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August 22, 2024

Ms. Chiquita Brooks-LaSure
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
7500 Security Blvd.
Baltimore, MD 21244-1850

Re: Docket #CMS-1803-P: Medicare Program: CY 2025 Home Health Prospective Payment System (HH PPS) and HH Quality Reporting Program Updates, proposed rule

Dear Ms. Brooks-LaSure:

The Association for Professionals in Infection Control and Epidemiology (APIC) wishes to thank the Centers for Medicare and Medicaid Services (CMS) for the opportunity to provide input to the CY 2025 Home Health Prospective Payment System proposed rule. APIC is a nonprofit, multidisciplinary organization representing 15,000 infection preventionists (IPs) whose mission is to create a safer world through prevention of infection. We are pleased that CMS continues to demonstrate its commitment to improving the quality of patient care across the healthcare continuum. We value the efforts to improve transparency through public reporting of important quality measures.

Proposal to Continue Respiratory Illness Reporting in Long-Term Care Facilities

CMS is proposing to revise the Long-Term Care (LTC) Requirements for acute respiratory illness reporting by replacing the current COVID-19 and Seasonal Influenza reporting requirements with a new requirement that would require LTC facilities to electronically report information about COVID-19, influenza, and RSV in a standardized format and frequency, beginning January 1, 2025. Proposed data elements would include:

- Facility census (defined as the total number of residents occupying a bed at this facility for at least 24 hours during the week of data collection).
- Resident vaccination status for a limited set of respiratory illnesses including but not limited to COVID-19, influenza, and RSV.
- Confirmed resident cases of a limited set of respiratory illnesses including but not limited to COVID-19, influenza, and RSV (overall and by vaccination status).
- Hospitalized residents with confirmed cases of a limited set of respiratory illnesses including but not limited to COVID-19, influenza, and RSV (overall and by vaccination status).

APIC recognizes the importance of respiratory illness surveillance as an indicator for preventing outbreaks, creating proactive protective measures (source control, testing, isolation protocols), and driving future actions. Awareness of incidence of respiratory illness within communities is critical for rapid response to impending issues. We want to stress the importance of actionable data being available to the LTC facility in a timely manner so that IPs can implement initiatives to ensure patient, staff, and



visitor safety (such as source control and visitation protocols). It would be important that data is analyzed and distributed to LTC facilities rapidly so it can be used to identify trends and activate prevention protocols in real time. This analysis needs to include regional geographic trending for actionability.

Recommendations:

- APIC supports the collection of respiratory illness data (COVID-19, Influenza, and RSV) for residents of LTC facilities.
- APIC recommends a staffing requirement of at least one full-time dedicated infection preventionist to afford long-term care sites the ability to develop and maintain a robust infection prevention and control program aimed at ensuring a safe environment for residents, visitors, and staff and to complete reporting requirements. Our concern is that continued reporting requirements without full-time dedicated infection prevention staffing hinder LTC infection preventionists from completing other crucial prevention work, thereby negatively impacting other resident safety initiatives.
- We request that CMS coordinate with public health and CDC to minimize duplicate reporting requirements across platforms that could yield the same results.

APIC commends CMS for its ongoing commitment to patient safety and healthcare quality improvement across all care settings and populations. We look forward to continuing to work with CMS to prevent healthcare-associated infections in healthcare facilities.

Sincerely,

A handwritten signature in dark ink, appearing to read "TBubba", with a long, sweeping horizontal line extending to the right.

Tania Bubba, PhD, RN, CIC, FAPIC
2024 APIC President