

# THE ROAD TO CMS FINAL RULE ON DATA COLLECTION AND MEDICARE CONDITIONS OF PARTICIPATION (CoPs)

## ◀ February 2020

Administration declares states are responsible for collecting data/knowing incidence of COVID-19 in state and what is needed to support patient care. States stand up their own data collection systems.

## ◀ Mid-March

The White House Task Force wants to collect its own data. Asks AHA to collect it from hospitals.

## March 29, 2020 ▶

The White House Task Force shuts down AHA data collection. VP Pence sends letter to hospitals announcing shift to Federal collection of the data.

## ◀ April 10, 2020

Sec. Azar letter to hospitals describes 5 paths for hospitals to submit required data on COVID cases - only three of them actually exist – report through CDC's NHSN, report through your state, report through TeleTracking.

## April 25, May 12, May 24, June 8 and June 15, 2020 ▶

HHS suddenly announces "special" data collection on these dates. Hospitals must submit same data, but TeleTracking is the only pathway to use.

## ◀ June 12, 2020

Administration threatens to send in the National Guard to hospitals to collect data.

## June 19, 2020 ▶

Hospital associations suggest alternate approach to collaborate on identifying and addressing problems. HHS agrees to work collaboratively and launched collaborative efforts with hospital associations. They have been effective, in identifying and addressing many problems, but much more work remains to be done.

## ◀ July 13, 2020

Unexplained change to eliminate CDC's NHSN as a pathway for reporting, increase amount of data expected from hospitals.

## Mid-August ▶

Time for another policy change – this time threatening to remove hospitals from the Medicare program if they don't report data.