

All-Cause Admissions and Readmissions Steering Committee –Public Comments 1/27/14-2/10/14

Name of Commenter:	Organization Affiliated:	Comment:	Comment Received:
<p>Pamela Heckman Quality Improvement Specialist</p>	<p>Northeast Health Care Quality Foundation</p>	<p>To whom it may concern: I would like to nominate Ms. Patricia Ramsey to be part of your All-Cause Admissions and Readmissions Steering Committee. I am a Quality Improvement Specialist with Northeast Health Care Quality Foundation, the Medicare Quality Improvement Organization (QIO) for Maine, New Hampshire and Vermont and work with the nursing homes in our states. Of all the administrators that I know in our three states Ms. Ramsey was the first person that came to my mind when I read the email about seeking a nursing home representative. Patricia is an outstanding and active member of the New Hampshire state and local nursing home community. She is president of The Edgewood Centre, a nursing home in Portsmouth, New Hampshire. She would be interested in knowing more about the time commitment and said she would be very interested in the opportunity. Her contact information is: Patricia Ramsey, NHA President The Edgewood Centre 928 South St. Portsmouth, NH 03801 Office 603-766-2301 Cell 603-661-0058 Please let me know if I can be of further assistance in this matter. Sincerely, Pam Heckman</p>	<p>1/29/14</p>
		<p>Response: Thank you for your email. You can submit a nomination via our nominations portal on the NQF website. You will just have to fill the nomination form and submit a disclosure of interest. I have attached the call for nominations to give you more insight into our project and the time commitment. Please reach out if you have any additional questions. Thank you.</p>	<p>Response Sent: 1/29/14</p>

<p>Name of Commenter:</p> <p>John Hood Federal Affairs Manager</p>	<p>Organization Affiliated:</p> <p>Florida Hospital</p>	<p>Comment:</p> <p>Hello,</p> <p>Would you please send me more information about how to nominate hospital medicine representatives for this committee? Are there any guidelines or requirements for nominations?</p> <p>Best Regards, Johnny</p>	<p>Comment Received:</p> <p>1/29/14</p>
		<p>Response:</p> <p>Thanks for your email. You can submit a nomination via our nominations portal on the NQF website. There are no guidelines in particular, you will just have to fill the nomination form and submit a disclosure of interest.</p>	<p>Response Sent:</p> <p>1/29/14</p>
<p>Name of Commenter:</p> <p>Sean Ervin Pediatric and Internal Medicine Hospitalist</p>	<p>Organization Affiliated:</p> <p>Wake Forest Baptist Health Center</p>	<p>Comment:</p> <p>Would love to be considered for a spot on this committee.</p>	<p>Comment Received:</p> <p>1/30/14</p>
		<p>Response:</p> <p>Hi Dr. Ervin</p> <p>Thanks for your email. You can submit a nomination via our nominations portal on the NQF website. There are no guidelines in particular, you will just have to fill the nomination form and submit a disclosure of interest. I've also attached the call for nominations to give you more insight into our project and the time commitment.</p>	<p>Response Sent:</p> <p>1/30/14</p>
<p>Name of Commenter:</p> <p>Urvi Shah Senior Manager,</p>	<p>Organization Affiliated:</p> <p>American Health Care Association</p>	<p>Comment:</p> <p><i>January 31st, 2014</i></p>	<p>Comment Received:</p> <p>1/31/14</p>

Quality Improvement

*National Quality Forum
1030 15th Street NW
Suite 800
Washington, DC 20005*

RE: All-Cause Admissions and Readmissions Measures Proposed Roster

The American Health Care Association (AHCA) is the nation's leading long term care organization representing more than 11,000 non-profit and proprietary centers. Our members deliver the professional, compassionate, quality long term and post-acute care that more than 1.5 million of America's seniors and persons with disabilities rely on each day.

