comprehensively identify and correctly assign positive laboratory tests as reportable vs. duplicate
 - Understanding of and ability to correctly apply LabID Event following NHSN protocols in the NHSN PSC Manual Chapter 12 (MDRO/CDI) (available at <u>https://www.cdc.gov/nhsn/pdfs/pscmanual/pcsmanual_current.pdf</u>)
 - Awareness of MRSA-positive blood specimens and toxin-positive CDI test results among inpatient, emergency department, and 24-hour observation patients





- Ability to identify MRSA-positive blood specimens and toxin-positive CDI test results obtained in facilityaffiliated outpatient clinics on the day of admission to an inpatient location
- Tracking relevant decisions for positive laboratory tests leading to reporting outcomes
- Capacity to produce a complete list of MRSA-positive blood specimens and/or CDI-positive test results from stool specimens by location for all NHSN inpatient, emergency department, and 24-hour observation units to facilitate internal or external audits.

The next sections of the toolkit provide guidance to ensure accurate collection of risk-adjusted variables, denominator data, and screening of all potential HAI events as they relate to case status and case classification.





Facility Self-Validation Guidance

Validation	Items to review	Suggested method
component		
Annual	Patient care locations where CLABSI	1. On an annual basis, integrate internal validation/quality assurance process into facility risk assessment
surveillance	CAUTI and VAE surveillance are	program:
and validation	planned	a. Staffing and training needed for quality data collection
plan	Types of surgical procedures followed	b. Plan for staff training and assessment
	for SSI surveillance	c. Consider whether burden of manual data collection justifies establishing and validating
	Sources of information for surgical	manual daily or weekly sampled or electronic denominator reporting for each surveillance
	procedures, surgical readmissions,	location
	and post-discharge surveillance	d. Assess adequacy of facility infrastructure, EMR or vendor systems, and practices for
	Source of inpatient admissions and	documenting device use, placement, and removal
	patient days as defined for LabID	e. Evaluate access to IT and other support services for planned data checks; line listings from
	Event	laboratory information system, linkage to ADT data for surgical readmissions, and counting of
	Laboratory capacity to produce	inpatient days and admissions
	specified line listings by location or	f. Determine which facility information systems include patient days and admissions with and
	house-wide	without observation patients to assure that LabID Event denominators are being counted
	Ability to link laboratory and	correctly and encounters from the emergency department and 24-hour observation units are
	admissions/discharges/transfer (ADT)	also identified and included
	data	
	IT support, especially if electronic	
	reporting will be introduced	
	Training needs:	
	Staff training for denominator	
	counting: CLABSI, CAUTI	
	Staff training for NHSN	
	operative procedure	
	reporting	





Validation	Items to review	Suggested method
component		
	NHSN training updates and	
	case-studies for NHSN	
	reporters	
Facility and	Facility level information reported to	1. The NHSN Patient Safety Component includes separate annual surveys for Acute Care
location	NHSN	Hospitals/Facilities (Patient Safety Component – <u>Annual Hospital Survey, 57.103</u>), Long-term Acute
information	Teaching hospital status	Care Facilities (Patient Safety Component – <u>Annual Facility Survey for LTAC, 57.150</u>), and Inpatient
reported to	Number of facility beds	Rehabilitation Facilities (Patient Safety Component – <u>Annual Facility Survey for IRF, 57.151</u>)
NHSN		a. On an annual basis, review and confirm that teaching status and number of beds (ICU vs.
		all other inpatient location beds) are accurate (see below)
		Note: If facilities that share a single CCN (CMS certification number) are in physically separate buildings
		from each other, whether on the same property or over multiple campuses, they should be enrolled
		separately in NHSN. Each distinct facility should have its own unique NHSN OrgID and have its own
		annual survey entered.
	Patient location level mapping	On an annual basis, review data for each patient care location entered into NHSN using up-to-date
	information reported to NHSN	information on patient demographics by location (objective data may be available from bed control or a
	Facility location label and CDC	chief nursing officer) to confirm the following:
	location description	1. The CDC location label assigned meets the CDC 80% rule for the assigned CDC location description (See
	The number of beds reported for	NHSN PSC Manual Chapter 15, available at
	ICU and non-ICU location types	https://www.cdc.gov/nhsn/pdfs/pscmanual/pcsmanual_current.pdf). Note: Annually review NHSN
		mapping guidance for updates and changes.
		2. The combined number of ICU beds and non-ICU beds is correct
		3. Physically separate acute care IRF/IPF/SNF units are enrolled and mapped according to NHSN guidance
CLABSI and	Patient days, central line days, and	1. Regardless of type of denominator data collection (manual or electronic):
CAUTI	indwelling urinary catheter days.	a. For CLABSI and CAUTI denominator data assure that each month is correctly listed as in-plan
denominator		b. For each in-plan month assure that denominator data (patient days, central line days, and
data	Use Appendix C, CLABSI and CAUTI	indwelling urinary catheter days) have been entered into NHSN
	Denominator Counting Survey with Key to	2. If manual daily or weekly sampled denominator data collection is used:
	assess the current knowledge of	





Validation	Items to review	Suggested method			
component					
	denominator data collection methodology and to identify further training needs.	 Assure that staff members collecting denominator data know correct NHSN procedures and definitions for this task and are following the Chapter 4 and 7 NHSN protocols (<u>https://www.cdc.gov/nhsn/pdfs/pscmanual/pcsmanual_current.pdf</u>). <u>Appendix C</u> of this document contains a survey that may be adapted for evaluation of denominator collection practices for CLABSI and CAUTI denominators. 			
		 b. Conduct data quality checks of manual denominators. b. Conduct data quality checks of manual denominator data periodically (for example, for one week annually in each location type) by performing concurrent independent patient-level data collection (for example, room number, room occupied, patient name/MRN, and central line present or absent). This is particularly important when training new denominator counting personnel. 			
		 c. The IP should review the corresponding data to determine if standard data collection is correct and compliant with NHSN protocols for the patient location (for example, NICUs, specialty care areas, other). Results should be shared with staff for recognition of good work or to modify practices for collecting data if necessary. If problems are found manual validation should be repeated. State Health Department validators may ask to see results of data quality checks and may assess staff knowledge and practices. d. Periodically assess completeness and reliability of denominator data collected/reported to NHSN. Using denominator logs calculate % of days per year that: i. patient days were not collected ii. central line days were not collected iii. indwelling urinary catheter days were not collected iv. be prepared to share your data logs and analysis with reviewers during external 			
		validation			
		3. If electronic data capture is used:			
		 a. The NHSN CLABSI and CAUTI protocols state "when denominator data are available from electronic databases these sources may be used <u>as long as the counts are not substantially different (+/- 5%) from manually-collected counts</u>" (https://www.cdc.gov/nhsn/pdfs/pscmanual/pcsmanual_current.pdf). This guideline is important because unexamined electronic counts may be seriously flawed and can be difficult 			



Validation	Items to review	Suggested method
component		
		to align with NHSN reporting definitions.
		For each reporting location where electronic databases are used to obtain counts of patient
		days and/or device days, determine if initial data validation was performed according to this
		guidance. If electronic counts were not validated or not within 5% of manual counts, resume
		manual counting and continue working with IT staff to improve design of electronic
		denominator data extraction (while reporting manual counts) until concurrent counts are
		within 5% for 3 consecutive months.
		Once an individual reporting location's electronic counts are within 5% of manual counts for 3
		consecutive months, electronic counts may be used for that location. Continue concurrent
		counts for remaining locations until their electronic counts are also within 5% of their manual
		counts for 3 consecutive months.
		b. When converting from one electronic counting system to another electronic counting system,
		the new electronic system should be validated against manual counts as above. If electronic
		counts for the new electronic system are not within 5% of manual counts, resume manual
		counting and continue working with IT staff to improve design of electronic denominator data
		extraction (while reporting manual counts) until concurrent counts are within 5% for 3
		consecutive months.
		Note: This guideline is important because validating a new electronic counting system against
		an existing electronic system can magnify errors and result in inaccurate denominator counts.
		c. Because electronic systems are subject to change and can result in disrupted or inaccurate
		data streams, best practices for use of electronic data capture also require:
		i. vigilance for aberrant data that could result from changes to electronic medical
		records or related systems
		ii. periodic spot checks of electronic data to assure continued good performance
		d. A report of successful alignment of electronic denominator counting at two related facilities
		has been published (Tejedor SC, et al. Infect Control Hosp Epidemiol 2013; 34:900-907).





Validation	Items to review		Suggested method
component			
CLABSI and	Complete ascertainment of candidate	1.	Assure that the microbiology laboratory tracks and reports patient care location at the time of
CAUTI	CLABSIs and candidate CAUTIs in	i	specimen collection and not at the time of final report for surveillance purposes.
numerator	surveillance locations	2.	Consider documentation of surveillance decisions, for example:
data		i	a. Keep a record/line-listing of positive blood specimens and decision making about CLABSI,
		l	particularly in surveillance locations. Patients without a recent or current central line can
		l	quickly be eliminated from consideration for CLABSI. For any positive blood specimens that
		l	meet the definition of laboratory-confirmed bloodstream infection (LCBI types 1, 2, or 3) in a
		l	surveillance location, document the LCBI, presence or absence of a central line, why you
		l	consider the event to be either healthcare-associated (HA) or non-HA, primary or secondary,
		l	and whether or not the event was reported as a CLABSI to NHSN.
		l	b. Keep a record/line listing of positive urine cultures and decision making about CAUTI,
		l	particularly in surveillance locations. Patients without a recent or current indwelling urinary
		l	catheter can quickly be eliminated from consideration for CAUTI. For any positive urine
		l	cultures that meet the definition of asymptomatic bacteremic urinary tract infection (ABUTI)
		l	or specific symptomatic urinary tract infection types (SUTI1a, SUTI1b or SUTI2), document the
		l	urinary tract infection (UTI), presence or absence of an indwelling urinary catheter, why you
		l	consider the event HA or non-HA, and whether or not the event was reported as a CAUTI to
			NHSN.
		3.	Periodically assure that all positive blood specimens and urine cultures have been reviewed by
			requesting a surveillance location line list for comparison to the record.





