

31 July 2012

RE: Addition of Select Healthcare-Associated Infections to the Notifiable Disease List

I am writing to let you know that we have added certain healthcare-associated infections (HAIs) to the list of diseases that must be reported to the Department of Public Health. The start date is 1 January 2013.

In 2011, CDC and the Association of State and Territorial Health Officials developed a state policy guidance document encouraging states to take action to reduce healthcare associated infections. That same year, the federal Center for Medicaid Services (CMS) required that healthcare facilities report select HAIs using CDC's National Healthcare Safety Network (NHSN) in order to receive full reimbursement under the Inpatient Prospective Payment System. CMS will require reporting of additional HAIs via NHSN according to the timeline in the attached table.

Currently, our Department does not receive Georgia HAI data until CMS publishes it on the public Hospital Compare website. By then the data is more than a year old. This hampers our ability to identify situations where immediate intervention could be of greatest benefit, and to target public health efforts to prevent HAIs.

For those reasons, we are adding select HAIs to the list of diseases which are notifiable by law to the Department of Public Health (DPH). This will not require reporting of additional HAIs beyond those required by CMS. Our reportable HAIs will be in exact alignment with the federal CMS requirements, and we will establish a DPH users group within NHSN. Facilities reporting HAIs to NHSN to meet CMS requirements will simply be required to authorize the DPH users group to gain access to the data which they already report to CMS. Hospitals that are not required to report HAIs to the NHSN, such as critical access hospitals, are not required to report to our Department. However, if they choose to do so, their data will be kept confidential.

Making select HAIs notifiable to DPH through NHSN will permit DPH to:

- Monitor risk-adjusted HAI rates at the state and facility level;
- Evaluate HAI prevention activities and measure progress towards HHS national goals;
- Obtain data on complications, extended hospital stay, and deaths due to HAIs; and
- Promptly identify healthcare facilities with substandard performance in infection control measures, address shortcomings, and prevent HAI transmission in healthcare settings

The national Healthcare Infection Control Practice Advisory Committee (HICPAC) recommends validation of all HAI data prior to reporting the data, in order to ensure accuracy and consistency of the data. Though the data will be extremely valuable for surveillance and public health purposes in tracking facility infection rates over time, variations from facility to facility in reporting practices make it difficult to directly compare facilities against each other in the absence of thorough validation of the data. Please



be assured, though, that all notifiable disease data reported to our Department, including data regarding HAIs, will remain confidential in accordance with Georgia law, Code Sections 31-12-2(a) and 31-5-5.

Thank you for helping our Department protect the lives and health of Georgia's citizens.



Brenda Fitzgerald, M.D.,
Commissioner of Public Health

CMS Reporting via NHSN – Current and Proposed Requirements

HAI Event	Facility Type	Reporting Start Date
CLABSI	Acute Care Hospitals Adult, Pediatric, and Neonatal ICUs	January 2011
CAUTI	Acute Care Hospitals Adult and Pediatric ICUs	January 2012
SSI (colon surgery and abdominal hysterectomy)	Acute Care Hospitals	January 2012
Intravenous antimicrobial start	Dialysis Facilities	January 2012
Positive blood culture	Dialysis Facilities	January 2012
Signs of vascular access infection	Dialysis Facilities	January 2012
CLABSI	Long Term Care Hospitals *	October 2012
CAUTI	Long Term Care Hospitals *	October 2012
CAUTI	Inpatient Rehabilitation Facilities	October 2012
MRSA Bacteremia	Acute Care Hospitals	January 2013
<i>C. difficile</i> Laboratory Identification Event	Acute Care Hospitals	January 2013
Healthcare Worker Influenza Vaccination	Acute Care Hospitals	January 2013
Healthcare Worker Influenza Vaccination	Ambulatory Surgery Centers	October 2014
SSI (<i>Future Proposal</i>)	Outpatient Surgery/Ambulatory Surgery Centers	TBD
* Long Term Care Hospitals are called Long Term Acute Care Hospitals in NHSN		

Future dates are subject to change and additional requirements added by CMS. Reporting requirements to GDPH will remain consistent with CMS requirements.