Successful Reporting For the COVID-19 Vaccination Among Healthcare Personnel (HCP) Measure

Question and Answer Summary Document

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February 2, 2022
2 p.m. Eastern Time (ET)

Subject-matter experts researched and answered the following questions during the live webinar. The questions may have been edited for grammar.

Question #1: **The previous Facility Administrator (FA) for my center is no longer here. How can I change the FA to me? Do I also need to register in Security Access Management System (SAMS)?**

You will electronically change the FA on the National Healthcare Safety Network (NHSN) website on the About NHSN page at https://www.cdc.gov/nhsn/about-nhsn/index.html. Please choose the Change NHSN Facility Admin option. If you scroll down the page, there will be an electronic form to fill out and submit.

Question #2: **How are we to report approved exemptions?**

An individual who declines to receive vaccination for any reason, other than the medical contraindications listed in Interim Clinical Considerations for Use of COVID-19 Vaccines Currently Approved or Authorized in the United States, should be categorized as "offered but declined COVID-19 vaccine" for Question 3.2. This is true even if your facility permits religious or philosophical exemptions for COVID-19 vaccination.

Question #3: **Do Ambulatory Surgical Centers (ASCs) have to report ASC-20: COVID-19 Vaccination Coverage Among Health Care Personnel if we do not yet have a Medicare CMS Certification Number (CCN)?**

No. The program requirements apply to all ASCs designated as operating in the CMS Certification and Survey Provider Enhanced Reporting (CASPER) system four months prior to January 1 of the reporting period. For example, if an ASC is designated as newly operating in August of 2022, the ASC would begin collecting data in 2022 and report that data in 2023 for the calendar year 2024 payment determination. If you open after September 1, you will move all of this up one year.

Question #5: **A consulting group stated that it is optional to report the Other Contract Personnel category. Please provide clarification.**

The Other Contract Personnel category is a required category for the NHSN COVID-19 Vaccination surveillance tool. This includes contractors and vendors who work in the facility on a regular, weekly basis.

Question #6: **How does this presentation of the ASC requirement relate to the hospital requirement? Do hospitals start reporting this for October, November, and December of 2021, with a due date of May 15?**

The COVID-19 Vaccination Among Healthcare Personnel (HCP) measure has been adopted across multiple CMS quality programs. For acute care hospitals, the Hospital Inpatient Quality Reporting (IQR) Program requires hospitals to report COVID-19 vaccination data on HCP beginning with the reporting period for Quarter 4 (October 1 through December 31, 2021), with a data submission deadline of May 16, 2022. However, for the Hospital Outpatient Quality Reporting (OQR) and the Ambulatory Surgical Center Quality Reporting (ASCQR) Programs, the first reporting period is Quarter 1 (January 1 through March 31, 2022), which has a data submission deadline of August 15, 2022.

Question #7: **Our ASC is only open once every three weeks, and the staff is employed by another Medicare-certified facility. Does that facility need to report?**

Although not a program requirement, NHSN recommends that every individual, free-standing facility should enroll and report separately in NHSN with a unique NHSN-assigned OrgID. This applies even if physically separate facilities share a single CCN. Note: If your ASC is a free-standing facility that bills less than 240 Medicare claims in a year, you are not required to report for the ASCQR Program.

Question #8: **If HCP are eligible to work the week of reporting, but they do not work that week because of low patient volume, are they still included?**

Yes, per Centers for Disease Control and Prevention (CDC) specifications, HCP eligible to work include those scheduled to work in the facility at least one day every week. Working any part of a day is considered as working one day. Facilities should include healthcare personnel even if they are on temporary leave during the week of data collection. Temporary leave is defined as less than or equal to two weeks in duration. If they are on leave that is greater than two weeks, then they should not be included for the week of data collection.

Question #9: **We are an ASC that has COVID-19 temporary hospital privileges. We report via the ASCQR Program. Do we need to report data for the COVID-19 Vaccination Among HCP measure as a hospital and as an ASC, or only as an ASC?**

If your ASC is currently billing with a hospital CCN under the Hospitals Without Walls Program, then you are required to report data under your ASC's CCN for the ASCQR Program.