VAE	Patient days and ventilator days.	1.	Regardless of type of denominator data collection (manual or electronic):
denominator			a. For VAE denominator data assure that each month is correctly listed as in-plan.
data	Use Appendix C, CLABSI, CAUTI, and VAE		b. For each in-plan month assure that denominator data (patient days and ventilator days) have
	Denominator Counting Survey with Key to		been entered into NHSN.
	assess the current knowledge of	2.	If daily manual denominator or episodes of mechanical ventilation (EMV) data collection is used:
	denominator data collection methodology and to identify further training needs.		 a. Assure that staff members collecting denominator data know correct NHSN procedures and definitions for this task and are following the Chapter 10 NHSN protocol (<u>https://www.cdc.gov/nhsn/pdfs/pscmanual/pcsmanual_current.pdf</u>). <u>Appendix C</u> of this document contains a survey that may be adapted for evaluation of denominator collection practices for VAE denominators. b. Conduct data quality checks of manual denominator/EMV denominator data periodically (for example, for one week annually in each location type) by performing concurrent independent patient-level data collection (for example, room number, room occupied, patient name/MRN, and mechanical ventilator present or absent). This is particularly important when training new denominator counting personnel. c. The IP should review the corresponding data to determine if standard data collection is correct and compliant with NHSN protocols for the patient location (for example, adult ICUs, specialty care areas, other). Results should be shared with staff for recognition of good work or to modify practices for collecting data if necessary. If problems are found manual validation should be repeated. State Health Department validators may ask to see results of data quality checks and may assess staff knowledge and practices. d. Periodically assess completeness and reliability of denominator data collected/reported to
		3.	 NHSN. Using denominator logs calculate % of days per year that: patient days were not collected mechanical ventilator days were not collected be prepared to share your data logs and analysis with reviewers during external validation If electronic data capture is used: The NHSN VAE protocol states "when denominator data are available from electronic sources, these sources may be used as long as the counts are not substantially different (+/- 5%) from manually-collected counts"





		 important because unexamined electronic counts may be seriously flawed and can be difficult to align with NHSN reporting definitions. For each reporting location where electronic databases are used to obtain counts of patient days and/or device days, determine if initial data validation was performed according to this guidance. If electronic counts were not validated or not within 5% of manual counts, resume manual counting and continue working with IT staff to improve design of electronic denominator data extraction (while reporting manual counts) until concurrent counts are within 5% for 3 consecutive months. Once an individual reporting location's electronic counts are within 5% of manual counts for 3 consecutive months. b. When converting from one electronic counting system to another electronic counting system, the new electronic system should be validated against manual counts, resume manual counting and continue working with IT staff to improve design of electronic counting system, the new electronic system should be validated against manual counts, resume manual counting and continue working with IT staff to improve design of electronic denominator data extraction (while reporting manual counts) until concurrent counts are within 5% for 3 consecutive months. b. When converting from one electronic counting system to another electronic counting system, the new electronic system should be validated against manual counts, resume manual counting and continue working with IT staff to improve design of electronic denominator data extraction (while reporting manual counts) until concurrent counts are within 5% for 3 consecutive months. Note: This guideline is important because validating a new electronic counting system against an existing electronic system can magnify errors and result in disrupted or inaccurate data streams, best practices for use of electronic data capture also require: i. vigilance for
		d. A report of successful alignment of electronic denominator counting at two related facilities has been published (Tejedor SC, et al. Infect Control Hosp Epidemiol 2013; 34:900-907).
VAE numerator data	 Complete ascertainment of candidate VAEs (VAC, IVAC, and PVAP) in surveillance locations 	 Assure access to daily mechanical ventilation settings for all patients eligible for VAE surveillance for purposes of determining daily minimum PEEP and FiO₂ values. Assure access to the Medication Administration Record to determine which antimicrobial agents were actually administered to the patient (orders and dispensing information are not sufficient).





		3.	 Assure that the microbiology laboratory tracks and reports patient care location at the time of specimen collection and not at the time of final report for surveillance purposes. Consider documentation of surveillance decisions, for example: a. Keep a record/line-listing of patients on mechanical ventilation and decision making regarding VAE in surveillance locations. Document or have access to electronic capture of daily minimum FiO₂ and PEEP for all patients eligible for VAE surveillance. For any patients meeting VAC - document temperature, WBC count, and antimicrobial administration. For any patients meeting IVAC - document applicable laboratory findings. For any patient that meets the definition of VAE - document the VAE event met (VAC, IVAC, or PVAP) and whether or not the event was reported as a VAE to NHSN.
SSI denominator data	 Surgical procedures under NHSN surveillance for SSI. Use Appendix D, Surgical Procedure and SSI Surveillance Methods Survey with Key to determine current knowledge and practices of SSI reporting and to identify training needs. 	2.	 a. As part of annual surveillance and validation planning, determine which surgical procedures will be reported to NHSN, whether inpatient, outpatient, or both, and note the assigned surveillance period (30 or 90 days) for each procedure. b. Identify all primary sources of information about procedures for which you will conduct surveillance. ICD-10-PCS and/or CPT operative procedure codes are required to determine the correct NHSN operative procedure category to be reported. Cross-referencing of sources (for example, OR procedure records plus ICD-10-PCS/CPT operative procedure codes assigned after discharge) is the best way to assure complete denominator. c. It is prudent to scrutinize the list of ICD-10-PCS and/or CPT procedure codes used by the OR system to identify procedures of interest for completeness. Failure to include one or more specified codes for designated procedures in the denominator can lead to the appearance of falsely higher SSI rates. d. Assure that all persons collecting data for procedures are familiar with NHSN definitions for Denominator for Procedure Details (https://www.cdc.gov/nhsn/pdfs/pscmanual/pcsmanual_current.pdf), and ensure that processes are in place to capture this data accurately and completely.





		 b. Both manual and electronic denominator data quality are subject to error at the source of information and to systematic error. In either case, data quality may be monitored by one of several internal validation methods: double checking of procedure record completeness by two persons (for example, one reading the ICD-10-PCS and/or CPT procedure code list and one reading the NHSN record list) monthly NHSN analysis prior to data transmission to check for duplicate procedure entry, consistency, and logical quality of entered data (for example, unusual ASA scores or duration of procedures), with investigation and resolution of outliers cross checking a second data source to identify discordant records that may have been missed or reported in error, and to identify errors leading to large errors (such as omitting a required ICD-10-PCS and/or CPT procedure code) periodic (at least annual) download from the OR system to confirm that procedure data for individual days or weeks were not missed during the interval
SSI Event numerator data	 Sources of information for surgical infection events and surgical readmissions 	 Identify information sources to identify infections among post-operative surgical inpatients, for example pharmacy, radiology, laboratory, and/or microbiology data. Assure identification of surgical readmissions during the post-operative surveillance period (30 or 90 days) and screen for infection as a cause of re-admission. Optimize post-discharge surveillance methods. Cooperate with other facilities to notify one another of SSIs following procedures at another facility.
	 Concurrent and post-discharge surveillance methods for identification of SSI events 	 Assure a mechanism to routinely identify surgical readmissions and complete post-discharge surveillance during the 30-day SSI surveillance period following COLO and HYST procedures. Investigate options for optimal post-discharge SSI surveillance, including cross-facility communications and reporting of SSIs identified by other facilities. Multiple networked surveillance modalities (for example, readmissions, surgical nursing contacts, surgical rounds, surgeon inquiry, chart review, patient survey) typically provide more complete information. Consult with other hospital IPs to consider best practices for inter-facility communication of SSIs (reports that you provide to other facilities that performed a procedure and for SSIs that are reported by other facilities to your facility). For example, the referring IP can provide details regarding the SSI event to assist with completion of the SSI event form (such as date of event, signs/symptoms, etc).





LabID Event	NHSN inpatient admissions and	1. LabID Event denominators: facility-wide admissions and inpatient days (as defined by NHSN to include
denominator	patient days include observation	observation patients located in inpatient locations) normally are derived electronically. Determine
data	patients who are located in inpatient	how to assure inclusion of observation patients that are located in inpatient locations in denominator
	locations	data counts.
		2. Some systems (typically vendor and ADT systems) can be adjusted to count observation patients in
		inpatient locations, but facilities relying on billing data must be careful to include observation patients
		from inpatient locations, who may be billed separately.
		3. Denominator validation can be accomplished using manual counting of patient days and admissions in
		three specified location types for one month each: one ICU, one Labor/Delivery/Recovery/Post-Partum
		(LDRP) location (if available), and one or more wards where observation patients are frequently
		located. Facilities with inpatient rehabilitation facility (IRF) and/or inpatient psychiatric facility (IPF)
		locations with separate CCNs and facilities with baby-based locations (for example, NICU, well baby
		nursery, etc.) should also validate these locations. Validated counts should be within 5% of the
		referent (usual) electronic counts or an evaluation of why they differ should be conducted. This
		internal validation process may be requested or required by state health departments. Use <u>Appendix</u>
		<u>F</u> , LabID Event Facility-Wide Inpatient (FacWideIN) Denominator Validation Template to determine
		accuracy of validation using electronic counts.
LabID Event	□ Assure that any reporter(s) overseeing	1. Assure that the microbiology laboratory tracks and reports patient care location at the time of
numerator	LabID Event reporting understand	specimen collection, not at the time of final report to infection control.
data	rules for duplicate reporting and	a. Note: For LabID Event, laboratory tests taken on the day of admission in affiliated facility-
	include laboratory reports from	associated outpatient locations (for example, clinics) should be included for accurate tracking
	affiliated outpatient locations on	of community-onset (CO) LabID Events.
	admission date.	2. Consider periodic internal auditing (for example, duplicate audit or abstraction of candidate events).
	Appendix E, LabID Event Surveillance	
	Methods Survey with Key to determine	
	current knowledge and practices of LabID	
	reporting and to identify training needs.	





