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NHSN Enrollment and Reporting: A Guide for Inpatient Rehabilitation Facilities

NOTE: *This document has been approved by Dawn Sievert and Kathy Allen-Bridson of the Centers for Disease Control and Prevention*

As mandated in Section 3004 of the Affordable Care Act, Inpatient Rehabilitation Facilities (IRFs) are now required to submit information about Catheter-Associated Urinary Tract Infections (CAUTIs) using the Centers for Disease Control and Prevention's (CDC) National Healthcare Safety Network. All IRFs must participate or risk losing 2% of the annual payment update.

Facilities must submit a report data to NHSN on a monthly basis, regardless of whether an infection event occurred. In order to be able to report through NHSN, the facility needs to enroll into NHSN (only if the facility is not already enrolled to fulfill other reporting requirements). Steps to do this are outlined in the NHSN Facility Administrator Enrollment guide, found here: <http://www.cdc.gov/nhsn/PDFs/FacilityAdminEnrollmentGuideCurrent.pdf>

This memo is designed to supplement the enrollment guide.

There are three components of the NHSN. To participate in the submission of CAUTI data, IRFs are only participating in the Patient Safety Component. Disregard any references to the Healthcare Personnel Safety Component and the Biovigilance Component.

Before you begin:

- Determine whether your facility is already enrolled in NHSN for other reporting purposes. Almost all acute care facilities are already enrolled in NHSN to report CLABSI, CAUTI, and SSI data per CMS IPPS reporting requirements.
- If you determine that your facility is not already enrolled within NHSN:
 - o Appoint a person from your facility as the NHSN Facility Administrator to enroll the facility in NHSN. The person in charge of Infection Prevention/Control is an appropriate choice. This person will be responsible for enrolling the facility in NHSN, serving as the contact person for NHSN, and also determining who within the community can have access to your facility's NHSN data.
 - o The NHSN Facility Administrator can act as the Primary Point of Contact, or he/she can appoint someone else the Patient Safety Primary Contract to carry out this task
- Know your facility's CCN ID.
- Urinary tract infection diagnostic criteria can be found here - starting on page 7-1: <http://www.cdc.gov/nhsn/PDFs/pscManual/7pscCAUTIcurrent.pdf>
- Technical and legal requirements for the NHSN can be found here: <http://www.cdc.gov/nhsn/enroll.html>

Who needs to report and how:

- All free-standing inpatient rehabilitation facilities with the last four digits of their CCN between 3025-3099 should be enrolled within NHSN as a separate NHSN facility. These facilities should enroll as a HOSP-REHAB facility type to ensure proper set-up and accurate transfer of CAUTI data to CMS.
- All rehabilitation units within acute care facilities with a 'T' or 'R' in the 3rd position of their rehab unit specific CCN should report as an inpatient rehabilitation ward location within their affiliated NHSN acute care facility. These units should not enroll as separate facilities within NHSN.

Basic Steps if your Facility is NOT already Enrolled in NHSN

- 1) Complete the online training. This consists of the following steps:
 - a. Read the NHSN Facility Administrator Enrollment Guide:
<http://www.cdc.gov/nhsn/PDFs/FacilityAdminEnrollmentGuideCurrent.pdf>
- 2) Complete the following sections of the training found at the links below:
 - a. <http://www.cdc.gov/nhsn/Training/enrollment-setup/index.html>
 - i. NHSN Enrollment
 - ii. Facility Set-up
 - b. <http://www.cdc.gov/nhsn/Training/analysis/index.html>
 - i. Data Entry, Import and Customization
 - c. <http://www.cdc.gov/nhsn/Training/patient-safety-component/index.html>
 - i. Overview of the Patient Safety Component
 - ii. Catheter-associated Urinary Tract Infection (CAUTI)
- 3) Begin NHSN enrollment, by following the steps designated in the NHSN Facility Administrator Enrollment Guide:
<http://www.cdc.gov/nhsn/PDFs/FacilityAdminEnrollmentGuideCurrent.pdf>
 - a. Within enrollment you will complete the following steps:
 - i. Read and agree to the NHSN Rules of Behavior
 - ii. Register with NHSN
 - iii. Apply for a CDC Digital Certificate
 - iv. Enroll in NHSN by completing the necessary contact information and survey forms
 - v. Print, sign, and return consent form to CDC

