Measure Information

This document contains the information submitted by measure developers/stewards, but is organized according to NQF's measure evaluation criteria and process. The item numbers refer to those in the submission form but may be in a slightly different order here. In general, the item numbers also reference the related criteria (e.g., item 1b.1 relates to sub criterion 1b).

Brief Measure Information

NQF #: 0230
Corresponding Measures:
De.2. **Measure Title:** Hospital 30-day, all-cause, risk-standardized mortality rate (RSMR) following acute myocardial infarction (AMI) hospitalization
Co.1.1. **Measure Steward:** Centers for Medicare & Medicaid Services
De.3. **Brief Description of Measure:** The measure estimates a hospital-level 30-day risk-standardized mortality rate (RSMR) for patients discharged from the hospital with a principal diagnosis of AMI. Mortality is defined as death for any cause within 30 days after the date of admission for the index admission. CMS annually reports the measure for patients who are 65 years or older and are either Medicare fee-for-service (FFS) beneficiaries and hospitalized in non-federal hospitals or are hospitalized in Veterans Health Administration (VA) facilities.
1b.1. **Developer Rationale:** The goal of this measure is to improve patient outcomes by providing patients, physicians, and hospitals with information about hospital-level, risk-standardized mortality rates following hospitalization for AMI. Measurement of patient outcomes allows for a broad view of quality of care that encompasses more than what can be captured by individual process-of-care measures. Complex and critical aspects of care, such as communication between providers, prevention of and response to complications, patient safety, and coordinated transitions to the outpatient environment, all contribute to patient outcomes but are difficult to measure by individual process measures. The goal of outcomes measurement is to risk-adjust for patients' conditions at the time of hospital admission and then evaluate patient outcomes. This measure was developed to identify institutions whose performance is better or worse than what would be expected based on their patient case mix, and therefore promote hospital quality improvement and better inform consumers about care quality.
Additionally, AMI mortality is a priority area for outcomes measure development as it is a costly and common condition. Hospital mortality is an outcome that is likely attributable to care processes and is an important outcome for patients. Measuring and reporting mortality rates will inform health care providers about opportunities to improve care, strengthen incentives for quality improvement, and ultimately improve the quality of care received by Medicare patients. The measure will also provide patients with information that could guide their choices. Furthermore, the measure will increase transparency for consumers and has the potential to lower health care costs associated with mortality.

S.4. **Numerator Statement:** The outcome for this measure is 30-day all-cause mortality. We define mortality as death from any cause within 30 days from the date of admission for patients hospitalized with a principal diagnosis of AMI.
S.6. **Denominator Statement:** This claims-based measure is used for patients aged 65 years or older.

The cohort includes admissions for patients aged 65 years and older discharged from the hospital with a principal discharge diagnosis of AMI and with a complete claims history for the 12 months prior to admission. The measure is publicly reported by CMS for those patients 65 years and older who are Medicare FFS or VA beneficiaries admitted to non-federal or VA hospitals, respectively.

Additional details are provided in S.7 Denominator Details.
S.8. **Denominator Exclusions:** The mortality measures exclude index admissions for patients:

1. Discharged alive on the day of admission or the following day who were not transferred to another acute care facility;
2. With inconsistent or unknown vital status or other unreliable demographic (age and gender) data;
3. Enrolled in the Medicare hospice program or used VA hospice services any time in the 12 months prior to the index admission,

including the first day of the index admission; or
4. Discharged against medical advice (AMA).

For patients with more than one admission for a given condition in a given year, only one index admission for that condition is randomly selected for inclusion in the cohort.

De.1. **Measure Type:** Outcome
S.17. **Data Source:** Claims, Enrollment Data, Other
S.20. **Level of Analysis:** Facility

IF Endorsement Maintenance – Original Endorsement Date: May 09, 2007 **Most Recent Endorsement Date:** Feb 19, 2016

IF this measure is included in a composite, NQF Composite#/title:

IF this measure is paired/grouped, NQF#/title:

De.4. **IF PAIRED/GROUPED, what is the reason this measure must be reported with other measures to appropriately interpret results?** This measure is paired with a measure of hospital-level, all-cause, 30-day, risk-standardized readmission rate (RSRR) following an AMI hospitalization.

1. Evidence, Performance Gap, Priority – Importance to Measure and Report

Extent to which the specific measure focus is evidence-based, important to making significant gains in healthcare quality, and improving health outcomes for a specific high-priority (high-impact) aspect of healthcare where there is variation in or overall less-than-optimal performance. ***Measures must be judged to meet all sub criteria to pass this criterion and be evaluated against the remaining criteria.***

1a. Evidence to Support the Measure Focus – See attached Evidence Submission Form
NQF_evidence_AMImortality_Fall2020_final_7.22.20.docx
1a.1 For Maintenance of Endorsement: Is there new evidence about the measure since the last update/submission?
Do not remove any existing information. If there have been any changes to evidence, the Committee will consider the new evidence. Please use the most current version of the evidence attachment (v7.1). Please use red font to indicate updated evidence.
Yes

1b. Performance Gap

Demonstration of quality problems and opportunity for improvement, i.e., data demonstrating:

- considerable variation, or overall less-than-optimal performance, in the quality of care across providers; and/or
- Disparities in care across population groups.

1b.1. **Briefly explain the rationale for this measure** *(e.g., how the measure will improve the quality of care, the benefits or improvements in quality envisioned by use of this measure)*
If a COMPOSITE (e.g., combination of component measure scores, all-or-none, any-or-none), SKIP this question and answer the composite questions.
The goal of this measure is to improve patient outcomes by providing patients, physicians, and hospitals with information about hospital-level, risk-standardized mortality rates following hospitalization for AMI. Measurement of patient outcomes allows for a broad view of quality of care that encompasses more than what can be captured by individual process-of-care measures. Complex and critical aspects of care, such as communication between providers, prevention of and response to complications, patient safety, and coordinated transitions to the outpatient environment, all contribute to patient outcomes but are difficult to measure by individual process measures. The goal of outcomes measurement is to risk-adjust for patients' conditions at the time of hospital admission and then evaluate patient outcomes. This measure was developed to identify institutions whose performance is better or worse than what would be expected based on their patient case mix, and therefore promote hospital quality improvement and better inform consumers about care quality.
Additionally, AMI mortality is a priority area for outcomes measure development as it is a costly and common condition. Hospital mortality is an outcome that is likely attributable to care processes and is an important outcome for patients. Measuring and reporting mortality rates will inform health care providers about opportunities to improve care, strengthen incentives for quality improvement, and ultimately improve the quality of care received by Medicare patients. The measure will also provide patients with

information that could guide their choices. Furthermore, the measure will increase transparency for consumers and has the potential to lower health care costs associated with mortality.

