Guidance For Reporting Data Into The Centers For Disease Control And Prevention’s National Healthcare Safety Network
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1. Overview

Beginning with the FY 2012 IRF/PPS Final Rule\(^1\), and currently, the Centers for Medicare & Medicaid Services (CMS) adopted the requirement that inpatient rehabilitation facilities (IRFs) are to report data on a total of three National Healthcare Safety Network (NHSN) measures:

- National Healthcare Safety Network (NHSN) Catheter-Associated Urinary Tract Infection (CAUTI) Outcome Measure (NQF #0138)
- Influenza Vaccination Coverage Among Healthcare Personnel (NQF #0431)
- National Healthcare Safety Network (NHSN) Facility-Wide Inpatient Hospital-Onset Clostridium difficile Infection (CDI) Outcome Measure (NQF #1717)

Each IRF must submit data for the NHSN CAUTI Outcome Measure (NQF #0138) and the NHSN Facility-wide Inpatient Hospital-onset CDI Outcome Measure (NQF #1717) on all patients from all inpatient locations, regardless of payer. Additionally, each IRF must submit Influenza Vaccination Coverage Among Healthcare Personnel (NQF #0431) data for all health care personnel (HCP) physically working in the inpatient locations for at least 1 day between October 1 and March 31.

Compliance with the IRF Quality Reporting Program (QRP) requires submission of data for the NHSN CAUTI Outcome Measure (NQF #0138) and the NHSN Facility-wide Inpatient Hospital-onset CDI Outcome Measure (NQF #1717) irrespective of whether patients have the infection or event of interest during the reporting period. In the event that no patients have the infection or event of interest during the reporting period, the IRF is still required to submit monthly denominator counts (i.e., device days and patient days) along with the "no event" indicators to CDC’s NHSN. For reporting of the NHSN CAUTI Outcome Measure (NQF #0138) and the NHSN Facility-wide Inpatient Hospital-onset CDI Outcome Measure (NQF #1717), CDC’s NHSN requires that data be submitted on a monthly basis and strongly encourages IRFs to enter each month’s data within 30 days of the end of the month in which they are collected (e.g., data for October should be entered into the NHSN by November 30).

As of October 1, 2018, IRFs are no longer required to submit data for NHSN Facility Wide Inpatient Hospital Onset Methicillin Resistant Staphylococcus aureus (MRSA) Bacteremia Outcome Measure (NQF #1716) for the IRF QRP. However, reporting on this data is required for certain IRFs based on state and local mandates. Please check your state and local mandates to ensure you are in compliance with their reporting requirements.

While CMS strongly agrees with CDC’s recommended reporting time frames (providers should report an infection within 30 days following the event), for the purpose of meeting data submission requirements related to applicable annual increase factor (AIF), providers must

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submit all data collected during a given calendar year (CY) quarter no later than the quarterly data submission deadlines, approximately 4.5 months or 135 days following the end of each CY quarter. Although providers must submit monthly data, providers are not required to log onto the NHSN on a monthly basis to submit these data. Providers may log on and submit data for all 3 months within a given CY quarter at the same time, providing that data are submitted prior to the CY quarterly deadlines. Please visit the IRF QRP webpage for additional information regarding the data submission deadlines at: https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/IRF-Quality-Reporting/IRF-Quality-Reporting-Data-Submission-Deadlines.html.

CDC has an annual facility survey that is specific to IRFs and has specific location types to support facilities with data submission for the IRF QRP. Additionally, Acute Care hospitals (ACH) can include ACH units designated as IRFs (CMS-certified Rehabilitation Unit mapped as a location within the hospital, i.e. the CCN for the Rehabilitation unit includes an ‘R’ or ‘T’ in the 3rd position.) These IRF-units will be required to complete a small annual survey found within their ACH facility. Questions on this small survey are only to be answered with information from the CMS certified IRF-unit. For more information, including operational guidance and updates on the reporting of the NHSN CAUTI Outcome Measure (NQF #0138), the NHSN Facility-wide Inpatient Hospital-onset CDI Outcome Measure (NQF #1717), and the Influenza Vaccination Coverage Among Healthcare Personnel (NQF #0431) data under the IRF QRP, please visit the CDC’s NHSN Web site at: https://www.cdc.gov/nhsn/inpatient-rehab/index.html

