

National Healthcare Safety Network (NHSN) Group Data Access Frequently Asked Questions (FAQs)
April 3, 2019

Q: Can NHSN group data be used by the group for research purposes?

A: NHSN group users may use data accessible via the NHSN group for research purposes as long as the research purposes have been communicated to healthcare facility participants in the group. As a result of the NHSN group user's communications, facilities participating in a group should have a clear and accurate understanding of how their NHSN data will be used and by whom. Any changes to the purpose or scope of analyses should be communicated in writing to all facility users within the group and opportunities provided for facilities to consent or refrain from consenting to use of their NHSN data for the additional analytic use(s), including research.

Q: Can NHSN group data be shared with external consultants or data analysts?

A: NHSN group users can share data accessible via the NHSN group with external consultants, data analysts, or researchers when shared within the terms of data non-disclosure agreements and, when appropriate, data use agreements with the NHSN group organization. NHSN group users assume data governance responsibilities for how analysts and researchers within their organizations or external to them gain access to and use the accessible NHSN data. If an external entity's use of the data accessible via the NHSN group goes beyond the purposes and plans previously communicated to the healthcare facilities participating in the group, the additional analytic use(s) should be communicated in writing to all users at affected facilities within the group and opportunities provided for facilities to consent or refrain from consenting to use of their NHSN data for the additional analytic use(s).

Q: When is facility informed consent needed to analyze or publish NHSN group data?

A: Facility informed consent is necessary when the NHSN group user, or any entity whose access to NHSN data has been enabled by the NHSN group user, plans to use the NHSN group data in a way that differs from the purpose and scope that a NHSN group user previously communicated to the healthcare facilities participating in the group. The informed consent process can be accomplished via email communications.

Q: Can summary or aggregate data be published or released without facility consent?

A: Aggregate data accessed via a NHSN group can be published or publicly released without consent from the healthcare facilities participating in the group. However, CDC strongly advises NHSN group users to notify healthcare facility participants—via written communication—that their data accessible via the NHSN group will be published or publicly released and provide the publication or release details (e.g., release date, name of publication). Data is considered to be “in aggregate” if individual facilities cannot be identified using the data presented. Such data may include facility location, indicators of facility size or patient population.

Q: How does this differ by type of NHSN data access?

A:

Standard NHSN Groups:

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The NHSN group functionality is a technical feature within the NHSN application that enables healthcare facilities to share some or all of their data with a NHSN group user, i.e., a third party (other than the facility and CDC) such as a state or local health department, corporate headquarters, or End Stage Renal Disease (ESRD) Network Organization; for a mutually agreed to purpose, e.g., performance improvement, required reporting. Healthcare facilities join NHSN groups voluntarily after receiving an email invitation from the group administrator which includes the group user's purpose(s), plans for data use, and the safeguards that the group user will use to protect the confidentiality of the NHSN data to which it seeks access. Health departments in states with mandatory healthcare-associated infection (HAI) reporting requirements access mandatorily reported data in their jurisdictions via the standard NHSN group function. Some health departments without mandatory HAI reporting requirements use the NHSN group function for NHSN data access granted voluntarily from healthcare facilities in their jurisdictions.

NHSN Group use by ESRD Networks:

Outpatient dialysis facilities that participate in the CMS ESRD Quality Incentive Program (QIP) are required to join the ESRD Network Organization's ("Network") NHSN group as part of the ESRD Conditions of Coverage. The Confer Rights template in NHSN lists the data requested by the Network, which includes, but is not limited to, data required to be shared as part of the CMS ESRD Statement of Work. Dialysis facilities, as participants in the QIP, share data with Networks for the purpose of quality improvement. The CMS Statement of Work with Networks defines the purposes and scope for how NHSN data accessed via the NHSN group function may be used. The CMS contract with Networks governs the privacy, confidentiality, and disclosure assurances that safeguard dialysis facility data shared via the ESRD Network Organization's group.

NHSN data access via DUA:

NHSN group users who access NHSN data via a data use agreement (DUA), e.g., health department HAI/ antimicrobial resistance (AR) program staff, agree that the data will be used only for HAI/ AR surveillance and prevention purposes and not for legal and regulatory action. The DUA further prohibits the NHSN group user from making facility-identifiable data publicly available.

NHSN data provision for HAI prevention activities and outbreak response:

Health departments that gain access to NHSN data for specified HAI prevention activities or for outbreak investigation and response similarly agree that the data will be used for HAI/ AR surveillance and prevention purposes only and not for legal and regulatory action, and that facility-identifiable data will not be made publicly available.

Q: What are some best practices for communication with facilities in the NHSN group?

A: CDC recommends that NHSN group users communicate with healthcare facilities participating in NHSN groups via written communications such as e-mail.

Q: My organization no longer needs access to the data in the NHSN group. What should we do?

A: NHSN group users who no longer need access to an NHSN group should contact NHSN@cdc.gov for instructions to deactivate data access. If your organization is an external entity whose NHSN data access has been enabled by an NHSN group user, contact that NHSN group user regarding termination of data access.