



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
Bureau of Health Care Safety and Quality
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Circular Letter: DHCQ 14-12-625

TO: Acute Care Hospital Chief Executive Officers

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

DATE: December 17, 2014

RE: Seasonal Influenza Vaccination of Healthcare Personnel at Massachusetts Acute Care Hospitals for the 2014-2015 Influenza Season

Background

As a condition of licensure, Massachusetts Department of Public Health (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 130.325(I)).¹

The MDPH has established an overall minimum performance goal for all licensed facility HCP vaccination rates. Statewide, the MDPH expects that a 90% influenza vaccination coverage rate will be reached for all HCP. During the 2013-2014 influenza season, Massachusetts acute care hospital HCP did not achieve vaccine coverage of 90% and only 31 acute care hospitals (41%) vaccinated 90% or more of their HCP. Completeness of documentation varied widely with some facilities reporting up to 34% of HCP with unknown vaccination status. MDPH regulations do not allow for reporting unknown vaccine status.†

Public reporting of HCP vaccination data is an important strategy to increase influenza vaccination coverage. MDPH is committed to promoting continuous quality improvement and recommends you share your hospital's vaccination rates internally with all staff, your Board of Directors, and your Patient and

¹105 CMR 130.325, 105 CMR 140.150, 105 CMR 150.002(D)(8) available at www.mass.gov/dph.

† See 105 CMR 130.325(H)(1).

Family Advisory Council. The acute care hospital Healthcare Personnel Vaccination data for the 2013-2014 season is available at the following link under the heading “Announcements”.

<http://www.mass.gov/eohhs/gov/departments/dph/programs/hcq/healthcare-quality/>

Reporting Healthcare Personnel Influenza Vaccination Data

MDPH will continue to require all acute care hospitals to report HCP influenza vaccination data using the Centers for Disease Control and Prevention’s (CDC) National Healthcare Safety Network (NHSN). Reporting HCP influenza vaccination to NHSN also meets the Centers for Medicare and Medicaid Services (CMS) requirement for facilities participating in the Hospital Inpatient Quality Reporting Program (IQR), Outpatient Quality Reporting Program (OQR) and Inpatient Rehabilitation Facility Quality Reporting.

Reporting Changes for the 2014-2015 Influenza Season

1. Acute care facilities that participate in both the CMS IQR and OQR programs must report a single combined HCP influenza vaccination summary for HCP physically working for at least one day between October 1 and March 31 within the acute care inpatient facility and all hospital outpatient units/departments (HOPDs) that share the exact same CMS certification number (CCN).
2. The CMS Inpatient Rehabilitation Facility Quality Reporting Program (IRF QRP) requires inpatient rehabilitation facilities (IRF) located as patient care units within an acute care or critical access hospital to report HCP influenza vaccination summary data to NHSN. NHSN has been updated to allow IRF units mapped as locations of an acute care hospital to enter individual monthly reporting plans and submit summary influenza vaccination data separately to fulfill the CMS IRF QRP requirements.

**To fulfill MDPH and CMS requirements
all HCP influenza data must be entered into NHSN by May 15, 2015**

The NHSN protocol, training, reporting forms, survey and instructions are available on the NHSN website at the following link: <http://www.cdc.gov/nhsn/acute-care-hospital/hcp-vaccination/index.html>

Operational Guidance for Acute Care Hospitals to Report Healthcare Personnel (HCP) Influenza Vaccination Data to CDC’s National Healthcare Safety Network (NHSN) for the Purpose of Fulfilling CMS’s Hospital Inpatient Quality Reporting (IQR) Program Requirements and CMS’s Hospital Outpatient Quality Reporting (OQR) Program Requirements is available on the NHSN website at the following link: <http://www.cdc.gov/nhsn/PDFs/cms/Operational-Guidance-ACH-HCP-Flu.pdf>.

Please forward this circular letter to all persons in your healthcare facility responsible for infection prevention, employee health, and quality management reporting; including, but not limited to: Infection Preventionists, Occupational Health Professionals, Chief Nursing Officers, Directors of Quality Improvement, and Directors of Human Resources.

Seasonal influenza vaccination is an effective method of preventing influenza virus infection and its potentially serious complications. MDPH is dedicated to working with you to ensure that patients and personnel are protected. Thank you for your ongoing participation in this important initiative. Please

submit questions concerning the reporting and data submission requirements to the Bureau of Health Care Safety and Quality at dhcq.fludata@state.ma.us.

CC: Acute Care Hospital Infection Preventionists
Acute Care Hospital Occupational Health Professionals
Eileen Sullivan, Acting Commissioner
Alfred DeMaria, Jr., MD, Bureau of Infectious Diseases