

The Inside Scoop F0884 NHSN Reporting

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Objectives

- 1. Review the Regulatory Components & F Tag itself.
- 2. Consider issues that are currently causing providers to receive this tag.
- Identify very specific practices providers can do to mitigate and avoid deficiencies in this area.
- 4. Review resources and tools that can help.
- 5. Provide action items to actively increase compliance with this regulation.



Disclaimer

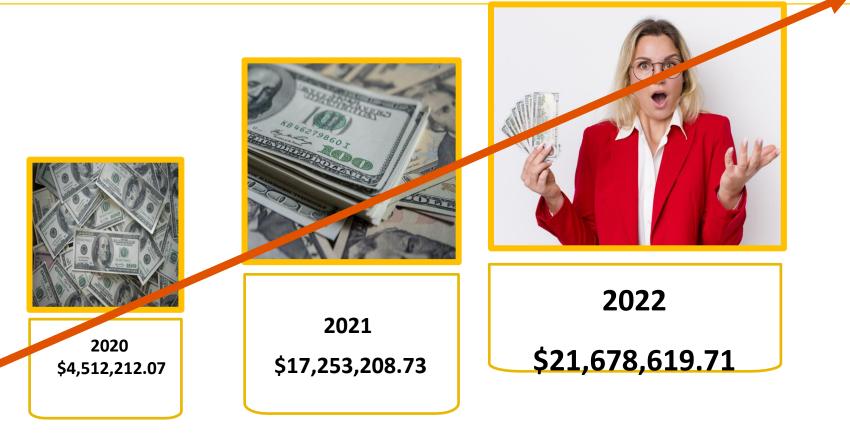
Due to the Public Health Emergency ending on May 11, 2023, The Long-term Care Facility COVID-19 Module Surveillance Pathways (Resident Impact and Facility Capacity, Staff and Personnel Impact, and Therapeutics) will undergo various updates.

Please note, long-term care facilities that are CMS certified will still need to report to the LTCF COVID-19 Module Surveillance Pathways (Resident Impact and Facility Capacity, Staff and Personnel Impact, and Therapeutics) at least once a week.

Changes may have already been made since the development of these slides.



CMP Fines F0884



We need to get good at this!

This tag can be avoided and can save you thousands in penalties!



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§ 483.80 - Infection control.

- 42 CFR 483.80. Under this Rule, skilled nursing facilities are required to report certain COVID-19 related information to the Centers for Disease Control and Prevention (CDC).
- The intent of this requirement is to provide the CDC with valuable COVID-19 data

 NHSN Reporting will continue at minimum, through December 2024, at which point CMS is still determining what will continue to be required afterwards.



What is F884 and What are the Regulatory Requirements?

- May 6, 2020, CMS introduced QSO-20-29-NH which indicated on May 8, 2020, CMS will
 publish an interim final rule regarding COVID-19 Reporting Requirements which required
 all Nursing Homes to report facility data to the CDC through the National Health Safety
 Network (NHSN).
- As required by the Centers for Medicare & Medicaid Services (CMS), outlined in <u>QSO-20-29-NH</u>, SNFs/NFs must report certain COVID-19 data to the National Healthcare Safety Network (NHSN) at least once every seven (7) days.
- Facilities that do not report into the NHSN system by Sunday 11:59 pm of any given week are subject to a Civil Money Penalty (CMP).
- The facility will also be cited for F884 at scope and severity level F, though no plan of correction is required.



How are F844 Tags Generated?

- Data for NHSN is due every week before Sunday at 11:59PM.
- Data that is entered into the NHSN record is timestamped for completion, and this data is used to determine if the facility is in compliance for the reporting week timeframe.
- A list of facilities that failed to enter all the appropriate data by each Sunday at midnight is generated and automatically cited.
- CMS is using the CASPER system for notification of non-compliance because this allows them to automate the process for issuing these 2567s and enforcement letters on a weekly basis. They are looking at additional options to alert the facility when the notice has been uploaded into CASPER but have yet to provide alternative means.