1b.2. **Provide performance scores on the measure as specified (current and over time) at the specified level of analysis**. *(This is required for maintenance of endorsement. Include mean, std dev, min, max, interquartile range, scores by decile. Describe the data source including number of measured entities; number of patients; dates of data; if a sample, characteristics of the entities include.) This information also will be used to address the sub-criterion on improvement (4b1) under Usability and Use.*
Variation in mortality rates indicates opportunity for improvement. We conducted analyses using data from July 1, 2016 to June 30, 2019 Medicare claims and VA administrative data (n= 470,621 admissions from 4,246 hospitals).

The three-year hospital-level risk-standardized mortality rates (RSMRs) have a mean of 12.7% and range from 8.8 – 18.1% in the study cohort. As shown below, the median risk-standardized rate is 12.7%. The distribution of RSMRs across hospitals is shown below:

Distribution of Hospital AMI RSMRs over Different Time Periods
Results for each data year
Characteristic//07/2016-06/2017//07/2017-06/2018//07/2018-06/2019//07/2016-06/2019
Number of Hospitals//3869//3771//3669//4246
Number of Admissions//167954//156642//146025//470621
Mean(SD)//12.9(0.6)//12.7(0.6)//12.5(0.5)//12.7(0.8)
Range(Min-Max)//9.5-18.3//9.6-15.8//10.1-15.4//8.8-18.1
Minimum//9.5//9.6//10.1//8.8
10th percentile//12.2//12.0//12.0//11.7
20th percentile//12.5//12.4//12.2//12.2
30th percentile//12.7//12.5//12.3//12.5
40th percentile//12.8//12.6//12.4//12.6
50th percentile//12.8//12.7//12.4//12.7
60th percentile//12.9//12.8//12.5//12.8
70th percentile//13.1//12.9//12.6//12.9
80th percentile//13.2//13.0//12.7//13.2
90th percentile//13.5//13.3//13.0//13.6
Maximum//18.3//15.8//15.4//18.1

1b.3. **If no or limited performance data on the measure as specified is reported in 1b2, then provide a summary of data from the literature that indicates opportunity for improvement or overall less than optimal performance on the specific focus of measurement.**
N/A

1b.4. **Provide disparities data from the measure as specified (current and over time) by population group, e.g., by race/ethnicity, gender, age, insurance status, socioeconomic status, and/or disability.** *(This is required for maintenance of endorsement. Describe the data source including number of measured entities; number of patients; dates of data; if a sample, characteristics of the entities included.) For measures that show high levels of performance, i.e., "topped out", disparities data may demonstrate an opportunity for improvement/gap in care for certain sub-populations. This information also will be used to address the sub-criterion on improvement (4b1) under Usability and Use.*
Distribution of 30-day AMI RSMRs by Proportion of Dual Eligible Patients:
Data Source: Medicare FFS claims, VA data, and Master Beneficiary Summary File (MBSF) data
Dates of Data: July 2016 through June 2019

Variation in RSMRs across hospitals (with at least 25 cases) by proportion of patients with social risk//
Description of Social Risk Variable//Dual Eligibility
Quartile//Q1//Q4
Social Risk Proportion (%)//(0-8.33)//(29.91-100)
# of Hospitals//582//581

100%Max//15.6//17.1
90%//13.8//14.0
75%//13.1//13.4
50%//12.4//12.7
25%//11.8//12.2
10%//11.2//11.6
0%Min//9.3//9.4

Distribution of 30-day AMI RSMRs by Proportion of Patients with AHRQ SES Index Scores:
Data Source: Medicare FFS claims, VA data, and the American Community Survey (ACS) data
Dates of Data: July 2016 through June 2019 (claims); 2013-2017 (ACS)

Variation in RSMRs across hospitals (with at least 25 cases) by proportion of patients in lower and upper social risk quartiles//
Description of Social Risk Variable //AHRQ SES Index
Quartile//Q1//Q4
Social Risk Proportion(%)//(0-6.72)//(17.45-93.33)
# of Hospitals//582//581
100%Max//15.7//17.1
90%//13.6//14.0
75%//13.1//13.4
50%//12.4//12.7
25%//11.8//12.1
10%//11.2//11.5
0%Min//9.3//8.8

1b.5. **If no or limited data on disparities from the measure as specified is reported in 1b.4, then provide a summary of data from the literature that addresses disparities in care on the specific focus of measurement. Include citations. Not necessary if performance data provided in 1b.4**
N/A

2. Reliability and Validity—Scientific Acceptability of Measure Properties

Extent to which the measure, as specified, produces consistent (reliable) and credible (valid) results about the quality of care when implemented. ***Measures must be judged to meet the sub criteria for both reliability and validity to pass this criterion and be evaluated against the remaining criteria.***

2a.1. Specifications The measure is well defined and precisely specified so it can be implemented consistently within and across organizations and allows for comparability. eMeasures should be specified in the Health Quality Measures Format (HQMF) and the Quality Data Model (QDM).

De.5. **Subject/Topic Area** *(check all the areas that apply):*
Cardiovascular, Cardiovascular : Coronary Artery Disease (AMI)

De.6. **Non-Condition Specific***(check all the areas that apply):*
Safety

De.7. **Target Population Category** *(Check all the populations for which the measure is specified and tested if any):*
Elderly, Populations at Risk

S.1. **Measure-specific Web Page** *(Provide a URL link to a web page specific for this measure that contains current detailed specifications including code lists, risk model details, and supplemental materials. Do not enter a URL linking to a home page or to general information.)*
https://www.qualitynet.org/inpatient/measures/mortality

S.2a. **If this is an eMeasure**, HQMF specifications must be attached. Attach the zipped output from the eMeasure authoring tool (MAT) - if the MAT was not used, contact staff. (Use the specification fields in this online form for the plain-language description of the specifications)
This is not an eMeasure **Attachment:**

S.2b. **Data Dictionary, Code Table, or Value Sets** *(and risk model codes and coefficients when applicable) must be attached. (Excel or csv file in the suggested format preferred - if not, contact staff)*
Attachment **Attachment:** NQF_datadictionary_AMImortality_Fall2020_final_7.22.20.xlsx

S.2c. Is this an instrument-based measure (i.e., data collected via instruments, surveys, tools, questionnaires, scales, etc.)? Attach copy of instrument if available.
No, this is not an instrument-based measure **Attachment:**

S.2d. Is this an instrument-based measure (i.e., data collected via instruments, surveys, tools, questionnaires, scales, etc.)? Attach copy of instrument if available.
Not an instrument-based measure

S.3.1. **For maintenance of endorsement:** Are there changes to the specifications since the last updates/submission. If yes, update the specifications for S1-2 and S4-22 and explain reasons for the changes in S3.2.
No

S.3.2. **For maintenance of endorsement,** please briefly describe any important changes to the measure specifications since last measure update and explain the reasons.
Updates consisted of updating the specifications to include new and modified ICD-10 CM/PCS codes.