Question #10: **I thought that the Data Tracking Worksheet for the COVID-19 Vaccination Among Healthcare Personnel measure, located on the NHSN website, would be useful to compile a list of those that we are reporting; however, I've noticed some issues. For example, the column for reporting the manufacturer of an additional dose/booster does not provide any options when you select the drop-down box, so nothing populates the summary. Will these glitches be fixed so that we have a completely functional worksheet?**

The drop-down box is functioning appropriately. There is an instruction page available to assist you with the completion of the Data Tracking Worksheet. You should enter required data from left to right. If you select Yes or No to Eligible for Additional/Booster Dose first, you will then see the drop-down options.

Question #11: **What if an employee works at the ASC once a month and not once a week?**

Staff who are eligible to have worked include employees, licensed independent practitioners, adult students/trainees, and volunteers, as well as other contract personnel who are scheduled to work in the facility at least one day every week. Working any part of a day is considered as working one day. Therefore, an employee who only works in the facility once a month would not be included in the data.

Question #12: **What does "regular weekly basis" mean for the purposes of determining if we should include the Other Contract Personnel category?**

Staff who are eligible to have worked include employees, licensed independent practitioners, adult students/trainees, and volunteers, as well as other contract personnel who are scheduled to work in the facility at least one day every week. Working any part of a day is considered as working one day. Include HCP even if they are on temporary leave during the week of data collection. You can refer to the Table of Instructions (TOI) for more information: https://www.cdc.gov/nhsn/forms/instr/57.219-toi-508.pdf (Instructions for Completion of the Weekly Healthcare Personnel Vaccination Summary Form Non-LTCF HCP)

Question #13: **We are an ASC with minimal change and turnover. Do we just report a 0 quarterly if there is no change to report?**

Facilities will still need to report data at least one week per month. If there are no changes to your data, then you would report the same numbers as the previously reported week.

(For example, there are no changes in the number of individuals and their vaccination status.) Because there could be new staff joining or leaving the facility, vaccination coverage and the counts on the form could change week by week even though no new vaccines are given.

Question #14: **Do we meet the requirements if we report just one week out of every month?**

Yes, for the purposes of the ASCQR Program, you will need to report one self-selected week a month for every month of the quarter. Just remember, make sure the week you enter ends in the month you want. The system will put the submitted data under the month the week ends. For example, if a week includes December 27, 2021, through January 2, 2022, then that week's data is applied to the month of January.

Question #15: **What is counted for the All Core category, just the employees?**

The All Core category is considered all of the denominator categories with the exception of the "Other Contract Personnel" Category. However, reporting of Other Contract Personnel category is still required in the NHSN tool.

Question #16: **What if our ASC employees are contracted by the hospital? Would the hospital also report to CMS for this COVID-19 data submission? They might be including us in their data.**

If you are an ASC owned by a hospital and your Medicare claims are filed under the hospital's CCN, then you would report data under the Hospital OQR Program, not the ASCQR Program.

Question #17: **How do I add a new facility to our group that was previously registered under another owner? I tried to add the facility and the CCN number already existed in the database.**

If you are referring to a Group within the NHSN application, then, based on your statement, the facility has already joined the Group. Moving forward, the facility will need a new FA. This gives the FA access to report data.

Question #18: **Can we fill in the data in real time?**

Yes. Also, if facilities need to make changes to the data, this can be done prior to the deadline.

Question #19: **Is there a reporting requirement for 2021?**

No. For the purposes of the ASCQR Program, reporting began with the calendar year 2022 reporting period, beginning with January 1, 2022. ASCs will collect data for at least one, self-selected week during each month of a quarter. The first reporting period, Quarter 1, will be for January, February, and March of 2022. The submission deadline to submit that first quarter of data is August 15, 2022.

Question #20: **Do we need to make quarterly reporting plans?**

No, but you will need to create a monthly reporting plan for each month data are entered into NHSN.

Question #21: **Can we go back and pick any week in January?**

Yes. ASCs will collect data for at least one, self-selected week during each month of a quarter. The first reporting period, Quarter 1, will be for January, February, and March of 2022. The submission deadline to submit that first quarter of data is August 15, 2022.

Question #22: **Since boosters are not required, do we need to add numbers? They are inaccurate as we don't require booster cards from staff. Should we put zero (0)?**

For the purposes of reporting the ASC-20 measure, data on additional booster doses are not required. However, the COVID-19 Vaccination module does require this information to be reported. You should do your best to obtain data on additional doses and booster doses from your staff and enter the data that are most accurate to your knowledge.