II. Data Quality Survey Tools

Data quality survey tools include surveillance surveys with answer keys which can be implemented by the facility annually to identify and learn current HAI data collection knowledge and practices, and to identify gaps in knowledge and need for additional training among staff responsible for HAI data collection and reporting via NHSN. These survey tools can be used as frequently as needed by the facility and define the training needs for staff. Appendix B and Appendix F for documentation of electronic denominator validation should be completed when switching from manual to electronic denominator data collection and also when switching from one electronic denominator collection method to another electronic method to document that data collection is accurate and within the tolerable level of margin of error. Documentation of completion of Appendix B and Appendix F must be maintained at the facility since this may be requested by state health department during an external audit.

Appendix A: CLABSI/CAUTI/VAE/SSI/LABID Surveillance Coordinator Survey

OrgID/Name of Hospital _____ Date of Survey _____

Instru	ctions: Administer this survey to the person who oversees NSHN surveille	ance and denominator counting
1. W	'hich best describes your facility's training for CLABSI, CAUTI and VAE Den	ominator counters? (select all that apply
	No specific training is provided or required	
	Peer training (person who previously counted) trains new staff	
	Training is provided by IP	-
	Training by NHSN (for example, online training) is required	_
	Annual training updates are required/provided	_
	Other (describe):	_
	o you conduct periodic spot-checks or otherwise validate CLABSI, CAUTI at apply)	and VAE denominator counts? (select c
	Not currently	
	Yes, when we have a new denominator counter	
	Yes, when I have concerns	
	Yes, routinely	
3. W	hich best describes your own training for 2022 NHSN surveillance? (sele	ect all that apply)
	No specific training for 2022	Select Training Modules Taken





		CDC-sponsored 2022 training webinar (live or on-line)	🗆 CLABSI 🗆 CAUTI 🗆 VAE
			□ SSI □ LabID Event
		CDC-sponsored on-line case-studies	🗆 CLABSI 🗆 CAUTI 🗆 VAE
			□ SSI □ LabID Event
		CDC-sponsored 2022 online self-paced interactive multimedia	🗆 CLABSI 🗆 CAUTI 🗆 VAE
		instruction trainings	SSI 🗆 LabID Event
		State-sponsored 2022 NHSN training event(s)	🗆 CLABSI 🗆 CAUTI 🗆 VAE
			🗆 SSI 🗖 LabID Event
		Other (describe):	
4.		staff member(s) is/are responsible for entering CLABSI (numerator)	IP IP
	events	data into NHSN?	Clerical support
			Other
5.		staff member(s) is/are responsible for entering CAUTI (numerator) data into NHSN?	IP IP
	events		Clerical support
			Other
6.		staff member(s) is/are responsible for entering VAE (numerator) data into NHSN?	IP IP
	evento		Clerical support
			Other
7.	ls ente	red data checked for errors or validated by analysis?	Yes
			No
			Unknown
		a. If yes, describe what is done:	





 How many persons to medical record befor reported to NHSN? 		One reviewer typically decides, with internal (for example, second reviewer) adjudication when needed
	reported to INHSN?	Two or more persons typically review and agree before reporting
		One reviewer typically decides, with external (for example, CDC NHSN) adjudication when needed
		Approval is required (for example, from physician or administrator) before events are reported
		Other (explain):
9. Is there ever pressure from administrators		Yes
not report a CLABSI,		No
other NHSN) event?		Unsure
		Comment:
10. In cases of ambiguity	v, who makes the	
final decision regardi	•	
determination of wh	ether an infection	
should be reported?		





Appendix B: Documentation of Electronic CLABSI/CAUTI/VAE Denominator Validation Template

OrgID/Name of Hospital: ___

__ Date of Survey: ____

Instructions: NHSN requires that the monthly electronic denominator count falls within a 5% tolerance interval of the monthly manual denominator count for 3 consecutive months before reporting electronic denominator counts for CLABSI/CAUTI/VAE. (*If there is no electronic denominator counting at this facility, skip this survey.*)

Note: Validation of electronic denominator counting against manual denominator counting is required a. when transitioning from manual counts to electronic counts

b. when transitioning from one electronic counting system to a new electronic counting system

If electronic device denominator counting is used for reporting at this facility, document the NHSN-required validation results below:

Initial electronic denominator validation (when electronic denominator reporting began):

		Manual count	*Calculated 5% tolerance interval	Electronic count
Location name:				1
	Patient days			
Month/year:	Central line days			
	Indwelling urinary			
	catheter days			
	Ventilator days			
Location name:				
	Patient days			
Month/year:	Central line days			
	Indwelling urinary			
	catheter days			
	Ventilator days			
Location name:				
	Patient days			





Central line days			
Induciling urinory			
catheter days			
Ventilator days			
nent additional inform	nation for any more	recent electronic denom	inator validation:
	Manual count	*Calculated E%	Electronic count
	Manual count	tolerance interval	
	-	I	1
Patient days			
Central line days			
Indwelling urinary			
catheter days			
Ventilator days			
Patient days			
Central line days			
Indwelling urinary			
catheter days			
Ventilator days			
		I	
Patient days			
Central line days			
Indwelling urinary catheter days			
	Indwelling urinary catheter days Ventilator days Nent additional inform Patient days Central line days Central line days Ventilator days Ventilator days Central line days Central line days Central line days Central line days Central line days Ventilator days Central line days Central line days Central line days Central line days	Indwelling urinary catheter days Ventilator days ment additional information for any more of Manual count Patient days Central line days Indwelling urinary catheter days Ventilator days Patient days Central line days Indwelling urinary catheter days Ventilator days Patient days Ventilator days Ventilator days Ventilator days Patient days Central line days Ventilator days Patient days Central line days Indwelling urinary catheter days Ventilator days Indwelling urinary catheter days Indwelling urinary Central line days Indwelling urinary Central line days Indwelling urinary Central line days Indwelling urinary Indwelling urinary	Indwelling urinary catheter days Image: Constraint of the second sec





*Equation for calculating 5% tolerance interval: manual count ± (manual count * 0.05). Example calculations where manual count = 164 and electronic count = 178:

Eligible 5% tolerance interval = [164±(164*0.05)]=155.8 to 172.2

Electronic count 178 falls outside the tolerance interval.



Appendix C: CLABSI, CAUTI, and VAE Denominator Counting Survey (with Key)

OrgID/Name of Hospital

OrgID/Name of Hospital Dat				Date of Survey	
Instructions: Administer in person or by telephone, directly to individuals responsible for a where these tasks are performed by different persons. The first section, PATIENT DAYS , c denominator collection (questions 1-9). The second section, CENTRAL LINE DAYS , contain 10-22). The third section, INDWELLING URINARY CATHETER DAYS , contains questions ap fourth section, MECHANICAL VENTILATOR DAYS , contains questions applicable to VAE de				AYS , contains questions application of the second	ble to both CLABSI, CAUTI and VAE CLABSI denominator collection (questions inator collection (questions 23-29). The
Facility OrgID:	Name/ID of individual interviewed:		tion: b lerical lursing other (explain)	Interviewer initials:	Date of survey:
(<i>circle</i>): CLABSI, CAUTI, VAE NHSN location(s) covered:					
PATIENT	DAYS (for <u>CLABSI, CAUTI, and</u>	<u>I VAE</u> denominat	tor counters)	Answer Key/Rationale	
1. How are patient days usually collected? (choose one) Electronically (document the software system utilized and skip to Q8): Manually (daily/weekly)			ne)	VAE is excluded from once	e weekly sampling of denominator data
S	Some units electronic and som	e units manual			
C	Comment:				
2. Is there a specified time when the denominator count is taken? □ Yes □ No				The answer should be Yes.	
3. When is it done?					a specific time daily, preferably at nearly the e facility to avoid errors when patients transfer.
	cribe the method used to cour				r data (patient days and device days) should be
	Count the number of <u>patients</u> assigned to a unit bed <u>at the same time central</u> <u>line/indwelling urinary catheter/mechanical ventilator counts are conducted</u>				e, every day, for each location performing It differing collection methods don't inadvertently g > patient days.
(Other (specify):				,,.