S.4. **Numerator Statement** *(Brief, narrative description of the measure focus or what is being measured about the target population, i.e., cases from the target population with the target process, condition, event, or outcome) DO NOT include the rationale for the measure.*
IF an OUTCOME MEASURE, state the outcome being measured. Calculation of the risk-adjusted outcome should be described in the calculation algorithm (S.14).
The outcome for this measure is 30-day all-cause mortality. We define mortality as death from any cause within 30 days from the date of admission for patients hospitalized with a principal diagnosis of AMI.

S.5. **Numerator Details** *(All information required to identify and calculate the cases from the target population with the target process, condition, event, or outcome such as definitions, time period for data collection, specific data collection items/responses, code/value sets – Note: lists of individual codes with descriptors that exceed 1 page should be provided in an Excel or csv file in required format at S.2b)*
IF an OUTCOME MEASURE, describe how the observed outcome is identified/counted. Calculation of the risk-adjusted outcome should be described in the calculation algorithm (S.14).
The measure counts all deaths (including in-hospital deaths) for any cause to any acute care hospital within 30 days of the date of the index AMI hospitalization.
Identifying deaths in the FFS measure
As currently reported, we identify deaths for FFS Medicare patients 65 years and older in the Medicare Enrollment Database (EDB) and for VA patients in the VA data.

S.6. **Denominator Statement** *(Brief, narrative description of the target population being measured)*
This claims-based measure is used for patients aged 65 years or older.

The cohort includes admissions for patients aged 65 years and older discharged from the hospital with a principal discharge diagnosis of AMI and with a complete claims history for the 12 months prior to admission. The measure is publicly reported by CMS for those patients 65 years and older who are Medicare FFS or VA beneficiaries admitted to non-federal or VA hospitals, respectively.

Additional details are provided in S.7 Denominator Details.

S.7. **Denominator Details** *(All information required to identify and calculate the target population/denominator such as definitions, time period for data collection, specific data collection items/responses, code/value sets – Note: lists of individual codes with descriptors that exceed 1 page should be provided in an Excel or csv file in required format at S.2b.)*
IF an OUTCOME MEASURE, describe how the target population is identified. Calculation of the risk-adjusted outcome should be described in the calculation algorithm (S.14).
To be included in the measure cohort used in public reporting, patients must meet the following inclusion criteria:
1. Having a principal discharge diagnosis of AMI;
2. Enrolled in Medicare fee-for-service (FFS) Part A and Part B for the 12 months prior to the date of the index admission and Part A during the index admission, or those who are VA beneficiaries;
3. Aged 65 or over; and
4. Not transferred from another acute care facility.

We have explicitly tested the measure for those aged 65+ years (see Testing Attachment for details).

S.8. **Denominator Exclusions** *(Brief narrative description of exclusions from the target population)*
The mortality measures exclude index admissions for patients:

1. Discharged alive on the day of admission or the following day who were not transferred to another acute care facility;
2. With inconsistent or unknown vital status or other unreliable demographic (age and gender) data;
3. Enrolled in the Medicare hospice program or used VA hospice services any time in the 12 months prior to the index admission, including the first day of the index admission; or
4. Discharged against medical advice (AMA).

For patients with more than one admission for a given condition in a given year, only one index admission for that condition is randomly selected for inclusion in the cohort.

S.9. **Denominator Exclusion Details** *(All information required to identify and calculate exclusions from the denominator such as definitions, time period for data collection, specific data collection items/responses, code/value sets – Note: lists of individual codes with descriptors that exceed 1 page should be provided in an Excel or csv file in required format at S.2b.)*
1. The discharge disposition indicator is used to identify patients alive at discharge. Transfers are identified in the claims when a patient with a qualifying admission is discharged from an acute care hospital and admitted to another acute care hospital on the same day or next day. Patient length of stay and condition is identified from the admission claim.
Rationale: This exclusion prevents inclusion of patients who likely did not have clinically significant AMI.

2. Inconsistent vital status or unreliable data are identified if any of the following conditions are met 1) the patient's age is greater than 115 years; 2) if the discharge date for a hospitalization is before the admission date; and 3) if the patient has a sex other than 'male' or 'female'.
Rationale: Reliable and consistent data are necessary for valid calculation of the measure.

3. Hospice enrollment in the 12 months prior to or on the index admission is identified using hospice data. This exclusion applies when the measure is used in Medicare FFS patients only.
Rationale: These patients are likely continuing to seek comfort measures only; thus, mortality is not necessarily an adverse outcome or signal of poor quality care.

4. Discharges against medical advice (AMA) are identified using the discharge disposition indicator in claims data.
Rationale: Providers did not have the opportunity to deliver full care and prepare the patient for discharge.

