

Frequently Asked Questions about the New National Hospital Discharge Survey

1. What is the National Hospital Discharge Survey (NHDS)?

NHDS, authorized by Section 306 of the Public Service Act (Title 42, U.S. Code, 242k), is part of the National Hospital Care Survey and a principal source of information on inpatient utilization in non-federal non-institutional hospitals in the United States. Since 1965 the survey has been used for policymaking, health care research, academic education, and various applications within the hospital industry. Information about NHDS can be found at <http://www.cdc.gov/nchs/nhds.htm>.

2. Who is sponsoring NHDS? What is the National Center for Health Statistics (NCHS)?

The National Center for Health Statistics (NCHS) is sponsoring NHDS. NCHS, a part of the Centers for Disease Control and Prevention (CDC), is the nation's principal health statistics agency and is responsible for assessing the health status and health care needs of people in the United States. The NCHS conducts a family of surveys that are designed to measure utilization of the health care delivery system, and which are used for a variety of purposes in the public and private sectors. More information about the NCHS can be found at <http://www.cdc.gov/nchs/>.

3. What are the patient privacy and confidential issues?

NCHS is required by law to keep all data regarding patients and facilities strictly confidential and to use these data only for research and statistical purposes as stated by Section 308(d) of the Public Health Service Act [42 United States Code 242m (d) and Section 513 of the Confidential Information Protection and Statistical Efficiency Act or CIPSEA (PL-107-347)]. All protected health information will be kept confidential and will be used only by NCHS staff, contractors, and agents only when required and with necessary controls. CIPSEA also includes provisions for a felony conviction and/or fine of up to \$250,000 if NCHS, RTI or SSS staff violates the confidentiality provisions. The national survey has been approved by the Institutional Review Board (IRB) of NCHS.

4. Are there HIPAA implications for the hospital by participating in the National Hospital Discharge Survey?

NHDS is being conducted under the auspices of CDC/NCHS (federal government). Special provisions within HIPAA exist to permit hospitals to provide data to public health entities such as CDC/NCHS for purposes such as NHDS.

The HIPAA Privacy Rule recognizes 1) the legitimate need for public health authorities and others responsible for ensuring the public's health and safety to have access to protected health information to conduct their missions, and 2) the importance of public health reporting by covered entities to identify threats to the public and individuals. The Privacy Rule permits 1) protected health information disclosures without a written patient authorization for specified public health purposes to public health authorities legally authorized to collect and

receive the information for such purposes, and 2) disclosures that are required by state and local public health or other laws (HIPAA Regulations (45 CFR§164.501)). Thus, HIPAA permits hospitals such as yours to participate in studies of this nature for public health purposes. Because Research Triangle Institute International (RTI) and Social and Scientific Systems (SSS) are serving as authorized agents of NCHS, it is permissible to disclose data to RTI and SSS for the purposes of this project. HIPAA also permits covered entities to obtain the documentation and rely on the approval of one Institutional Review Board (IRB) or privacy board. In this case, the hospital may rely on the approval of the NCHS IRB.

5. *Who is conducting NHDS?*

RTI, an independent, nonprofit research organization based in North Carolina, is the data collection agent for the 2011 NHDS. SSS is a sub-contractor to RTI and will be collecting data from participating hospitals on behalf of NCHS. More information about RTI can be found at www.rti.org. More information about SSS can be found at www.s-3.com.

6. *How can my hospital and hospital staff benefit from participating in the NHDS?*

NHDS participation is important because without it, neither your hospital nor others like your hospital can benefit from being represented in the national description of hospital utilization. Further, the NHDS benefits hospitals by collecting data used to make national estimates of hospital care against which individual hospitals may compare themselves. Also, research findings using the data collected may help hospitals to better care for patients.

We are offering the hospital \$500 to partially offset their costs in setting up the processes and procedures to transmit the data to NCHS. At the end of each year of data collection hospitals will receive \$500 for participation. In addition, hospital staff who specialize in health information management may be eligible to receive continuing education credits for completing a short on-line module to learn about participation in the NHDS. This informative module can be found at <http://www.cdc.gov/nhds>.

7. *What will be expected of us if our hospital agrees to participate in the new NHDS?*

Participation in the NHDS will include the following:

- Speak with SSS staff to learn about the study and answer a few questions that confirms that your hospital is eligible for participation in the NHDS.
- Identify a primary contact within the hospital who will be responsible for enrolling the hospital in the NHDS, answering a few questions about the hospital and submitting the claims data on a quarterly basis for all inpatients discharged from the hospital.
- Provide additional information about the characteristics of the hospital by answering a short self-administered facility questionnaire.
- In 2011, the data collection will be limited to data on inpatients and will be primarily transmitted from the data collected on the UB-04. Your hospital may be asked to

participate in special studies in addition to the NHDS and beginning in 2013, the NHDS will become the National Hospital Care Survey and expand to include data collection from the Emergency and Outpatient Departments and Ambulatory Surgery Centers.

