NATIONAL QUALITY FORUM

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COST AND RESOURCE USE STANDING COMMITTEE

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WEDNESDAY MARCH 15, 2017

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The Standing Committee met at the National Quality Forum, 9th Floor Conference Room, 1030 15th Street, N.W., Washington, D.C., at 9:00 a.m., Brent Asplin and Cheryl Damberg, Co-Chairs, presiding.

PRESENT:

BRENT ASPLIN, MD, MPH, Co-Chair CHERYL DAMBERG, PhD, Co-Chair; Principal Senior Researcher, RAND Distinguished Chair in Healthcare Payment Policy LARRY BECKER, Retired* MARY ANN CLARK, MHA, Vice President, Avalere* JENNIFER EAMES HUFF, MPH, CPEH, Principal, JEH Health Consulting; Senior Advisor, Pacific Business Group on Health TROY FIESINGER, MD, FAAFP, Physician, Chairman Quality Committee, Village Family Practice of Fort Bend* NANCY GARRETT, PhD, Chief Analytics Officer, Hennepin County Medical Center ANDREA GELZER, MD, MS, FACP, Senior Vice President and Corporate Chief Medical Officer, AmeriHealth Caritas* MARTIN MARCINIAK, MPP, PhD, Vice President, US Medical Affairs, Customer Engagement, Value, Evidence and Outcomes,

GlaxoSmithKline

KRISTINE MARTIN ANDERSON, MBA, Executive Vice President, Booz Allen Hamilton

JAMES NAESSENS, ScD, MPH, Professor, Mayo Clinic JACK NEEDLEMAN, PhD, Professor of Health Policy

and Management, UCLA Fielding School of Public Health

JANIS ORLOWSKI, MD, MACP, Chief Health Care Officer, Association of American Medical Colleges

BETTY RAMBUR, PhD, RN, Routhier Endowed Chair for Practice and Professor of Nursing, University of Rhode Island*

JOHN RATLIFF, MD, FACS, FAANS, Associate Professor of Neurosurgery; Vice Chair, Operations and Business Development; Co-Director, Division of Spine and Peripheral Nerve Surgery, Department of Neurosurgery, Stanford University Medical Center, American Association of Neurological Surgeons*

SRINIVAS SRIDHARA, PhD, MHS, Managing Director, The Advisory Board Company

BILL WEINTRAUB, MD, FACC, Chair of Cardiology, Christiana Care Health System*

HERBERT WONG, PhD, Senior Economist, Agency for Healthcare Research and Quality

DOLORES YANAGIHARA, MPH, Vice President, Performance Measurement, Integrated Healthcare Association

NQF STAFF:

TAROON AMIN, MPH, PhD, Consultant HELEN BURSTIN, MD, MPH, FACP, Chief Scientific Officer HIRAL DUDHWALA, RN, MSN/MPH, Project Manager ERIN O'ROURKE, Senior Director RACHEL ROILAND, MS, PhD, Senior Project Manager IRVIN SINGH, MPH, Project Analyst ASHLIE WILBON, RN, MPH, Senior Director MARCIA WILSON, PhD, MBA, Senior Vice President, Quality Measurement ALSO PRESENT: CHAD HEIM, Vice President, Health Informatics, HealthPartners* GARY KITCHING, Senior Manager, Health Informatics, HealthPartners* SUE KNUDSON, MA, Senior Vice President, Health Informatics, HealthPartners* SRINIKETH NAGAVARAPU, PhD, Senior Policy Associate, Acumen KIMBERLY SPALDING BUSH, OT, Director, Performance-Based Payment Policy Group, Center for Medicare, Centers for Medicare & Medicaid Services SCOTT WETZEL, Senior Specialist, Quality Reporting, Association of American Medical Colleges

* present by teleconference

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1 P-R-O-C-E-E-D-I-N-G-S 2 (9:10 a.m.) All right, good morning 3 DR. ROILAND: 4 everyone and welcome to today's meeting of the 5 Cost and Resource Use Standing Committee. My name is Rachel Roiland, and I'm the Senior Project 6 Manager for this project and, along with the rest 7 8 of the staff up here today, we'll be guiding you 9 through this evaluation of three measures today. But before we do that, I just want to 10 11 provide some housecleaning details. Irvin, if 12 you could go to the next slide please? All right. We'll just wait until it loads there --13 14 all right. 15 Just so you all are aware -- if you 16 could go back one slide Irvin -- there are restrooms available on this floor of the 17 18 building. If you go outside this room and go 19 straight past the elevators and hang a right, that's where you'll find the restrooms. 20 21 We do have two breaks scheduled for 22 today, the first at 10:45 in between our

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evaluation of the two health partners measures, 1 2 and then lunch is also provided today by NQF. For those of you with laptops and cell 3 phones in the room, we do have a WiFi network 4 available for you and the log-in and username and 5 password are available upon the screen. 6 7 We do ask those of you who have cell 8 phones if you could please mute then during the 9 meeting just to minimize distractions. And if you do need to take a phone 10 11 call you're more than welcome to do that, we just 12 ask that you go out into the area where you 13 picked up your name tags, just to minimize the 14 background noise when we're having discussion. For those of you in the room, we do 15 16 ask that you use your microphones when you're 17 talking and talk directly into the microphone, 18 just so that it helps the folks who are listening in to better hear everything going on. 19 20 And it also helps our court reporter 21 take a better transcript. And also just a little 22 note -- there can only be three microphones on at