S.10. **Stratification Information** *(Provide all information required to stratify the measure results, if necessary, including the stratification variables, definitions, specific data collection items/responses, code/value sets, and the risk-model covariates and coefficients for the clinically-adjusted version of the measure when appropriate – Note: lists of individual codes with descriptors that exceed 1 page should be provided in an Excel or csv file in required format with at S.2b.)*
N/A

S.11. **Risk Adjustment Type** (Select type. Provide specifications for risk stratification in measure testing attachment)
Statistical risk model
If other:

S.12. **Type of score:**
Rate/proportion
If other:

S.13. **Interpretation of Score** *(Classifies interpretation of score according to whether better quality is associated with a higher score, a lower score, a score falling within a defined interval, or a passing score)*
Better quality = Lower score

S.14. **Calculation Algorithm/Measure Logic** (*Diagram or describe the calculation of the measure score as an ordered sequence of steps including identifying the target population; exclusions; cases meeting the target process, condition, event, or outcome; time period for data, aggregating data; risk adjustment; etc.)*
The measure estimates hospital-level 30-day all-cause RSMRs following hospitalization for AMI using hierarchical logistic regression models. In brief, the approach simultaneously models data at the patient and hospital levels to account for variance in patient outcomes within and between hospitals [Normand and Shahian, 2007]. At the patient level, it models the log-odds of mortality within 30 days of index admission using age, sex, selected clinical covariates, and a hospital-specific intercept. At the hospital level, it models the hospital-specific intercepts as arising from a normal distribution. The hospital intercept represents the underlying risk of a mortality at the hospital, after accounting for patient risk. The hospital-specific intercepts are given a distribution to account for the clustering (non-independence) of patients within the same hospital. If there were no differences among hospitals, then after adjusting for patient risk, the hospital intercepts should be identical across all hospitals.
The RSMR is calculated as the ratio of the number of "predicted" to the number of "expected" deaths at a given hospital, multiplied by the national observed mortality rate. For each hospital, the numerator of the ratio is the number of deaths within 30 days predicted on the basis of the hospital's performance with its observed case mix, and the denominator is the number of deaths expected based on the nation's performance with that hospital's case mix. This approach is analogous to a ratio of "observed" to "expected" used in other types of statistical analyses. It conceptually allows for a comparison of a particular hospital's performance given its case mix to an average hospital's performance with the same case mix. Thus, a lower ratio indicates lower-than-expected mortality rates or better quality, and a higher ratio indicates higher-than-expected mortality rates or worse quality.
The "predicted" number of deaths (the numerator) is calculated by using the coefficients estimated by regressing the risk factors and the hospital-specific intercept on the risk of mortality. The estimated hospital-specific intercept is added coefficients multiplied by the patient characteristics. The results are transformed and summed over all patients attributed to a hospital to get a predicted value. The "expected" number of deaths (the denominator) is obtained in the same manner, but a common intercept using all hospitals in our sample is added in place of the hospital-specific intercept. The results are transformed and summed over all patients in the hospital to get an expected value. To assess hospital performance for each reporting period, we re-estimate the model coefficients using the years of data in that period.
This calculation transforms the ratio of predicted over expected into a rate that is compared to the national observed readmission rate. The hierarchical logistic regression models are described fully in the original methodology report posted on QualityNet [https://qualitynet.org/inpatient/measures/mortality/methodology].
References:
1. Normand S-LT, Shahian DM. 2007. Statistical and Clinical Aspects of Hospital Outcomes Profiling. Stat Sci 22(2): 206-226.
2. Krumholz H, Normand S, Galusha D, et al. Risk-Adjustment Models for AMI and HF 30-Day Mortality Methodology. 2005.

S.15. **Sampling** *(If measure is based on a sample, provide instructions for obtaining the sample and guidance on minimum sample size.)*
IF an instrument-based performance measure (e.g., PRO-PM), identify whether (and how) proxy responses are allowed.
N/A. This measure is not based on a sample or survey.

S.16. **Survey/Patient-reported data** *(If measure is based on a survey or instrument, provide instructions for data collection and guidance on minimum response rate.)*
Specify calculation of response rates to be reported with performance measure results.
N/A. This measure is not based on a sample or survey.

S.17. **Data Source** *(Check ONLY the sources for which the measure is SPECIFIED AND TESTED).*

If other, please describe in S.18.
Claims, Enrollment Data, Other

S.18. **Data Source or Collection Instrument** *(Identify the specific data source/data collection instrument (e.g. name of database, clinical registry, collection instrument, etc., and describe how data are collected.)*
IF instrument-based, identify the specific instrument(s) and standard methods, modes, and languages of administration.
Data sources for the Medicare FFS measure:
Medicare Part A Inpatient and Part B Outpatient Claims: This data source contains claims data for FFS inpatient and outpatient services including: Medicare inpatient hospital care, outpatient hospital services, skilled nursing facility care, some home health agency services, as well as inpatient and outpatient physician claims for the 12 months prior to an index admission.
Medicare Enrollment Database (EDB): This database contains Medicare beneficiary demographic, benefit/coverage, and vital status information. This data source was used to obtain information on several inclusion/exclusion indicators such as Medicare status on admission as well as vital status. These data have previously been shown to accurately reflect patient vital status (Fleming et al., 1992). The Master Beneficiary Summary File (MBSF) is an annually created file derived the EDB that contains enrollment information for all Medicare beneficiaries including dual eligible status. Years 2016-2019 were used.
Veterans Health Administration (VA) Data: This data source contains data for VA inpatient and outpatient services including: inpatient hospital care, outpatient hospital services, skilled nursing facility care, some home health agency services, as well as inpatient and outpatient physician data for the 12 months prior to and including each index admission. Unlike Medicare FFS patients, VA patients are not required to have been enrolled in Part A and Part B Medicare for the 12 months prior to the date of admission.
The American Community Survey (2013-2017): The American Community Survey data is collected annually and an aggregated 5-years data were used to calculate the Agency for Healthcare Research and Quality (AHRQ) Socioeconomic Status (SES) composite index score.
References:
Fleming C, Fisher ES, Chang CH, Bubolz TA, Malenka DJ. Studying outcomes and hospital utilization in the elderly: The advantages of a merged data base for Medicare and Veterans Affairs hospitals. Medical Care. 1992; 30(5): 377-91.