What are the issues that are currently causing a facility to receive this tag?

• It's as simple as not reporting what is required by regulation.

• But there are many different scenarios that can cause challenges or barriers that providers face such as



Contributing factors to NHSN reporting deficiencies

NHSN user turnover

No Backup NHSN users

Data Entry System Errors

System is Down Cant Report

Locked out of the NHSN System

Entering wrong data – failing QA Checks

Don't know where to find 2567 form

Don't have an NHSN Administrator anymore

Numbers not adding up preventing data entry

Lack of NHSN training / understanding of requirements

Changed work email unable to change NHSN password





4 Proven Practices to Improve Quality and Avoid Deficiencies

Ensure that you have designated more than one user to the NHSN system for reporting. Having a solid back-up plan is important to timely reporting. We recommend having at least 3 users at the facility able to report at each time.

Ensure all users are competent and up to date with NHSN Data Reporting

Pick a day each week and consistently report your data to NHSN on that same day each week. Each provider must report every at minimum once every 7 days before Sunday at Midnight of each week.

This is not optional.

If you change the day of data reporting, it is important to know that you will need to report two times the week that you change your reporting day in order to avoid a penalty for not reporting.





Continued

Do not misunderstand the requirement to report every 7 days with reporting 7 days of data.

Submit your data and always go back to the pathway calendar and vaccination module on the NSHN reporting system to double check for a green bar for each of the all components required for reporting. If you **see a tan bar, you have not successfully** met the reporting requirements, and something needs to be corrected to avoid a fine.

Notification of CMP fines are reported by CMS through the CMS CASPER/QIES system. Each provider should check the CASPER/QIES system for communications weekly.





Reporting Requirements & Upcoming Changes

COVID-19 Surveillance Pathways	COVID-19 Vaccination Module
Reporting requirements	Reporting requirements
CMS certified facilities are required to report at least once every reporting week	Weekly reporting requirement for LTC residents and staff Report at least once every reporting week Requirement to go through December 2024
Requirement to go through December 2024	 Quarterly Reporting Requirement for Staff Report vaccination data 1 week/month for staff After the weekly requirement expires in Dec. 2024, continue to report 1 week/month for staff Use the "COVID-19 Vaccination-HCP" tab in order to report these data



Additional COVID-19 Vaccination Reporting Resources:

- Operational Guidance for Reporting COVID-19 Vaccination Data
- FAQs on Reporting COVID-19 Vaccination Data



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COVID-19 Surveillance pathways versus COVID-19 Vaccination Modules

