Mandatory Reporting of Healthcare Associated Infections in Texas

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Healthcare Associated Infections
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Note:
Presenter notes are available on some slides in this document. To read them, point and hover when you see this icon at the top of the page.
Presentation Overview

1. HAI Legislation
2. Anticipated Reporting Requirements
3. Anticipated Reporting Time-Line
4. Preparation for Reporting
Important message about HIPAA Privacy Standards to providers and entities that submit protected health information to the Texas Department of State Health Services

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) privacy regulations implemented standards for how information that identifies a patient can be used and disclosed. (Title 45, Code of Federal Regulations (CFR), Parts 160 and 164) The regulations apply to “covered entities” including health-care plans, health-care clearinghouses, and health-care providers. These privacy standards go into effect on April 14, 2003.

The regulations were amended in August 2002 deleting the requirement to obtain an individual’s consent for the use and disclosure of private health information for treatment, payment and health care operations. (45 CFR §164.506).

You can continue to submit information you currently submit to DSHS under one or more of the following exceptions in the HIPAA Privacy Standards:

- **USE AND DISCLOSURE REQUIRED BY LAW:**
  Section 164.512(a) allows covered entities to use and disclose private health information if the use or disclosure is required by law. For example, DSHS rules require certain diseases, injuries and conditions to be reported to DSHS. Under the “required by law” exception you can continue to comply with these mandatory reporting rules.

- **USE AND DISCLOSURE FOR PUBLIC HEALTH ACTIVITIES:**
  Section 164.512(b) permits covered entities to release private health information to a public health authority that is authorized by law to collect and receive information for preventing and controlling disease, injury, or disability. This information includes reporting of; disease, injury, vital statistics like births, deaths, marriages,
Legislation Background

- **78th legislative Session (2005)** passed study bill
  - Advisory Panel, White Paper
- **79th legislative Session (2007)** passed SB 288
  - Reporting provisions
- **80th legislative Session (2009)** passed SB 203: Amended SB 288 (Chapter 98)
  - Added two members to AP
  - 28 PAE
- **82nd Legislative Session**
  - To allow for use of NHSN
Who is required to report?

- Ambulatory Surgical Centers - SSIs
  - Licensed under Chapter 243
- General Hospitals – CLABSIs & SSIs
  - Licensed under Chapter 241
  - Hospital that provides surgical or obstetrical services that is maintained or operated by the state.
  - Includes LTACs and Critical Access Hospitals

- DOES NOT INCLUDE COMPREHENSIVE MEDICAL REHABILITATION HOSPITAL
Reporting Requirements

- Reportable healthcare-associated infections
  - Central line-associated bloodstream infections in *special care settings* (unit or hospital service that provides treatment to inpatients who require extraordinary care on a concentrated and continuous basis, such as ICUs & CCUs)
  - Surgical site infections (see ICD-9 codes in rules)
    - PEDS/ADOLESCENT HOSPITALS: Cardiac procedures, spinal surgery with instrumentation, and ventriculoperitoneal shunt procedures
    - ALL OTHER HOSPITALS: Colon surgeries, hip & knee arthroplasties, abdominal & vaginal hysterectomies, vascular procedures, and coronary artery bypass grafts
Proposed Rules

Phase in reporting, beginning July 2011*

- All facilities report CLABSIs in specialty care areas
- Surgical centers and general hospitals report knee arthroplasties
  - Knee arthroplasties ICD-9th Revision codes; Knee prosthesis – 00.80-00.84, 81.54 and 81.55
- Pediatric hospitals report ventriculoperitoneal shunts
  - Ventriculoperitoneal shunts ICD-9th Revision codes; Ventriculoperitoneal shunts including revision and removal of shunt – 02.2, 02.32-02.35, 02.39, 02.42, 04.43 and 54.95

* Tentative date – may include retrospective reporting
Proposed Rules

Beginning in January 2012*
- Surgical centers and general hospitals report hip arthroplasties, coronary artery bypass grafts
- Pediatric hospitals report cardiac procedures

Beginning January 2013*
- Surgical centers and general hospitals report abdominal & vaginal hysterectomies, colon surgeries, and vascular procedures
- Pediatric hospitals report spinal surgeries with instrumentation

* Tentative date
Alternative SSI Reporting

Alternative for surgical site infections

- A facility that does not perform a least a monthly average of 50 of any combination of the listed reportable procedures, shall report the surgical site infections relating to the three (3) most frequently performed NHSN procedures.
What to Report?

Are you an ambulatory surgical center (facility licensed under Chapter 243) or a general hospital (hospital licensed under Chapter 241 or hospital that provides surgical or obstetrical services and maintained or operated by the State)?

Yes

Are you a pediatric or adolescent hospital (general hospital that specializes in providing services to children and adolescents, including surgery and related ancillary services)?

Yes

Do you perform at least a monthly average of 50 of any combination of these 3 procedures: spinal surgeries with instrumentation, cardiac procedures, ventriculoperitoneal shunts?

Yes

Report Ventriculoperitoneal shunts including revision and removal of shunt in 2011

No

No

Do you perform at least a monthly average of 50 of any combination of these 7 procedures: knee arthroplasties including knee prosthesis, hip arthroplasties including hip prosthesis, coronary artery bypass grafts, abdominal and vaginal hysterectomies, colon surgeries, and vascular procedures?

