**COVID-19 State and Federal reporting**

There are now two separate and distinct COVID-19 reporting requirements.  
1) the weekly CMS reporting and 2) the daily CDPH reporting. Both are required as outlined below.

**CMS Weekly Reporting**

On 5/6/20 the Centers for Medicare and Medicaid Services (CMS) released a [QSO memo](https://cl.exct.net/?qs=1e9736892c5b90acc4809d179f0109d68d61df4d62628b5264f4d94edd300e3e575771123e74b49534db88904fc3e64b0e808d10c1ac21b7) addressing the Interim Final Rule requiring nursing homes to report to the National Healthcare Safety Network (NHSN) on COVID-19 as well as provide notifications to residents, their representatives and families.

Under this new requirement nursing facilities must:

Electronically report information about COVID-19 in a standardized format, which will rely on the CDC NHSN portal that went live on 4/29/20 with the new LTCF COVID-19 module.

Provide the information at a frequency no less than weekly to NHSN. **Facilities must submit their first set of data by 11:59 pm on Sunday, May 17, 2020 to the NHSN Long-Term Care Facility COVID-19 Module.**

**Action:** Register now for NHSN and begin collecting data starting May 8, 2020.  NOTE: registration is taking more time than expected and we encourage you to start now to avoid further delays that may impact your compliance.

**CMS will provide facilities with an initial two-week grace period to begin reporting cases in the NHSN system (which ends at 11:59 p.m. on May 24, 2020)**. Facilities that do not begin reporting after the third week (by 11:59 pm on May 31, 2020) will receive a warning letter reminding them to begin reporting the required information to the CDC.    
  
For facilities that have not started reporting in the NHSN system by 11:59 p.m. on June 7, ending the fourth week of reporting, CMS will impose a per day (PD) CMP of $1,000 for the failure to report that week.   
  
For each subsequent week that the facility fails to submit the required report, the noncompliance will result in an additional one-day PD CMP imposed at an amount increased by $500.  

By the end of May, CMS anticipates publicly posting CDC’s NHSN data (including facility names, number of COVID-19 suspected and confirmed cases, deaths, and other data as determined appropriate) weekly every Monday on its [online web portal](https://data.cms.gov/).

CMS understand that state and local health departments may currently require nursing homes to report certain COVID-19 related information to them. A key difference is that reporting to state/local health departments allows them to understand the status of their local environment and intervene (e.g., direct staffing and supplies), whereas this national requirement provides standardized information to assist with national surveillance on the status of COVID-19 in all nursing homes.

State and local health departments are also able to submit the required data on behalf of a nursing homes, although this does not relieve facilities of their accountability to report in accordance with the regulation.

**Reporting COVID-19 Information**

It is also required to inform residents, their representatives, and families of those residing in facilities by 5 p.m. the next calendar day following the occurrence of:

* Either a single confirmed infection of COVID-19, or
* Three or more residents or staff with new onset of respiratory symptoms occurring within 72 hours of each other.
* Not include personally identifiable information.
* Include information on mitigating actions implemented to prevent or reduce the risk of transmission, including if normal operations of the facility will be altered.
* Include any cumulative updates for residents, their representatives, and families at least weekly or by 5 p.m. the next calendar day following the subsequent occurrence of either: each time a confirmed infection of COVID-19 is identified, or whenever three or more residents or staff with new onset of respiratory symptoms occur within 72 hours of each other.

**How to enroll with the CDC National Healthcare Safety Network (NHSN)**

[LTCF Module Enrollment link](https://www.cdc.gov/nhsn/ltc/covid19/enroll.html)

**The new COVID-19 Module includes skilled nursing facilities/nursing homes, long-term care for the developmentally disabled and assisted living facilities. The CMS final rule only requires the participation of skilled nursing facilities.**

Participation in the COVID-19 Module for LTCFs requires facilities to be actively enrolled in NHSN.

LTCFs that are currently enrolled in NHSN’s LTCF Component have immediate access to the new module and may begin reporting.

If your facility previously enrolled, but is no longer able to gain access, contact NHSN user support at [nhsn@cdc.gov](mailto:nhsn@cdc.gov) for assistance. Please do not re-enroll a previously enrolled facility. A facility should only enroll into NHSN once.

LTCFs that are not enrolled in NHSN may gain access to the COVID-19 Module by completing the enrollment steps below. Upon completion, the facility will gain same-day access to NHSN.

Facilities are encouraged to review the [Enrollment Guidance document](https://www.cdc.gov/nhsn/pdfs/covid19/ltcf/covid19-enrollment-508.pdf) for a more in-depth explanation of the enrollment process.

**Providers are reporting the enrollment process is a bit overwhelming, so we encourage you to get started now. To enroll, please follow the steps outlined below:**

**Step 1 – Prepare your computer to interact with NHSN**

You may need to change your email and internet security settings to receive communications from NHSN during the enrollment process.