AHCA is pleased to have the opportunity to comment on the proposed roster for the All-Cause Admissions and Readmissions Steering Committee. In reviewing the roster we identified a gap in experience in the post-acute care sector, in particular skilled nursing care centers. We believe that this is a significant oversight as 40 percent of Medicare discharges from an acute care hospital require post-acute care, of these half are in skilled nursing care centers. Nearly, 90 percent of all admissions from a skilled nursing care center come from hospitals. This makes skilled nursing centers an important component to consider when examining rehospitalizations.


We would like to recommend that the following two individuals be added to the roster in order to fill the gap in representation from the skilled nursing care sector.

Debra Saliba

*Affiliated Adjunct Staff, Rand Corporation
Anna and Harry Borun Chair in Geriatrics and Gerontology, UCLA
Director, UCLA/JH Borun Center for Gerontological Research
Research Physician, VA GLAHS GRECC and HSR&D Center of Excellence
Phone: 1-310-825-8253*

Oran Intrator

*Associate Professor of Health Services Policy & Practice
Brown University
Phone: 1-401-863-3579*

		<p>Sincerely,</p>  <p>David Gifford Senior Vice President Quality and Regularity Affairs</p>	
		<p>Response:</p> <p>Thank you for your recommendation, we have filled the spot with Helen Chen, M.D., Chief Medical Officer, Hebrew SeniorLife Health Care Services and Hebrew Rehabilitation Center.</p>	<p>Response Sent: 2/10/14</p>
<p>Name of Commenter:</p> <p>Liza Greenberg Senior Consultant</p>	<p>Organization Affiliated:</p> <p>Medicaid Health Plans of America</p>	<p>Comment:</p> <p>Dear NQF Representative:</p> <p>It does not appear that you have a representative from a State Medicaid Agency or a Medicaid managed care organization (health plan). We encourage you to include this perspective. With the increased enrollment in the Medicaid program, and increased use of managed care for all Medicaid populations - including dual and disabled members, this perspective is essential</p> <p>Thank you for your consideration. Liza Greenberg</p>	<p>Comment Received:</p> <p>1/31/14</p>
		<p>Response: Thank you for your email. We did not receive a nomination from a State Medicaid Agency of Medicaid MCO. Due to the limited number of seats on the committee and the cross cutting nature of the measure's we have recieved, we could not accommodate an additional nomination at this time. We hope that you will participate in our project as a Public Member and continue to bring this perspective to our project.</p>	<p>Response Sent: 2/14/10</p>
<p>Name of Commenter:</p> <p>D.E.B. Potter Senior Survey Statistician</p>	<p>Organization Affiliated:</p> <p>Agency for Healthcare Research and Quality (AHRQ)</p>	<p>Comment:</p> <p>Dear NQF Collogues:</p> <p>I am writing to provide feedback on the proposed roster and potential gaps in expertise for the "All-Cause Admissions and Readmissions Measures" project.</p>	<p>Comment Received:</p> <p>1/31/14</p>

I serve as the AHRQ representative to NQF's Measures Applications Partnership (MAP) - Post-Acute Care/Long-Term Care Workgroup and the MAP Duals Eligible Workgroup (although I am writing to NQF as an individual with expertise in nursing home quality and policy, not as an official representative of AHRQ, or the HHS Office of the Assistant Secretary's Office of Disability, Aging and Long-Term Policy, or the U.S. Department of Health and Human Services).

As NQF noted when the proposed roster was released *"there are several gaps in the Standing Committee and is actively trying to fill these gaps, including representatives from Nursing Homes and Hospital Medicine."*

I would like to suggest that the gap on nursing homes be filled by Dr. Vincent Mor, Ph.D., Professor of Medical Science Florence Pirce Grant University, and Professor, Department of Health Services, Policy and Practice in the Department of Community Health, Brown University.