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one time, so when you're done speaking, please 1 2 make sure to turn your microphone off. And then when you do want to speak, we 3 4 ask that those of you in the room put your name tents up, like this. It just helps Brent and 5 Cheryl know who to call on. 6 7 And then for those folks on the phone, 8 or participating in the webinar, we ask that you 9 raise your hand by the webinar platform, and that will signal to us that we need to let Brent or 10 Cheryl know that you'd like to jump in and be a 11 12 part of that conversation. 13 So that's all the housekeeping stuff, 14 and now I'll turn it over to Erin O'Rourke, our Senior Director, to just give us some opening 15 16 remarks, and we'll introduce the rest of the 17 staff. 18 MS. O'ROURKE: Thank you so much 19 Rachel, and thank you to all of you for braving 20 the inclement weather and getting down here, or 21 for those of you who are on the phone, for bearing with us for an extended web meeting. We 22

really appreciate everyone's efforts to come 1 2 together today and do this work, so thank you. So I think with that, I can just 3 4 introduce myself. I'm Erin O'Rourke, the Senior 5 Director supporting this project and I'm excited to work with you all, joined by obviously Rachel, 6 7 our Senior Project Manager, Hiral Dudhwala, our Project Manager, and Irvin Singh, our Project 8 9 Analyst. We also have Taroon Amin, consultant for NQF helping to support this work. I think 10 11 many of you have worked with him in the past. 12 We're joined also by Helen Burstin, our Chief 13 Scientific Officer, and Marcia Wilson, our Senior 14 Vice President. So that's the NQF team, and I think with that I can turn it over to Brent and 15

17 CO-CHAIR DAMBERG: Great, thanks
18 everyone for joining us in person today, and for
19 those of you on the phone, I know it's going to
20 be a long day but thanks for joining us and
21 hanging in there throughout the day.

Cheryl to say a few words.

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We have three measures that we're

going to review today and I know all of you spent 1 2 fair amount of time looking through them and a probably have a lot of interesting comments to 3 4 provide, and so we'll look forward to that 5 discussion. CO-CHAIR ASPLIN: Good morning 6 It's good to see a lot 7 everyone. Brent Asplin. 8 of familiar faces in the room, and look forward 9 to the conversation today. And background, emergency physician, 10 11 I was recently at Mercy Health in Ohio and 12 Kentucky as the Chief Medical Officer, and look 13 forward to the conversation and the dialogue 14 around these methods this morning and this 15 afternoon. 16 And with that I'll turn it over to 17 Marcia Wilson, and we can go through the 18 declarations of conflicts. 19 DR. WILSON: Thank you so much, 20 Brent. As Erin said, I'm Marcia Wilson, Senior 21 Vice President for Quality Measurement, and I'm 22 filling in for our general counsel today.

1	It's our custom here at NQF to combine
2	introductions and disclosures of interest. And I
3	know when you signed up for this committee, you
4	got a very long DOI form, disclosure of interest
5	form.
6	And today we're going to ask you to
7	orally disclose any relevant activities, relevant
8	in terms of the work before this committee.
9	So, it's not necessary to summarize
10	your resume, you are a stellar committee, and so
11	we bring considerable expertise to this panel,
12	but we do want to know if you have any
13	activities, funded or unfunded, that are directly
14	related to the measures and the issues coming
15	before the committee today.
16	So, just a couple of reminders. You
17	sit on this committee as an individual, you don't
18	represent your organization. So, for example,
19	when you do your introduction you would say, hi
20	I'm Marcia Wilson and I work at the National
21	Quality Forum.
22	So you are seated as an individual,

and just because you disclose something, it does
 not mean that you have a conflict. But we do this
 is the spirit of transparency and openness. So,
 what we are going to do is start with
 introductions and disclosures.

6 Here in the room, I'm going to start 7 with our Co-Chairs. We'll go around the room and 8 then I know we have quite a few committee members 9 on the phone today, and I will call your name and 10 you can do an introduction and disclosure once 11 we're finished in the room. So Cheryl, if you 12 won't mind starting please?

13 CO-CHAIR DAMBERG Sure, Cheryl 14 Damberg, I'm the Senior Researcher at the RAND Corporation. I have a number of contracts with 15 One of them in particular is around the 16 CMS. 17 Medicare star ratings, which involves us 18 analyzing performance measure data that's 19 submitted by health plans to Medicare and 20 generating the star ratings. But other than that 21 I don't think I have any conflicts related to 22 these three measures.

