Memo

TO: Pulmonary and Critical Care Steering Committee

FR: Kathryn Streeter, Project Manager
Reva Winkler, Senior Director

SU: Pulmonary and Critical Care Report Addendum Public and Member Comments

DA: December 11, 2012

The Pulmonary and Critical Care Steering Committee will meet via conference call on Wednesday, December 12. The purpose of the meeting is to:

1. Discuss comments received during the public and member comment period.
2. Provide input on responses to comments.
3. Determine whether reconsideration of any measures is warranted.

Please let us know if you have any questions.

Steering Committee Action:

Review the individual comments received during the public and member comment period and proposed responses. (Excel spreadsheet included in the meeting materials has been sorted by measures. Filters have also been applied to the spreadsheet so that custom filters can be applied by theme, submitter, member council, etc.)

Review comment themes (within this memo) and proposed responses.

Be prepared to provide feedback and input on proposed comment responses.

Conference Call Information: *Wednesday, December 12, 2012, 4-5 pm ET*

Please use the following information to access the conference call line:

Dial-in Number: (888) 799-5160
Conference ID: 78809796

Weblink: http://nqf.commpartners.com/se/Rd/Mt.aspx?566152

Comments on Pulmonary and Critical Care measures

NQF received **17** comments on the draft report addendum from the public and six NQF member organizations. The major themes of the comments and issues identified for Committee discussion are listed below. The full comments are detailed in the accompanying comment spreadsheet.   All comments and proposed responses are subject to discussion. The developers will be available on the call to respond to the comments and questions from the Committee.

Major Themes/Issues of the Measures

In addition to several comments that support the recommendations of the Steering Committee, comments were received regarding:

1. **Response to the concerns voiced during the initial project comment period in June 2012.**
2. **Support the planned readmission algorithm**
3. **Concerns with measure**

The following comments pertain to the following measures:

0506 Thirty-day all-cause risk standardized readmission rate following pneumonia hospitalizations

1891 Thirty-day all-cause risk standardized readmission rate following COPD hospitalizations

Theme 1- Response to the concerns voiced during the initial project comment period in June 2012.

> *Description:* A commenter commended the NQF, the Steering Committee and the measure developer (Yale/CMS) for their consideration of the concerns voiced by the AHA and other stakeholders during the initial project comment period in June 2012.

Theme 2 - Support the planned readmission algorithm

> *Description*: Several commenters noted support for the new planned readmission algorithm that is harmonized with the other NQF-endorsed readmission measures. Comments note, however, that the algorithm identifies a very small number of planned readmissions. The commenter suggest that there is an opportunity to use the field experience going forward to determine whether additional changes are warranted and request that the developer provide an assessment at the annual update. Another commenter recommended that the exclusion/inclusion selection criteria methodology be improved with frequent reviews and revisions.

Theme 3 – Concerns with the measures

> *Description:* Commenters voiced various concerns with the measures:

- Excluding patients with medical conditions or comorbidities that often require multiple episodes of care.
- Concerns about reliability.
- Distinguishing between related and unrelated admissions.
- Accounting for socioeconomic factors.
- The COPD measure should include ages 40 years and up.
- Use of hierarchical modeling in the risk adjustment methodology

ACTION ITEM: After reviewing the comments and the measure developer's responses, does the Committee wish to change their recommendations of the measures?