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June 18, 2014

Ms. Marilyn Tavenner
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Room 445-G, Hubert Humphrey Building
200 Independence Avenue SW
Washington, DC 20201

Re: CMS-1606-P, Medicare Program; Inpatient Psychiatric Facilities Prospective Payment System - Update for Fiscal Year Beginning October 1, 2014 (FY 2015)

Dear Ms. Tavenner:

The Association of Professionals in Infection Control and Epidemiology (APIC) wishes to thank the Centers for Medicare & Medicaid Services (CMS) for the opportunity to provide input into proposed changes to the ***FY 2015 Inpatient Psychiatric Facility (IPF) Prospective Payment System***. APIC is a nonprofit, multi-disciplinary organization whose mission is to create a safer world through prevention of infection. We are pleased that CMS continues to demonstrate a commitment to improving the quality and efficiency of healthcare for all patients, including those who receive care in psychiatric settings. Our comments address issues raised by CMS related specifically to influenza prevention.

APIC supports the effort to enhance the implementation and reporting of quality programs in IPFs. Patients who are undergoing inpatient hospital services furnished in psychiatric hospitals and psychiatric units are at risk for influenza, a significant cause of morbidity and mortality. We will be commenting on two of the proposed quality measures: Influenza immunization for inpatients and influenza immunization for healthcare personnel.

Influenza Immunization

APIC notes that CMS has proposed the adoption of reporting influenza immunization rates for inpatients age six months and older, collected through chart abstraction, and reporting to CMS, as a quality measure for the Inpatient Psychiatric Facilities Quality Reporting (IPFQR) Program for FY 2017 payment determination. APIC supports the use of this quality measure, agrees that the measure is ready to be implemented, and that further testing or experience is unnecessary. Though the measure is not National Quality Form (NQF)-endorsed in the IPF setting, APIC believes that the screening for and administration of influenza vaccine to at-risk patients in any setting should be a standard of practice in healthcare. Due to this, the proposed measure is an appropriate assessment of the quality of care furnished in IPFs, as related to HAI prevention.



Influenza Vaccination Coverage among Healthcare Personnel Measure

APIC supports the CMS proposal to adopt Influenza Vaccination Coverage among Healthcare Personnel (NQF #0431) for the IPFQR Program for FY 2017 payment determination. Data collection for this measure would be via the National Healthcare Safety Network (NHSN) from October 1, 2015 to March 31, 2016. APIC agrees that the addition of this measure and the proposed timeline promotes alignment across quality reporting programs.

APIC notes, however, that some IPFs may be housed within a hospital or have staff that work primarily with outpatient clients which could make data collection burdensome. Due to the challenge of separately collecting healthcare personnel (HCP) influenza vaccination status in multiple settings, we support CMS' proposal to allow reporting as a single vaccination count for each healthcare facility by each individual facility CMS Certification Number (CCN). The collection and reporting of all HCPs under a single CCN and the submission of this single number to NHSN will simplify data collection for those facilities with multiple settings. APIC agrees that the public reporting of an overall vaccination rate for a facility will provide meaningful data to inform the public on the quality of care provided by the IPF.

Because HCP can unintentionally expose patients to seasonal influenza if they have not been vaccinated, and such exposure can be harmful to vulnerable patients, APIC supports mandatory HCP influenza vaccination as a condition of employment. We applaud CMS for adding this measure to the IPFQRP as we feel this will advance the strategy aimed at improving patient safety.

In summary, APIC supports the reporting of inpatient influenza vaccination rates and the reporting of an overall HCP influenza vaccination rate for healthcare facilities. These measures support quality through protecting patients, visitors and HCP from influenza.

Thank you for the opportunity to comment on the proposed quality improvement updates.

Sincerely,

A handwritten signature in black ink that reads "Jennie L. Mayfield". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Jennie L. Mayfield, BSN, MPH, CIC
2014 APIC President