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1	CO-CHAIR ASPLIN: Brent Asplin,
2	currently independent. I do not have any
3	disclosures, although I do think the committee
4	should know that I worked as an Emergency
5	Physician for Health Partners Medical Group about
6	a decade ago, but did not have any direct
7	involvement in the development of the measures
8	we're going to be reviewing today.
9	DR. WILSON: Thank you Brent. And if
10	we go to Janis, next.
11	MEMBER ORLOWSKI: Good morning. I'm
12	Janis Orlowski, and I am the Chief Health Care
13	Officer working at the AAMC, and I have nothing
14	to disclose.
15	DR. WILSON: Thank you.
16	MEMBER NAESSENS: I'm Jim Naessens,
17	I'm a Health Care Researcher at the Mayo Clinic
18	and I have nothing to disclose.
19	DR. WILSON: Thank you.
20	MEMBER SRIDHARA: I'm Srinivas
21	Sridhara I work for The Advisory Board, and I
22	have worked with all three measures actually,

part of grant programs in the past and both 1 2 implementing and testing for the health partners measures, along with Henry so that, though I'm no 3 4 longer engaged in that and have no role in the 5 measure development process. And for the Medicare spending for 6 7 beneficiary, we've tested and implemented in both 8 the State of Maryland, and now The Advisory 9 So, but again, no association with Board. 10 measure developers currently. 11 DR. WILSON: Okay. 12 MEMBER NEEDLEMAN: Morning. I'm Jack 13 Needleman, and I'm a Professor in the Department 14 of Health Policy and Management at the UCLA 15 Fielding School of Public Health. 16 I don't think I have any conflicts but in the interest of full disclosure, as Marcia 17 18 said, I'm sitting as a member of the technical 19 expert panel that CMS is using to evaluate the 20 trends in their quality measures over time, and I 21 believe this measure today is included in the purview of that committee. 22

1	-
1	DR. WILSON: Thank you.
2	MEMBER GARRETT: Good morning, I'm
3	Nancy Garrett, I'm the Chief Analytics Officer at
4	Hennepin County Medical Center, which is a safety
5	net provider in Minneapolis.
6	And I don't have any conflicts to
7	disclose other than just being aware that the
8	HealthPartners measure is used in Minnesota
9	through our Minnesota community measurement
10	organization, and I've been involved in kind of
11	that roll out and using it as a provider as well.
12	DR. WILSON: And again, using measures
13	does not present a conflict.
14	MEMBER WONG: Good Morning. My name's
15	Herb Wong. I am an economist with the Agency for
16	Healthcare Research and Quality and I have
17	nothing to disclose.
18	MEMBER MARCINIAK: Hello, I'm Martin
19	Marciniak, I'm a Vice President with
20	GlaxoSmithKline and a policy economist by
21	training. I worked in the U.S. medical affairs
22	organization.

	-
1	MEMBER YANAGIHARA: Good Morning I'm
2	Delores Yanagihara, I'm Vice President of
3	Analytics and Performance Information at
4	Integrated Healthcare Association in California,
5	and I have nothing to disclose.
6	MEMBER EAMES HUFF: Hi, my name is
7	Jennifer Eames Huff, I'm an independent
8	consultant and participating in this on behalf of
9	the Pacific Business Group on Health. I have
10	nothing to disclose.
11	DR. WILSON: Thank you, and we'll now
12	go to the committee members on the phone,
13	alphabetical just to give you a heads up. We're
14	starting with Larry Becker, are you on the phone?
15	MEMBER BECKER: I'm here Marcia, I'm
16	Larry Becker. Recently retired from Xerox. I'm
17	on the Board of NQF and I have nothing else to
18	disclose.
19	DR. WILSON: Thank you. Mary Ann
20	Clark?
21	MEMBER CLARK: Yes, good morning. It's
22	Mary Ann Clark. I'm a Vice President of Health

Economics and Advanced Analytics at Avalere 1 2 Health. Although I personally have nothing to disclose, I believe in the past some others in 3 our company have worked on behalf of our client 4 5 to develop quality measures for submission to NQF, but I have not worked directly on any of 6 those and that was in the past. 7 8 Thank you. Is it Troy DR. WILSON: 9 Fiesinger? 10 MEMBER FIESINGER: Yes, this is Troy 11 Fiesinger. I'm a physician in balmy Houston, I 12 have no conflicts to disclose for today's 13 meeting. 14 Thank you. Andrea DR. WILSON: 15 Gelzer? MEMBER GELZER: Hi, Andrea Gelzer, and 16 17 I'm Corporate Chief Medical Officer at 18 AmeriHealth Caritas, and I have nothing to 19 disclose. 20 DR. WILSON: Thank you. Kristine 21 Martin Anderson? 22 MEMBER MARTIN ANDERSON: Hi, I'm

Kristine Martin Anderson, I'm with Booz Allen 1 2 Hamilton. I have no conflicts, but Booz Allen does have a number of contracts with CMS, OCM, VA 3 4 and others, where we are selecting measures for 5 use in new programs, which include efficiency 6 measures. 7 DR. WILSON: Okay, thank you. Betty 8 Rambur? 9 MEMBER RAMBUR: Hi. Betty Rambur, Routhier Chair for Practice and Professor of 10 11 Nursing at University of Rhode Island and very 12 recently moved from Vermont where I was a member of the Green Mountain Care Board, and I have no 13 conflicts of interest to disclose. 14 Thank you. John Ratliff? 15 DR. WILSON: 16 MEMBER RATLIFF: Hi, good morning. 17 I'm John Ratliff, I'm a neurosurgeon at Stanford. 18 I've done some consulting and collaborative work 19 with Acumen one of the developers on episode 20 groupers for CMS, but I have no conflicts 21 relevant to these measures. Thank you. Bill 22 DR. WILSON:

Weintraub? Bill, are you on the phone? Do you
 show him signed up?

