March 17, 2020

Alex M. Azar, II
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Seema Verma
Administrator
U.S. Centers for Medicare & Medicaid Services
7500 Security Blvd.
Baltimore, MD 21244

Dear Secretary Azar and Administrator Verma:

The Association for Professionals in Infection Control and Epidemiology (APIC) is a nonprofit, multidisciplinary organization representing nearly 16,000 infection preventionists (IPs) whose mission is to create a safer world through prevention of infection. On behalf of our members, I would like to thank the Centers for Medicare & Medicaid Services (CMS) for the actions and waivers it has implemented to ensure prompt care and precautions for Medicare and Medicaid beneficiaries in care settings throughout our country during the COVID-19 pandemic.

Among those actions already taken, we respectfully request that CMS also consider invoking a waiver to delay reporting requirements under Quality Reporting, Value-Based Purchasing, and Hospital-Acquired Condition Reduction programs so healthcare providers can focus on preparing their facilities to keep their communities safe during this crisis.

In 2017, CMS invoked the Extraordinary Circumstances Exception (ECE) of CMS prospective payment system rules to provide relief to healthcare facilities in areas impacted by Hurricanes Harvey, Irma, and Maria without these facilities having to submit an ECE request form. This allowed those facilities to focus on patient care, as well as repairing and preparing their structures, instead of other equally important but less immediate administrative needs. During the current period of uncertainty, we ask that CMS again invoke the ECE for all healthcare facilities in the U.S., as well as waive the ECE request form requirement.

Since the inception of the CMS quality incentive programs, APIC has supported reporting requirements for healthcare-associated infections (HAIs) via CDC’s National Healthcare Safety Network (NHSN) because we know that reporting infections ensured high quality standardized HAI surveillance. However,
compliance with reporting requirements is quite time-consuming, and right now, the time and resources of IPs and all healthcare providers needs to be spent making sure that facilities, personnel, and equipment are ready and available to protect patients from the spread of COVID-19 in healthcare facilities.

We again thank you for the actions and flexibilities taken so far to allow healthcare providers respond to and contain the coronavirus, and we hope you will consider this additional request to further your actions.

Sincerely,

Connie Steed, MSN, RN, CIC, FAPIC
2020 APIC President

cc: David R. Wright, Director, Quality, Safety & Oversight Group, CMS Center for Clinical Standards and Quality