

Operational Guidance for Skilled Nursing Facilities to Report Annual Influenza Vaccination Data to CDC's National Healthcare Safety Network (NHSN) for the Purpose of Fulfilling CMS's Skilled Nursing Facility (SNF) Quality Reporting Program (QRP)

The Centers for Medicare & Medicaid Services (CMS) published a final rule in the *Federal Register* for the CMS Skilled Nursing Facility Quality Reporting Program (QRP) requirements on August 3, 2022 that included healthcare personnel (HCP) influenza vaccination summary data reporting from skilled nursing facilities (SNFs) via the Centers for Disease Control and Prevention's (CDC's) National Healthcare Safety Network (NHSN) beginning with the 2022-2023 influenza season.¹ The rule announced a requirement for SNFs to report HCP influenza vaccination summary data beginning on October 1, 2022. Beginning with the 2022-2023 influenza season, SNFs must submit data for the entire influenza vaccination season (October 1 through March 31) to NHSN.

This operational guidance provides additional information about reporting HCP influenza vaccination data to NHSN as part of the SNF QRP. The requirements for HCP influenza vaccination summary data reporting to NHSN for this CMS program do not preempt or supersede any state mandates for HCP influenza vaccination summary data reporting to NHSN (i.e., SNFs in states with a HCP influenza vaccination reporting mandate must also abide by their state's requirements, even if they are more extensive than the requirements for this CMS program).

NHSN guidance and definitions for reporting HCP influenza vaccination summary data can be found in the NHSN Influenza Vaccination Summary Protocol: [NHSN HPS Flu Vaccine Protocol 2022 \(cdc.gov\)](https://www.cdc.gov/nhsn/datacollection/2022/2022-2023_influenza_vaccine_protocol.pdf).² The NHSN protocol provides guidance for healthcare facilities to report HCP influenza vaccination summary data from October 1 (or when the vaccine became available) through March 31, which includes all influenza vaccinations administered during the influenza season at the facility or elsewhere, influenza vaccine declinations, and determinations of a medical contraindication to influenza vaccination. Users must also report associated denominator data for HCP physically working in the SNFs for at least 1 working day between October 1 through March 31 of an influenza season, regardless of clinical responsibility or patient contact. Facilities must report data separately for employees, licensed independent practitioners, and adult

students/trainees and volunteers. Reporting summary data from other contract personnel and vendors is optional at this time.

Facilities must activate the NHSN Healthcare Personnel Safety (HPS) Component to report HCP influenza vaccination summary data. Facilities must submit all data fields required for both numerator and denominator data collection to NHSN. Facilities report data to NHSN by means of manual data entry or .CSV file upload (available beginning November 2022) into the NHSN web-based application.

CDC/NHSN strongly encourages facilities to update HCP influenza vaccination summary counts monthly and encourages healthcare facilities to update new counts within 30 days of the end of each month (e.g., all October data should be added by November 30), for the greatest impact on influenza vaccination activities. HCP influenza vaccination summary reporting in NHSN consists of a single data entry screen per influenza season. Each 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.

Facilities that would like to maintain monthly records should save their own copies of each data entry on their own systems. Facilities must enter their summary report by May 15 for data to be shared with CMS.

HCP influenza vaccination summary data submitted to NHSN by May 15 is reported by CDC to CMS for each SNF CMS Certification Number (CCN). CDC provides an HCP influenza vaccination percentage for each reporting SNF CCN.

¹ US Department of Health and Human Services. Medicare Program; Prospective Payment System and Consolidated Billing for Skilled Nursing Facilities; Updates to the Quality Reporting Program and Value-Based Purchasing Program for Federal Fiscal Year 2023; Changes to the Requirements for the Director of Food and Nutrition Services and Physical Environment Requirements in Long-Term Care Facilities; Final Rule Federal Register 2022; 87 FR 47502
<https://www.federalregister.gov/documents/2022/08/03/2022-16457/medicare-program-prospective-payment-system-and-consolidated-billing-for-skilled-nursing-facilities>

² NHSN healthcare personnel (HCP) annual influenza vaccination training materials:
<https://www.cdc.gov/nhsn/hps/vaccination/index.html>