Okay, Bill, it may be that you're signed onto the webinar but not called in, so I'm going to go ahead and keep moving on with the DOIs, and then if you are able to join us by phone then you give a -- introduce yourself and give us a disclosure.

9 And I think -- is there anyone else on 10 the phone that I have not called? Okay, just a 11 final comment that if at any time during the 12 meeting you think that you have a conflict of 13 interest, or if you perceive that someone else 14 had a conflict of interest, we do ask that you 15 speak up.

You can approach our Co-Chairs, or any of the NQF staff. What we don't want is for you to sit there and think that there's some conflict going on and not bring it to our attention in real time as opposed to waiting later. So, based on what you've heard from your colleagues on the committee, and from the

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remarks, does anyone have any questions? Okay,
 thank you very much.

3	DR. ROILAND: All right. Thank you
4	Marcia. Hi everyone, again. This is Rachel for
5	those of you on the phone, and I'm just going to
6	give you a brief introduction to the project that
7	we have today, as well as give a little bit of
8	historical context of where we've been and how
9	we've gotten to where we are today.
10	This will be old news to all of you
11	who worked on most of these projects but just to,
12	sort of, touch base again on them.
13	NQF's prior work in cost and resource
14	use has really focused a lot on doing a lot of
15	conceptual work and trying to come up with
16	frameworks that we can utilize to evaluate these
17	measures, as well as in applying those evaluation
18	criteria that were developed to various cost and
19	resource use measures.
20	So here up on the slide we just list
21	those various projects that a lot of you are most

22 likely involved in.

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I	2
1	And so we begin with Episodes of Care
2	Measurement Framework, which really laid the
3	groundwork for how we look at episodes of care
4	and apply quality measurement to those episodes,
5	and then
6	MEMBER WEINTRAUB: Excuse me. Bill
7	Weintraub, I was only on the webinar, my headset
8	didn't work, but I'm now on the phone.
9	DR. ROILAND: Oh, thank you Bill. And
10	did you have anything to disclose?
11	MEMBER WEINTRAUB: Yes, well I do have
12	I'm a cardiologist, Christiana Care in
13	Delaware, outcomes researcher. I had a CMMI
14	outcome support
15	(Telephonic interference.)
16	MEMBER WEINTRAUB: included.
17	DR. ROILAND: Okay, thank you so much
18	Bill. We appreciate it. All right, so just to
19	bring us back to talking mode and NQF's prior
20	work in this area.
21	So there's been three phases before
22	this phase where we've applied the cost and

resource use evaluation criteria to various
 measures, and this fourth phase is actually our
 first maintenance phase.

4 So we'll be taking three of those 5 measures that you all have reviewed before and 6 putting them through the maintenance process for 7 NQF. So it's a bit of a new territory, a mix of 8 old and new. The measures you've seen before, but 9 the maintenance process is new for these 10 particular measures.

11 And then there's been various other 12 projects talking about different methodological 13 challenges when developing and evaluating cost 14 and resource use measures as well.

So, you all have done a lot of work thus far, and will do a lot of work today as well. So, we look forward to it, and thank you all again for being here today.

19Go to the next slide. This slide just20lists our current portfolio of NQF endorsed21measures for cost and resource use measures.22And this also includes the three we

will be looking at today which include the first 1 2 two, the Total Resource Use Population-based index, as well as the Total Cost of Care index, 3 4 and the one listed on the bottom, the Medicare 5 Spending Per Beneficiary hospital. Go to the next slide. And this just 6 7 reiterates the same point that this project today 8 will be evaluating measures related to cost and 9 resource use that can be used for accountability in public reporting for the population that 10 11 they've been specifically tested for. 12 And so, again, the three measures 13 we'll be reviewing today are listed at the bottom 14 of the slide there. So, three measures today, but we expect it to be a rich discussion, so we 15 16 look forward to hearing all of your thoughts. 17 And with that, I will turn it over to 18 our Project Manager, Hiral, who will walk us 19 through the evaluation process we'll be going 20 through today, as well as voting procedures. So 21 Hiral, over to you. Okay, thank you. 22 MS. DUDHWALA: So

again, this will probably just be a refresher for
 all of you. Next slide we're just going to go
 over a quick overview.

So, the roles of the standing committee during our evaluation meeting today is to act as a proxy for the NQF multi-stakeholder membership to work with the NQF staff to achieve the goals of the project.

9 Evaluate each measure against each 10 criterion. Indicate to the extent to which each 11 criteria is met and rationale for the rating. 12 Make some recommendations regarding endorsement 13 to the NQF membership.

14Oversee the portfolio of our cost and15resource use measures, as well as select two to16three year terms for our new committee members.17Next slide, please. All right, and

18 also just some ground rules for our meeting19 today.