S.19. **Data Source or Collection Instrument** *(available at measure-specific Web page URL identified in S.1 OR in attached appendix at A.1)*
No data collection instrument provided

S.20. **Level of Analysis** *(Check ONLY the levels of analysis for which the measure is SPECIFIED AND TESTED)*
Facility

S.21. **Care Setting** *(Check ONLY the settings for which the measure is SPECIFIED AND TESTED)*
Inpatient/Hospital
If other:

S.22. **COMPOSITE Performance Measure** - Additional Specifications *(Use this section as needed for aggregation and weighting rules, or calculation of individual performance measures if not individually endorsed.)*
N/A

2. Validity – See attached Measure Testing Submission Form
NQF_testing_AMImortality_Fall2020_final_10.27.20_updated_11_17_20.docx

2.1 For maintenance of endorsement
Reliability testing: If testing of reliability of the measure score was not presented in prior submission(s), has reliability testing of the measure score been conducted? If yes, please provide results in the Testing attachment. Please use the most current version of the testing attachment (v7.1). Include information on all testing conducted (prior testing as well as any new testing); use red font to indicate updated testing.
Yes

2.2 For maintenance of endorsement
Has additional empirical validity testing of the measure score been conducted? If yes, please provide results in the Testing attachment. Please use the most current version of the testing attachment (v7.1). Include information on all testing conducted (prior

testing as well as any new testing); use red font to indicate updated testing.
Yes

2.3 For maintenance of endorsement
Risk adjustment: For outcome, resource use, cost, and some process measures, risk-adjustment that includes social risk factors is not prohibited at present. Please update sections 1.8, 2a2, 2b1,2b4.3 and 2b5 in the Testing attachment and S.140 and S.11 in the online submission form. NOTE: These sections must be updated even if social risk factors are not included in the risk-adjustment strategy. You MUST use the most current version of the Testing Attachment (v7.1) -- older versions of the form will not have all required questions.
Yes - Updated information is included

3. Feasibility

Extent to which the specifications including measure logic, require data that are readily available or could be captured without undue burden and can be implemented for performance measurement.

3a. Byproduct of Care Processes
For clinical measures, the required data elements are routinely generated and used during care delivery (e.g., blood pressure, lab test, diagnosis, medication order).

3a.1. **Data Elements Generated as Byproduct of Care Processes.**
Coded by someone other than person obtaining original information (e.g., DRG, ICD-9 codes on claims)
If other:

3b. Electronic Sources
The required data elements are available in electronic health records or other electronic sources. If the required data are not in electronic health records or existing electronic sources, a credible, near-term path to electronic collection is specified.

3b.1. **To what extent are the specified data elements available electronically in defined fields** (*i.e., data elements that are needed to compute the performance measure score are in defined, computer-readable fields*) Update this field for **maintenance of endorsement**.
ALL data elements are in defined fields in electronic claims

3b.2. **If ALL the data elements needed to compute the performance measure score are not from electronic sources, specify a credible, near-term path to electronic capture, OR provide a rationale for using other than electronic sources.** For **maintenance of endorsement**, if this measure is not an eMeasure (eCQM), please describe any efforts to develop an eMeasure (eCQM).
N/A

3b.3. **If this is an eMeasure, provide a summary of the feasibility assessment in an attached file or make available at a measure-specific URL. Please also complete and attach the NQF Feasibility Score Card.**
Attachment:

3c. Data Collection Strategy
Demonstration that the data collection strategy (e.g., source, timing, frequency, sampling, patient confidentiality, costs associated with fees/licensing of proprietary measures) can be implemented (e.g., already in operational use, or testing demonstrates that it is ready to put into operational use). For eMeasures, a feasibility assessment addresses the data elements and measure logic and demonstrates the eMeasure can be implemented or feasibility concerns can be adequately addressed.

3c.1. **Required for maintenance of endorsement. Describe difficulties (as a result of testing and/or operational use of the measure) regarding data collection, availability of data, missing data, timing and frequency of data collection, sampling, patient confidentiality, time and cost of data collection, other feasibility/implementation issues.**
IF instrument-based, consider implications for both individuals providing data (patients, service recipients, respondents) and those whose performance is being measured.
This measure uses administrative claims data and enrollment data and as such, offers no data collection burden to hospitals or providers.

3c.2. **Describe any fees, licensing, or other requirements to use any aspect of the measure as specified** *(e.g., value/code set, risk model, programming code, algorithm)*.
N/A

4. Usability and Use

Extent to which potential audiences (e.g., consumers, purchasers, providers, policy makers) are using or could use performance results for both accountability and performance improvement to achieve the goal of high-quality, efficient healthcare for individuals or populations.

4a. Accountability and Transparency

Performance results are used in at least one accountability application within three years after initial endorsement and are publicly reported within six years after initial endorsement (or the data on performance results are available). If not in use at the time of initial endorsement, then a credible plan for implementation within the specified timeframes is provided.

4.1. **Current and Planned Use**

NQF-endorsed measures are expected to be used in at least one accountability application within 3 years and publicly reported within 6 years of initial endorsement in addition to performance improvement.

Specific Plan for Use	Current Use (for current use provide URL)
	Public Reporting Hospital Compare https://www.medicare.gov/hospitalcompare/search.html? Hospital Compare https://www.medicare.gov/hospitalcompare/search.html? Payment Program Hospital Value Based Purchasing (HVBP) Program https://www.qualitynet.org/inpatient/hvbp Hospital Value Based Purchasing (HVBP) Program https://www.qualitynet.org/inpatient/hvbp

4a1.1 **For each CURRENT use, checked above (update for maintenance of endorsement), provide:**

- Name of program and sponsor
- Purpose
- Geographic area and number and percentage of accountable entities and patients included
- Level of measurement and setting

Public Reporting
Program Name, Sponsor: Hospital Compare, Centers for Medicare and Medicaid Services (CMS)

Purpose: Under Hospital Compare and other CMS public reporting websites, CMS collects quality data from hospitals, with the goal of driving quality improvement through measurement and transparency by publicly displaying data to help consumers make more informed decisions about their health care. It is also intended to encourage hospitals and clinicians to improve the quality and cost of inpatient care provided to all patients. The data collected are available to consumers and providers on the Hospital Compare website at: https://www.medicare.gov/hospitalcompare/search.html. Data for selected measures are also used for paying a portion of hospitals based on the quality and efficiency of care, including the Hospital Value-Based Purchasing Program, Hospital-Acquired Condition Reduction Program, and Hospital Readmissions Reduction Program.

Payment Program
Program Name, Sponsor: Hospital Value-Based Purchasing (HVBP) Program, Centers for Medicare and Medicaid Services (CMS)

Purpose: The Hospital Value-Based Purchasing (VBP) Program is a CMS initiative that rewards acute-care hospitals with incentive

payments for the quality of care they provide to people with Medicare. It was established by the Affordable Care Act of 2010 (ACA), which added Section 1886(o) to the Social Security Act. The law requires the Secretary of the Department of Health and Human Services (HHS) to establish a value-based purchasing program for inpatient hospitals. To improve quality, the ACA builds on earlier legislation—the 2003 Medicare Prescription Drug, Improvement, and Modernization Act and the 2005 Deficit Reduction Act. These earlier laws established a way for Medicare to pay hospitals for reporting on quality measures, a necessary step in the process of paying for quality rather than quantity.
Geographic area and number and percentage of accountable entities and patients included: More than 3,000 hospitals across the country are eligible to participate in Hospital VBP. The program applies to subsection (d) hospitals located in the 50 states and the District of Columbia and acute-care hospitals in Maryland. More details about the Hospital VBP program are online at https://www.qualitynet.org/inpatient/hvbp.

