

April 11, 2020

Administration Updates Request for Daily Hospital Data on COVID-19 Testing, Bed Capacity and Utilization

States May Report to Federal Government on Hospitals' Behalf

The Issue

In a letter and FAQ [document](#) sent via the Centers for Medicare & Medicaid Services (CMS) quality reporting listservs yesterday evening, the Department of Health and Human Services (HHS) announced updates to the process it [launched](#) last month for obtaining data on hospital bed capacity and utilization and COVID-19 testing results from in-house laboratories. They aim to clarify the existing reporting process, and outline new options for states, vendors and other third parties to report data on hospitals' behalf.

The documents acknowledge that many states and other non-federal entities ask hospitals to report much of the same data as the federal government has requested. **They reiterate that the responsibility for reporting data to the federal government defaults to hospitals, but provide new options that permit states, vendors and other third parties to report data to the federal government on hospitals' behalf.**

AHA's Take

The AHA has strongly encouraged hospitals and health systems to report the data requested by the federal government to assist in the national response to the COVID-19 pandemic. At the same time, we conveyed the hospital field's concern about federal data requests duplicating those of states and other non-federal entities. The information announced in the letter and FAQs are steps in the right direction and should provide additional options for data reporting. We will continue to work with the Administration to streamline and coordinate data requests to minimize unnecessary duplication and ensure hospitals can remain focused on patient care.

Key Takeaways

- Multiple options for hospitals to submit bed capacity/utilization and in-house testing data
- States now permitted to submit data to the federal government on hospitals' behalf, but must have written certification from FEMA Regional Administrator to do so
- Reporting responsibility still defaults to hospitals if state does not have certification
- Administration is updating previously established reporting mechanisms

DETAILS OF ADMINISTRATION'S LETTER AND FAQs

A summary of the updates contained in the documents follow. Please note that the documents do not provide certain implementation details. The AHA will continue to share additional information as it emerges.

State Reporting on Hospitals Behalf. States may submit facility-level data on both COVID-19 testing and hospital bed capacity and utilization that hospitals may already be reporting to them. **However, states must first receive written certification from their Federal Emergency Management Agency (FEMA) Regional Administrator that the state “has an established, functioning data reporting stream to the federal government that is delivering all of the information” requested by the government.** The table on pages 2 and 3 of the FAQ document list the minimum bed capacity and utilization data requested by the federal government, and pages 4 and 5 describe the minimum in-house testing data. *The document does not list which states, if any, have received such certification at this time.*

Bed Capacity and Utilization Data Reporting Updates. Previously, hospitals had one option for reporting data on bed capacity and utilization – the Centers for Disease Control and Prevention (CDC) National Healthcare Safety Network (NHSN) portal. While that option remains available, the documents outline an array of options for collecting and reporting data to HHS:

- Reporting data to the state (provided that the state has the written certification from its FEMA Regional Administrator outlined above) and allowing the state to report via NHSN or directly to FEMA;
- NHSN COVID-19 [module](#) (note: states may ask hospitals to submit information via this channel);
- HHS's TeleTracking portal. Page 3 of the FAQ document provides additional information on how to access the portal;
- Health IT vendors or other third parties authorized to share data with HHS. The documents do not specify which vendors or third parties may be used, and also notes hospitals should use either NHSN or TeleTracking “until your FEMA Regional Administrator notified [the hospital/state] that this implementation is being received;” or
- Publishing data to a hospital's website using a “standardized format” like schema.org.

For those hospitals and states using the NHSN reporting, note that CDC plans to update its COVID-19 module early next week with new components asking about supply and health care worker availability. CDC will host a webinar on Tuesday, April 14 from 2 p.m. - 3 p.m. ET to discuss these changes. You can access the [webinar here](#).

COVID-19 In-House Testing Results. The documents outline a number of changes to the reporting process for reporting the results of COVID-19 tests performed in in-house

laboratories. Hospitals now have the following options to report data to the federal government:

- Provide test results to the state (provided that the state has written certification from its FEMA Regional Administrator outlined above).
- Report data using the HHS Protect System. **Note that this process replaces the previous process of emailing spreadsheets to FEMA.** The documents note that hospitals were emailed links to a secured form. If you did not receive this link, please email fema-hhs-covid-diagnostics-tf@fema.dhs.gov.
- Authorize a health IT vendor or other third party to submit in house testing data. The documents do not specify which vendors or other vendors may be used, and also notes hospitals should use the two options above until this option is “confirmed in writing to be working successfully.”

What You Can Do

Hospitals and health systems are encouraged to:

- Share this update with your key clinical and administrative leaders, including your chief medical officer, chief nursing officer, chief quality officer and those currently responsible for reporting your infection data via the CDC’s NHSN portal.
- Consult with your state agencies to determine whether they are certified by your FEMA Regional Administrator to report results on your behalf. Continue to comply with state-level reporting requirements.
- If your state is not yet certified by FEMA to report data on your behalf, use one of the other mechanisms outlined in the documents to submit your data.
- Stay tuned for future changes to data reporting mechanisms and data elements as the pandemic evolves.

Further Questions

Questions about CDC NHSN COVID-19 module reporting can be directed to NHSN@cdc.gov. Questions about COVID-19 testing results can be directed to Protect-ServiceDesk@hhs.gov.