20 So during our discussion, committee 21 members should be prepared, having reviewed the 22 measures beforehand, base evaluations and

recommendations on the measure valuation criteria and guidance.

3	Remain engaged in the discussion
4	without distractions. Attend the meeting at all
5	times except breaks. Please keep comments precise
6	and focused. Avoid dominating a discussion and
7	allow others to contribute. Indicate agreement
8	without repeating what had already been said.
9	For those that are participating on
10	the phone, please make sure to use your raise
11	your hand function and we will be monitoring and
12	call out your name so that you may also
13	participate.
14	Next slide. Okay, so again review the
15	measure evaluation process. You have received a
16	measure worksheet which includes a preliminary
17	analysis.
18	The committee pre-evaluation comments
19	are included in that, as well as the pre-meeting
20	public and member comments, as well as any
21	evidence and testing attachments.
22	We just want to stress that NQF's

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1staff would like to stress that preliminary2analysis is intended to be used as a guide to3facilitate the committees discussion and4evaluation. Next slide please.5Okay, so measure discussion and6voting. There will be a brief introduction by the7developer, about three to five minutes to begin8with. There are lead discussions which will9begin the committee discussion by providing a10summary of the pre-meeting evaluation comments as11mell as emphasizing areas of concern or12differences of opinion.13The developers will also be available,14whether in person or by phone, to respond to any15questions. The full committee will discuss and16then vote on the criterion before moving on to17the next criterion.18So voting process for today. The19voting tool. All in person voting members have a20remote clicker to vote. You should all have it21right next to you.22For those that are on the line, we		
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16 then vote on the criterion before moving on to 17 the next criterion. 18 So voting process for today. The 19 voting tool. All in person voting members have a 20 remote clicker to vote. You should all have it 21 right next to you.	14	whether in person or by phone, to respond to any
17 the next criterion. 18 So voting process for today. The 19 voting tool. All in person voting members have a 20 remote clicker to vote. You should all have it 21 right next to you.	15	questions. The full committee will discuss and
18 So voting process for today. The 19 voting tool. All in person voting members have a 20 remote clicker to vote. You should all have it 21 right next to you.	16	then vote on the criterion before moving on to
<pre>19 voting tool. All in person voting members have a 20 remote clicker to vote. You should all have it 21 right next to you.</pre>	17	the next criterion.
20 remote clicker to vote. You should all have it 21 right next to you.	18	So voting process for today. The
21 right next to you.	19	voting tool. All in person voting members have a
	20	remote clicker to vote. You should all have it
22 For those that are on the line, we	21	right next to you.
	22	For those that are on the line, we

have already communicated with you how you can 1 2 send your votes to an NQF staff member and they will do the clicking for you here. All voting 3 members, as I just said, who are remote, we have 4 5 those instructions already provided to them. So, with the clickers, make sure to 6 point the clicker towards our staff member here 7 8 in the corner, Irvin. When voting, the remote 9 will briefly display your vote choice. You do have the chance to change your 10 11 response, so whatever is your last option that 12 you choose on your clicker is the voting that 13 will be the final vote. So, you can change it if 14 you do make an error, so --15 Okay, next slide. All right, so, for 16 achieving consensus, quorum would be 66% of the 17 committee, so that would be, for this meeting, 13 18 committee members. 19 Pass -- recommend greater than 60% of 20 the committee who vote yes, which would be High 21 plus Moderate. Consensus not reached would be 40-60% yes votes, inclusive of 40 and 60%. 22 So does

1	not pass, not recommended, less than 40% yes.
2	Next slide.
3	Okay we just went over quite a few
4	items, so if there any questions from anyone in
5	the room or by committee members on the phone?
6	Okay. All right. Next slide. Okay.
7	Well, I will go ahead and pass it on to our Co-
8	Chairs, as we begin the candidate measures. Brent
9	and Cheryl.
10	CO-CHAIR ASPLIN: Very good, thank
11	you, Hiral. And good morning, we're going to
12	start with Measure 1598, the Total Resource Use
13	Population-Based Per Member Per Month Index. The
14	developers, Health Partners.
15	And we'd like to begin by inviting the
16	developers to provide a brief overview of the
17	measure, and I'd ask them to introduce
18	themselves. I'm not sure if the developer is here
19	or on the phone.
20	DR. ROILAND: They're on the phone,
21	Brent. So if, Operator, if you could open their
22	lines, if they are not already open.