The following hospitals are excluded from Hospital VBP:
• Hospitals and hospital units excluded from the Inpatient Prospective Payment System, such as psychiatric, rehabilitation, long-term care, children's, and cancer hospitals;
• Hospitals that are located in the state of Maryland participating in the Maryland All-Payer Model;
• Hospitals subject to payment reductions under the Hospital Inpatient Quality Reporting (IQR) Program;
• Hospitals cited by the Secretary of HHS for deficiencies during the performance period that pose an immediate jeopardy to patients' health or safety;
• Hospitals with an approved extraordinary circumstance exception specific to Hospital VBP; and
• Hospitals that do not meet the minimum number of cases, measures, or surveys required by Hospital VBP.

4a1.2. **If not currently publicly reported OR used in at least one other accountability application (e.g., payment program, certification, licensing) what are the reasons?** (*e.g., Do policies or actions of the developer/steward or accountable entities restrict access to performance results or impede implementation?*)
N/A, this measure is currently publicly reported

4a1.3. **If not currently publicly reported OR used in at least one other accountability application, provide a credible plan for implementation within the expected timeframes -- any accountability application within 3 years and publicly reported within 6 years of initial endorsement.** (*Credible plan includes the specific program, purpose, intended audience, and timeline for implementing the measure within the specified timeframes. A plan for accountability applications addresses mechanisms for data aggregation and reporting.*)
N/A, this measure is currently publicly reported

4a2.1.1. **Describe how performance results, data, and assistance with interpretation have been provided to those being measured or other users during development or implementation.**
How many and which types of measured entities and/or others were included? If only a sample of measured entities were included, describe the full population and how the sample was selected.
The exact number of measured entities (acute care hospitals) varies with each new measurement period. For the period between 2016-2019, all non-federal short-term acute care hospitals (including Indian Health Service hospitals), critical access hospitals, and VA hospitals (4,246 hospitals) were included in the measure calculation. Only those hospitals with at least 25 AMI admissions were included in public reporting.

Each hospital receives their measure results in Spring of each calendar year through CMS's QualityNet website. The results are then publicly reported on CMS's Hospital Compare website in July of each calendar year. Since the measure is risk standardized using data from all hospitals, hospitals cannot independently calculate their score.

However, CMS provides each hospital with several resources that aid in the interpretation of their results (described in detail below). These include Hospital-Specific Reports with details about every patient from their facility that was included in the measure calculation (for example, dates of admission and discharge, discharge diagnoses, outcome [died or not], transfer status, and facility transferred from). These reports facilitate quality improvement activities such as review of individual deaths and patterns of deaths; make visible to hospitals post-discharge outcomes that they may otherwise be unaware of; and allow hospitals to look for patterns that may inform quality improvement (QI) work (e.g. among patient transferred in from particular facilities). CMS also provides measure FAQs, webinars, and measure-specific question and answer inboxes for stakeholders to ask specific questions.

The Hospital-Specific Reports also provide hospitals with more detailed benchmarks with which to gauge their performance relative to peer hospitals and interpret their results, including comorbidity frequencies for their patients relative to other hospitals in their state and the country.

Additionally, the code used to process the claims data and calculate measure results is written in SAS (Cary, NC) and is provided each year to hospitals upon request.

4a2.1.2. **Describe the process(es) involved, including when/how often results were provided, what data were provided, what educational/explanatory efforts were made, etc.**
During the Spring of each year, hospitals have access to the following list of updated resources related to the measure which is provided directly or posted publicly for hospitals to use:

1. Hospital-Specific Reports (HSR): available for hospitals to download from QualityNet in April/May of each calendar year; includes information on the index admissions included in the measure calculation for each facility, detailed measure results, and state and national results.
2. HSR User Guide: available with the HSR and posted on QualityNet; provides instructions for interpreting the results and descriptions of each data field in the HSR.
3. Mock HSR: posted on QualityNet; provides real national results and simulated state and hospital results for stakeholders who do not receive an HSR.
4. HSR Tutorial Video: A brief animated video to help hospitals navigate their HSR and interpret the information provided.
5. Public Reporting Preview and Preview Help Guide: available for hospitals to view from QualityNet in Spring of each calendar year; includes measure results that will be publicly reported on CMS's public reporting websites.
6. Annual Updates and Specification Reports: posted in April/May of each calendar year on QualityNet with detailed measure specifications, descriptions of changes made to the measure specifications with rationale and impact analysis (when appropriate), updated risk variable frequencies and coefficients for the national cohort, and updated national results for the new measurement period.
7. Frequently asked Questions (FAQs): includes general and measure-specific questions and responses, as well as infographics that explain complex components of the measure's methodology, and are posted in April/May of each calendar year on QualityNet.
8. The SAS code used to calculate the measure with documentation describing what data files are used and how the SAS code works. This code and documentation are updated each year and are released upon request beginning in July of each year.
9. Measure Fact Sheets: provides a brief overview of measures, measure updates, and are posted in April/May of each calendar year on QualityNet.

During the summer of each year, the publicly-reported measure results are posted on CMS's public reporting websites, a tool to find hospitals and compare their quality of care that CMS created in collaboration with organizations representing consumers, hospitals, doctors, employers, accrediting organizations, and other federal agencies. Measure results are updated in July of each calendar year.

4a2.2.1. **Summarize the feedback on measure performance and implementation from the measured entities and others described in 4d.1.**
Describe how feedback was obtained.
Question and Answer Inbox (Q&A)
The measured entities (acute care hospitals) and other stakeholders or interested parties submit questions or comments about the measure through an email inbox (CMSmortalitymeasures@yale.edu). Experts on measure specifications, calculation, or implementation, prepare responses to those inquiries and reply directly to the sender. We consider issues raised through the Q&A process about measure specifications or measure calculation in measure reevaluation.

Literature Reviews
In addition, we routinely scan the literature for scholarly articles describing research related to this measure. We summarize new information obtained through these reviews every 3 years as a part of comprehensive reevaluation as mandated by the Measure Management System (MMS) Blueprint.

