



Yesterday, CMS issued Quality, Safety, and Oversight (QSO) letter 20-29-NH, which comprehensively addresses the new COVID-19 reporting and notification requirements for skilled nursing centers. Those requirements are part of an omnibus interim final rule that CMS adopted earlier. Important clarifications in the QSO include:

- The first set of data to be reported to the National Healthcare Safety Network (NHSN) is due May 17, with a two-week initial grace period.
- CMS established two new survey tags, F884 (reporting to NHSN) and F885 (resident and family notification).
- SNFs that do not report data will receive F-level deficiencies under F884 and will be fined for each week after the deadline at \$1,000 for the first week, increasing by \$500 for each subsequent week.
- CMS will begin posting the reported data by the end of May on a new web site that is not yet live, not on Nursing Home Compare.
- The NHSN reporting does not replace existing state or local reporting.
- States may submit data on behalf of SNFs.
- CMS encourages, but does not require, SNFs to report older data going back to January 1, 2020.
- Deaths of facility patients that occur in another location (e.g., a hospital) must be reported by the facility.
- All residents, representatives, and families must be notified when a notifiable event occurs, not just the affected people. Notifiable events are that a confirmed COVID-19 case occurs or that three or more residents or staff have new onset respiratory symptoms that occur within 72 hours of each other in the facility.
- Facilities must make cumulative updates for each additional notifiable event.
- CMS does not require a particular method of notification. That is, individual phone calls are not required.
- New admissions of positive COVID-19 patients to a COVID unit count as notifiable events.
- Staff are defined as including employees, consultants, contractors, volunteers, and caregivers who provide care and services to residents in the facility.

Click here to access this rule:

<https://www.cms.gov/files/document/qso-20-29-nh.pdf>