Reporting of the NHSN CAUTI Outcome Measure (NQF #0138) and the NHSN Facility-wide Inpatient Hospital-onset CDI Outcome Measure (NQF #1717) data are required. For these quality measures, the reporting period consists of the four quarters in a given CY, with the fourth quarter’s data to be submitted by May 15 of the subsequent year. To fulfill the CMS IRF QRP requirements, each facility’s data for the NHSN CAUTI Outcome Measure (NQF#0138) and the NHSN Facility-wide Inpatient Hospital-onset CDI Outcome Measure (NQF #1717) must be entered into the CDC’s NHSN no later than 135 days after the end of the reporting quarter. In other words, for first quarter (Q1) data (January 1–March 31) to be shared with CMS, data must be entered into NHSN by August 15.

CDC submits the data to CMS on behalf of the facility, according to the facility’s monthly reporting plan. Data submitted to CDC more than 135 days after the end of the reporting quarter, such as data submitted to the CDC NHSN after August 15, for Q1, of that same CY will not be provided to CMS and will not be considered for the purpose of compliance determination.

IRFs are able to review data submitted to CMS on their behalf through the “Analysis – Reports” function within NHSN. More information regarding the location and interpretation of these reports can be found on the CDC Web site: https://www.cdc.gov/nhsn/ps-analysis-resources/reference-guides.html.

For Influenza Vaccination Coverage Among Healthcare Personnel (NQF #0431) data, the reporting period consists of the influenza vaccination season. Data collection is required from...
October 1 of a given year (or whenever the seasonal influenza vaccine becomes available) through March 31 of that subsequent year, and must be submitted by May 15 of the same subsequent year.

For Influenza Vaccination Coverage Among Healthcare Personnel (NQF #0431) reporting, entering a single influenza vaccination summary report at the end of the reporting period for the influenza season will meet the minimum data requirements for NHSN participation. However, CDC encourages that HCP influenza vaccination summary counts be updated on a monthly basis, and each update be kept on printed paper copy, so that they can be used at the facility level to impact influenza vaccination activities.


**NHSN CAUTI Outcome Measure (NQF #0138) Reporting**

For reporting data on the NHSN CAUTI Outcome Measure (NQF #0138) under the IRF QRP, IRFs must adhere to the definitions and reporting requirements for CAUTIs as specified in CDC’s *NHSN Patient Safety Component Manual*, available at https://www.cdc.gov/nhsn/pdfs/pscmanual/7psccauticurrent.pdf. These requirements include reporting denominator data (patient days, and urinary catheter days) by location, as well as CAUTIs (event data), to NHSN each month. Monthly denominator data must be reported on CAUTIs regardless of whether an infection occurred in the IRF. Monthly reporting plans must be created or updated to include CAUTI surveillance in all locations that require reporting (i.e., surveillance must be “in-plan”). All required data fields in the numerator and the denominator, including the “no events” field for any month during which no CAUTIs were identified, must be submitted to NHSN. More information on how to report zero CAUTI events for a month is available at https://www.cdc.gov/nhsn/PDFs/CMS/how-to-report-No-Events-CLAB-CAU.pdf.

**NHSN Influenza Vaccination Coverage Among Healthcare Personnel (NQF #0431) Reporting**

For reporting data on the Influenza Vaccination Coverage Among Healthcare Personnel (NQF #0431) measure under the IRF QRP, IRFs must adhere to the definitions and reporting requirements for this measure as specified in the CDC’s NHSN *Healthcare Personnel Safety Component Protocol*, available at https://www.cdc.gov/nhsn/pdfs/hps-manual/vaccination/hps-flu-vaccine-protocol.pdf. To report Influenza Vaccination Coverage Among Healthcare Personnel (NQF #0431) data, the NHSN Healthcare Personnel Safety (HPS) Component must be activated. An HPS Component Reporting Plan (see pages 2-1 and 4-2 of *Healthcare Personnel Safety Component Protocol*) must be completed for every month that data are entered into NHSN; however, for Influenza Vaccination Coverage Among Healthcare Personnel (NQF #0431) reporting, once the “Influenza Vaccination Summary” box is checked on one monthly reporting plan, the system will auto-check that same box on every monthly reporting plan throughout the entire NHSN-defined
influenza season (defined as the 12 months from July 1–June 30). Please note that the NHSN uses the July 1 to June 30 time period to clearly identify the end of one influenza season and the beginning of the next influenza season. Reporting begins when the influenza vaccination becomes available. HCP are eligible for the measure if they are working at the IRF for at least 1 working day between October 1 and March 31. The *Healthcare Personnel Safety Reporting Plan* form includes brief instructions for collecting and entering each data element. (See *Healthcare Personnel Safety Component Protocol* for the report form and instructions.) Please note that whereas the NHSN allows reporting of this quality measure data throughout the CY, CMS only requires that IRFs collect and report this data between October 1 and March 31 (what is considered the influenza vaccination season) to meet compliance requirements for reporting Influenza Vaccination Coverage Among Healthcare Personnel (NQF #0431) data.