5.	When reporting monthly patient day total, what is done if there are missing patient days data? (choose one)	NHSN issued specific guidance on imputing values for missing device- associated denominator data <u>https://www.cdc.gov/nhsn/pdfs/gen-</u>
	Report the sum of available daily counts with no adjustment for missing data	support/MissingDenomData-508.pdf)
	Estimate or re-create missing data from existing information using our own methods	
	Impute missing values using recent CDC/NHSN guidance	
	Other (specify):	
6.	Which best describes your training for denominator (patient days and central line or indwellin, <i>apply</i>)	g urinary catheter or mechanical ventilator days) counting? (select all that
	No specific training was provided	Formal training by NHSN or NHSN-trained IP is recommended due to
	Peer training (person who previously counted explained their approach to new staff)	technical aspects of definitions (for example, central line, permanent line, temporary line) and methods (for example, when to count lines, how
	Formal training by IP	many to count).
-	Formal training by NHSN (for example, online training)	
	Annual training updates	
	Other (describe):	
7.	Which staff member counts patient days and central line or indwelling urinary catheter or mechanical ventilator days when the "regular" data collector(s) is/are not working?	□ IP □ Another trained counter □ Nobody □ Other (specify)
8.	Does your facility have a mechanism in place for quality control of denominator data? (Select of	one):
	(<i>Electronic data</i>) Yes, data submitted electronically is periodically checked using manual methods	
	(Manual data) Yes, manually collected data are periodically counted by more than one staff member	
	Yes, other (explain)	
	No formal quality control process	
9.	Which staff member(s) is/are responsible for entering reporting locations patient days and central line or indwelling urinary catheter or mechanical ventilator day data into NHSN?	□ IP □ Counter □ Clerical □ Other (specify)



CENTRAL LINE DAYS (for CLABSI denominator counters only)	Answer Key/Rationale
10. How are central line days collected for the unit(s) you oversee? (choose one) Electronically (specify software system utilized): Manually (daily/weekly) Some units electronic and some units manual	
Comment:	
11. Identify the method used to count central line days: (choose one) Count the number of patients with at least one central line at the time surveillance rounds are conducted Count the number of central lines that are in place at the time surveillance rounds are conducted Count the number of central lines that are in use at the time surveillance rounds are conducted Count the number of central lines that are in use at the time surveillance rounds are conducted Other (specify):	A daily count of <u>the number of patients with a central line</u> in the patient care location during a time period, which is summed for the monthly total
12. When reporting monthly central line day total, what is done if there are missing central line day data? (choose one) Report the sum of available daily counts with no adjustment for missing data Estimate or re-create missing data using existing information (for example, medical records), then sum Impute missing values using recent CDC/NHSN guidance for missing denominator data	NHSN issued specific guidance on imputing values for missing device- associated denominator data <u>https://www.cdc.gov/nhsn/pdfs/gen-</u> <u>support/MissingDenomData-508.pdf</u>)
13. A patient has a radial arterial line and a peripheral IV. How many denominator device days are counted for this patient on this day?	Zero. The radial arterial line and peripheral IV are not central lines.
14. A patient has a temporary central line and a permanent central line that have both been used during this hospitalization. How many denominator device days are counted for this patient on this day?	One. Although the patient has two central lines, a device day is defined as the number of patients who have the device, not the number of devices.
15. The patient above with the temporary central line and the permanent central line is on an oncology ward. Should you report one temporary line day, one permanent line day, or both a temporary and a permanent line day?	When a patient in an oncology location has both temporary and permanent lines, the line day is reported as a temporary line day because it is associated with a higher risk of bloodstream infection. (This information is detailed in the NHSN Manual, <u>Instructions for Form</u> <u>57.117</u>)
16. A patient has a port-a-cath that has not been accessed during this hospital stay, and a peripheral IV that is in use. How many denominator device days are counted for this patient on this day?	One. Beginning in January 2018, central lines that are present on admission should be included in device day counts beginning on the day of admission to an inpatient location. This is regardless of access of the central line. The peripheral IV is not a central line.



17.	A port-a-cath was inserted during this admission for pla How many denominator device days are counted for th	One. If a central line was accessed via placement in an inpatient location during the current admission, it is counted in the denominator device day count each day that it remains in place, whether in use or not.	
18.	A patient has a central line that was accessed for a bloc currently in use, and a peripheral IV that is in use. How for this patient on this day?	One. The central line was accessed in an inpatient location during this stay. All central lines should be included in denominator device day counts once the patient locates to an inpatient location. This is regardless of access of the central line.	
19.	A patient has a central line that was accessed once for evaluation leading to admission. The patient is now add line is not currently in use. How many denominator dev on this day?	One. Starting in 2018, all central lines should be included in denominator device day counts once the patient locates to an inpatient location. This is regardless of access of the central line.	
20.	If a central line is removed at 2PM and replaced at 8PM. The central line day count is done at 5PM, should the line be counted?	Yes No Unknown	No. Central line must be in place at time of count.

NICU-Specific Central Line Questions (Optional: Check here and skip section if NICU questions do not apply to your job) 🗌)			
21. When reporting central line (CL) days in neonates, which neonatal weight is used for reporting? <i>(select one)</i>	Birth weight Current weight	Birth weight	
22. Neonates with both a CL and an umbilical catheter (UC) are included in the daily count as: (select one)	 UC only CL only 2 separate lines 	CL only. No separate reporting of UCs; UCs are considered CLs Although the patient has two central lines, a device day is defined as the number of patients who have the device, not the number of devices. When reporting the central line, it should be stratified by birth weight.	



IND	WELLING URINARY CATHETER DAYS (for CAUTI denominator counters only)	Answer Key/Rationale
23.	How are indwelling urinary catheter days collected for the units you oversee? (choose one)	
	Electronically (specify software system utilized):	
	Manually (daily/weekly)	1
	Some units electronic and some units manual	1
	Comment:	1
24.	Identify the method used to count indwelling urinary catheter days: (choose one)	Count the number of patients on the unit with an indwelling catheter or
	Count the number of patients on the unit with a urine collection bag	indwelling three-way (infusion) catheter used for bladder irrigation.
	Count the number of patients on the unit with an indwelling urinary catheter or condom catheter	Note : Indwelling urinary catheter: A drainage tube that is inserted into the bladder through the urethra, left in place, and connected to a drainage bag, including urinary catheters that are used for intermittent
	Count the number of patients on the unit with an indwelling urinary catheter, condom catheter, or suprapubic catheter	or continuous irrigation, but excluding suprapubic, condom, or straight in-and-out catheters.
	Count the number of patients on the unit with an indwelling catheter or indwelling urethral three-way (infusion) catheter used for bladder irrigation	
	Other (specify):	
	When reporting monthly indwelling urinary catheter day total, what is done if there are missing urinary catheter day data? (choose one)	NHSN issued specific guidance on imputing values for missing device- associated denominator data <u>https://www.cdc.gov/nhsn/pdfs/gen-</u>
	Report the sum of available daily counts with no adjustment for missing data	support/MissingDenomData-508.pdf)
	Estimate or re-create missing data using patient information (for example, medical records), then sum	
	Impute missing values using recent CDC/NHSN guidance for missing denominator data	1
	A patient has a draining ureteral stent and an indwelling urinary catheter; each one is connected to a collection bag. How many urinary catheter days are counted for this patient on this day?	One. Ureteral stents are not counted because they are not urethral catheters.
	A patient has a three-way indwelling urinary catheter used for irrigation after surgery to prevent blood in the bladder from clotting, and to provide for urinary drainage. How many urinary catheter days are counted for this patient on this day?	One. Catheters to be counted include indwelling urethral catheters used for intermittent or continuous irrigation, as well as those used for drainage.
	A patient on the unit has a supra-pubic urinary catheter. How many urinary catheter days are counted for this patient on this day?	Zero. Supra-pubic catheters are not urethral catheters because they enter the bladder through the abdominal wall.
	A patient's indwelling urinary catheter is removed at noon (12PM) and replaced at 5PM. Daily indwelling urinary catheter counts take place at 2PM. How many urinary catheter days are reported for this patient on this day?	None. There was no indwelling urinary catheter in place at the time of the daily denominator count.



MECH	ANICAL VENTILATOR DAYS (for VAE denominator counters only)	Answer Key/Rationale	
<i>30.</i> H	low are ventilator days collected for the units you oversee? (choose one) Electronically (<i>specify software system utilized</i>):	Note: EMV is not a replacement for vent days	
	Manually (daily)		
	Some units electronic and some units manual		
	Episodes of Mechanical Ventilation (EMV) are collected along with daily ventilator counts		
	Comment:		
<i>31.</i> Io	dentify the method used to count ventilator days : (<i>choose one</i>)	Count the number of patients on the unit who are receiving mechanical	
	Count the number of patients on the unit with a mechanical ventilator in the room.	ventilation through an endotracheal or tracheostomy tube at the time of the daily ventilator count.	
	Count the number of patients on the unit receiving positive-pressure ventilation with a mechanical ventilator via an artificial airway and patients receiving positive-pressure ventilation with a CPAP/BiPAP machine via a full-face mask.	Note : Ventilator is a device used to support, assist, or control respiration (inclusive of the weaning period) through the application of positive pressure to the airway when delivered via an artificial airway, specifically	
	Count the number of patients on the unit receiving mechanical ventilation via an artificial airway using a conventional mode of ventilation only.	oral/nasal endotracheal or tracheostomy tube.	
	Count the number of patients on the unit receiving mechanical ventilation via an artificial airway on any mode of ventilation.		
	Other (specify):		
	When reporting monthly ventilator day total, what is done if there are missing ventilator day lata? (choose one)	NHSN issued specific guidance on imputing values for missing device- associated denominator data <u>https://www.cdc.gov/nhsn/pdfs/gen-</u>	
	Report the sum of available daily counts with no adjustment for missing data	support/MissingDenomData-508.pdf)	
	Estimate or re-create missing data using patient information (for example, medical records), then sum		
	Impute missing values using recent CDC/NHSN guidance for missing denominator data		
	patient has been on mechanical ventilation for only one day. How many ventilator days are ounted for this patient on this day?	One. All ventilator days are counted, including ventilator days for patients on mechanical ventilation for less than 3 days.	
	patient is receiving mechanical ventilation using APRV mode. How many ventilator days are ounted for this patient on this day?	One. All ventilator days are counted, regardless of ventilator mode.	
	patient on the unit is on mechanical ventilation and receiving extracorporeal life support. Now many ventilator days are counted for this patient on this day?	One. All ventilator days are counted, regardless if patients are receiving therapies that are excluded from VAE surveillance.	
<i>36.</i> A n	patient is removed from the ventilator for weaning using a tracheostomy collar trial at ioon (12PM) and replaced on the ventilator at 5PM. Daily ventilator counts take place at PM. How many ventilator days are reported for this patient on this day?	None. There was no ventilator in place at the time of the daily denominator count. Patients undergoing weaning while on the ventilator are included in daily ventilator counts.	