Question #23: **When I build the report in NHSN, it shows a weekly submission. If we only report for one of those weeks, do the other three weeks sit blank? Is there a way to clear those alerts?**

The NHSN application will provide weekly alerts, and those cannot be cleared at this time. For the purposes of reporting the ASC-20 measure in the ASCQR Program, ASCs will collect data for at least one, self-selected week during each month of a quarter. However, the CDC strongly encourages weekly reporting for surveillance purposes.

Question #24: **I am having difficulty in registering our facility. I receive an error message on the submit page. I have contacted CDC, but I have not heard back from them.**

Please submit an email to the NHSN Help Desk at NHSN@cdc.gov to request a temporary enrollment number. Use this subject line: ASC-Need Temporary Enrollment Number to Enroll Facility. This will allow you register your facility. Once you complete the enrollment process, you will add your CCN into the NHSN system.

Question #25: **We have multiple CCNs, and staff travel between locations. Do we include traveling staff in all locations?**

Yes. All eligible individuals must be counted at each facility where they work or are eligible to work during the week of data collection. Although not a program requirement, NHSN recommends that every individual, free-standing facility enroll and report separately in NHSN with a unique NHSN-assigned OrgID. This applies even if physically separate facilities share a single CCN.

Question #26: **If you have staff and physicians who have had Moderna and Pfizer, which do we report? How do we report them?**

You should report COVID-19 vaccination data for all vaccine manufacturers as applicable. To enter data for more than one vaccine manufacturer in Question 2, please follow the following steps:

Step 1: Select a COVID-19 vaccine from the drop-down box.

Step 2: Enter the cumulative number of individuals who received only dose 1 of vaccine.

Step 3: Enter the cumulative number of individuals who received both dose 1 and dose 2 of vaccine.

Step 4: If some individuals received another type of vaccine, then return to the drop-down box. Select the other vaccine and repeat Steps 1 through 3 as described above.

Question #27: **Can I make any corrections for a particular week's reported data before the CMS deadline?**

Yes, you can modify or edit data up to the deadline for that given quarter. Any changes made to data in the NHSN portal after the program deadlines will not be included for that reporting period/submission to CMS.

Question #28: **How do we count all of the contracted vendors who come into the facility without patient contact?**

Vendors providing care, treatment, or services should be included in the Other Contract Personnel category if they work in the facility on a regular (weekly) basis, regardless of clinical responsibility or patient contact. If they do not work in the facility on a regular basis (at least once per week), then they do not need to be counted.

Question #29: **When reporting the data for a specific week every month, do we only report new vaccinated employees, or are we reporting the same data for all the staff for each of those weeks?**

NHSN Weekly COVID Vaccination modules collect data cumulatively: Each time you report, you should report the total number of individuals at the facility for that week. Then, of these individuals, report the number who have ever received COVID-19 vaccination (at that facility or elsewhere) since it became available in December 2020. Do not limit reporting to just the individuals who were vaccinated that week; instead, report the cumulative total of all individuals in the facility who have ever been vaccinated to date.

Question #30: **If the FA is no longer with us, can we change it?**

Yes, please complete the online form if there is a change in FA: https://www.cdc.gov/nhsn/facadmin/index.html

Question #31: **On the NHSN landing page, I am unable to access the Select Component option. How can I get that resolved?**

You must be added to a facility in NHSN as a user. Please contact the FA and request to be added as a user. If you have been added as a user and experience this issue, then rights must be added to your profile. The FA must add rights to your profile within the facility.

Question #32: **I am new to my position as a Clinical Director, and I do not have my SAMS credentials yet. I am waiting for my grid card in the mail. I could not report for January. Will my ASC be penalized?**

No. The deadline for reporting Quarter 1 2022 data is August 15, 2022. You can enter your Quarter 1 data (January 1 through March 31, 2022) anytime up to the deadline.

Question #33: **To clarify, in our situation, a person on leave is not eligible to work. Are they counted?**

Facilities should include healthcare personnel even if they are on temporary leave during the week of data collection. Temporary leave is defined as less than or equal to two weeks in duration. If they are on leave that is greater than two weeks, then they should not be included for the week of data collection.

Question #34:   **Can I be the FA for two different facilities with different CCN numbers?**

Yes, you can. Keep in mind that all individual, free-standing facilities should enroll and report separately in NHSN with a unique NHSN-assigned OrgID. This applies even if physically separate facilities share a single CCN. If there is a change in FA, please complete the following online form: https://www.cdc.gov/nhsn/facadmin/index.html.

