



1400 Crystal Drive, Suite 900  
Arlington, VA 22202  
Phone: 202/789-1890  
Fax: 202/789-1899  
[apicinfo@apic.org](mailto:apicinfo@apic.org)  
[apic.org](http://apic.org)

May 29, 2026

Dr. Mehmet Oz  
Administrator  
Centers for Medicare & Medicaid Services  
U.S. Department of Health and Human Services  
7500 Security Blvd.  
Baltimore, MD 21244-1850

***Re: Docket #CMS-1843-P: Medicare Program: Prospective Payment System and for Skilled Nursing Facilities; Updates to the Quality Reporting Program for FY 2027, proposed rule***

Dear Dr. Oz:

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 FY 2027 Skilled Nursing Facilities Prospective Payment System and Quality Reporting Program Update. APIC is a nonprofit, multidisciplinary organization representing 15,000 infection preventionists (IPs) whose mission is to create a safer world through the prevention of infection.

***Proposed Removal of the COVID-19 Vaccination Coverage Among Healthcare Personnel Measure Beginning with the CY 2026 Reporting Period/FY 2028 Payment Determination***

APIC supports the proposed removal to the COVID-19 Vaccination Coverage Among Healthcare Personnel (HCP) measure from the Skilled Nursing Facility Quality Reporting Program (SNF QRP). When the vaccines were first made available there was value in closely tracking the uptake of vaccinations and reporting added value. The value at that time outweighed the burden it imposed on those responsible for entering the data. More recently, the value of reporting COVID-19 vaccination rates has decreased. CMS's withdrawal of the COVID-19 Health Care Staff Vaccination Requirements, the ending of the Public Health Emergency, and changing definitions of "fully vaccinated," make it difficult to capture the data and detracts from their utility. Resources currently allocated to this task



could be better utilized in other areas that directly contribute to the safety and protection of our workforce. APIC continues to support COVID-19 vaccination among healthcare personnel (HCP) in all healthcare settings as the most effective infection prevention tool to protect staff, patients, and visitors against severe illness, hospitalization, and death. APIC also continues to strongly promote the importance of vaccination in preventing infections and protecting public health. Recent reductions in vaccination rates<sup>1</sup> have contributed to a resurgence of vaccine-preventable diseases in the United States such as measles and pertussis, posing a new and real threat to public health.

APIC Recommendations:

- APIC supports removal of the COVID-19 Vaccination Coverage Among HCP measure from the SNF QRP.
- APIC strongly supports vaccination of HCP in all healthcare settings against COVID-19 and all vaccine-preventable diseases.
- APIC strongly supports vaccination of all demographic groups against vaccine-preventable diseases according to pre-2025 recommendations from the Centers for Disease Control and Prevention and Food and Drug Administration.

***Proposed Modifications of Reporting Requirements for COVID-19 Vaccine: Percent of Patients/Residents Who Are Up to Date Measure Beginning with the FY 2028 SNF QRP***

For the reasons we noted in our comments on proposed removal of the COVID-19 HCP vaccination measure above, the COVID-19 Vaccine: Percent of Patients/Residents Who are Up to Date measure no longer provides value. Therefore, we support the proposal to remove this measure.

APIC Recommendation: Although APIC continues to support COVID-19 vaccination, we agree with the proposal to remove the COVID-19 Vaccine: Percent of Patients/Residents Who Are Up to Date measure from the SNF QRP.

***Proposed Revision of the Final Data Submission Deadline Period from 4.5 Months to 45 Days***

Timely reporting of quality and other performance measures allows healthcare consumers to make educated decisions about where to receive care. Moving from a 4.5-month reporting period to a 45 day after the quarter ends reporting period will reduce the time from reporting to public display. Based on the analysis performed by CMS, 97.5 percent of



facilities reporting submitted the data within 45 days, so the shortened reporting period does not seem to create a burden.

APIC Recommendation: APIC supports shortening the data submission deadline for the SNF QRP to 45 days after the quarter ends.

APIC appreciates the opportunity to provide recommendations relating to infection prevention and control provisions in the proposed rule. We look forward to continuing to work with CMS to prevent healthcare-associated infections in healthcare facilities.

Sincerely,

A handwritten signature in black ink that reads "Kathy Ward". The signature is written in a cursive, flowing style.

Kathy Ward, RN, BSN, MPH, FAPIC, CIC  
2026 APIC President

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<sup>1</sup> U.S. Centers for Disease Control and Prevention: Vaccination coverage and exemptions among US Kindergartners, October 2024. Available at <https://www.cdc.gov/schoolvaxview/data/index.html>.