The Commonwealth of Massachusetts

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Department of Public Health

Bureau of Health Care Safety and Quality

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**Circular Letter: DHCQ 19-5-691**

**TO:** Out-of-hospital Dialysis Unit Administrators

**FROM:** Elizabeth D. Kelley, MPH, MBA

Director, Bureau of Health Care Safety and Quality

Massachusetts Department of Public Health

**DATE:** May 2, 2019

**RE:** New Requirements for Reporting Healthcare-Associated Infection (HAI)/Antibiotic Resistance (AR) Data

**Background**

The Department of Public Health (Department) has promulgated updated out-of-hospital dialysis unit regulations. To ensure patient safety, the updated regulations require out-of-hospital dialysis units to report and address healthcare associated infection (HAI) and antibiotic resistance (AR). The purpose of this circular letter is to provide guidance to out-of-hospital dialysis units on how to report HAI and AR data to the Department.

Public reporting of HAIs promotes quality improvement, patient safety and transparency in healthcare settings. Expanding the reporting requirements to include out-of-hospital dialysis demonstrates the Department’s ongoing commitment to patient safety, and towards the eventual elimination of HAI.

**Reporting Requirements**

The Department is adopting the Centers for Medicare and Medicaid Services (CMS) HAI/AR reporting requirements for facilities participating in End Stage Renal Disease Quality Incentive Programs (QIP). The reporting requirements of the End Stage Renal Disease QIP include the following dialysis events, positive blood cultures, intravenous antimicrobial starts and signs of vascular access infection. Please refer to the CDC Dialysis Event Surveillance Protocol for additional information on these reporting requirements.[[1]](#footnote-1) The Department is requiring all licensed out-of-hospital dialysis units to report the ESRD QIP dialysis events to the Department.

Please note that while the End Stage Renal Disease QIP no longer requires out-of-hospital dialysis units to submit healthcare personnel (HCP) influenza vaccination data, reporting HCP influenza data to the Department is required by the out-of-hospital dialysis regulations.[[2]](#footnote-2)

Out-of-hospital dialysis units must report all required data, including HAI/AR and HCP influenza vaccination data, to the Centers for Disease Control and Prevention’s National Healthcare Safety Network (NHSN) and make the data available to the Department. Since 2016, out-of-hospital dialysis units have been reporting HCP influenza data in this manner to NHSN. Additionally, any out-of-hospital dialysis units participating in End Stage Renal Disease QIP have been required to report using NHSN since 2012.

All out-of-hospital dialysis units are required to provide the Department access to the NHSN data measures by July 1, 2019.

Any facility not currently enrolled in NHSN must do so immediately. NHSN enrollment guidance is available at the following link: <http://www.cdc.gov/nhsn/dialysis/enroll.html>. All out-of-hospital dialysis units must also “JOIN” the DPH NHSN “Group” and “Confer Rights” to the data to the Department. Please see the attached guidance to complete this requirement.

The Department HAI/AR program will continue to assist facilities in reporting HAI/AR data to NHSN and provide guidance as new HAIs become reportable. The data will be used to monitor state and national trends over time and to identify areas for improvement.

**Please forward this circular letter to all persons in your facility responsible for infection prevention, and quality management reporting including: Infection Preventionists, Medical Directors, Chief Nursing Officers, and Directors of Quality Improvement.**

For questions related to the expanded reporting requirement, please contact Eileen McHale, DPH HAI Coordinator at Eileen.mchale@state.ma.us

1. <https://www.cdc.gov/nhsn/PDFs/pscManual/8pscDialysisEventcurrent.pdf> [↑](#footnote-ref-1)
2. 105 CMR 145.900. [↑](#footnote-ref-2)