**General NHSN Reporting**

To report data for the IRF QRP through CDC’s NHSN, the IRF must be enrolled in the NHSN. Enrollment steps are outlined in the *NHSN Facility Administrator Enrollment Guide* available at www.cdc.gov/nhsn/pdfs/gen-support/facilityadminenrollmentguidecurrent.pdf. The information in the rest of this chapter supplements information available to the IRFs through the *NHSN Facility Administrator Enrollment Guide*.

**Reminder:** IRFs can be enrolled in NHSN as Acute Care Hospital units designated as IRFs OR as freestanding Inpatient Rehabilitation Facilities If your IRF is not enrolled in NHSN as a separate facility, and instead is currently submitting data as part of an acute-care hospital, i.e., as an acute care hospital unit designated as an IRF, it must have its own unique IRF CCN. If you have questions or need assistance, please contact IRFCoverage@cms.hhs.gov.

If your IRF is a freestanding inpatient rehabilitation facility and is not currently enrolled in NHSN as a separate facility, it will have to be enrolled in NHSN as a separate facility with a unique orgID that is identified as an IRF. If you have questions or need assistance, please contact the CDC NHSN Help Desk at nhsn@cdc.gov.
If your IRF is already enrolled as an IRF in the NHSN, please do the following:

1. Confirm that your CMS Certification Number (CCN) and CCN Effective Date are correctly entered on the Facility Information screen. Specific guidance for adding/updating your facility’s CCN or CCN Effective Date within NHSN can be found here: [www.cdc.gov/nhsn/pdfs/cms/changing-ccn-within-nhsn.pdf](http://www.cdc.gov/nhsn/pdfs/cms/changing-ccn-within-nhsn.pdf).

2. Take the NHSN trainings for CAUTI, Healthcare Personnel Safety Vaccination Module, and CDI reporting if you have not already done so. Trainings can be found on the event-specific NHSN Web site by starting here: [https://www.cdc.gov/nhsn/inpatient-rehab/index.html](https://www.cdc.gov/nhsn/inpatient-rehab/index.html).

3. Check your location mappings prior to reporting. Additional information regarding location mapping can be found here: [https://www.cdc.gov/nhsn/pdfs/pscmanual/15locationsdescriptions_current.pdf](https://www.cdc.gov/nhsn/pdfs/pscmanual/15locationsdescriptions_current.pdf).

4. Use one of the following two NHSN Monthly checklists depending on the type of IRF to ensure complete reporting.

If you need assistance with these steps, please contact the CDC NHSN Help Desk at [nhsn@cdc.gov](mailto:nhsn@cdc.gov).

2. Before IRF Begins Enrollment Process


   - Appoint a person from your facility as the NHSN Facility Administrator to complete the NHSN enrollment process. The person in charge of Infection Prevention/Control is an appropriate choice. This person will be responsible for enrolling the facility in NHSN and will serve as the contact person for NHSN.

   - You will need your facility’s CCN or relevant identifier code to complete the NHSN enrollment process.

   - Note that after the facility is enrolled in NHSN, the NHSN Facility Administrator can add other users to assist with surveillance and reporting activities. We strongly urge each IRF to set up an alternative or substitute user ensuring the IRF’s ability to submit timely data, regardless of staff absence or turnover.

   - Complete the required NHSN trainings that are available on the NHSN Web site at [www.cdc.gov/nhsn/training/](http://www.cdc.gov/nhsn/training/).

