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MEMO

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TO: Chief Executive Officers
Chief Nursing Officers
Government Relations Executives
Directors of Pharmacy
Directors of Information Technology
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FROM: Sarah Willson
Vice President of Clinical and Regulatory Affairs

SUBJECT: Delay of Antibiotic Stewardship Reporting Requirement

A state requirement that Missouri hospitals must report antibiotic use and antibiotic resistance through the National Healthcare Safety Network Antimicrobial Use and Resistance Module will be delayed a year.

The basis for the delay is Centers for Medicare & Medicaid Services' decision to postpone the scheduled full implementation of Stage 3 Meaningful Use standards for use of electronic health records. Implementation was slated for January 2018. In its 2,456-page final rule for the fiscal year 2018 Medicare Hospital Inpatient Prospective Payment System, CMS opted to delay full implementation until January 2019.

A Missouri state law enacted in 2016 requires the use of the NHSN AUR module for reporting data on antimicrobial use and resistance. However, the effective date of this part of the law is tied to the effective date of Stage 3 Meaningful Use regulations that enables the electronic interface for such reporting. CMS postponement of full implementation also delays the state law.

The NHSN AUR module reporting delay does not change other components of the 2016 infection control legislation. For example, the requirement for Missouri hospitals to have an antimicrobial stewardship program took effect August 28, 2017.

CMS indicated in its final rule that it delayed full implementation of Stage 3 Meaningful Use in response to hospital concerns about the challenges of meeting the 2018 deadline. MHA appreciates CMS' action to bring about a measure of regulatory relief.

MHA continues to collaborate with the Centers for Disease Control and Prevention and the Department of Health and Senior Services to identify ways to support Missouri hospitals in implementing the NHSN AUR module standard. Please contact me with any questions or concerns at swillson@mhanet.com or 573/893-3700, ext. 1304.

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