I	∠
1	MS. KNUDSON: Hi this is Sue Knudson
2	from HealthPartners, can hear me okay?
3	CO-CHAIR ASPLIN: Yes, good morning,
4	Sue. We can hear you just fine.
5	MS. KNUDSON: Hi, okay thank you.
6	Just to let you know, I'm joined by my
7	colleagues, Chad Heim, Gary Kitching, Erica
8	Vetta, and Kim Ritten.
9	So I'm going to do just a brief
10	introduction, and before I do that I just want to
11	say thank you to the NQF staff and to all the
12	committee members. We know this is a big time
13	commitment for all of you, and appreciate the
14	attention. Both the NQF as well as all of you
15	individually are going to address this important
16	topic in health care.
17	So first, about HealthPartners. We are
18	a consumer-governed non-profit organization.
19	We're both an integrated health care and
20	financing organization with about 2300 team
21	members located mostly here in Minnesota.
22	Our health plan has about 1.5 million

1	members. We're ranked by NCQA among the top 30 in
2	the nation. From a care group perspective, we
3	care for about a million patients. We have about
4	1700 physicians that cover multiple specialties.
5	Six hospitals including a level one
6	trauma center in the heart of St. Paul, all the
7	way down to community critical access hospitals
8	in size.
9	Our mission is to improve the health
10	and well-being of those we serve in partnership
11	with our members, patients and the community.
12	And our vision is an important one, because it
13	helps you to understand where this work comes
14	from, health as it could be, affordability as it
15	must be through relationships built on trust.
16	So we're also an organization, and a
17	group of team members, that is committed to
18	health equity and serving community needs, so to
19	that end, that includes providing and advocating
20	for mental health services.
21	And we are number two in the state for
22	charity care services, and number one in the East

1 Metro of the Twin Cities.

2	So, just quickly about our measures.
3	There's two measures that we'll be reviewing
4	today: total cost of care and resource use,
5	starting with resource use. They are for a
6	commercial insured population. They're based on
7	all care that's provided to patients, so we refer
8	to them as a population based measure approach.
9	We developed them upwards to 20 years
10	ago on the TCOC side, and in the early 2000's
11	created the algorithm that creates the resource
12	use measure that we will be covering first. The
13	costing technique is the only difference between
14	the two.
15	So for total cost of care, it's the
16	allowed payments, which is inclusive of what the
17	plan pays as well as what the member pays.
18	But for resource use, where we're
19	starting, that uses our standardized patented
20	algorithm for standardizing the cost approach.
21	So, we'll talk I'm sure a bit more about that.
22	The measures are powerful when used

1 together, because by having the two you can do 2 the simple math to understand price drivers as 3 well. However, resource use on its own is also 4 very powerful in helping to drive care delivery 5 improvement by steering, in a focused way, where 6 there are pockets to improve in the overall 7 performance.

8 So again, their commercial members are 9 measured. We have as an organization calibrated 10 for Minnesota, for our own use, a Medicaid model, 11 but that is calibrated, we've been under a 12 bidding system in the state for several years now 13 that is not translatable to other states, 14 therefore we did not submit it.

We are a Medicare cost plan, planning to transition to Medicare Advantage, so we do not have the full suite of Medicare claims, so therefore we could not calibrate at this time a Medicare model.

20 And if users have those data, we still 21 recommend segmenting the measures among the 22 different populations to account for differences

in disease prevalence, enrollment profiles and
 the like.

3	So what I think is important in terms
4	of context for the committee to understand is we
5	do measure everything from a particular point of
6	view here at HealthPartners, so our quality
7	results from a care group point of view lead the
8	state at community measurement, and we've been
9	able to make improvements using these measures.
10	At the same time, our quality has
11	improved, we're assisting at very high levels,
12	and for a health plan point of view, the same
13	goes with being ranked in the top 30 in the
14	country.
15	So since the initial endorsement in
16	2012 before we get into the measures, just to
17	close my comments. The spread and the uptake of
18	the measures has been impressive. We have well
19	over 200 users across the country. Those types of
20	users manned health plans, providers,
21	consultants, and measurement collaboratives, as
22	well as researchers.

1	We've enhanced our public domain
2	website beyond just containing the
3	specifications. We also have out in the public
4	domain the software to actually create the
5	measures. We've also included software that, if
6	a user would like, they can create the full suite
7	of reports that HealthPartners produces for our
8	network providers as well.
9	And one thing I forgot to mention
10	about. This is just not a health care or a
11	HealthPartners set of measures. We do the same
12	reporting for every contracted partner in our
13	health plan network, and work with them, because
14	our attitude is their success is our success.
15	So in terms of usability, there's been
16	a strong uptake, and we've gotten very favorable
17	results by being very transparent and putting all
18	of our tools, if you will, out there because
19	we're an organization that wants to compete on
20	our results, not just the techniques.
21	So several of those users include, and
22	you guys probably saw the comments from several

of the delivery systems that we work with. For 1 2 example, Sanford, or Ascension Health, or Fairview. And then also, the national Network 3 4 for Regional Healthcare Improvement and all of 5 their sites in different states cross the 6 country. 7 And Nancy mentioned in her comment, 8 the uptake here at Minnesota community 9 measurement. So the work has been really great to be a part of, and we're proud of this spread, 10 11 and it's what we can do as a consumer-governed 12 non-profit to contribute to the issue of 13 affordability in healthcare. So, that would 14 conclude my comments, Brent. Very good, thank 15 CO-CHAIR ASPLIN: 16 you, Sue. I appreciate your comments and being 17 on the phone here this morning. And we're going 18 to move forward then with the review of the 19 measure, and I'll just -- for review, for many of 20 you, but we have some new committee members. 21 Just want to -- for efficiency's sake, 22 stay disciplined about the focus of the