4a2.2.2. **Summarize the feedback obtained from those being measured.**
Summary of Questions or Comments from Hospitals submitted through the Q & A process:

For the AMI mortality measure, we have received the following inquiries from hospitals since the last endorsement maintenance cycle:
1. Requests for detailed measure specifications including the ICD-9 and ICD-10 codes used to define the measure cohort or in the risk-adjustment model;
2. Request for the SAS code used to calculate measure results;
3. Requests about the data source used to calculate the measure;
4. Question about how transfers are handled in the measure calculation;
5. Requests for hospital-specific measure information such as HSRs; and
6. Requests for clarification of how inclusion and exclusion criteria are applied

4a2.2.3. **Summarize the feedback obtained from other users**
Summary of Question and Comments from Other Stakeholders:

For the AMI mortality measure, we have received the following feedback from other stakeholders since the last endorsement maintenance cycle:
1. Requests for detailed measure specifications including the narrative specifications for the measure, CC-to-ICD-9 code crosswalks, and ICD-9 and ICD-10 codes used to define the measure cohort or in the risk-adjustment model;
2. Requests for the data source and the SAS code used to calculate measure results;
3. Requests for clarification of how inclusion and exclusion criteria are applied;
4. Queries about how cohorts and outcomes are defined;
5. Questions about how transfers are handled in the measure calculation.

Summary of Relevant Publications from the Literature Review:
Since the last endorsement cycle, we have reviewed more than 600 articles related to mortality following AMI admissions. Relevant articles shared key themes related to: spillover effects of the AMI mortality measure on readmission rates for other conditions; considerations for additional risk adjustment variables, including social risk factors and other clinical comorbidities; association between public reporting of mortality rates and trends in mortality rates; potential unintended consequences of readmission measures on mortality outcomes; and, the clinical differences between different types of AMIs.

Researchers have conducted considerable investigation of potential unintended consequences since the implementation of the Hospital Readmission Reductions Program (HRRP). More specifically, the relationship between the implementation of the AMI, HF, and PN readmission measures in HRRP and subsequent trends in their respective mortality rates has been studied.
Some studies have argued that since HRRP implementation, readmissions for HRRP condition-specific measures decreased but post-discharge mortality may have increased, suggesting a potential unintended consequence that readmission measures may be incentivizing hospitals to not readily admit patients with AMI, and as a result, mortality rates increased (Gupta et al., 2018; Vaduganathan et al., 2019; Khera et al., 2018; Wadhera et al. 2018; Meyer et al., 2018). However, these same studies and others have acknowledged that AMI mortality specifically has declined since HRRP implementation, providing supporting evidence that there is no apparent rise in AMI mortality due to AMI readmission measure implementation in HRRP (Dharmarajan et al., 2017; MedPAC, 2018; Stensland., 2019).
Given the importance of this potential issue on patient outcomes, CMS commissioned an independent group to investigate whether there have been increases in mortality rates after HRRP implementation. CMS found through this investigation that no sufficient evidence exists to suggest that mortality has increased because of the HRRP readmission measures. CMS is committed to continuing to monitor trends in same-condition readmission and mortality rates through annual measure reevaluation and surveillance tasks.
References:
Dharmarajan K, Wang Y, Lin Z, et al. Association of Changing Hospital Readmission Rates With Mortality Rates After Hospital Discharge. JAMA. 2017;318(3):270-278.
Gupta A, Allen LA, Bhatt DL, et al. Association of the Hospital Readmissions Reduction Program Implementation With Readmission and Mortality Outcomes in Heart Failure. JAMA Cardiol. 2018;3(1):44-53.
Khera R, Dharmarajan K, Wang Y, et al. Association of the Hospital Readmissions Reduction Program With Mortality During and After Hospitalization for Acute Myocardial Infarction, Heart Failure, and Pneumonia. JAMA Netw Open. 2018;1(5):e182777.
Medicare Payment Advisory Commission. Mandated report: The effects of the Hospital Readmissions Reduction Program. Washington, DC 07/18 2018.
Meyer N, Harhay MO, Small DS, et al. Temporal Trends in Incidence, Sepsis-Related Mortality, and Hospital-Based Acute Care After

Sepsis. Crit Care Med. 2018;46(3):354-360.
Stensland J. MedPAC evaluation of Medicare's Hospital Readmission Reduction Program: Update. In:2019.
Wadhera RK, Joynt Maddox KE, Wasfy JH, Haneuse S, Shen C, Yeh RW. Association of the Hospital Readmissions Reduction Program With Mortality Among Medicare Beneficiaries Hospitalized for Heart Failure, Acute Myocardial Infarction, and Pneumonia. JAMA. 2018;320(24):2542-2552.
Vaduganathan M, McCarthy CP, Ayers C, et al. Longitudinal Trajectories of Hospital Performance across Targeted Cardiovascular Conditions in the United States. Eur Heart J Qual Care Clin Outcomes. 2019.

4a2.3. **Describe how the feedback described in 4a2.2.1 has been considered when developing or revising the measure specifications or implementation, including whether the measure was modified and why or why not.**
Each year, issues raised through the Q&A or in the literature related to this measure are considered by measure and clinical experts. Any issues that warrant additional analytic work due to potential changes in the measure specifications are addressed as a part of annual measure reevaluation. If small changes are indicated after additional analytic work is complete, those changes are usually incorporated into the measure in the next measurement period. If the changes are substantial, CMS may propose the changes through rulemaking and adopt the changes only after CMS received public comment on the changes and finalizes those changes in the IPPS or other rule. There were no questions or issues raised by stakeholders requiring additional analysis or changes to the measure since the last endorsement maintenance cycle.

Improvement
Progress toward achieving the goal of high-quality, efficient healthcare for individuals or populations is demonstrated. If not in use for performance improvement at the time of initial endorsement, then a credible rationale describes how the performance results could be used to further the goal of high-quality, efficient healthcare for individuals or populations.

4b1. **Refer to data provided in 1b but do not repeat here. Discuss any progress on improvement (trends in performance results, number and percentage of people receiving high-quality healthcare; Geographic area and number and percentage of accountable entities and patients included.)**
If no improvement was demonstrated, what are the reasons? If not in use for performance improvement at the time of initial endorsement, provide a credible rationale that describes how the performance results could be used to further the goal of high-quality, efficient healthcare for individuals or populations.
The median hospital 30-day, all-cause, RSMR for the AMI mortality measure for the 3-year period between July 1, 2016 and June 30, 2019 was 12.7%. The median RSMR decreased by 0.4 absolute percentage points from July 2016-June 2017 (median RSMR: 12.8%) to July 2018-June 2019 (median: RSMR: 12.4%).