All activities involved in NHDS will be conducted either at participating hospitals or by telephone. No travel will be required on the part of hospital personnel.

8. *How many records from our hospital will we need to transmit to you?*

We are asking hospitals to submit all the data elements from the UB-04 for all inpatients discharged from the hospital.

9. *How much information will you need about the hospital?*

Hospital facility information includes questions on:

- Hospital demographics (e.g., total number of discharges for the year and hospital ownership type)
- Clinical capabilities and services (e.g., Does the hospital have an ED? What is the trauma level rating of the ED?)
- Types of revenue sources
- Health information technology (HIT) (In which areas in the hospital does HIT function?)

10. *How much hospital staff time will participation require?*

Once your hospital decides to participate in the survey, you will be contacted to arrange the following:

- 1) Completion of an **Induction Interview** to be conducted one time in order to obtain general information needed to facilitate the data transmission from your hospital. This is estimated to take 1 hour, including answering any questions you may have.
- 2) Completion of a **Facility Questionnaire** which obtains more specific information about hospital characteristics, financial information, staffing, and health information technology. This is a self-administered questionnaire and it is estimated to take approximately 1 hour to complete.
- 3) Creation of a file of discharged inpatients in a specified format and transmission to NCHS on a quarterly basis. We estimate that this would require approximately 1 hour each time. However, we recognize that the actual time required may vary across hospitals.

11. *How did you select our hospital/facility to participate?*

Your hospital was selected randomly from all hospitals in the United States. Selections were made to obtain enough hospitals of different sizes, service types, and geographical locations to ensure that the hospitals in our study are nationally representative.

12. Can another hospital/facility participate instead of us?

Your hospital facility was randomly chosen to provide representative data not only for its own inpatient services but also for similar hospitals in the United States. For statistical reasons, this is not possible to substitute another hospital. If we replaced your hospital with another hospital, this might introduce bias or inaccuracies into the data we collect. This would severely hinder our ability to make estimates about the amount and types of hospital care provided, as well as the types of patients served, in the entire United States and in hospitals like yours.

13. Who else is participating in NHDS?

We plan to recruit approximately 500 hospitals located in the 50 states and the District of Columbia for the national survey. The identity of your hospital and other hospitals participating in this study is confidential. No data will be shared among hospitals.

14. What will happen with the information we give you?

All information collected will be the property of NCHS and kept strictly confidential. The identity of specific hospitals or individual patients will not be released in any manner, except to NCHS staff, contractors, and agents only when required and with necessary controls. Results of the study will be published only in an aggregated manner that will not allow identification of any individual hospital or patient.

15. How long will our hospital be in this study? Will we need to provide information on an ongoing basis/long term?

The survey is designed to collect data from your hospital on an ongoing basis, until a new sample of hospitals is inducted. We do not know when a new sample will be drawn, but it will not be for a few years.

16. Do we need to let our patients know that we are accessing their records for NHDS?

HIPAA and the Privacy Rule permits disclosure of protected health information (PHI) and medical record information without written patient authorization for specific public health purposes to public health authorities and their authorized agents, including federal public health agencies such as the CDC, of which NCHS is a part.¹ Thus, HIPAA Regulations (45 CFR§164.501) do not require you to obtain patient authorization prior to disclosing protected health information to NCHS or RTI, as an authorized agent of NCHS.

¹ HIPAA Privacy Rule and Public Health: Guidance from CDC and the US Department of Health and Human Services; Morbidity and Mortality Weekly Report, Vol. 52, August 11, 2003.

In the case that a patient requests information about disclosures of his or her protected health information, the Privacy Rule requires hospitals to keep accounting documentation for 6 years. NCHS has developed an accounting document for NHDS participating hospitals. This documentation allows hospitals to respond to requests by patients for disclosures made of their protected health information. An accounting document will be provided to your hospital during the 2011 national survey to simplify your record-keeping and for your convenience in complying with this requirement. Since the 2011 NHDS data collection will involve more than 50 records, the hospital is not required to account for disclosures of information about any particular individual.

17. Whom do I contact for more information?

You may contact the SSS project director, Ms. Deborah Bittner, at 301-628-0322. You may also contact Dr. Carol DeFrances, Team Leader of the Hospital Care Team, NCHS, at 301-458-4440.

18. OK, I'm interested in participating in NHDS. What is the next step?

SSS staff will follow up with a telephone call to identify contacts at the hospital, and set up a call for further discussion with the hospital contact and other relevant hospital personnel.