   - NHSN CAUTI Outcome Measure (NQF #0138) criteria can be found here: [https://www.cdc.gov/nhsn/inpatient-rehab/cauti/index.html](https://www.cdc.gov/nhsn/inpatient-rehab/cauti/index.html).

• Guidance on the NHSN Facility-wide Inpatient Hospital-onset CDI Outcome Measure (NQF #1717) criteria can be found here: https://www.cdc.gov/nhsn/inpatient-rehab/cdiff-mrsa/index.html.

3. Basic Steps to NHSN Enrollment and Data Submission

   • NHSN Enrollment and Facility Set-up (PDF Slide Sets)
   • Overview of the Patient Safety Component, Device-associated Module (PDF Slide Set)
   • Data Entry, Surveillance, Analysis, Data Entry, Import, and Customization (PDF Slide Set)
   • Introduction to the Device-associated Module Training Course with Quiz
   • Catheter-Associated Urinary Tract Infection (CAUTI) Training Course with Quiz
   • Overview of the Healthcare Personnel Safety Component (PDF Slide Sets)
   • Vaccination Module (PDF Slide Sets)
   • MDRO and CDI LabID Event Training Course

2. Register for the NHSN, which includes accepting the NHSN Rules of Behavior and providing your contact information at https://nhsn.cdc.gov/RegistrationForm/index. If you use an identifier other than your CCN during the enrollment process, you must enter your CCN on NHSN’s Facility Information screen after your facility is enrolled to ensure that the appropriate data are shared with CMS.

3. Register for Secure Access Management Services (SAMS) and complete the Identity Proofing Verification form.

4. Electronically submit your facility’s enrollment forms, including a Facility Contact form and a Facility Survey. It is recommended that you print and complete the paper forms and then enter the information online.

5. Print and complete the Agreement to Participate and Consent Form that will be e-mailed to you. The form must be signed by a senior executive at your facility. The IRF must complete and sign this form and fax it to CDC at (404) 929-0131 within 60 days of receiving it.

6. All patient care units will need to be added as location(s) and mapped in NHSN in advance by a facility user.
7. Use the NHSN Monthly Checklist for Freestanding Inpatient Rehabilitation Facilities reporting to CMS IRF QRP to ensure complete reporting:

8. Use one of the following two NHSN Monthly checklists depending on the type of IRF to ensure complete reporting.
   - NHSN Monthly Checklist for Acute Care Hospital units designated as Inpatient Rehabilitation Facilities reporting to the CMS IRF IQR Program:

9. The locations must also be added to the monthly reporting plan under the device-associated module section for each month you plan on submitting the NHSN CAUTI Outcome Measure (NQF #0138) to CMS. After adding the location, please remember to check the “CAUTI” box to ensure that the data will be appropriately sent to CMS.

10. The FacWideIN location must also be selected in the Monthly Reporting Plan for LabID C. difficile All Specimens to meet the LabID Event reporting requirements.

11. Begin reporting data into the NHSN Web-based application.
   - Fill out a Urinary Tract Infection event form for each CAUTI identified in the IRF location(s). The form can be found here: www.cdc.gov/nhsn/forms/57.114_UTI_BLANK.pdf. Instructions for completing the form can be found here: www.cdc.gov/nhsn/forms/instr/57_114.pdf.

12. Complete a monthly summary form for the device-associated data. The number of patient days and indwelling catheter days for the location must be reported, even if that number was zero. To report data, use the Denominators for Intensive Care Unit/Other Locations form, which can be found here: www.cdc.gov/nhsn/forms/57.118_DenominatorICU_BLANK.pdf. Instructions for completing the form are available here: www.cdc.gov/nhsn/forms/instr/57_118.pdf.

13. If no CAUTI events were identified for the month, the “Report No Events” box must be checked for the appropriate surveillance type on the Denominator for “Intensive Care Unit/Other Locations” screen within the NHSN application. More information on how to report zero CAUTI events for a month is available at https://www.cdc.gov/nhsn/PDFs/CMS/how-to-report-No-Events-CLAB-CAU.pdf.
14. Complete a monthly summary form for the MDRO and CDI data. The number of patient days and admissions for the IRF facility must be reported, even if no events were identified that month. To report data, use the MDRO and CDI Prevention Process and Outcome Measures Monthly Reporting form, which can be found here: www.cdc.gov/nhsn/forms/57.127_mdromonthlyreporting_blank.pdf. Instructions for completing the form are available here: www.cdc.gov/nhsn/forms/instr/57_127.pdf.

