



STATE OF WASHINGTON
DEPARTMENT OF SOCIAL AND HEALTH SERVICES
Aging and Long-Term Support Administration
PO Box 45600, Olympia, Washington 98504-5600

May 26, 2021

ALISA: NH #2021-043

QSO-21-19-NH - INTERIM FINAL RULE - COVID-19 VACCINE IMMUNIZATION REPORTING REQUIREMENTS FOR RESIDENTS AND STAFF

Dear Nursing Facility/Home Administrator:

In response to the COVID-19 Public Health Emergency, the Centers for Medicare and Medicaid Services (CMS) updated nursing home regulations in 2020 related to COVID-19 and infection prevention, including establishing a reporting requirement of some COVID-19 related surveillance data to the National Healthcare Safety Network (NHSN), a division of the Centers for Disease Control and Prevention (CDC).

On May 11, 2021, with [QSO-21-19-NH](#), CMS announced the update of nursing home regulations to establish facility requirements for COVID-19 immunization. The interim final rule, [CMS-3414-IFC](#) adds requirements at 42 CFR 483.80. The new regulations require facilities to offer education to residents and staff about the vaccine, to offer the vaccine, and to report information about vaccination rates to NHSN. RCS provided information about education and offering the vaccine in Dear Administrator letter [021-040](#). The intent of this letter is to provide more information about the reporting requirements.

42 CFR 483.80(g)(1)(viii)-(ix) requires nursing homes report, on a **weekly basis**, the COVID-19 vaccination status of residents and staff, and therapeutics administered to residents for treatment of COVID-19 through NHSN's Long Term Care Facilities (LTCF) COVID-19 Module. **The last date to begin reporting is June 13, 2021.**

- CMS will begin reviewing for compliance with the reporting requirement on June 14, 2021. Facilities identified as not meeting reporting requirements will be cited at a scope and severity of F. Civil money penalties starting at \$1000 for the first occurrence will be imposed and amounts are progressive based on the provider history of noncompliance with reporting requirements.

For earlier reporting requirements related to surveillance, facilities could choose to report the required data directly to NHSN or to the [state reporting portal](#) maintained by the Washington State Department of Health (DOH) and the Department of Social and Health Services (DSHS). If the facility elected to use the state reporting portal, DOH uploaded the data to NHSN. **To fulfil the reporting requirements for the COVID-19 vaccination regulations, facilities must report data directly to the NHSN. The state reporting portal will not have the capacity to gather the needed vaccination data for upload to NHSN.**

NHSN Reporting

Reporting to NHSN requires a facility to be enrolled and for at least one user to have access to the system.

- Homes that have been reporting data directly to NHSN will be able to access the vaccination module using their current facility and user credentials.
- Homes that have been reporting surveillance data to the state reporting portal will need to ensure they have NHSN user access or obtain access. Facilities should immediately verify they have access and start the process to obtain access, if needed.

ALTSA Provider Letter: **QSO-21-19-NH - INTERIM FINAL RULE - COVID-19 VACCINE
IMMUNIZATION REPORTING REQUIREMENTS FOR RESIDENTS AND STAFF**

May 24, 2021

Page 2

- To help ensure uninterrupted reporting, RCS strongly recommends all facilities have more than one NHSN user who has access and is familiar with reporting to NHSN. Instructions from the NHSN website for enrolling additional users for the same facility: <https://www.cdc.gov/nhsn/pdfs/covid19/lpcf/add-user-508.pdf>
- Instructions to re-assign users, in case of NHSN user turnover: <https://www.cdc.gov/nhsn/pdfs/covid19/lpcf/reassign-fa-508.pdf>
- More information about the reporting questions is available at the [CDC/NHSN website](#). The QSO memo also has a list of additional resources.

CMS will post the new information reported to the NHSN for viewing by facilities, stakeholders, and the public on CMS's [COVID-19 Nursing Home Data website](#).

Thank you for your continued commitment to resident health and safety. If you have any questions, please contact Lisa Herke, Nursing Home Policy Program Manager, at (509) 209-3088 or lisa.herke@dshs.wa.gov.

Sincerely,



Mike Anbesse, Director
Residential Care Services

DSHS: "Transforming Lives"