conversation today. Because for each measure, if 1 2 it doesn't pass on importance to measure or scientific acceptability -- those are must pass 3 criteria -- so we want to do it in order and 4 5 restrict our comments to the topic. We will vote after each section. There 6 7 will be plenty of time at the end of the 8 conversation, if we get through all the areas, 9 for summary comments from committee members, if you wish, before our final vote, which is a 10 11 recommendation to endorse or not to endorse after 12 we've gone through all the different sub 13 categories. 14 So with those comments, let's get started. On 1598, Larry Becker is our lead 15 16 discussant for importance to measures, so Larry, the floor is yours. 17 18 MEMBER BECKER: Thank you very much. 19 Can you hear me? 20 CO-CHAIR ASPLIN: Yes, we can hear you 21 just fine. Thank you. 22 MEMBER BECKER: Good. Thank you.
1	And so one thing I would note in the
2	document, that the developer, to marry the two
3	measures together on importance. But let's begin
4	with 1598. I think everybody would agree that
5	cost and affordability is a major concern in the
6	healthcare system. And it contributes to the
7	number of uninsured. It contributed to budget
8	deficits. It contributes to medical bankruptcy.
9	Before you can understand how to
10	effectively lower costs without decreasing
11	quality you need to understand the total cost of
12	virtually everything that goes into the care
13	equations here. And one of the things that I
14	noted in the developer's discussion of this is
15	that most, if not all, of those contributors are
16	inside these indices around primary care: so,
17	professional; facility; in-patient and out-
18	<pre>patient; pharmacy; radiology; lab; ancillary and</pre>
19	behavioral health. There may be more but that
20	seems to me that those are the biggest
21	contributors to these things.
22	And in my experience in industry,

having worked for Xerox for nearly 30 years, is 1 2 that one of the ways you begin to think about cost is you look at something called UMCs, unit 3 4 manufacturing costs. In other words, what are 5 all the contributors to developing an output. You know, in this case it might be an office 6 It might be a surgery. 7 visit. It might --8 whatever it is.

9 And that's the only way in industry 10 that we are able then, once we understand the big costs, is to look at all the contributing 11 12 elements, all of the inputs to that and begin to break it down, and look at the individual pieces 13 14 to understand where inefficiencies are, where 15 there are opportunities, as opposed to, you know, 16 just sort of saying arbitrarily we're going to 17 change this or that.

18 The other really important thing here 19 that we learned in industry is something called 20 entitlement. It's a Lean Six Sigma term. It's 21 probably not what you're thinking. It's not that 22 people are entitled to A or B. Entitlement in

1 the Lean Six Sigma context says that you are able 2 to compare what you do to what else is being done by similarly situated people or processes out 3 there, so that if somebody is producing that 4 5 output at, say, 100 and you're at 90, you know 6 that you could, given the right input, be able to Somebody else has 7 get to that same hundred. 8 achieved it. And that's what they mean by 9 "entitlement." So, by being able to look at total 10 costs and looking at people, benchmarking across 11 12 multiple systems, multiple providers of the same 13 type, you begin to begin to be able to make 14 comparisons and say, I'm here; it's possible for 15 me to get there. 16 And so, the importance in this measure 17 is to begin the conversation and to begin to sort 18 of, if you will, level the playing field so that 19 people can make appropriate comparisons to be 20 able to take appropriate action. 21 So, I'm going to stop there and ask if 22 others wanted to add to that.

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1	CO-CHAIR ASPLIN: Thank you, Larry.
2	Any comments from committee members on
3	this area? We'll have three votes under the
4	overall importance. The first will be on the
5	priority, our assessment of the priority of the
6	measure.
7	The second would be on opportunity for
8	closure in care gaps.
9	And then the third is around the
10	measure intent.
11	So, are there any comments from
12	committee member at this time? Martin.
13	MEMBER MARCINIAK: So I'm echoing
14	Larry's concerns. I mean, one of the things that
15	I saw when I reviewed this measure, and reviewing
16	it I guess now three years ago, was a general
17	concern that when things are aggregated it speaks
18	to Larry's point: how do you disaggregate it to
19	really find quality improvement?
20	That was something I was looking for
21	when I read through the review this past time.
22	Didn't really feel I saw that. It would be nice

1	if at some point the measure developer might
2	comment on that.
3	CO-CHAIR ASPLIN: Sue, do you have any
4	comments in response to that?
5	MS. KNUDSON: Yes. Sure, I'd love to.
6	Thank you for those questions and comments.
7	What we have found to be very useful
8	and you could see this on our public website
9	as well as in the Minnesota Community Measurement
10	work, for example, they've taken a different
11	approach. But there is drillability to the
12	measures. And so what we've provided in our
13	reporting suite is a dashboard, if you will, that
14	include this measure and then companion
15	utilization measures that go along with it.
16	And so, for example, as an
17	organization on our own, as we are working with
18	providers we will benchmark back to our plan
19	average performance. And not that folks aspire
20	to be average, but they can set goals. It makes
21	the map easy and they can set goals that might be
22	10 points better than average, for example.