Yes

Report the 3 surgical procedures most frequently performed at your facility that are also listed by the designated electronic interface

No

Yes

Report knee arthroplasties including knee prosthesis

No

Report the 3 surgical procedures most frequently performed at your facility that are also listed by the designated electronic interface

Do Not Report
Alternative SSI Reporting

Selection of surgical procedures to report (example)

- Identify NHSN procedures
  - [http://www.cdc.gov/nhsn/PDFs/ImportingProcedureData_current.pdf](http://www.cdc.gov/nhsn/PDFs/ImportingProcedureData_current.pdf)
  - Cesarean section: 2
  - **Gallbladder surgery: 12**
  - Knee prosthesis: 1
  - Eye surgeries
  - Open reduction of fracture: 5
  - **Colon surgery: 7**
  - Pain management
  - Hip prosthesis: 1
  - Pacemaker surgery: 3
  - **Appendix surgery: 6**

- Select 3 highest volume surgical procedures to report using NHSN
4 categories for SSI reporting

Are you licensed as a general hospital under Ch 241? Are you licensed as an ASC under Ch 243? Or state/government run?

No

STOP: No State reporting

Yes

Do you perform at least 50 of any combination of listed reportable procedures?

No

Report 3 highest volume NHSN procedures

Yes

STOP: Nothing to report for 1st phase

Do you perform Knee Arthroplasties?

No

Report Knee Arthroplasties to NHSN for 1st phase of reporting

Yes
HAI Reporting

- National Healthcare Safety Network (NHSN) developed and sustained by the Centers for Disease Control & Prevention is the anticipated designated reporting system.
## Texas vs CMS Reporting: 2011

<table>
<thead>
<tr>
<th>Who?</th>
<th><strong>Texas</strong></th>
<th><strong>CMS</strong></th>
</tr>
</thead>
</table>
| –General hospitals (adult, pediatric, adolescent) with ICU/CCU and/or that perform NHSN surgeries. Includes LTACs & CAHs  
–ASCs that perform NHSN surgical procedures | | Hospitals that receive Medicare reimbursement through IPP. |

<table>
<thead>
<tr>
<th>Excludes?</th>
<th><strong>Texas</strong></th>
<th><strong>CMS</strong></th>
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</table>
| Comprehensive medical rehabilitation hospitals  
Department of Veterans Affairs/ Department of Defense hospitals. | | Rehab, cancer, children’s, psych, VA/DOD hospitals, LTACs, and CAH |

<table>
<thead>
<tr>
<th>What?</th>
<th><strong>Texas</strong></th>
<th><strong>CMS</strong></th>
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| CLABSIs in ICU/CCUs of general hospitals.  
General hospitals and ASCs will report SSI data. | | CLABSIs in ICUs and high risk nurseries |

<table>
<thead>
<tr>
<th>When?</th>
<th><strong>Texas</strong></th>
<th><strong>CMS</strong></th>
</tr>
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<tbody>
<tr>
<td><strong>Q2 or Q3 2011</strong>: CLABSIs and knee arthroplasties, VP shunts or 3 highest volume NHSN procedures (not due until end of Aug/Nov 2011)</td>
<td></td>
<td>CLABSIs in ICUs &amp; high-risk nurseries in Jan 2011 (not due until Aug 2011)</td>
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## Proposed Reporting Time Line

<table>
<thead>
<tr>
<th>Reporting Quarter</th>
<th>Jan 1 – Mar 31</th>
<th>April 1 – June 30</th>
<th>July 1 – Sept 30</th>
<th>Oct 1 – Dec 31</th>
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<tbody>
<tr>
<td>Facility data submission deadline</td>
<td>31-May</td>
<td>31-Aug</td>
<td>30-Nov</td>
<td>28-Feb</td>
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<tr>
<td>DSHS data reconciliation performed</td>
<td>15-Jun</td>
<td>15-Sep</td>
<td>15-Dec</td>
<td>15-Mar</td>
</tr>
<tr>
<td>Facility corrections due</td>
<td>30-Jun</td>
<td>30-Sep</td>
<td>31-Dec</td>
<td>31-Mar</td>
</tr>
<tr>
<td>DSHS data summary to facilities</td>
<td>NA</td>
<td>15-Oct</td>
<td>NA</td>
<td>15-Apr</td>
</tr>
<tr>
<td>Facility comment period</td>
<td>NA</td>
<td>30-Oct</td>
<td>NA</td>
<td>30-Apr</td>
</tr>
<tr>
<td>DSHS review of comments</td>
<td>NA</td>
<td>15-Nov</td>
<td>NA</td>
<td>15-May</td>
</tr>
<tr>
<td>Public posting of summary</td>
<td>NA</td>
<td>1-Dec</td>
<td>NA</td>
<td>1-Jun</td>
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</tbody>
</table>
Enroll your facility in NHSN **using CMS Provider #**
- May need to request an enrollment #

Establish facility contacts for communication with **TEXAS**: Select a primary and secondary contact responsible for coordinating communications related to data submissions, verifications and approval of data summary.
- You may want to establish a general facility email address. For example:
  - NHSNusers@yourhospital.com
Healthcare-Associated Infections (HAI)

- What's New
- Reporting Rules
- Meetings and Conferences
- Professionals
- Advisory Panel
- Resources
- Data
- Reporting
- Calendar of Events
- Prevention

FREE TRAINING ON NHSN REPORTING
TO REGISTER VISIT:
www.apic.org/TexasNHSN

Do you have an HAI Question?
For HAI reporting questions:

- **Office:** (512) 458-7111, extension 3773
- **Email:** HAITexas@dshs.state.tx.us

Important Websites:

- [www.HAITexas.org](http://www.HAITexas.org)
- [www.cdc.gov/nhsn](http://www.cdc.gov/nhsn)
- [https://sdn.cdc.gov/](https://sdn.cdc.gov/)