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Circular Letter: DHCQ 15-3-630

TO: Ambulatory Surgical Center Facility Administrators

FROM: Deborah S. Allwes, BS, BSN, MPH *DSA*
 Director, Bureau of Health Care Safety and Quality

DATE: March 23, 2015

RE: Important Change in Reporting Seasonal Influenza Vaccination of Healthcare Personnel (HCP) at Massachusetts Ambulatory Surgical Centers (ASC) for the 2014-2015 Influenza Season

The purpose of this circular letter is to inform Massachusetts ASCs of the steps needed to fulfill the Massachusetts Department of Public Health (MDPH) and Centers for Medicaid Services (CMS) requirement to submit HCP influenza data to the Centers for Disease Control and Prevention's (CDC) National Healthcare Safety network (NHSN) by May 15, 2015.

Background

As a condition of licensure, MDPH regulations require all licensed healthcare facilities to:

- Offer free-of-charge, annual influenza vaccine to all personnel (full and part-time employees, contracted employees, volunteers, house staff and students);
- Document receipt of influenza vaccine administered within and outside the facility or document the declination of immunization.
- Report information to MDPH, documenting compliance with the vaccination requirement, in accordance with reporting and data collection guidelines of the Commissioner (105 CMR 140.150(I)).¹ MDPH regulations do not allow for reporting unknown vaccine status.[†]

MDPH has established an overall minimum performance goal for all licensed facility Healthcare Personnel (HCP) vaccination rates. Statewide, MDPH expects that a 90% influenza vaccination coverage rate will be reached for all HCP. During the 2013-2014 influenza season, Massachusetts ASC HCP did

¹105 CMR 130.325, 105 CMR 140.150, 105 CMR 150.002(D)(8)

[†] See 105 CMR 140.150(H)(1).

not achieve vaccine coverage of 90%. On average, 80% of HCP at 54 ASCs were vaccinated against influenza, and 19% declined vaccination.

Reporting Changes for the 2014-2015 Influenza Season

The Centers for Medicare and Medicaid Services (CMS) published a final rule in the *Federal Register* on December 10, 2013, that included healthcare personnel (HCP) influenza vaccination summary reporting from ambulatory surgical centers via the Centers for Disease Control and Prevention's (CDC's) National Healthcare Safety Network (NHSN) in the CMS Ambulatory Surgical Center Quality Reporting (ASCQR) Program requirements beginning with the 2014-2015 influenza season.² NHSN is an internet-based application created and managed by the CDC for patient and healthcare personnel safety surveillance.

To fulfill the CMS requirement and avoid unnecessary duplicate reporting, the MDPH reporting requirement will be considered met upon each ASC reporting HCP influenza vaccination data to the NHSN beginning with the 2014-2015 influenza season and making the data available to MDPH in NHSN.

NHSN Enrollment

ASCs should begin the NHSN facility enrollment process as soon as possible in order to ensure sufficient time to complete the enrollment process and report the HCP influenza vaccination summary data. The registration process can take more than a month, so please register immediately if you have not already. NHSN enrollment instructions are available at the following link:

<http://www.cdc.gov/nhsn/ambulatory-surgery/enroll.html>

NHSN has developed ASC-specific guidance for enrolling into NHSN and setting up the facility to report these data. The checklist can be found at: <http://www.cdc.gov/nhsn/ambulatory-surgery/enroll.html>.

Facility-specific operational guidance documents regarding HCP influenza vaccination summary data reporting are located at: <http://www.cdc.gov/nhsn/cms/index.html>.

ASC training materials are located at:

<http://www.cdc.gov/nhsn/ambulatory-surgery/hcp-vaccination/index.html>.

Live training webinars were offered in August 2014 for the 2014-2015 influenza season. The webinar recasts and PowerPoint slides are available at: <http://www2.cdc.gov/vaccines/ed/nhsn/>.

MDPH Requirement

The attached document “**Instructions for Joining and Conferring Rights to the MDPH ASC National Healthcare Safety Network Group**” is specifically for Massachusetts ASCs with instructions on how to confer rights to the NHSN data to MDPH. This process grants MDPH permission to view the HCP influenza vaccination data and must be completed by each facility to comply with the state requirement.

cc: Monica Bharel MD, MPH, Commissioner, Department of Public Health
Alfred DeMaria, Jr., MD, Medical Director, Bureau of Infectious Diseases

² <http://www.gpo.gov/fdsys/pkg/FR-2013-12-10/pdf/2013-28737.pdf>