Dr. Mor "has been Principal Investigator of nearly 30 NIH funded grants focusing on the organizational and health care delivery system factors associated with variation in use of health services and the outcomes frail and chronically ill persons experience. He has also had multiple grants from the Agency for Healthcare Quality and Research, the Robert Wood Johnson Foundation, the Commonwealth Fund and the Retirement Research Foundation as well as contracts from the Centers for Medicare & Medicaid Services (formerly the Health Care Financing Administration) and the Office of the Assistant Secretary for Planning and Evaluation to evaluate the impact of programs and policies in aging and long term care. ...

Dr. Mor was one of the authors of the Congressionally mandated Minimum Data Set (MDS) for Nursing Home Resident Assessment and evaluated its implementation, focusing particularly on the manner it was implemented. Dr. Mor has developed several summary measures based upon MDS data to characterize residents' physical, cognitive and psycho-social functioning, all of which have been used in resident and facility level analyses of the quality of nursing home care in US and international populations. Dr. Mor was part of a team of researchers that developed and validate risk adjusted quality indicators for nursing homes versions of which are currently being used in public reporting throughout the country."

Among his more than 300+ peer reviewed publications are:

Mor V, Besdiine RW. Policy options to improve discharge planning and reduce rehospitalization. **JAMA**. 2011 Jan 19;305(3):302-3.

Mor V. Cost of nursing home regulation: building a research agenda. **Med Care**. 2011 Jun;49(6):535-7.

Mor V. System Factors Affecting Long-term Care Outcomes. **Med Care**. 2011 Sept;49(9): 787-9.

Gozalo P, Teno JM, Mitchell SL, Skinner J, Bynum J, Tyler D, **Mor V**. **N Engl J Med**. End-of-Life Transitions Among Nursing Home Residents with Cognitive Issues., 2011 Sep 29;365(13):1212-21.

Rahman M, Zinn JS, **Mor V**. **Health Serv Res**. The impact of hospital-based skilled nursing facility closures on rehospitalizations.2013 Apr;48(2 Pt 1):499-518. doi: 10.1111/1475-6773.12001. Epub 2012 Oct 4. PMID: 23033808

Teno JM, Gozalo PL, Bynum JP, Leland NE, Miller SC, Morden NE, Scupp T, Goodman DC, **Mor V**.**JAMA**. Change in end-of-life care for Medicare beneficiaries: site of death, place of care, and health care transitions in 2000, 2005, and 2009. 2013 Feb 6;309(5):470-7. doi: 10.1001/jama.2012.207624. PMID: 23385273

Thomas KS, Dosa D, Hyer K, Brown LM, Swaminathan S, Feng Z, **Mor V**. **J Am Geriatr Soc**. Effect of forced transitions on the most functionally impaired nursing home residents. 2012 Oct;60(10):1895-900. doi: 10.1111/j.1532-5415.2012.04146.x. Epub 2012 Sep 24. PMID:23002792

Lima JC, Intrator O, Karuza J, Wetle T, **Mor V**, Katz P. **J Am Med Dir Assoc**. Nursing home medical staff organization and 30-day rehospitalizations. 2012 Jul;13(6):552-7. doi: 10.1016/j.jamda.2012.04.009. Epub 2012 Jun 7. Erratum in: J Am Med Dir Assoc. 2013 Feb;14(2):146. PMID: 22682694