Question #35:   **We are building a new ASC that is not enrolled and I already have SAMS access for my current facility. Can I enroll and use the same SAMS access?**

Yes, you can. Please make sure you have the NHSN enrollment option on your SAMS profile. If not, contact the NHSN Help Desk and request to have the enrollment option added to your SAMS profile. When you select NHSN enrollment in your profile, you can follow the steps to enroll an additional facility to your profile.

Question #36:   **Our ophthalmic ASC leases employees from our clinic. Out of 35 employees, we have 15 employees that go to the ASC and work. Do we include employees that work only in the ASC and not the clinic?**

You would only include staff who physically work in the ASC. If certain staff do not regularly work in the ASC, they would not be included.

Question #37:   **What is the denominator portion?**

Question 1 (Denominator) is number of HCP that were eligible to have worked at this healthcare facility for at least one day during the week of data collection.

Question #38:   **Is flu vaccination data required for surgical centers?**

No, reporting of the flu vaccination data is not required to meet program requirements for the purposes of the ASCQR Program.

Question #39:   **What if you do not remember your exact day of completing NHSN training?**

You can estimate the date. The training is not required, but preferred.

Question #40: **If our new administrator has used NHSN/SAMS, does she need to re-register, or can our facility administrator assign her a role at our facility?**

The FA can add her to the facility as a user. If she does have SAMS access, then her email address must be the same in SAMS and the facility. If she does not have SAMS, then she will be able to register for SAMS through a link contained in the "Welcome to NHSN" email.

Question #41: **What percentage vaccination rate is required in order to "meet program requirements" and avoid a reduction in payment?**

There is no percentage needed. This is a pay-for-reporting program. This means if you submit data for the required measures and meet program requirements, you will not receive a reduction in payment.

Question #42: **May I conclude from the statement "program requirements are separate from any mandate, state or federal" that the ASCQR Program is simply reporting the vaccination status of facility personnel rather than verifying implementation of a vaccination mandate for the facility?**

. That is correct. Any state or federal vaccine mandates are separate from the ASCQR Program requirements.

Question #43: **As an ASC, do I have to report the vaccine status of the healthcare personnel in my clinics, or just the ASC?**

For the purposes of reporting for the ASCQR Program, facilities should count HCP working in facilities designated as an ASC. Keep in mind that all individual, free-standing ASCs facilities should enroll and report separately in NHSN with a unique NHSN-assigned OrgID. This applies even if physically separate facilities share a single CCN.

Question #44: **Are there spreadsheets to complete before entering data into NHSN?**

Yes. NHSN has developed an optional data tracking workbook which many facilities find useful to help them summarize data before completing data entry. Please review information here: https://www.cdc.gov/nhsn/hps/weekly-covid-vac/index.html#dtw

Question #45: **I'm confused between Healthcare Quality Information System (HCQIS) Access Roles and Profile (HARP) and the Hospital Quality Reporting (HQR) System. I last submitted our data through HQR. Can you explain the role of each of these platforms?**

HARP is a secure identity management portal provided by the Centers for Medicare and Medicaid Services (CMS). Creating a HARP account provides you with a user Identification (ID) and password that can be used to sign into many CMS applications, including HQR. HQR is the system you will use to enter your web-based measures (ASC-9, -11, -13, and -14). You log into HQR using your HARP credentials: HARP is the key to get into the HQR building.

Question #46: **If identity is proven with the soft token, is the hard token needed, or is it just one or the other?**

You only need one token.

Question #47: **Do we also submit COVID-19 vaccine measure data into QualityNet?**

No. You will enter data for the COVID-19 measure in NHSN system only using your SAMS credentials.

Question #48: **Our Human Resources (HR) module indicates the last date of a vaccine and whether it was two doses or a single dose. Amongst the two doses, it does not list whether it was Pfizer or Moderna. If a booster is given, it does not list the vaccination manufacturer. Do we collect physical copies of the vaccination cards to record the vaccination type?**

Acceptable forms of documentation include a signed statement, signed form, or an electronic form or e-mail from the individual indicating when and where they received the COVID-19 vaccine. A note, receipt, vaccination card, or other written documentation from the outside vaccinating entity that states the individual received the COVID-19 vaccine at that location are also permitted. Verbal statements are not acceptable to document vaccination outside the facility for the purposes of NHSN COVID-19 vaccination summary data reporting.