Appendix D: Surgical Procedure and SSI Surveillance Methods Survey (with Key)

OrgID/Name of Hospital ______ Date of Survey ______

Instructions: Administer this survey to the person who oversees NSHN SSI surveillance and reporting of surgical denominator (surgical procedure) data								
Facility org ID:Name / ID of individualPosition:interviewed:□IP□Other (explain):		:	Interviewer initials:	Date of survey:				
Procedure (Denomina	tor) Data		Answer Key/Rationale					
 Does your facility normally upload surgical procedure data electronically to NHSN (via CSV or CDA), or is procedure data entered manually? (choose one): 			 Electronic (skip to Q3) Manual Other (comment):					
 If manual, who has primary responsibility for surgical procedure data entry to NHSN? (choose one): 			 IP Clerical/support staff Clerical/support staff with IP Other 	e oversight	If IP is responsible for entering denominator data and unable to fully meet other responsibilities, recommend clerical support with IP oversight for this task.			
NORMALLY us	3) What source(s) of information does your facility NORMALLY use to identify COLO and/or HYST procedures? <i>(choose all that apply):</i>			rts system cords/reports based on key s eedure codes assigned by ds (specify) 	ICD-10-PCS/CPT operative procedure codes are required to determine the correct NHSN operative procedure category to be reported.ICD-10-PCS/CPT operative procedure codes should be assigned by a professional medical coder.If there are questions regarding the accuracy of an assigned operative procedure code, these questions should be reviewed with your professional medical coder.			
	ssuring that all qualifying in rocedures are included in y data?	•	 No systematic way Review only CPT operative prod Review only ICD-10-PCS operation Review both CPT and ICD-10-PC Cross-reference (multiple) data so Other	tive procedure codes CS operative procedure codes□	NHSN does not require a facility use one coding system over another (ICD-10 codes or CPT codes). From a reporting standpoint, it is important to have a standard method of identifying procedures so that ALL appropriate procedures are included in the denominator for procedure data. Instances such as a facility using CPT codes for what they consider is an 'outpatient' procedure but the procedure actually meets the NHSN inpatient procedure definition,			



	the facility must include CPT codes in addition to ICD-10 codes in their surveillance in order to capture all of the 'outpatient' procedures that meet the NHSN inpatient definition.
	A facility should set up a process to identify procedures for reporting using both ICD-10 and CPT codes if both are being assigned by the facility's coders. This prevents the possibility of procedures from being missed; however, a process must also be in place to prevent reporting duplicate procedures.
	A vaginal hysterectomy procedure may qualify as an abdominal hysterectomy (HYST) if an abdominal incision is made. A medical coder may correctly assign laparoscopic vaginal hysterectomy procedure codes based on route of detachment but for the purpose of NHSN SSI reporting, hysterectomy procedure codes that involve an incision made into the abdomen, including trocar insertion, are listed in the abdominal hysterectomy procedure codes should be assigned by a medical record coder using current guidelines and conventions.
	*Cross-referencing of sources (for example, OR records plus ICD-10-PCS/CPT operative procedure codes assigned after discharge) is the best way to assure complete denominator count.



5)	If you are following inpatient procedures, under what circumstances do you remove COLO and/or HYST procedures from NHSN? <i>(choose all that apply):</i>	 a. COLO or HYST ICD-10-PCS/CPT operative procedure code was not assigned to the operative procedure b. COLO or HYST ICD-10-PCS/CPT operative procedure code was assigned, but IP believes coder assigned COLO or HYST code in error c. Incision not primarily closed in OR d. The admission and discharge date were the same calendar date (NHSN outpatient operative procedure) e. Infection was present at the time of surgery (PATOS) f. COLO wound class = Clean (C) g. ASA score = 6 h. Other 	Correct answers: a, d, f, g Although questioning of ICD-10-PCS/CPT operative procedure codes is acceptable, removal of procedures with designated ICD- 10-PCS/CPT operative procedure code is only acceptable if procedure does not meet other aspects of NHSN operative procedure definition. Therefore, it would be appropriate to remove procedure if there is a) no appropriate ICD-10-PCS/CPT procedure code assigned d) not an inpatient operative procedure) (if facility is <u>only</u> following inpatient procedures on monthly reporting plan) f) COLO wound class = C. Based on feedback from external experts in the field of surgery, there are a group of NHSN procedures that can never be recorded as clean. These operative procedure categories are APPY, BILI, CHOL, COLO , REC, SB, and VHYS. Therefore, for these procedures in the application clean is not an option on the drop-down menu. g) ASA score = 6 Note: Facilities should keep clear and accurate documentation when procedures are
6)	If the operative procedure report details do not match the listed ICD-10-PCS/CPT procedure codes, what should you do?	 a. Review coding assignment with the facility medical coder b. Query NHSN c. Other	excluded from NHSN reporting. For validation purposes, NHSN recommends that IPs should bring coding mismatches to coders for review and should not over-ride coders' decisions. On a rare occasion the procedure performed was accurately coded but does not match the assigned the category description. In these cases, based on knowledge and review of the actual procedure performed, if the procedure clearly does not meet the procedure category description then for that specific instance the procedure should not be reported to NHSN for that procedure category. This determination must be made on a case by case basis and the facility may query NHSN. Clear and accurate



	· · · · · · · · · · · · · · · · · · ·		• · · · · · · · · · · · · · · · · · · ·		
1				documentation should be maintained in	
I				these instances.	
7)) Which of the following are consistent with the definition of primary wound closure? (check ALL that apply)		 a. Complete closure of skin with suture b. Partial closure of skin with staples c. Closure of skin except for wick/drain through incision d. Closed fascia with incision loosely closed at the skin level e. Closed fascia, with skin layer left open 	<i>Correct answers: a, b, c, d</i> If any portion of the incision is closed at the skin level, by any manner, a designation of primary closure should be assigned to the surgery. The closure of the surgical wound in a way which leaves the skin level completely open following surgery is a non-primary closure (e).	
				All procedures, regardless of closure method, must be reported to NHSN.	
8)	Does your facility conduct NHSN analysis to look at longitudinal trends for COLO or HYST SSIs and procedures?] Yes] No	This is recommended practice for facility use of NHSN data.	
9)	What would you do if your procedure denominator this month was dramatically higher from one month to the next?			Recommended: investigate this aggregate data by exploring the data at a patient/procedure level to identify the reason.	



Instructions: Interview individual(s) directly	responsible for identifving and reporti	Date of survey:				
Name/ID of individual interviewed: Position: Numerator (SSI Event) Data			(circle one): COLO HYST BOTH Answer Key/Rationale			
12) If you are contacted by the IP from another hospital regarding a patient with an SSI who underwent a procedure in your facility, what do you do? (choose all that apply)		 Ask the IP for help completing the NHSN report Document in your tracking records Report the SSI to NHSN Ask the IP to report the SSI to NHSN No internal reporting or documentation Comment: 		The other IP can provide details regarding the infection, but cannot report the event NHSN (the SSI event must be reported by the facility in which the procedure was performed and linked to the operative procedure (denominator details) associate to the SSI event). Request pertinent detail. regarding the SSI event to assist with completion of the SSI event form (such as date of event, signs/symptoms, etc.). Include relevant details in the patient medical record.		



 13) What methods are routinely and systematically used to identify possible SSIs? (<i>Check all that apply</i>) 14) How does your facility conduct post-discharge 	Reports/Rounds: Emergency department line lists with diagnoses Admissions line lists with diagnoses Surgical ward rounds – talk to primary care staff Positive laboratory cultures from inpatients Positive laboratory cultures from ED Pharmacy reports (antibiotic starts or continuations) Other Surgical service information: Inpatient returns to surgery Surgical service readmissions ADT/Medical Records Data Mining: Readmissions within one month of discharge Extended LOS Discharge diagnostic coding (for example, ICD-10-CM Infection Diagnosis Codes to prompt further review) Other IP does not have a formal post-discharge surveillance plan	Any combination of these methods (or other methods identified by the facility) with the capacity to identify all SSIs is acceptable for use; however, NHSN criteria for SSI must be used.
surveillance for SSIs? (check all that apply)	 IP conducts patient survey by mail IP conducts patient survey by telephone IP provides line list of patients to surgeon for response Surgeon indicates SSIs identified at surgical follow-up Surgeon surveys patient by mail Surgeon surveys patient by telephone IP reviews surgical clinic / wound clinic information IP reviews surgical patient records within a time period that aligns with the operative procedure category surveillance period Other/ Comment: 	
SSI Attribution Knowledge Check	Answer Key/Rationale	
15) During one trip to the operating room, both a COLO procedure and a HYST procedure are performed. Patient meets criteria for a Deep incisional SSI. The patient meets criteria for a deep incisional SSI event following the COLO and HYST procedure. SSI attribution is not clear. To which procedure should you attribute the SSI?	 a. COLO b. HYST c. Both d. Neither 	Correct Answer a. The procedure which is higher on the 2022 procedure hierarchy (Table 4 found within the SSI Protocol) gets the SSI attribution.



16) At the conclusion of a COLO procedure, the skin around the stoma is closed, but the midline abdominal incision is left open. Is this a primary or non-primary closure?	 a. Primary Closure b. Non-primary Closure 	Correct answer a. The stoma is a primary incision site. If a procedure has multiple incision/laparoscopic trocar sites and any of the incisions are closed primarily then the procedure technique is recorded as primary closed.
17) SSI events where PATOS = Yes do not get reported to NHSN.?	a. Trueb. False	Correct answer: b SSI events where PATOS = YES are still SSI events and must be reported to NHSN.
18) A COLO is assigned a wound class of Clean (C). The IP should change the wound class to Clean Contaminated (CC) to submit the COLO into NHSN.	 a. True b. False 	Correct answer: bA COLO with a wound class designation of C cannot be entered into NHSN. There are situations where a clean wound class can be appropriately assigned to a COLO and therefore, the procedure would not be included in the denominator for procedure data.Excluding a procedure from the denominator for procedure data should be made on a case by case basis with knowledge of the procedure and after review of the operative report. We recommend that you document the rationale for excluding a procedure in your facility's surveillance records in the event an explanation is needed in the future.