**Step 2A – Register Facility with NHSN**

The person who will serve as the NHSN  Facility Administrator (usually the person enrolling the facility) must access and read the [NHSN Facility/Group Administrator Rules of Behavior](https://nhsn.cdc.gov/RegistrationForm/index).

**Step 2B – Register with SAMS (Security Access Management System)**

After NHSN receives your completed registration, you will receive an Invitation to Register with SAMS via email with steps to complete the process.

**Step 3 – Complete NHSN LTC Enrollment**

On the SAMS homepage, click the link to the National Healthcare Safety Network labeled NHSN LTC Enrollment and Complete Facility Contact Information.

**Step 4 – Electronically Accept the NHSN Agreement to Participate and Consent**

After successfully completing enrollment, the NHSN Facility Administrator and Component Primary Contact (may be the same person) will receive an NHSN email with instructions on how to electronically accept the NHSN Agreement to Participate and Consent.

Once accepted, enrollment is complete, and the user will gain access to NHSN’s COVID-19 module.

If you experience problems during enrollment, please contact the NHSN user support [nhsn@cdc.gov](mailto:nhsn@cdc.gov).

There is a lag time between initiating registration to NHSN and completion of the registration process due to the number of long-term care facilities that are trying to gain access. NHSN is reporting a 24-48 hour, and in some instances longer, lag time between initial registration to actual completion of registration and the ability to use the COVID-19 reporting module.    
  
While waiting for the registration process to complete, you should download now the four data collection pathway forms and accompanying instructions to start collecting the data that you will be uploading to [NHSN](https://cl.exct.net/?qs=cf720e26c231076f85066003c0d50db45b922f4917c44780764dbaa05b65ce04686ad0dabb793ec1fe85573a62356dea23b7bff5417d1569) once registration process is complete. It is extremely important to download, and refer to, the instructions page for each of the four data collection pathways. Refer to the definitions of each term prior to completing the data collection form.   
The four data collection pathway forms are:

[Resident Impact and Facility Capacity](https://cl.exct.net/?qs=cf720e26c231076f0acb01f21e26298a97567c6f0e833311eafa3b40b51212c521d863134d617f2f3284e04dfeba0cea1b9ee33093c191c7)

[Staff and Personnel Impact](https://cl.exct.net/?qs=cf720e26c231076f01c962b1b31e20d23b7bfe86e133801d03e731a225c2150d3154338f0e9dc33262dd01f482cb33f7e52e36a921e5eab1)

[Supplies and Personal Protective Equipment](https://cl.exct.net/?qs=cf720e26c231076fd1e74176b64b8263b61e2b2ccae01b13a8fbaa8e965ddc6e6a22905f5b130b2a772eb7f214f9cdba990a64254f56e5f6)

[Ventilator Capacity and Supplies](https://cl.exct.net/?qs=cf720e26c231076f9ec52f18427076681fbc3821624baa8cacf87f98e1e76a656df61ca1c5640a7620aefba539af1d5d64d56f86f3c9437d)

**CDPH Daily Reporting**

CDPH released AFL 20-43.1 on 4/24/20

[SNF Coronavirus Disease 2019 (COVID-19) Daily Reporting](https://www.cdph.ca.gov/Programs/CHCQ/LCP/Pages/AFL-20-43.aspx)

CDPH plans to release an updated AFL in the near future to better align the CDPH questions with the CDC questions.

**Skilled nursing facilities should submit this information no later than 12:00 P.M. Pacific Time daily. This includes reporting on Saturday and Sunday.**

To ensure consistent reporting across the state CDPH is including a [data dictionary](https://www.cdph.ca.gov/Programs/CHCQ/LCP/CDPH%20Document%20Library/AFL-20-43-Attachment-01.pdf). SNFs are encouraged to review the data dictionary in its entirety before inputting data into the COVID-19 Survey.

Information from this survey will be shared with the local public health office emergency teams so we can work collaboratively with facilities to quickly find solutions.

However, you should still notify your local Medical Health Operational Area Coordinator (MHOAC) for personal protective equipment (PPE) resource requests.

[Check your facility data here for accuracy](https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/SNFsCOVID_19.aspx)   
Remember this is public information to reflect your facility status and needs and you will want to check this frequently to make sure the data you submitted is reflected correctly.

If you notice any errors please email the CDPH CHCQ Duty Officer at [CHCQDutyOfficer@cdph.ca.gov](mailto:CHCQDutyOfficer@cdph.ca.gov)

CAHF feels this reporting will need to be completed by someone with specific training on the reporting questions and process and we urge provider to consistently use the same staff to complete both of the reporting requirement. Post at each station the reporting persons contact information so the information will be available for the charge nurse if CDPH calls after hours or weekends. This information not only will be public, it will also show a clear consistent picture of your real time needs.