Question #49: **How do you download the soft token app?**

Refer to the CDC SAMS site: https://www.cdc.gov/nhsn/sams/about-sams.html. You can also view a webinar presented in February where this process is discussed: https://www.qualityreportingcenter.com/en/ascqr-program/archived-events/

Question #50: **Where do we find the CCN effective date?**

You should have this on your CCN acceptance letter from Medicare. You can also use the tool shown at the beginning of the presentation. The link for the tool is https://qcor.cms.gov/main.jsp. You can also call our help desk at (866) 800-8756. We will be glad to assist you.

Question #51: **If you accidently enter a wrong password, do you wait to try again, or do you notify NHSN for a reset?**

After a total of three consecutive incorrect login attempts, regardless of when, your SAMS account will lock. The account will remain locked for two hours. Contact the SAMS Help Desk if you still have issues or cannot wait for the two hours.

Question #52: **When does the reporting period begin for South Carolina since the first vaccination requirement for us is February 14, 2022, for the first dose and March 15, 2022, for the second dose?**

Any state or federal vaccination mandates are completely separate from the ASCQR Program requirements. The ASC-20 measure, as part of the ASCQR Program, is simply the reporting of vaccination status of facility personnel rather than the implementation of a vaccination mandate for the facility.

Question #53: **What if our facility is not administering COVID-19 vaccines?**

The ASC-20 measure assesses the percentage of HCP that are fully vaccinated for COVID-19. This measure is reporting the vaccination status of facility HCP, not verifying the implementation of any vaccination mandate. This is to be reported regardless of whether your ASC administers vaccinations or not. In addition, you are reporting the number of individuals who received COVID-19 vaccination at the facility or elsewhere. It doesn't matter where they received the vaccine.

Question #54: **How do we account for staff that have been placed on an unpaid leave of absence for not receiving the COVID-19 vaccine? They are still technically on staff for headcount purposes, but they not permitted to work onsite. Otherwise, all onsite staff are 100 percent fully vaccinated.**

In instances where temporary leave extends past two weeks, the healthcare worker should not be included in Question 1 for the current week of data collection. However, if the healthcare worker is eligible to work, they should be reported in Question 3.2 under "offered but declined COVID-19 vaccine."

Question #55:   **Is there a cost to join NHSN?**

No, there is no cost to register or enroll into NHSN. This is part of the CDC.

Question #56:   **What if I do not know which vaccine the employee received?**

If you cannot obtain this information and they are fully vaccinated, you would enter them as vaccinated with "unspecified" manufacturer under Question 2.99. If they only had one dose from an unspecified manufacturer, then they would be classified as 3.3 "unknown status."

Question #57:   **How do we report the non-vaccinated employees?**

If an individual has not received any doses of COVID-19 vaccine, they should be reported in Question 3.2 under "offered but declined COVID-19 vaccine."

Question #58:   **Is payment determination based on reporting or vaccination compliance?**

This is a pay for reporting program. If you report data for the required program measures, you will not receive a payment reduction. The reporting of the ASC-20 measure for the ASCQR Program is completely separate from any state or federal vaccine mandates. The ASC is simply reporting the vaccination status of facility personnel. This is not related to the implementation of any vaccination mandates.

Question #59:   **Will our previous data automatically enter into the chart each week, or will we enter it each week?**

You will need to enter your data for each selected week of each month. ASCs will collect data for at least one self-selected week during each month of a quarter.

Question #60:   **After my data are entered and completed, there is an "Upload CSV" button at the bottom of the calendar list. Should I just ignore that?**

Facilities have two options for data submission. One option allows facilities to enter data directly into the NHSN application. Another option allows facilities to submit COVID-19 vaccination data to NHSN by using .CSV file upload. The .CSV upload is an option for NHSN members that belong to multiple groups.

Question #61: **Do we need to report the individuals that declined the vaccine every month, even though it is the same person?**

Yes. If there are no changes to your data (for example, there are no changes in the number of individuals and their vaccination status), then you would report the same numbers as the previously reported week. Because there could be new staff, residents, and/or patients joining or leaving the facility, vaccination coverage could change week by week even though no new vaccines are given.

Question #62: **What about personal time off (PTO)? How do we address that when reporting data?**

Facilities should include healthcare personnel even if they are on temporary leave during the week of data collection. Temporary leave is defined as less than or equal to two weeks in duration. If they are on leave that is greater than two weeks, then they should not be included for the week of data collection.

Question #63: **How do we account for a fully remote worker?**

If they are fully remote and do not come into the facility, they are not included in the reporting.