Appendix E: LabID Event Surveillance Methods Survey (with Key)

OrgID/Name of Hospital ______ Date: ______

LabID Event Surveillance Methods Survey Instructions: Administer this survey to the person who oversees NHSN LabID Event reporting								
Patient Days/Patient Admissions (Denominator) Data Collection Questions								
Name of individual interviewed: Position: Image: FacWideIN MRSA bacteremia Image: Mathematical Structure Image: FacWideIN CDI					Interviewer Date initials:		Date	of survey:
1)	For FacWideIN reporting, denom facility-wide level	nator data are entered i	into N	NHSN once a month at the		True False		Т
2)	For CDI reporting, the denominat	or should include all cor	nplet	ed CDI toxin tests		True False		F (denominator = admissions and patient days)
3)	Patient days include only admitte located on inpatient wards are ex		wards	s; observation patients	TrueFalse			F (all patients housed in inpatient locations)
4) For CDI reporting pediatric locations should be excluded from FacWideIN reporting						True False		F (NICU and well- baby locations and babies on LDRP are excluded for CDI)
5)	For MRSA bacteremia reporting be excluded from the denominator	baby locations (NICU, ner	wbor	n nursery, etc.) should be		True False		F (no location exclusions for MRSA)
Lab	ID Event (Numerator) Data Collect	ion Questions						
Name of individual interviewed: Position: Image: FacWideIN MRSA bacteremia Image: Description of the sector of th						Interviewer Date of survey: initials:		of survey:
6)	For FacWideIN reporting, a mont wide level only	hly total for all LabID Eve	ents i	s reported at the facility-		True False		F (LabID events are reported by location)
 For CDI reporting, the numerator should include toxin-positive CDI results conducted on formed stool specimens 						True False		F (laboratories should only process and report results for unformed stools)
8)	A second event is always reported MRSA bacteremia or toxin-positive second seco		d froi	m the most recent positive		True False		Т
9) A second event is only reported if >14 days have passed from the most recently reported LabID event						True False		F (If the patient changes location, a second event is reported even within 14 days of prior event)
 A second event is only reported if the patient changes location OR >14 days have passed since the most recent positive MRSA bacteremia or toxin-positive CDI test in the same location 						True False		Т
11) Only reportable CDI LabID Events should be entered into NHSN						True False		Т
Poli	Policy Question							
12)	Does your facility laboratory limit only, or does the laboratory proc					Unformed s specimens o All stool specimens		Recommended policy is to only process unformed stool specimens for CDI



Appendix F: LabID Event Facility-Wide Inpatient (FacWideIN) Denominator Validation Template

Feel free to adapt this template to meet your facility's needs

Electronically collected MRSA bacteremia and CDI FacWideIN denominators

"FacWideIN" includes all patient days counted at the same time each day for all inpatient locations, including any patients located for the day in inpatient locations, whether or not the facility considers them admitted patients or observation patients, but excluding any patients located for the day in outpatient locations (such as 24-hour observation units). This information is typically collected electronically.

Because the task of validating electronic patient days and admissions facility-wide is daunting, denominator validation can be accomplished using manual counting of patient days and admissions in three specified location types for three months each: one ICU, one Labor/Delivery/Recovery/Post-Partum (LDRP) location (if available), and one or more inpatient wards where observation patients are frequently located. Facilities with inpatient rehabilitation facility (IRF) and/or inpatient psychiatric facility (IPF) locations with separate CCNs and facilities with baby-based locations (for example, NICU, well baby nursery, etc.) should also validate these locations.

Electronic counts should be within 5% of manual counts, or an evaluation of why they differ should be conducted.

MRSA Bacteremia LabID Event Denominator Validation							
Location of	Month of		Admissions			Patient Days	
Validation*	Validation	Usual	5% Tolerance	Manual	Usual	5% Tolerance	Manual
	(specify)	Count	interval†	Count	Count	interval ⁺	Count
	1						
	2						
	3						
	1						
	2						
	3						
	1						
	2						
	3						
*Select one ICU, one Labor/Delivery/Recovery/Post-Partum (LDRP) location if available, and one or more inpatient ward location where observation patients are frequently located and conduct manual (patient level) validation of admissions and patients days for three consecutive months, according to NHSN definitions. (https://www.cdc.gov/nhsn/pdfs/pscmanual/pcsmanual current.pdf, and http://www.cdc.gov/nhsn/forms/instr/57_127.pdf) Remember that for MRSA bacteremia both mothers and babies are counted in LDRP locations.							
[†] Equation for 5% tolerance interval: Usual Count ± (Usual Count * 0.05). Example calculations where Usual Count = 164 and Manual Count = 178: Eligible 5% tolerance interval = [164±(164*0.05)]=155.8 to 172.2 Manual Count 178 falls outside the tolerance interval, suggesting that Usual Count is inaccurate and should be investigated.							



		C	DI LabID Event D	enominator V	alidation		
Location of	Month of	Admissions		Patient Days			
Validation*	Validation	Usual	5% Tolerance	Manual	Usual	5% Tolerance	Manual
	(specify)	Count	interval†	Count	Count	interval ⁺	Count
	1						
	2						
	3						
	1						
	2						
	3						
	1						
	2						
	3						
where observa for three conse (<u>https://www.e</u> Remember tha †Equation for 5	tion patients are ecutive months, <u>cdc.gov/nhsn/po</u> t for CDI, only n 5% tolerance int	e frequently according to dfs/pscmanu nothers (and erval: Usual	located and conduc NHSN definitions.	t manual (patien ent.pdf, and <u>http:</u> unted in LDRP loc nt * 0.05).	t level) valida ://www.cdc.g	one or more inpatient ition of admissions and gov/nhsn/forms/instr/5	l patients days

Manual Count 178 falls outside the tolerance interval, suggesting that Usual Count is inaccurate and should be investigated.





III. Quarterly/Monthly Data Quality Assessment Activities

Monthly HAI reporting plan

Facilities must ensure that their monthly HAI NHSN reporting plan is complete and accurately reflects their HAI reporting intentions. HAIs not included in the monthly reporting plan may be entered by the facilities but will not be used for facility SIR calculation.

Data Quality Checklists

The data quality checklists provided in this toolkit contain the minimum suggested data quality checks to be performed on HAI data reported via NHSN. Facilities are strongly encouraged to check the completeness and accuracy of their data at least quarterly prior to CMS data submission deadlines. However, routine monthly data quality checks are beneficial for maintaining data accuracy and timeliness. Refer to the NHSN Patient Safety Analysis Quick Reference Guides for guidance on generating reports for data entered into NHSN (https://www.cdc.gov/nhsn/ps-analysis-resources/reference-guides.html).

Note: Remember to Generate Data Sets after updating data in NHSN and prior to running Analysis Reports.

Note: Remember to Modify Report to the Time Period being validated.

Appendix G: Data Quality Checklist – CLABSI/CAUTI/VAE Data

This checklist is intended to ensure completeness and accuracy of CLABSI, CAUTI and VAE data entered NHSN and can be used at acute care hospitals, long-term acute care facilities, critical access hospitals, and inpatient rehabilitation facilities.



Summary Denominator Data				
Indicator	Description/Action	Validated		
i) Missing summary data	Verify that summary data has been entered for the location and month/year. (Go to NHSN Application –> Alerts –> Missing Summary Data)			
ii) Missing denominator variables (Incomplete summary data)	Verify that all mandatory/required fields are completed, and that "Report No Events" is checked, where appropriate. (Go to NHSN Application -> Alerts -> Incomplete Summary Data)			
iii) Verify denominator data accuracy:	Generate Rate Tables to display summary data by location and month in a table format.			
	Go to NHSN Application -> Analysis -> Reports - > Device-Associated (DA) Module -> Central Line-Associated BSI -> Rate Table			
	OR			
	NHSN Application –> Analysis – Reports –> Device-Associated (DA) Module –> Urinary Catheter-Associated UTI –> Rate Table			
	OR			
	NHSN Application -> Analysis - Reports -> Device-Associated (DA) Module -> Ventilator- Associated Events -> Rate Table			
	Alternative Method: Generate a Summary Line List Go to NHSN Application -> Analysis -> Reports -> Advanced -> Summary-level Data -> Line Listing - All Summary Data			
1. Total Patient Days should not be greater than the location beds multiplied by number of days in the reporting month.	Example: If location beds is 30 and the reporting month is June, Total Patient Days should not be greater than 900 (30 x 30).			
2. Total Patient Days should be greater than (or equal to) Central Line Days or Urinary Catheter Days or Ventilator Days for the same location and month.	Central Line Days/Urinary Catheter/Ventilator Days should not be greater than Total Patient Days.			
3. Zero (0) Total Patient Days reported for a location for multiple months.	Does this location need to be inactivated?			