4b2. Unintended Consequences
The benefits of the performance measure in facilitating progress toward achieving high-quality, efficient healthcare for individuals or populations outweigh evidence of unintended negative consequences to individuals or populations (if such evidence exists).

4b2.1. **Please explain any unexpected findings (positive or negative) during implementation of this measure including unintended impacts on patients.**
We did not identify any unintended consequences during measure development or model testing. However, we are committed to monitoring this measure's use and assessing potential unintended consequences over time, such as the inappropriate shifting of care, increased patient morbidity and mortality, and other negative unintended consequences for patients.

4b2.2. **Please explain any unexpected benefits from implementation of this measure.**
N/A

5. Comparison to Related or Competing Measures

If a measure meets the above criteria and there are endorsed or new related measures (either the same measure focus or the same target population) or competing measures (both the same measure focus and the same target population), the measures are compared to address harmonization and/or selection of the best measure.

5. Relation to Other NQF-endorsed Measures
Are there related measures (conceptually, either same measure focus or target population) or competing measures (conceptually

both the same measure focus and same target population)? If yes, list the NQF # and title of all related and/or competing measures.
Yes

5.1a. **List of related or competing measures (selected from NQF-endorsed measures)**
0229 : Hospital 30-Day, All-Cause, Risk-Standardized Mortality Rate (RSMR) Following Heart Failure (HF) Hospitalization
0330 : Hospital 30-day, all-cause, risk-standardized readmission rate (RSRR) following heart failure (HF) hospitalization
0468 : Hospital 30-day, all-cause, risk-standardized mortality rate (RSMR) following pneumonia hospitalization
0505 : Hospital 30-day all-cause risk-standardized readmission rate (RSRR) following acute myocardial infarction (AMI) hospitalization.
0506 : Hospital 30-day, All-Cause, Risk-Standardized Readmission Rate (RSRR) Following Pneumonia Hospitalization
0730 : Acute Myocardial Infarction (AMI) Mortality Rate
1893 : Hospital 30-Day, all-cause, risk-standardized mortality rate (RSMR) following chronic obstructive pulmonary disease (COPD) hospitalization
2431 : Hospital-level, risk-standardized payment associated with a 30-day episode-of-care for Acute Myocardial Infarction (AMI)
3502 : Hybrid Hospital-Wide (All-Condition, All-Procedure) Risk-Standardized Mortality Measure
3504 : Claims-Only Hospital-Wide (All-Condition, All-Procedure) Risk-Standardized Mortality Measure

5.1b. **If related or competing measures are not NQF endorsed please indicate measure title and steward.**

5a. Harmonization of Related Measures
The measure specifications are harmonized with related measures;
OR
The differences in specifications are justified

5a.1. **If this measure conceptually addresses EITHER the same measure focus OR the same target population as NQF-endorsed measure(s):**
Are the measure specifications harmonized to the extent possible?
Yes

5a.2. **If the measure specifications are not completely harmonized, identify the differences, rationale, and impact on interpretability and data collection burden.**
We did not include in our list of related measures any non-outcome (e.g., process) measures with the same target population as our measure. Our measure cohort was heavily vetted by clinical experts, a technical expert panel, and a public comment period. Additionally, the measure, with the specified cohort, has been publicly reported since 2008. Because this is an outcome measure, clinical coherence of the cohort takes precedence over alignment with related non-outcome measures. Furthermore, non-outcome measures are limited due to broader patient exclusions. This is because they typically only include a specific subset of patients who are eligible for that measure (for example, patients who receive a specific medication or undergo a specific procedure).

5b. Competing Measures
The measure is superior to competing measures (e.g., is a more valid or efficient way to measure);
OR
Multiple measures are justified.

5b.1. **If this measure conceptually addresses both the same measure focus and the same target population as NQF-endorsed measure(s):**
Describe why this measure is superior to competing measures (e.g., a more valid or efficient way to measure quality); OR provide a rationale for the additive value of endorsing an additional measure. (Provide analyses when possible.)
N/A

Appendix

A.1 Supplemental materials may be provided in an appendix. All supplemental materials (such as data collection instrument or methodology reports) should be organized in one file with a table of contents or bookmarks. If material pertains to a specific

submission form number, that should be indicated. Requested information should be provided in the submission form and required attachments. There is no guarantee that supplemental materials will be reviewed.
Available at measure-specific web page URL identified in S.1 **Attachment:**

Contact Information

Co.1 **Measure Steward (Intellectual Property Owner):** Centers for Medicare & Medicaid Services
Co.2 **Point of Contact:** Helen, Dollar-Maples, Helen.Dollar-Maples@cms.hhs.gov, 410-786-7214-
Co.3 **Measure Developer if different from Measure Steward:** Yale New Haven Health Services Corporation – Center for Outcomes Research and Evaluation (CORE)
Co.4 **Point of Contact:** Doris, Peter, Doris.peter@yale.edu

Additional Information

Ad.1 **Workgroup/Expert Panel involved in measure development**
Provide a list of sponsoring organizations and workgroup/panel members' names and organizations. Describe the members' role in measure development.
The working group involved in the initial measure development is detailed in the original technical report available at www.qualitynet.org.

Our measure development team consisted of the following members:

Kanchana R. Bhat, M.P.H., Project Coordinator
Elizabeth E. Drye, M.D., S.M., Project Director
Harlan M. Krumholz, M.D., S.M., Principal Investigator
Sharon-Lise T. Normand, Ph.D., Co-Investigator*
Geoffrey C. Schreiner, B.S., Research Assistant
Yongfei Wang, M.S., Senior Statistical Analyst
Yun Wang, Ph.D., Senior Biostatistician

Measure Developer/Steward Updates and Ongoing Maintenance
Ad.2 **Year the measure was first released:** 2008
Ad.3 **Month and Year of most recent revision:** 06, 2019
Ad.4 **What is your frequency for review/update of this measure?** This measure is updated annually.
Ad.5 **When is the next scheduled review/update for this measure?** 2020

Ad.6 **Copyright statement:** N/A
Ad.7 **Disclaimers:** N/A

Ad.8 **Additional Information/Comments:** N/A