COVID-19 Surveillance Pathways

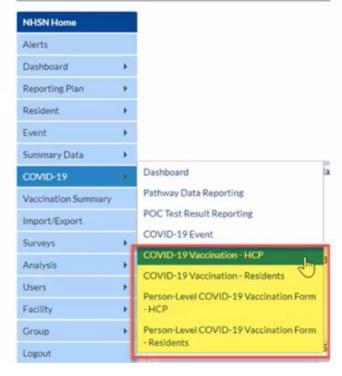
LTCF COVID-19 Module webpage



COVID-19 Vaccination Module

Weekly HCP & Resident COVID-19 Vaccination webpage







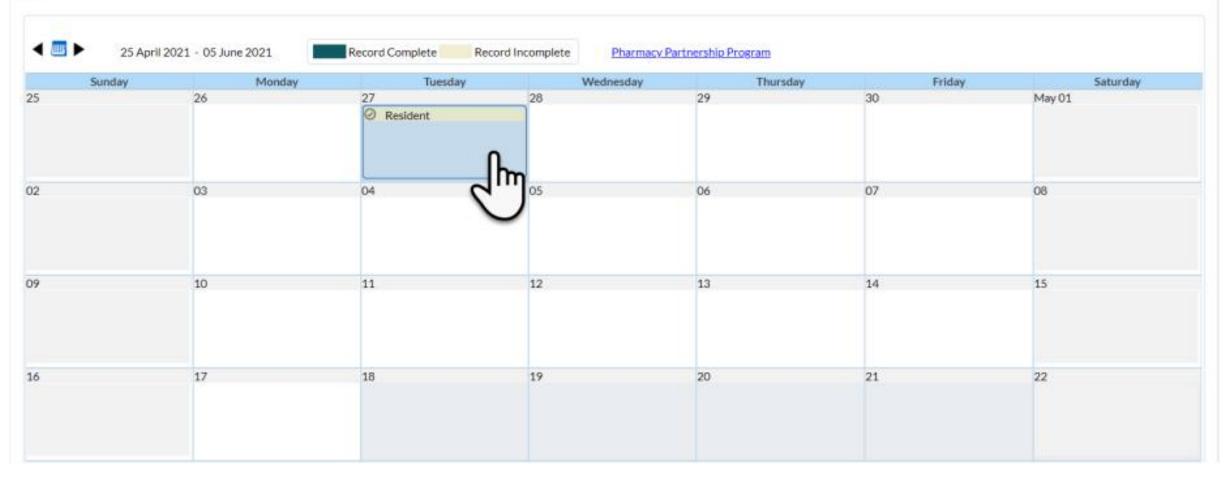




COVID-19



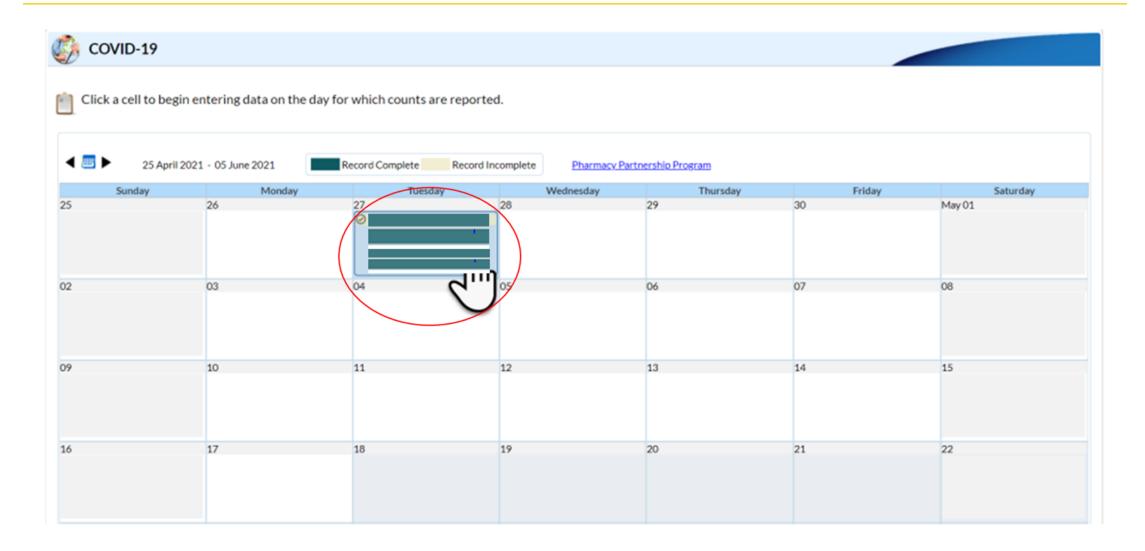
Click a cell to begin entering data on the day for which counts are reported.







Completed Pathway

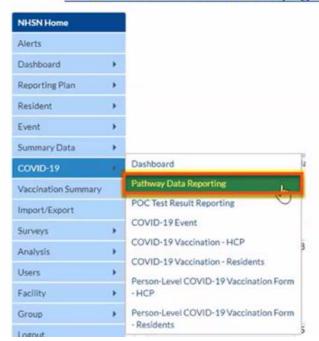




COVID-19 Surveillance pathways versus COVID-19 Vaccination Modules

COVID-19 Surveillance Pathways

LTCF COVID-19 Module webpage



COVID-19 Vaccination Module

Weekly HCP & Resident COVID-19 Vaccination webpage

VS.