15. If no CDI laboratory-identified events were identified for the month, the “Report No Events” box must be checked for the appropriate surveillance type on the Denominator for “MDRO and CDI Prevention Process and Outcome Measures Monthly Monitoring” screen within the NHSN application.


4. **Additional Tips and Hints**

  - You must complete the steps in order.
  - Allow several days for this process, because several steps require you to wait for information from CDC.

- Use Internet Explorer, which is the only browser that supports the NHSN.

- Use the buttons and arrows on the NHSN Web pages instead of the browser’s “back” button.

- Use your professional e-mail address, not your personal e-mail address, and be consistent. Use the same one for all fields requiring an e-mail address. The e-mail address you use to apply for your SAMS credentials must match the one you used to register in NHSN.

- Locate your facility’s CCN or relevant identifier code.

- Remember the password you created when you applied for your SAMS credentials; that password will be required each time you access NHSN.

- Facilities with separate CCNs must register as separate facilities, and each facility will need to identify and set up its location types.

- You may join or organize a group that reports to NHSN collectively, but first you must enroll with NHSN. Once the facility is enrolled, the Group Administrator should send an invitation and password for the group. Your facility must report data individually, but the group will be able to see data for which you conferrights.
NHSN requires that a unique organization ID be created for separate facilities at physically separate locations, even if those facilities share a CCN. If this is not done, the ability to clearly track and analyze infections by specific locations is compromised, and it becomes difficult to target prevention efforts effectively.

If a single unit has more than one type of patient population, report the location according to which population makes up 80% or more of the unit, on average, over a year. For example, if 80% of the patients in the unit are pediatric and 20% are adult, the location would be reported as pediatric. If no patient population in the unit fulfills this “80% rule,” please see instructions for mapping patient care locations at www.cdc.gov/nhsn/PDFs/pscManual/15LocationsDescriptions_current.pdf. If you still have questions, then you may contact the NHSN Help Desk at NHSN@cdc.gov for additional guidance.

Frequently asked questions about the NHSN enrollment process are available at www.cdc.gov/nhsn/faqs/FAQ_enrollment.html.

Once a patient’s information is entered into the NHSN, new events can be added for that patient using the Patient Find feature, provided that the same patient identifier is used.

Be sure that all events entered into NHSN are completed. Although an event may be saved without “completing” the event, only data for completed events will be sent by CDC to CMS.

Facilities will have approximately 135 days following the end of a quarter before NHSN freezes the NHSN CAUTI Outcome Measure (NQF #0138) and the NHSN Facility-wide Inpatient Hospital-onset CDI Outcome Measure (NQF #1717) and CDC sends the data to CMS.

An IRF patient’s stay may exceed this freeze date. If so, a potential death determination on the Healthcare-associated Infections (HAI) Event record would not be possible. Users should enter the patient’s status at the time of data entry, and then update this variable if AND when the patient’s status changes (i.e., the patient dies). This will ensure that all the data are marked as complete at the time of the freeze date and can be sent to CMS.

IRFs do not need to confer rights to CMS. CDC submits data to CMS on behalf of the IRF.

**Notes on Reporting the NHSN CAUTI Outcome Measure (NQF #0138)**

- Only those events that meet the NHSN’s current CAUTI criteria should be reported. Those that do not meet these criteria should not be reported.

- If a patient has more than one CAUTI event during his or her stay, an additional CAUTI would be reportable only if it occurs outside the 14-day Repeat Infection Timeframe. For more guidance on identification and reporting of repeat infections, please refer to www.cdc.gov/nhsn/PDFs/pscManual/2PSC_IdentifyingHAIs_NHSNcurrent.pdf.

- There is no exclusion for CAUTIs that are clinically believed to be related to an infection at another site (e.g., a wound). It must be reported if it meets the criteria of a reportable CAUTI. Note that NHSN uses surveillance definitions, which may, at times, vary from clinical definitions.
• If your facility’s monthly reporting plan requires reporting of both device-associated infections (e.g., CAUTI) and LabID events, then individual and separate events for each will need to be entered separately.

