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Promoting and protecting the health of the public and the environment

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January 10, 2007

Dear Hospital CEO:

The purpose of this letter is to inform hospital administrators, infection control practitioners (ICPs), and other infection control staff and departments of the requirements of the recently enacted Hospital Infections Disclosure Act (HIDA). This Act was approved by the South Carolina General Assembly on May 25, 2006 and signed by the Governor on May 31, 2006. DHEC assigned responsibility for HIDA implementation to the Health Services Deputy Area, Division of Acute Disease Epidemiology. DHEC is mandated to collect, analyze and disseminate reported information on certain hospital infection rates and to assure their accuracy. Hospitals are also to report methods and adequacy of selected infection control processes. We are therefore responsible for: 1) assuring that rates and processes are reported accurately and in a timely manner; 2) assuring that all hospitals are treated fairly; 3) establishing a validation program; and 4) establishing and defining training requirements.

Attached is the DHEC HIDA Implementation and Training Plan for your careful review. The details of this plan have been developed specifically to implement the requirements of the statute. Enclosed is a copy of the HIDA, which amended the Code of Laws of South Carolina, 1976 by adding Article 20 to Chapter 7, Title 44. Please note that the Act requires compliance as a condition of hospital licensure. If necessary, compliance issues will be forwarded from Health Services to DHEC Health Licensing for appropriate action. HIDA also requires that the DHEC Commissioner appoint an advisory committee to advise the department. The role of the committee is described throughout the attached copy of the statute. Please find attached a list of the HIDA Advisory Committee members.

The DHEC HIDA Workgroup and the Advisory Committee have met five times beginning in September 2006 to study the issues and plan for implementation. Because hospitals will need to begin entering data by July 1, 2007, in order to submit six months of data by February 1, 2008, the first order of business was to choose a data system for reporting. DHEC has selected the Centers for Disease Control and Prevention (CDC) National Healthcare Safety Network (NHSN) system for reporting risk adjusted hospital associated infections (http://www.cdc.gov/ncidod/dhqp/nhsn_members.html). Other states have also chosen this system to implement their own reporting laws. Since the NHSN is a web based reporting system, requiring a secure digital certificate supplied by the CDC, the Infection Control Professionals (ICPs) will need routine access to a computer capable of using the NHSN system with Internet connection. See the following web site for the latest system requirements:

http://www.cdc.gov/ncidod/dhqp/nhsn_sysRequirements.html .

CDC has scheduled NHSN enrollment for South Carolina Hospitals for March 2007. Information needed for enrolling your hospital will be covered in the required February training sessions described in the HIDA Implementation and Training Plan. CDC will create a South Carolina NHSN data group, which will allow only DHEC to have access to the NHSN hospital data. Each hospital will have access to its own data and will need to specifically assign access rights to their reportable data to DHEC. In addition, the SC Office of Research and Statistics' hospital discharge data will be used to link with the reported infections in the NHSN system to identify information needed for a validation program, to

conduct cost analysis, and identify other relevant information such as readmissions related to infection. DHEC and the Advisory Committee have established a sub-committee to develop models for the NHSN and ORS hospital discharge data links and methods.

We anticipate that your ICPs will provide the leadership for this initiative. Members of our Advisory Committee are informing us that in many hospitals this will involve the need for additional resources, if it is to be done with good accuracy and quality. ICPs in the hospitals are the key persons with the clinical knowledge required to report these infections. The application of standardized case definitions across all hospitals is critical to obtain comparable data for reporting rates. It is imperative to work with your ICPs to develop a plan for HIDA implementation and training. Participation in the training program is a requirement for those entering data into the reporting system. Other key staff involved in infection control practice and management may also want to attend the training. Training is required for your hospital staff if you perform any surgical procedures, insert central lines, or place patients on ventilators.

To facilitate training and to give the hospitals time to plan and implement this requirement, the decision was made to phase in the reporting of infections for a few selected procedures and clinical units. In February, the DHEC Workgroup and Advisory Committee will begin to plan for additions to the list as required by HIDA, and DHEC will notify hospitals as requirements are added.

Very soon, you will receive additional HIDA training and registration instructions from the SC Hospital Association. The one-day training will be presented on two separate days for your staff to choose the most convenient day for them. The dates are set for Thursday, February 22, and Wednesday, February 28, 2007. See the Training Plan for additional information.

By January 26, 2007, please submit the name of your hospital's ICP(s) and primary HIDA contact (who may be the same person) along with their contact information (address, phone, e-mail) to DHEC at e-mail: HIDAAdvisory@dhec.sc.gov, or mail to DHEC, Attn: Christine Phillips, Box 101106, Columbia, SC 29211-0106. Any questions can be submitted to the same e-mail or call Dixie Roberts at 803-898-0861.

Thank you for your cooperation as we work together to implement this new law.

Sincerely,

Lisa F. Waddell, MD, MPH
Deputy Commissioner, Health Services

cc: C. Earl Hunter, Commissioner
Ms. Pamela Dukes, Deputy Commissioner, Health Regulations
HIDA Advisory Committee

Enclosures:
Hospital Infections Disclosure Act
HIDA Advisory Committee Members
HIDA Implementation and Training Plan