Event Data Entry		
Indicator	Description/Action	Validated
i) All CLABSI, CAUTI and VAE events reported	Verify that all CLABSI, CAUTI and VAE events have been reported.	
	Go to NHSN Application -> Analysis -> Reports - > Device-Associated (DA) Module -> Central Line-Associated BSI -> Line Listing - All CLAB Events	
	OR	
	NHSN Application -> Analysis - Reports -> Device-Associated (DA) Module -> Urinary Catheter-Associated UTI -> Line Listing - All CAU Events	
	OR	
	NHSN Application -> Analysis - Reports -> Device-Associated (DA) Module -> Ventilator- Associated Events -> Line Listing - All VAE	
ii) Missing numerator variables (Incomplete events)	Verify that all mandatory/required data fields (marked with an *, **, or > on the event form) are completed. (Go to NHSN Application> Alerts> Incomplete Events, Event Type: BSI/UTI/VAE)	
iii) Missing events	Verify that 'Report No Events' are checked for in-plan CLABSI/CAUTI/VAE events as appropriate in the summary data form for respective location/month.	
iv Confirm that date of event occurred on or after the third calendar day of admission to the inpatient location for CLABSI/CAUTI.	If the date of event did not occur on or after the third calendar day of admission, then it is not considered an HAI and will not be counted in the SIR.	
 v) Confirm that the date of event occurred on or after the third calendar day of admission to the inpatient location for VAE. 	If the date of event did not occur on or after the third calendar day of admission to an inpatient unit, then it is not considered a VAE for the facility and will not be counted in the SIR.	
vi) Confirm that presence of a central line (permanent/temporary in specialty care locations) or indwelling urinary catheter is indicated on the event form.	If device presence is not confirmed on the event form, it will not be counted in the SIR.	

Appendix H: Data Quality Checklist - MDRO/CDI Data

This checklist is intended to ensure completeness and accuracy of LabID Event data entered into NHSN.

Summary Denominator Data – Validate Monthly/Quarterly				
Indicator	Description/Action	Validated		
i) Missing summary data	Verify that summary data have been entered for			
	the location and month/year. (Go to NHSN			
	Application -> Alerts -> Missing Summary Data)			
ii) Missing denominator variables (Incomplete	Verify that all mandatory/required fields are			
summary data)	completed, and that "Report No Events" is			
	checked, if appropriate. (Go to NHSN Application –			
	> Alerts -> Incomplete Summary Data)			
iii) Verify denominator data accuracy for all	Go to NHSN Application -> Analysis -> Reports ->			
reporting locations.	MDRO/CDI Module – LabID Event Reporting –> All			
Note: FACWIDEIN excludes data reported for rehabilitation	C. difficile (or MRSA) LabID Events -> Rate Tables for CDIF (or MRSA) LabID Data			
wards (IRF) and behavioral health/psych wards (IPF) that	OR			
have a CCN that is different from the acute care hospital.	NHSN Application -> Analysis - Reports ->			
	Advanced -> Summary-level Data -> Line Listing ->			
	All Summary Data			
	Alternative Method (this method requires you to			
	search for each location/month/year individually):			
	Go to NHSN Application -> Summary Data -> Find.			
	Select Summary Data Type "MDRO and CDI			
	Monthly Denominator" and enter Location Code,			
	Month, Year.			
	OR			
	Generate Rate Tables to display summary data by			
	location and month/year in a table format.			
iv) Verify the following for the month/quarter,				
as applicable for your facility. The variables				
listed in parentheses represent those that are				
visible in the Summary Data Line List.				
1. Line 1: Total Facility Patient Days (numTotpatdays) should be greater than 0.				
2. Line 1: Total Facility Admissions				
(numTotAdm) should be greater than 0.				
3. Line 1: Total Facility Patient Days should be				
greater than or equal to Total Facility				
Admissions.				
4. Line 2: patient days (numpatdays) should	If your facility has a CMS-certified rehab unit (IRF)			
be greater than 0, but fewer than (or equal to)	or CMS-certified psych unit (IPF), subtract these			
Total Facility Patient Days.	counts from "Total Facility Patient Days" and			
	"Total Facility Admissions" (Line 1).			
	If you do not have these units, enter the same			
	values you entered on Line 1.			
5. Line 2: admissions (numadms) should be	If your facility has a CMS-certified rehab unit (IRF)			
greater than 0, but fewer than (or equal to)	or CMS-certified psych unit (IPF), subtract these			
Total Facility Admissions.	counts from "Total Facility Patient Days" and			

		1
	"Total Facility Admissions" (Line 1).	
	If you do not have these units, enter the same	
	values you entered on Line 1.	
6. Line 2: Patient Days (numpatdays) should		
be greater than or equal to Admissions		
(numadms).		
7. Line 3: Patient Days (numcdifpatdays)	If your facility has a CMS-certified IRF, CMS-	
should be greater than 0, but fewer than (or equal to) Total Facility Patient Days.	certified IPF, NICU, or Well Baby Unit, subtract those counts from "Total Facility Patient Days"	
equal to rotal Facility Fatient Days.	(Line 1).	
	If you do not have these units, enter the same	
	values you entered on Line 1.	
8. Line 3: Admissions (numCdifadm) should	If your facility has a CMS-certified IRF, CMS-	
be greater than 0, but fewer than (or equal to)	certified IPF, NICU, or Well Baby Unit, subtract	
Total Facility Admissions.	those counts from "Total Facility Admissions" (Line	
	1).	
	If you do not have these units, enter the same	
	values you entered on Line 1.	
9. Line 3: Patient Days should be greater than		
or equal to Admissions.		
10. For facilities with both IRF/IPF locations		
and NICU/Well Baby locations: Line 2 Patient		
Days should be greater than or equal to Line 3		
Patient Days, but fewer than or equal to Line 1		
Total Facility Patient Days.		
11. For facilities with both IRF/IPF locations		
and NICU/Well Baby locations: Line 2		
Admissions should be greater than or equal to		
Line 3 Admissions, but fewer than or equal to Line 1 Total Facility Admissions.		
12. Encounters for the Emergency		
Department and 24-hour observation locations		
-		
should be greater than 0. Note: all active EDs		
and 24-hour observation locations should be		
listed on the monthly reporting plans in which		
FacWideIN surveillance is being followed.		
Event Data Entry – Validate Monthly/Qu	arterly	
Indicator	Description/Action	Validated
i) All CDI and MRSA bacteremia LabID Events	Verify that that all CDI and MRSA bacteremia	
reported	LabID Events have been reported.	
	Go to NHSN Application -> Analysis -> Reports ->	
	MDRO/CDI Module – LabID Event Reporting –> All	
	C. difficile LabID Events -> Line Listing for All CDIF	
	LabID Events	
	OR	
	NHSN Application -> Analysis - Reports ->	
	MDRO/CDI Module – LabID Event Reporting –> All	
	MRSA LabID Events -> Line Listing for All MRSA	
	LabID Events	

ii) Missing numerator variables (Incomplete events)	Verify that all mandatory/required data fields are completed.	
iii) Confirm that Facility Admit Date and	If dates are incorrect, the LabID Event may not be	
Specimen Collection Date are correct.	categorized accurately as Community-Onset (CO)	
	vs. Healthcare Facility-Onset (HO). Facility	
	admission date should be the date the patient was	
	first housed in an inpatient unit. This may be	
	different than the date this patient was placed in	
	"admitted" status.	
CDI Test Type – Validate Quarterly (Mar	ch, June, September, December)	
Indicator	Description/Action	Validated
i) CDI test type should be present on March,	Go to NHSN Application -> Analysis -> Reports ->	
June, September, and December MDRO/CDI	Advanced -> Data Quality -> Line Listing - CDI	
denominator records.	Test Method History	
ii) Verify that CDI test type is the same as the	If CDI test type is different, confirm whether or not	
previous quarter.	the primary testing method has changed. Test type	
	entered should represent the testing method used	
	for the majority of the quarter. Incorrect test type	
	will affect risk adjustment for the SIR.	
iii) If CDI test type selected is OTH – other:	CDI test type = "Other" should not be used to	
Verify that this is correct.	name specific laboratories, reference laboratories,	
	generic testing methods (such as "PCR") or the	
	brand names of <i>C. difficile</i> tests.	
iv) For IRF units within a hospital: The CDI test	Go to NHSN Application -> Alerts -> Confirm CDI	
type from the IRF unit denominator record	Test Type. If this alert is present, verify the correct	
should match the value selected on the	test type is entered into the Summary Data.	
FacWideIN denominator record for that month.		

Appendix I: Data Quality Checklist - SSI Events/Procedures

This checklist is intended to ensure completeness and accuracy of SSI Event and Procedure data entered NHSN.

SSI Event (numerator)				
Indicator	Description/Action	Validated		
i) All SSI events reported	Verify that all SSI events have been reported. (Go to NHSN Application -> Analysis - Reports -> Procedure-Associated (PA) Module -> SSI -> Line Listing - All SSI Events) Note: When generating the All SSI Events line list, choose the Procedure Date (procDate) as the Date			
	Variable on the Time Period tab.			
ii) Missing numerator variables (Incomplete events)	Verify that all mandatory/required data fields are completed. (Go to NHSN Application -> Alerts -> Incomplete Events, Event Type: SSI)			
iii) SSI event is linked to procedure	Verify that SSI event is linked to the correct procedure. (Add Display Variables "linkedproc" to			