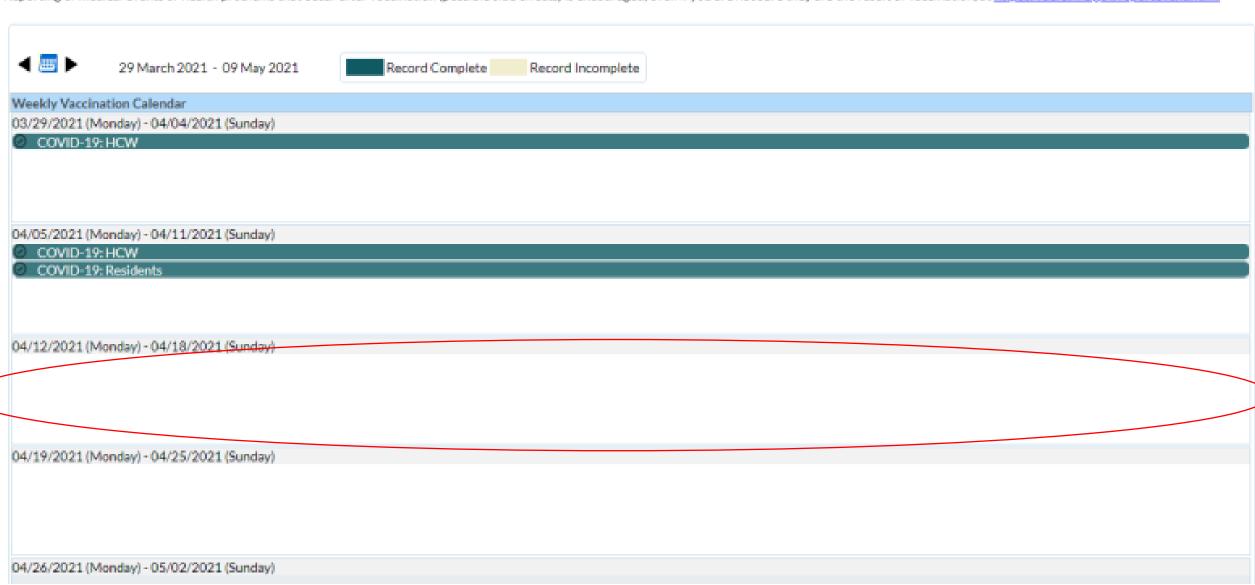


Vaccination Summary Data

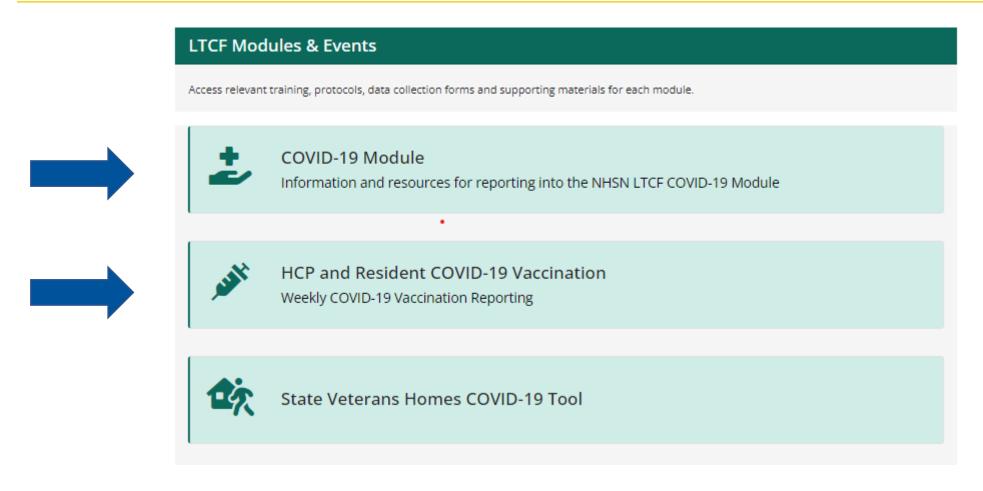


Click a cell to begin entering data for the week which counts are reported.