		<p>Feng Z, Wright B, Mor V. Health Aff (Millwood). Sharp rise in Medicare enrollees being held in hospitals for observation raises concerns about causes and consequences. 2012 Jun;31(6):1251-9. doi: 10.1377/hlthaff.2012.0129. PMID:22665837</p> <p>In 2011, Dr. Mor received the “Distinguished Investigator Award” from Academy Health, and in 2013 he received the “John M. Eisenberg Excellence in Mentoring Award” from the Agency for Health Research and Quality.</p> <p>I think Dr. Mor’s expertise would fill your nursing home gap with a recognized national expert, and bring to the table additional expertise in the areas of risk adjustment, Medicare and Medicaid quality measurement and reimbursement methods.</p> <p>Complete CV for Dr. Mor is available at https://research.brown.edu/myresearch/Vincent_Mor.</p> <p>Thank-you for your consideration.</p> <p>D.E.B. Potter*</p>	
		<p>Response: Thank you for your recommendation, we have filled Nursing Home representative with Carol Raphael, Former President & CEO Visiting Nurse Service of New York.</p>	<p>Response Sent: 2/10/14</p>
<p>Name of Commenter: Sheryl Davies Research Associate</p>	<p>Organization Affiliated: Stanford Health Policy</p>	<p>Comment: I am pleased to see a strong and varied panel appointed to this project. I have reviewed the background of each panelist, and believe my experience augments those of the appointed panel and request you reconsider my nomination.</p> <p>As a health services researcher, I have explored readmissions metrics in detail, leading to multiple publications on measuring readmissions. I also have conducted research in the area of community level resources and ED or hospital utilization. Understanding the relationship between ED use and</p>	<p>Comment Received: 2/1/14</p>

		hospitalization as well as the role of the community in readmissions is important to understanding and evaluating metrics.	
		Response: Thank you for submitting your nomination. Unfortunately due to the high volume of applicant we can only select a handful of people. We have several methodologists and well has a representative from the American College of Emergency Physicians who will be able to provide this persepective.	Response Sent: 2/3/14
Name of Commenter: Leticia Cruz DNP Student	Organization Affiliated:	Comment: Please allow me to introduce myself , I am a skilled nurse and DNP student , I currently have some time to commit to projects and am interested in the readmission working group, particularly nursing homes and hospital medicine. I posses extensive experience as a nurse ,and nurse mentor and preceptor in academic hospital institutions. Among my skills research is one of my strengths and I am quite good in statistical data management and measures of performance. If NQF needs further assistance in the above mentioned areas please feel free to contact me at any time . PS I also hold expertise in scientific literature construct , research designs and continuing education construction, and health IT. Kind Regards Ms Leticia Cruz RN MSN/Ed DNP Student	Comment Received: 2/3/14
		Response: Thanks for your email. You can submit a nomination via our nominations portal on the NQF website. There are no guidelines in particular, you will just have to fill the nomination form and submit a disclosure of interest. I've also attached the call for nominations to give you more insight into our project and the time commitment.	Response Sent: 2/1/14
Name of Commenter: Johnny Hood	Organization Affiliated: Florida Hospital	Comment: On behalf of Richard Morrison, Chief Government Relations Officer at Florida	Comment Received: 2/7/14

Federal Affairs Manager		<p>Hospital I would like to nominate Dr. Ross Edmundson for the NQF's All-Cause Admissions and Readmissions Steering Committee.</p> <p>I have submitted a nomination for Dr. Edmundson via the nominations portal on the NQF website.</p> <p>I have also attached a copy of Dr. Edmundson's CV to this email along with a document containing his contact information, description of relevant expertise and knowledge, a statement of interest and a brief nominee biography.</p> <p>Thank you for your consideration of Dr. Edmundson as a nominee to this committee. Please contact me if there is any additional information I can provide.</p> <p>All the best, Johnny</p> <p>Johnny Hood Federal Affairs Manager Florida Hospital 407-303-5552 john.hood@flhosp.org</p>	
		<p>Response: Thank you for your email, Dr. Edmundson has been selected to the final committee.</p>	<p>Response Sent: 2/7/14</p>
<p>Name of Commenter: James Callaghan Pediatric Hospitalist</p>	<p>Organization Affiliated: Seattle Children's Hospital</p>	<p>Comment: To Whom It May Concern:</p> <p>As a member of the NQF, I wanted to give feedback and support on 2 candidates for the proposed steering committee for the All-Cause Admissions and Readmissions Measures:</p> <p>(1) John Bulger: As a fellow hospitalist, I have gotten to know John during our work together over the past 2 years on the Society of Hospital Medicine (SHM) Hospital Quality and Patient Safety (HQPS) Committee. John and I worked very closely together last year, when he was the chairperson of the Choosing Wisely Subcommittee. I was very impressed with his leadership ability. He was able to energize</p>	<p>Comment Received: 2/9/14</p>