	Line Listing – All SSI Events; refer to "All SSI events	
	reported" above.)	
iv) General Exclusions from SIR calculation:	SSI events containing these data are excluded from	
	the SSI SIR. Verify that data are accurate and make	
	corrections as necessary.	
1. Gender = 'Other'	Confirm whether this is true or not.	
Outpatient procedure = 'Yes'	Confirm whether this is true or not.	
	An SSI that meets criteria for PATOS is not excluded	
	from reporting and should be entered into NHSN as	
3. PATOS = 'Yes'	an SSI event.	
4. If SSI Specific Event = Superficial incisional	Confirm whether this is true or not.	
secondary (SIS) or Deep incisional secondary (DIS)		
	l nerator, the associated procedure is excluded from the	l denominator.
Procedure (denominator)		
Indicator	Description/Action	Validated
i) Missing denominator variables	Verify that all mandatory/required fields are	
-	completed. (Go to NHSN Application -> Alerts ->	
	Incomplete Procedures)	
ii) Excluded procedures	Review denominator data for outliers/exclusions	
	(Go to NHSN Application -> Analysis - Reports ->	
	Procedure-Associated (PA) Module -> SSI -> Line	
	Listing – Procedures Excluded from SIR). Use this	
	quick reference guide for instructions on how to	
	generate this report.	
iii) Review excluded procedures for potential	Review data for accuracy and make necessary	
data quality issues or outliers:	corrections. See NHSN's Guide to the SIR for more	
	information: <u>https://www.cdc.gov/nhsn/pdfs/ps-</u>	
	analysis-resources/nhsn-sir-guide.pdf	
 Any mandatory/required data 	Verify that all mandatory/required data fields are	
are missing	completed.	
2. Age at time of procedure greater than 109 years	Confirm whether this is true or not.	
3. Gender = 'Other'	Confirm whether this is true or not.	
4. Procedure duration less than 5 minutes	Confirm whether this is true or not.	
5. Procedure duration greater than IQR5	Confirm whether this is true or not. Refer to	
	Procedure Duration Outliers (IQR5), Table 4, page	
6. BMI less than 12 or greater than 60 for	34. Confirm whether this is true or not.	
adult patients (greater than or equal to 18	If height is unknown, enter 1 ft., 0 in.	
years)	If weight is unknown, enter 1 lb.	
7. BMI less than 10.49 or greater than 65.79	Refer to Table 2, **footnote, page 27.	
for pediatric patients (less than 18 years)	,, ,, , , , , , , , , , , ,	
Note: When a procedure is excluded from the der	nominator, the associated SSI event is excluded from the	numerator.
· · · · · · · · · · · · · · · · · · ·	rmed by accessing reports from the Advanced analysis for	
	Data Quality and select the reports for the data you war	

IV. Facility/Provider to Facility/Provider Communications under HIPAA: Questions and Answers

Note: The following document was developed by CDC scientists and lawyers in collaboration with HHS Office of Civil Rights (OCR) program and legal staff, who oversee administration of the Health Insurance Portability and Accountability Act of 1996 (HIPAA). This information may not be modified without express permission of OCR.

Facility/Provider to Facility/Provider Communications under HIPAA: Questions and Answers

Health care providers [that is, individual clinicians and facilities (including hospitals and other health care facilities such as nursing homes and rehabilitation facilities)] are increasingly active in addressing concerns about patient safety and minimizing patients' risks of adverse healthcare events. In an era when the public, policymakers, and many health care providers seek greater transparency and accountability in healthcare, these efforts include but are not limited to new or renewed emphasis on information sharing among providers themselves about adverse events that are a consequence of a care process, care process omission, or some other risk exposure during a health care episode, such as exposure to an infectious agent.

Health care providers have raised questions as to whether the HIPAA Privacy Rule permits information sharing between individual providers and/or facilities for patient safety-related purposes. This guidance assumes that the provider seeking to share such patient information is a HIPAA covered entity. While any health care provider may be faced with these questions, they tend to arise more frequently at the facility level. The term "patient" is also used here to encompass persons residing in nursing homes or other facilities, where they are often referred to as "residents." "Source facility" or "source provider" refers to the health care facility or individual provider that first cared for the patient. Protected health information ("PHI") is individually identifiable health information, such as information that identifies (or can be used to identify) a patient.

Question One

Does HIPAA permit a health care facility to share PHI with the source facility where a patient was previously treated or where a patient previously resided, without the patient's authorization, for purposes of providing notification of an infection with potential infection control implications at the source facility?

In these scenarios a resident of a nursing home is admitted into a hospital, certain medical conditions are diagnosed, and the hospital wants to disclose this health information back to the nursing home.

- A practitioner at the hospital diagnoses a patient's tuberculosis and wants to inform the nursing home so that the staff there can quarantine the coughing roommate of the index case.
- The patient is admitted with sepsis and later dies in the hospital. Blood specimens drawn at admission grow group A streptococcus. The hospital seeks to disclose that this patient was diagnosed with invasive group A streptococcal infection (which causes serious outbreaks in nursing homes) to the nursing home for infection control purposes, even though the patient will not be returning.
- The hospital diagnoses the patient with influenza early in the flu season and wants to disclose this diagnosis to the nursing home for infection control purposes.

In each scenario the hospital will want to disclose the name of the patient so the nursing home can verify that this patient had been a resident in their home and the date and location of service.

Answer One

The HIPAA Privacy Rule permits a covered health care provider to <u>use or disclose</u> PHI for treatment purposes without the authorization of the patient. (Generally, disclosures of psychotherapy notes require written patient authorization, but these notes do not appear relevant here.) 45 CFR 164.506(c) and 164.508(a)(2). "Treatment" is defined to include the provision, coordination, or management of "health care" and related services. 45 CFR 164.501. "Health care" is defined to include preventive care. 45 CFR 160.103. Treatment refers to activities undertaken on behalf of individual patients. While in most cases, the information regarding an individual is needed for the treatment of that individual, the HIPAA Privacy Rule also allows the information regarding one individual (for example, a patient) to be used or disclosed for the treatment or preventive care (for example, vaccinations or quarantine) of other persons (for example, patients at risk).

In these scenarios, the patient (and former nursing home resident) has or had a medical condition while at the nursing home that may directly impact the health of certain or all residents at that facility. In some cases, the nursing home did not know of this condition, or the condition had not manifested itself at the time the patient was at the nursing home. The hospital may disclose PHI of the patient (and former nursing home resident) to the nursing home for treatment purposes involving other residents.

A distinction is made between <u>use</u> and <u>disclosure</u> of PHI for treatment purposes with regard to the "minimum necessary" requirement. The "minimum necessary" requirement does <u>not</u> apply to <u>disclosures</u> of PHI for treatment purposes, and the disclosures discussed above are treatment disclosures that are permitted under the HIPAA Privacy Rule.

After PHI is disclosed to the nursing home, the information may be <u>used</u> for the provision of treatment to the nursing home residents. For example, preventive measures, such as cohorting, isolation, or prophylaxis of specific patients who may be at risk at the nursing home, are

considered treatment under the Privacy Rule. The <u>uses</u> of PHI by the nursing home for treatment purposes in the above scenarios <u>are</u> subject to the Privacy Rule's "minimum necessary" requirement, and the nursing home's minimum necessary policies. A nursing home, as a covered entity, must identify those persons or classes of persons in its workforce who need access to PHI, and for each such person or classes of person, the category or categories of PHI to which access is needed, and any conditions appropriate to such access. 45 CFR 164.514(d)(2). For more information on the "minimum necessary" requirement, see: http://www.hhs.gov/ocr/privacy/hipaa/faq/minimum_necessary/207.html.

Question Two

Under HIPAA, is a health care facility permitted to share PHI with another health care facility that previously treated or housed a patient, without that patient's authorization, for purposes of notifying this source facility of a potential complication of care related to the health care provided at the source facility so as to monitor and improve care and prevent future complications?

- A hospital identifies a surgical site infection (SSI) that is probably attributable to an ambulatory surgical care facility and/or surgeon that performed the surgery within the past 12 months. The hospital seeks to notify the ambulatory surgical care facility about the SSI, or in a given situation, notify the surgeon directly.
- A patient is admitted to Hospital B with a surgical site infection (SSI) after an operation at another hospital (Hospital A), where the patient had been operated on and then discharged without signs or symptoms of infection. Because of federal requirements (for example, the Centers for Medicare and Medicaid Services' Inpatient Quality Reporting program requirements) or state law or policy, both hospitals are committed to reporting all SSIs following the type of operation performed on the patient. Hospital B seeks to report the SSI to Hospital A, where the SSI is presumed to have originated, so that Hospital A can fully account for SSIs attributable to its care.

Answer Two

The HIPAA Privacy Rule permits a covered entity to use or disclose PHI for certain "health care operations" purposes without the authorization of the patient. 45 CFR 164.506(c). This includes a covered entity disclosing PHI to another covered entity for certain purposes if each entity either has or had a relationship with the individual who is the subject of the information, and the PHI being disclosed pertains to the relationship. 45 CFR 164.506(c)(4). Of relevance here, disclosures are permitted for the purpose of the covered entity receiving the information "conducting quality assessment and improvement activities; . . . population-based activities relating to improving health [and] protocol development." 45 CFR 164.501 (definition of "health care operations"). Only the minimum amount of PHI necessary for the particular health care operations purpose may be disclosed.

The disclosures discussed above are health care operations disclosures that are permitted under the HIPAA Privacy Rule. In these scenarios we assume that the hospitals sharing the PHI, the ambulatory

surgical care facility, and the surgeon are all HIPAA covered entities. The hospitals disclosing the PHI would be sharing information regarding a patient who the surgical facilities (either the ambulatory care facility or the hospital) and/or surgeon had treated, and the communication is in regard to the treatment that had been provided. The disclosures are so that the surgical facilities and/or surgeon can monitor and improve the quality of care provided. This falls under "conducting quality assessment and improvement activities," and perhaps "population-based activities relating to improving health," and/or "protocol development." In these scenarios, information regarding the patient with an SSI can be shared with the surgical facilities and/or surgeon. While only the minimum amount of information regarding the patient may be disclosed, in these scenarios the identity of the patient may be shared because it is needed to investigate the cause of the infections (for example, the dates and locations of care, and the staff involved.) There is likely to be no need to share health information regarding these patients that is unrelated to investigating the SSI.

For additional information regarding disclosures for treatment and healthcare operations purposes, see: http://www.hhs.gov/ocr/privacy/hipaa/understanding/coveredentities/usesanddisclosuresfortpo.html.