Reporting of medical events or health problems that occur after vaccination (possible side effects) is encouraged, even if you are not sure they are the result of vaccination, at https://vaers.hhs.gov/reportevent.html.



Resources



• Long-term Care Facilities (LTCF) Component | NHSN | CDC



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Resources – COVID-19 Module (Pathway Component)

Data Collection Forms and Instructions

Resident Impact and Facility Capacity



COVID-19 Resident Impact and Facility Capacity Pathway Form (57.144) 🔼 [PDF – 251 KB] (print-only) – September 9, 2022

Table of Instructions (57.144)
 [PDF – 476 KB] – January 23, 2023

Staff and Personnel Impact



COVID-19 Staff and Personnel Impact Pathway Form (57.145) [PDF – 161 KB] (print-only) – September 9, 2022

Table of Instructions (57.145) [PDF – 250 KB] [PDF – 358 KB] – January 23, 2023

Therapeutics

COVID-19 Resident Therapeutics Form (57.158) 🔼 [PDF – 100 KB] (print-only) – July 29, 2022

Table of Instructions (57.158)
 [PDF – 320 KB] – July 29, 2022

Point of Care Testing

Table of Instructions (57.155)
 [PDF – 200 KB] – October 28, 2021

Resources – COVID Vaccination for HCP & Residents

Data Collection Forms and Instructions

ALL DATA COLLECTION FORMS ARE PRINT-ONLY

Weekly COVID-19 Vaccination Summary Form for Residents at LTCFs (57.218) December 194 KB - May 2022



Weekly COVID-19 Vaccination Summary Form for Healthcare Personnel at LTCFs (57.219) December 19 [PDF - 208 KB] - May 2022







Resources – Change NHSN Administrator Form

Change NHSN Facility Administrator | NHSN | CDC

NHSN Facility Administrator Reassignment

When the NHSN Facility Administrator role needs to be reassigned, the current Facility Administrator should follow the steps below to ensure that the role is properly reassigned to an additional facility user. Furthermore, facility users that no longer require access to NHSN can be deactivated by following the steps below. This process can be completed by any user with administrative rights.

Reassigning the NHSN Facility Administrator Role

- From the left navigation bar, you will select Facility > Facility Info.
- . From the Edit Facility Information screen, go to the Contact Information sections.
- Find "Facility Administrator" on the list and click the "reassign" button on the far right of the screen. You will be asked to
 find and select an existing user who will be reassigned this role. NOTE: The existing user must be assigned as a user
 with administrative rights. Once selected, remember to save the updated information on the Edit Facility Information
 page.

Deactivating Users

- Note: Users cannot be deleted once added to NHSN.
- Select USERS on the left navigation bar, select FIND, and FIND again on the bottom of the screen. Select the user's profile, go to EDIT, at the USER ACTIVE drop down, toggle to YES/NO>SAVE.

If the current NHSN Facility Administrator is no longer available, the incoming NHSN Facility Administrator should complete the form below to request the change in the absence of the current NHSN Facility Administrator.

Please contact NHSN@cdc,gov for additional support.





Continued

All fields are required, unless marked optional.
Facility Name *
Facility Street Address * •
City, State and Zip *
Date of Request * (MM/DD/YYY)
Facility OrgID (optional)
Facility CCN (optional)
(if applicable)



FLU HCP Reporting – SNF QRP Measure

- This was due on
 5/15/23 You should have
 submitted this already!
- If not, go in there and submit ASAP!