Basic Steps if your Facility is already Enrolled in NHSN

- 1) Complete the online NHSN training
 - a. <http://www.cdc.gov/nhsn/Training/analysis/index.html>
 - i. Data Entry, Import and Customization
 - b. <http://www.cdc.gov/nhsn/Training/patient-safety-component/index.html>
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- 2) Determine if the rehab unit has already been added as a location within your NHSN facility
- 3) Follow the directions found here to appropriately set up your rehab unit to submit data to CMS: <http://www.cdc.gov/nhsn/PDFs/irf/Updating-IRF-locations-within-NHSN.pdf>

Reporting Data within NHSN

- 1) The rehab location(s) will need to be added to the monthly reporting plan under the device-associated module section for each month you plan on submitting CAUTI data to CMS.
 - a. After adding the location, please remember to check the CAUTI box to ensure that the data will be appropriately sent to CMS.
- 2) Fill out a Urinary Tract Infection event form for each CAUTI identified in the rehab location(s). The form itself can be found here: <http://www.cdc.gov/nhsn/forms/Patient-Safety-forms.html#cauti>
 - a. Instructions for filling out the form can be found here: http://www.cdc.gov/nhsn/forms/instr/57_114.pdf
- 3) Complete a monthly summary form indicating the number of indwelling catheter days for the location must be reported, even if that number was zero, using the ICU/Other Denominator form found here: http://www.cdc.gov/nhsn/forms/57.118_DenominatorICU_BLANK.pdf
 - a. Instructions for filling out the form can be found here: http://www.cdc.gov/nhsn/PDFs/pscManual/14pscForm_Instructions_current.pdf
 - b. If there were no CAUTI events identified for the month, the Report No Events: CAUTI box must be checked on the Denominator for Intensive Care Unit/Other Locations screen with the NHSN application. See page 14-22 for guidance on this http://www.cdc.gov/nhsn/PDFs/pscManual/14pscForm_Instructions_current.pdf

Tips and Hints

- Enrollment and reporting within NHSN will largely be determined by your CMS Certification Number (CCN). Please make sure to get this number from your administrative/billing department to ensure that your CCN is correct and your data is appropriately sent to CMS.
 - o It's important to remember that if the rehab unit is within an acute care facility, the unit will have a separate CCN from the acute care facility.
- If your facility is not already enrolled in NHSN, follow the step-by-step instructions to enroll your facility found in the Facility Administrator Enrollment guide, found here: <http://www.cdc.gov/nhsn/PDFs/FacilityAdminEnrollmentGuideCurrent.pdf>

You must complete the steps in order.

 - o Allow several days for this process, as there are several steps that require you to wait for information from the CDC.
- When using NHSN, use Internet Explorer, as it is the only browser that supports the NHSN.

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- Never use the browser's "back" button. Use the buttons and arrows on the NHSN web pages themselves.
- Use your professional email address, not your personal email address, and be consistent-use the same email address for all fields requiring an email address.
- You will need your facility identifier number (CMS Certification Number or CCN).
- Remember your challenge phrase once you have created it; the phrase is needed every time you log into NHSN.
- Frequently asked questions about enrollment can be found here:
http://www.cdc.gov/nhsn/FAQ_enrollment.html
- Frequently asked questions about the NHSN in general can be found here:
http://www.cdc.gov/nhsn/FAQ_general.html
- To send questions and/or comments about the NHSN, send an email to: nhsn@cdc.gov. Each message will be forwarded to the appropriate person and a response will be sent to you.