MDHHS
Michigan Department of Health & Human Services
GRETCHEN WHITMER, GOVERNOR | ROBERT GORDON, DIRECTOR

May 21, 2020

<Provider Name>
<Provider Address 1>
<Provider Address 2>
<Provider City> <State> <zipcode5-zipcode4>

Dear Provider:

RE: COVID-19 Response: Federal and Michigan-Specific COVID-19 Reporting Requirements in EMResource for Skilled Nursing Facilities

The Michigan Department of Health and Human Services (MDHHS) requires all skilled nursing facilities (SNFs) to report daily COVID-19 facility data to MDHHS via EMResource. This reporting initiative will ensure that Michigan has the information necessary to respond to the COVID-19 outbreak by understanding the impact on residents and facilities. In addition, reporting will assist in identifying potential resource needs and prioritize public health action.

On May 6, 2020, Centers for Medicare & Medicaid Services (CMS) released memo QSO-20-29-NH describing COVID-19 reporting requirements for SNFs and introducing the National Healthcare Safety Network (NHSN) system. In the interest of reducing reporting duplication and burden for SNFs, MDHHS has aligned the current EMResource data set to include the complete NHSN Long-Term Care Facility (LTCF) COVID-19 Module, in addition to Michigan-specific data elements.

MDHHS will transmit the SNFs reported data set to NHSN on the facility's behalf. SNFs will only need to report in EMResource to satisfy the COVID-19 related MDHHS and CMS reporting requirements. **SNFs must have access to the NHSN system and an NHSN number for MDHHS to report on their behalf. Should a facility choose to submit data directly to NHSN, the requirement to complete daily EMResource reporting to MDHHS will remain.**

As a reminder, for MDHHS to transmit data to NHSN on behalf of SNFs, a new time-limited reporting event called "**COVID-19 LTC/SNF Time-Limited**" has been created in EMResource to collect the following information:

- the facility's name
- the facility's CMS Certification Number (CCN)
- NHSN Facility ID Number (facility identifier used by NHSN)

This information must be submitted one-time in EMResource. If a SNF does not complete the COVID-19 LTC/SNF time-limited event, MDHHS will be unable to transmit data to NHSN on the SNF's behalf. Further, the facility will be required to report in both EMResource and NHSN.

This MDHHS time-limited reporting must be completed through the web-based EMResource tool which can be accessed at https://emresource.juvare.com/login. For questions related to this time-limited reporting requirement, email MDHHS-MSA-COVID19@michigan.gov.

To complete NHSN enrollment, go to LTCF COVID-19 Module Enrollment. Direct NHSN-related questions to NHSN@cdc.gov and add "LTCF" in the subject header. If a SNF is already enrolled in NHSN, do NOT re-enroll.

Reporting Requirements and Frequency

All SNFs must report on all data fields in the "**Daily LTC NHSN Report**" and "**Daily LTC State of Michigan Report**" events in EMResource. Beginning **May 22, 2020**, SNFs are required to report in the new events and will no longer need to report in the "**COVID-19 Daily LTC Bed Availability & PPE**" and "**COVID-19 Daily Clinical Summary"** events**.**

Be advised that MDHHS will transmit all SNF data that is received as is. SNFs retain full accountability for ensuring that their submissions meet NHSN requirements. Failure to submit complete data according to requirements can result in both state and federal compliance actions.

Reporting period: 24-Hour Period, Ending at Midnight (0000 HRS) for the period being reported (detailed information regarding first reporting period and subsequent reporting periods can be found in the *MDHHS COVID-19 Reporting Data Collection Instructions for Skilled Nursing Facilities* at pages 3 and 19. Review document prior to first report.)

Reporting submission requirement: 1200 HRS Daily

Note: While NHSN allows for reporting at least once per week, MDHHS requires SNFs to report daily by noon in EMResource. Given the circumstances, this reporting requirement is intended to be time-limited, and MDHHS will notify providers of its termination.

NHSN and MDHHS Reporting Instructions and Definitions

The *MDHHS COVID-19 Reporting Data Collection Instructions for Skilled Nursing Facilities* document includes instructions and definitions regarding each data element and can be found at www.michigan.gov/medicaidproviders >> Billing & Reimbursement >> Provider Specific Information >> Nursing Facilities >> Nursing Facility Landing Page, click "MDHHS COVID-19 Reporting Data Collection Instructions for Skilled Nursing Facilities." The instructions, as well as a data dictionary of each element, can also be accessed within the EMResource platform through the "attached file" link. These documents should be downloaded and referenced for accuracy in reporting.

MDHHS-Designated Regional Hub Reporting

For SNFs that contain a MDHHS designated Regional Hub unit, the SNF must report Regional Hub information as part of the total report in EMResource. Such SNFs should complete the events as described below:

- "**Facility Name**": include information that encompasses the entire facility, including the Regional Hub unit
- "**Facility Name – HUB**": include only information from the Regional Hub

MDHHS recognizes that this will result in a duplicate entry. Data reported under the "**Facility Name – HUB**" will not be transmitted to NHSN.

Notification to Residents

As a reminder, CMS mandates that nursing facilities inform residents, resident representatives, and families of residents of confirmed or suspected COVID–19 cases in the facility among residents and staff.

Adult Foster Homes, Home for the Aged, and Assisted Living Facilities

Additional information will be provided to adult foster homes, home for the aged and assisted living facilities on how to report COVID-19 data via an online survey called Survey Gizmo. This communication will be jointly provided by the Michigan Department of Licensing and Regulatory Affairs (LARA) and MDHHS.

Sincerely,

Kate Massey, Director
Medical Services Administration