• A CAUTI Standardized Infection Ratio (SIR) will be generated using the 2015 national IRF data as the baseline for data from 2015 and forward.

• If a patient is transferred from another facility or location, and the date of event is on the day of transfer, or the next day, the infection is attributed to the transferring facility/location. Infections attributed to another facility do not need to be entered into NHSN by the receiving facility.

• Although it is not required, CDC strongly recommends sharing information with the transferring facility about HAIs identified in transferred patients to ensure the accuracy of data reported from all facilities.

• Frequently asked questions related to CAUTI surveillance are located at https://www.cdc.gov/nhsn/pdfs/faqs/psc/faqs-uti.pdf.

Notes on Reporting Influenza Vaccination Coverage Among Healthcare Personnel (NQF #0431)

• Individuals who physically work in the facility for at least 1 day from October 1 to March 31 are included in the count of healthcare personnel, regardless of clinical responsibility or patient contact.

• The monthly reporting plan (form found at https://www.cdc.gov/nhsn/forms/57.203_hcpsafetyplan_blank.pdf) indicates to the NHSN system which modules and protocols a user intends to follow for surveillance purposes. This form must be completed before influenza vaccination data can be entered for an influenza season.

• The influenza vaccination summary data report will need to be submitted only once/annually to CMS.

• Facilities are required to report summary-level vaccination data and not individual-level vaccination data.

• NHSN defines influenza season as July 1 to June 30. However, IRFs are not required to report on 12 months of data. IRFs must report data for the period specified in the NHSN protocol, which is October 1 to March 31 in the denominator, including all vaccinations given during the influenza season in the numerator (October 1, or whenever the seasonal influenza vaccine became available, to March 31).

• Facilities will always be able to review the Influenza Vaccination Coverage Among Healthcare Personnel (NQF #0431) data that are entered into NHSN. However, the Influenza Vaccination Coverage Among Healthcare Personnel (NQF #0431) reporting in NHSN consists of a single data entry screen per influenza season. Therefore, every time a user enters updated data for a particular influenza season, all previously entered data for that season will be overwritten and a new modified date will be auto-filled by the system. IRFs wishing to maintain monthly records are encouraged to save their own copies of each data entry. Facilities will also always be able to review the final healthcare personnel influenza vaccination summary data report that is transmitted to CMS.
• Frequently asked questions related to reporting Influenza Vaccination Coverage Among Healthcare Personnel (NQF #0431) data are located at https://www.cdc.gov/nhsn/pdfs/hps-manual/vaccination/IRF-FAQs.pdf.

**Notes on Reporting NHSN Facility-wide Inpatient Hospital-onset CDI Outcome Measure (NQF #1717) LabID Events**

• A LabID Event calculator is available on the NHSN Web site to help with data entry decisions regarding the 14-day rule: www.cdc.gov/nhsn/labid-calculator/index.html.

• CDI SIRs will be generated using 2015 national IRF data as the baseline for data from 2015 and forward.

• Frequently asked questions related to *C. difficile* LabID data are located at https://www.cdc.gov/nhsn/pdfs/faqs/psc/faqs_mdro-_cdi.pdf

• Additional information related to LabID Event reporting is located at https://www.cdc.gov/nhsn/inpatient-rehab/cdiff-mrsa/index.html.

5. **Additional Information**

• Frequently asked questions about the NHSN in general are located at www.cdc.gov/nhsn/faqs/FAQ_general.html.

• Direct questions and/or comments about the definitions, measure specifications, or the process of reporting and submitting the NHSN CAUTI Outcome Measure (NQF #0138), the Influenza Vaccination Coverage Among Healthcare Personnel (NQF #0431) or the NHSN Facility-wide Inpatient Hospital-onset CDI Outcome Measure (NQF #1717), via NHSN for the IRF QRP to the CDC NHSN Help Desk at nhsn@cdc.gov. Each message will be forwarded to the appropriate person and a response will be sent to you.

• All other questions and/or comments about these measures for the IRF QRP should be e-mailed to IRF.questions@cms.hhs.gov.