This email is intended for Facility and Group users of the Long-Term Care Component of NHSN.

Dear Long-term Care (LTC) NHSN Users,

We would like to provide some key updates regarding the December 2022 NHSN release.

Influenza Vaccination Data Reporting

We are aware that there is some confusion regarding LTC reporting of influenza vaccination data through NHSN. Therefore, we would like to clarify the following points below.

Please note that facilities that are required to report **annual** healthcare personnel influenza vaccination data into NHSN must do so using the Healthcare Personnel Safety (HPS) Component. Reporting **weekly** influenza vaccination data through the NHSN LTC Facility Component does not fulfill this reporting requirement. CDC is not collecting weekly influenza vaccination data for LTC residents and healthcare personnel covering the 2022-2023 influenza season. Please ignore tabs for reporting weekly influenza vaccination data for residents and healthcare personnel in the LTC Facility Component. The tabs are scheduled to be removed in January 2023 to avoid further confusion. We apologize for the inconvenience.

The deadline to report the annual healthcare personnel influenza vaccination summary data through the NHSN HPS Component is May 15, 2023.

Training materials can be accessed using this link: HCP Flu Vaccination | HPS | NHSN | CDC.

The data reporting protocol can be accessed using this link:

NHSN HPS Flu Vaccine Protocol 2022 (cdc.gov)

.CSV File Upload Materials

Thank you for your efforts reporting data through NHSN.

Sincerely,

NHSN Vaccination Team

HCP Flu Vaccination | HPS | NHSN | CDC.



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Here are the instructions for adding the HPS component to the facility.

- Have the NHSN Administrator log in to the facility as you normally would and access the standard LTC Component for your Facility.
- On the left side navigation list, go to Facility then click on Add/Edit Component.
- Check the box to the left of the HPS component.
- Make sure any existing components remains checked. DO NOT UNCHECK LTC COMPONENT.
- Once updated, scroll to the bottom and click "Update".
- Log out of NHSN / the facility.
- Then, log back in and select the new component.
- You will be directed to sign the agreement to participate.
- This will activate the new component and you will be able to report for flu.
- On the left-hand column, select "vaccination summary."
- Click on Annual Flu data.
- Click Add and then Continue- and once brought to the reporting page, be sure to hit the dropdown for 2022/2023 data submission.



Healthcare Personal Safety (HPS)

Activating the HPS Component

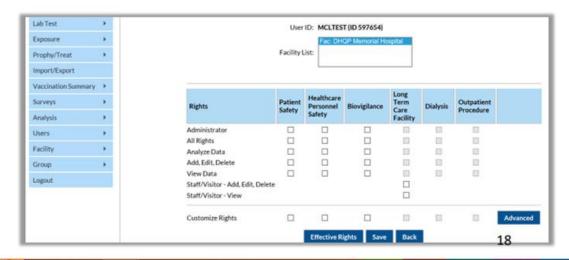
- Facility Administrator logs into SAMS: https://nhsn2.cdc.gov/nhsn/
 - · Click "NHSN Reporting"
- From the Home Page, click "Facility" then "Add/Edit Component"
 - Check box next to Healthcare Personnel Safety
- Facility Administrator adds HPS Component Primary Contact
 - Enter name, phone, e-mail, and address for person to be contacted if CDC/NHSN has updates or questions about the HPS





User Rights

- After saving the new user information, the "Edit User Rights" screen will appear
- Please be sure to confer the proper rights to users
- CDC recommends that at least two users at each facility have rights to add and analyze data



Remember to Activate HPS Component

 Report Annual HCP influenza vaccination summary data through the NHSN Healthcare Personnel Safety (HPS) Component for the 2022-2023 influenza season





 Report Annual HCP influenza vaccination summary data through the NHSN Healthcare Personnel Safety (HPS) Component for the 2022-2023 influenza season



- The NHSN facility administrator does not automatically have access to this component. It has to be added to the facility Home page.
- THE NHSN FACILITY ADMINISTRATOR MUST HAVE LEVEL 3 ACCESS TO COMPLETE ANY OF THE TASKS.