		<p>geographically far-flung individuals to work on a common goal and to successfully produce the SHM Adult Hospital Medicine Recommendations for the Choosing Wisely campaign, as well as a publication in the Journal of Hospital Medicine, all while under tremendous time pressure. I have no doubt that he will be an active and informative member of this steering committee.</p> <p>(2) James Gay: As a pediatric hospitalist, I can attest that James has authored or co-authored the seminal papers on readmissions in the pediatric population. He will bring a vital voice to this steering committee that is frequently overlooked during the development of national guidelines—that of the hospitalized pediatric patient.</p> <p>I fully and without reservation support the nomination of these 2 individuals. If you have any questions, or would like to discuss further, please do not hesitate to contact me.</p> <p>Jim</p> <p>James O’Callaghan, MD FAAP FHM</p> <p>Pediatric Hospitalist Clinical Assistant Professor of Pediatrics Seattle Children's Hospital University of Washington School of Medicine</p> <p>206-987-8232 OFFICE 206-987-3201 FAX 206-559-4698 PAGER 206-650-1473 CELL</p> <p>james.ocallaghan@seattlechildrens.org</p> <p>OFFICE 4800 Sand Point Way NE, Seattle, WA 98115 MAIL M/S M1-13, PO Box 5371, Seattle, WA 98145 WEB www.seattlechildrens.org</p>	
		<p>Response: Thank you for your comment.</p>	<p>Response Sent: 2/10/14</p>

<p>Name of Commenter:</p> <p>Linda DeRuvo-Keegan Executive Director</p>	<p>Organization Affiliated:</p> <p>Kidney Care Partners</p>	<p>Comment:</p> <p>February 9, 2014</p> <p>Helen Burstin, MD, MPH Senior Vice President, Performance Measures National Quality Forum 1030 15th Street, NW – Suite 800 Washington, DC 20005</p> <p>Via Email: readmissions@qualityforum.org</p> <p>Dear Dr. Burstin:</p> <p>Kidney Care Partners (KCP) greatly appreciates that NQF has undertaken the project, <i>All Cause Admissions and Readmissions Measures</i>. Further, we appreciate the opportunity to comment on the proposed slate for the Steering Committee that will review these important measures.</p> <p>Given that the project will review the Centers for Medicare and Medicaid Services measure, “Standardized Readmission Ratio (SRR) for Dialysis Facilities,” we recommend NQF supplement the current proposed slate with additional nephrology expertise from someone who is facility based. We appreciate the inclusion of Dr. Steven Fishbane from North Shore University Hospital and LIJ Medical Center, but we believe an individual directly associated with a dialysis organization would provide essential insights on care coordination between dialysis centers and hospitals to reduce readmissions, as well as health information technology/exchange, from the dialysis facility perspective.</p> <p>Thank you again for the opportunity to comment and for your consideration of this recommendation. We would be happy to work with you in identifying potential candidates—if you have any questions, please do not hesitate to contact Lisa McGonigal, MD, MPH, at lmcgon@msn.com or 203.298.0567.</p> <p>Sincerely,</p> <p>Linda DeRuvo-Keegan Executive Director</p>	<p>Comment Received:</p> <p>2/9/14</p>
		<p>Response:</p> <p>Thank you for your email. Due to the limited number of seats on the</p>	<p>Response Sent:</p> <p>2/10/14</p>

		<p>committee and the cross curtting nature of the measure's we have recieved, we could not accommodate two nephrologists for this project. We hope that KCP will participate in our project as a Public Members and continue to bring the perspective of their membership on this important measure.</p>	
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