

# 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.
- 3. 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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- 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



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### 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	<ul> <li>Weekly reporting requirement for LTC residents and staff</li> <li>Report at least once every reporting week</li> <li>Requirement to go through December 2024</li> </ul>
Requirement to go through December 2024	<ul> <li>Quarterly Reporting Requirement for Staff</li> <li>Report vaccination data 1 week/month for staff</li> <li>After the weekly requirement expires in Dec. 2024, continue to report 1 week/month for staff</li> <li>Use the "COVID-19 Vaccination-HCP" tab in order to report these data</li> </ul>



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

VS.

### COVID-19 Surveillance Pathways

#### LTCF COVID-19 Module webpage

NHSN Home	
Alerts	
Dashboard	•
Reporting Plan	
Resident	*
Event	۶
Summary Data	•
COVID-19	3
Vaccination Summary	
Import/Export	
Surveys	
Analysis	
Users	
Facility	•
Group	
Lorout	

### COVID-19 Vaccination Module

#### Weekly HCP & Resident COVID-19 Vaccination webpage

Alerts		
Dashboard		
Reporting Plan		
Resident		
Event		
Summary Data		
COVID-19		Dashboard
Vaccination Summa	ry	Pathway Data Reporting
mport/Export		POC Test Result Reporting
Surveys		COVID-19 Event
Analysis	- >	COVID-19 Vaccination - HCP
Jsers	- >	COVID-19 Vaccination - Residents
Facility	- >	-HCP
		Descent level COMP 10 Marchestics Form

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### COVID-19

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

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	26	27 Ø Resident	28	29	30	May 01
	03	04 C	Ŋ05	06	07	08
	10	11	12	13	14	15
	17	18	19	20	21	22



## **Completed Pathway**



### COVID-19 Surveillance pathways versus COVID-19 Vaccination Modules

COVID	-19 Surveillance Pathways		COVID-	19 Vaccination Module
LTCF CO	OVID-19 Module webpage		Weekly HCP & Resident (	COVID-19 Vaccination webpag
NHSN Home         Alerts         Dashboard       +         Reporting Plan       +         Resident       +         Event       +         Summary Data       +         COVID-19       +         Vaccination Summary       +         Surveys       +         Analysis       +         Users       +	Dashboard Pathway Data Reporting POC Test Result Reporting COVID-19 Event COVID-19 Event COVID-19 Vaccination - HCP COVID-19 Vaccination - Residents Person-Level COVID-19 Vaccination Form - HCP	VS.	NHSN Home         Alerts         Dashboard         Dashboard         Reporting Plan         Resident         Event         Summary Data         COVID-19         Vaccination Summary         Import/Export         Surveys         Analysis         Users         Facility	Dashboard Pathway Data Reporting POC Test Result Reporting COVID-19 Vaccination - HCP COVID-19 Vaccination - HCP COVID-19 Vaccination - Residents Person-Level COVID-19 Vaccination Form - HCP
Group +	Person-Level COVID-19 Vaccination Form - Residents 5		Logout	-Residents 5



### 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/reporteven/	<u>t.html.</u>
29 March 2021 - 09 May 2021 Record Complete Record Incomplete	
Weekly Vaccination Calendar	
03/29/2021 (Monday) - 04/04/2021 (Sunday)	
O COVID-19-HCW	
04/05/2021 (Monday) - 04/11/2021 (Sunday)	
COVID-19: Residents	
04/12/2021 (Monday) - 04/18/2021 (Sunday)	
04/19/2021 (Monday) - 04/25/2021 (Sunday)	

04/26/2021 (Monday) - 05/02/2021 (Sunday)

### **Resources**

#### **LTCF Modules & Events**

COVID-19 Module

Access relevant training, protocols, data collection forms and supporting materials for each module.

Information and resources for reporting into the NHSN LTCF COVID-19 Module

HCP and Resident COVID-19 Vaccination Weekly COVID-19 Vaccination Reporting

State Veterans Homes COVID-19 Tool

• 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

<u>Table of Instructions (57.144)</u> [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

Point of Care Test Reporting Tool (57.155) 🖪 [PDF – 80 KB] (print-only) – January 12, 2023

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

### **Resources – COVID Vaccination for HCP & Residents**





### **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.

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### Continued

All fields are required, unless marked optional.

Facility Name \*

Facility Street Address \*

City, State and Zip  $\,*\,$ 

Date of Request \*

(MM/DD/YYYY)

Facility OrgID (optional)

Facility CCN (optional)

(if applicable)



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### **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

Facilities reporting annual healthcare personnel influenza vaccination summary data currently submit these data directly into the NHSN application. In addition to this method of submitting data, facilities and groups are now able to submit these data via .CSV file upload beginning in December 2022. Instructions for uploading annual flu data via a CSV file, a .CSV file template, and .CSV example file will be posted to the following webpage by late December: <u>HCP Flu Vaccination | HPS | NHSN | CDC</u>

Thank you for your efforts reporting data through NHSN.

Sincerely,

NHSN Vaccination Team

HCP Flu Vaccination | HPS | NHSN | CDC.



### 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: <u>https://nhsn2.cdc.gov/nhsn/</u>
  - 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

Lap rest			User	ID: MCLTEST	(ID 597654)				
Exposure				Fac. DH0	P Memorial Ho	letiga			
Prophy/Treat			Facility	.ist:					
Import/Export				L					
Vaccination Summary						Process of			1
Surveys		Rights	Patient	Healthcare	Biovieilance	Term	Dialysis	Outpatient	
Analysis		- A A A A A A A A A A A A A A A A A A A	Safety	Safety	und right free	Care Facility	C.a.yaa	Procedure	
Users		Administrator					10	12	
		All Rights				ED	10	13	
Facility		Analyze Data					13	10	
Group		Add, Edit, Delete				13	03		
100000	-	View Data				100	13		
ogout		Staff/Visitor - Add, Edit, Delete							
		Staff/Visitor - View							
		Customize Rights						8	Advance
				Effective Ris	thts Save	Back			10



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### **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

2		
-		
Select component:		
	_	
Blovigliance		1
Dialysis	-	-
Healthcare Personnel Selety		
Long Term Care Facility		
Neonatal		
Change and the second second		
CALCORDER PROCEDURE		

- 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> <u>and 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.



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# **Adding Additional NHSN users**

• To add users, the NHSN Administrator needs to log into NHSN and select the Reporting option. From the lefthand 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

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

- 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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