Failed to Submit QRP on Time or at All?

Request a SNF Quality Reporting Program Exception & Extension

Some AHCA member facilities have experienced issues accessing the HPS component in NHSN to report the Skilled Nursing Facility (SNF) Quality Reporting Program (QRP) required data on annual HCP influenza vaccination.

If your facility was not able to submit the required SNF QRP data by the May 15th 11:59 PM deadline, CMS provides an opportunity to request a <u>Skilled Nursing Facility Quality Reporting Program Reconsideration</u> and <u>Exception & Extension</u> from the program's reporting requirements in the event the facility was unable to submit quality data due to extraordinary circumstances beyond their control.

This means SNFs affected by a natural or man-made disaster or other extraordinary circumstances may request an exception or extension by filing a Request for Reconsideration Due to Disaster or Extraordinary Circumstance. The request must be submitted via email to SNFQRPReconsiderations@cms.hhs.gov with the subject line, "Disaster Exception or Extension Request," within ninety (90) days of the event.



Adding Additional NHSN users

- To add users, the NHSN Administrator needs to log into NHSN and select the Reporting option. From the left-hand menu, select "Users" then "Add"
- For users with <u>existing NHSN accounts</u>, enter the information exactly as they did when they enrolled.
- For <u>new NHSN users</u>, enter the requested information (note: you will create their "User ID" for them); they will receive an email from SAMS in 4-5 days with information on registering with SAMS.



How do I get NHSN Level 3 Access if I am Level 1?

1. Send an email To: nhsn@cdc.gov

Subject: LTCF Enhancing Data Security

Email Memo: My name is [NAME] and I am with [FACILITY NAME] [5-digit Facility ID in NHSN]. Our CMS CCN# is [FACILITY CCN#]. I am requesting to obtain Level 3 SAMS access for the NHSN/COVID LTCF and POINT OF CARE (POC) Modules. I am requesting the identity proofing email be sent to me. [INSERT SIGNATURE LINE/ CONTACT INFORMATION]

1. After you send the email, the CDC/NHSN will give the OK to SAMS to invite you to continue the process. You will receive an email from SAMS, sams-no-reply@cdc.gov, and will be provided the next set of instructions. Watch your junk/spam folder. Please note, you cannot do anything further until you receive the email from SAMS to proceed to the next step. To clarify, SAMS is the system that ensures you are who you say you are and is the gatekeeper to the CDC/NHSN system. It may take several weeks for the SAMS email to arrive.

Long Term Care Survey Critical Element Pathways

 Medicare and Medicaid Programs; Reform of Requirements for Long-Term Care Facilities

https://www.cms.gov/medicare/provider-enrollment-and-certification/guidanceforlawsandregulations/nursing-homes

- Scroll down to Downloads.
- Click on Survey Resources ZIP (You will download a ZIP folder with various pathways within them).
- Click on LTC Survey Pathways Folder within the ZIP folder.
- Select Pathways that are Relevant to the Specific F-Tag you are looking into.



3(4) Things You Can do Today

- 1. Ensure a user at the facility also is designated as the NHSN Administrator. If no user is the NHSN Administrator, fill out the Change NHSN Admin Form if you need to.
- 2. Have the NHSN Administrator add additional users to for your building. This is be a lengthy process for individuals with no existing NHSN account. Again, we recommend having 3 additional users. Get it started today!
- 3. Review resources on the CDC / NHSN pages for tables of instructions if you are unsure what data belongs in what field & take screenshots of your data entry submissions incase there are any issues so you can IIDR any citations.
- 4. If you are having difficulty and/or need to trouble shoot and issue related to NHSN system, IPRO can assist you. Send an email or give us a call!



Contact us We're Here to Help!

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