1	And then by pointing to those risk-
2	adjusted utilization measures that would flow
3	right in the same reporting suite and by the
4	way, this is the software also that we've put out
5	on our public domain website for others to
6	replicate the measures just begin to cascade
7	down. And so you can understand do you have,
8	compared to your peers, an opportunity with
9	admissions, do you have an opportunity with high-
10	tech imaging used outside of the ER at higher
11	rates; so, those major contributing factors that
12	drive the overall performance. So we've made
13	that available.
14	Does that help?
15	MEMBER MARCINIAK: It does for me.
16	Thank you.
17	CO-CHAIR ASPLIN: So, go to Jack next.
18	And then, Troy, I see that you've raised your
19	hand. You'll be following Jack.
20	MEMBER NEEDLEMAN: Okay. It probably
21	reflects the fact I've been doing this too long.
22	But somewhere in the documentation is a

reference, and it may -- so this is a quality 1 2 measure. And so I just think because it always permeates our discussions, comes up at some point 3 or another, I think it's important to note at the 4 5 beginning this is not a quality measure. Cost and resource use are not measures of quality. 6 7 Nor is it an efficiency measure, which is where 8 people ultimately want to go is Are you more or 9 less efficient? 10 But, as we have discussed in the past, more or less efficient is contingent upon how 11

12 your resource use translates to your performance 13 on other kinds of measures of quality or 14 outcomes. And without that mapping and without 15 that examination of the correlation, it's hard to 16 talk about efficiency here either. So, this is 17 an input to the discussion about efficiency as 18 the developer, I think, pointed out.

19 And I think one of the issues of 20 importance is, by itself the resource use measure 21 has some interest but is not getting all the way 22 we want to go. So, the question I would ask the

developer is the extent to which they have 1 2 provided mapping tools for looking concurrently at their outcome measures and quality measures, 3 which are also included in the suite of things 4 5 they do, and the resource use or cost use measures that make it up. 6 Thank you. 7 CO-CHAIR ASPLIN: Sue. Chair, would you like me 8 MS. KNUDSON: 9 to address that? 10 CO-CHAIR ASPLIN: Yes, please. 11 Yes. MS. KNUDSON: So, we have take 12 -- we totally agree with what you are saying, this is one of the building blocks that would 13 14 help drive to that overall efficiency or value 15 equation. We have taken a multi-step approach. 16 And so when we display information we generally 17 do not display cost information on its own, it 18 would always be paired with quality and 19 experience information, if you will. But we look at those from two 20 21 different bars. So, for example, in our shared 22 savings contracts with our provider network, you

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must meet the thresholds that we have in place for quality and experience assessments. And then if you perform well in this cost of care and efficiency, then you would, you know, benefit by having bonus and/or shared savings payments paid out.

7 We use the same approach with 8 transparency on our website. We offer both a 9 quality and experience score for consumers to use, as well as that being paired with the 10 11 overall cost information. Because the literature 12 is pretty solid that there is no direct 13 correlation between cost and quality, we have 14 actually not take it that step further and done a value equation, which I think is perhaps the 15 16 spirit of where you're heading in the discussion. 17 And we have done that because 18 sometimes the map doesn't quite work out. And 19 consumers, particularly, need to make choices

20 based on where they're at in a particular point 21 of care. And sometimes that quality information 22 on its own might be the driving force and/or the

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costing combination.

2 So that is the way we have used it. CO-CHAIR ASPLIN: 3 Thank you, Sue. 4 Troy and then Andrea. MEMBER FIESINGER: This is Troy 5 Yes. Fiesinger from Houston. 6 7 You already addressed part of my 8 question about drillability. But in my mind I 9 want to make sure I understand clearly. How low can you go? I mean, if I have a 4- to 10-doctor 10 11 group over a 50-doctor practice and then 500 physicians in an ACO, how long in unit can you 12 13 get down to get to applicability and usability? 14 MS. KNUDSON: So, we're asking for endorsement on the measures at 600. And the 15 16 reason we're asking at 600 even though we've 17 tested and they're, they're good at lower levels, 18 is because that's the sweet spot where we have 19 found we have that robust quality and experience information available for all those uses that I 20 21 had mentioned. They are -- we have done testing --22

they are reliable and valid at lower levels. 1 We 2 also, in terms of the drillability, to your point in the question, we can drill that all the way 3 4 down to the physician level. But what I will 5 tell you is that from, you know, a real lift in improvement point of view, when we consult and 6 7 work with groups we have found the best way to 8 drive improvement is recognizing the fact that 9 all of us as individuals, care team members included, come to work wanting to do the best 10 11 they can. And we have often and predominantly 12 found that putting in place system solutions, 13 whether they be computer solutions or process 14 solutions across the team, are the best way to 15 list performance and drive results that you can 16 see. 17 So, we really take that approach with

18 it and have found very few individual physician 19 opportunities. And that's largely recognizing, 20 yes, we are largely a group practice state. But 21 we do have smaller groups and single-specialty 22 practices that we work with as well. But

1	generally it's the same types of solutions.
2	So, you can let me know if you still
3	have outstanding questions based on that. I'd be
4	happy to answer them.
5	MEMBER FIESINGER: Thank you. That
6	answered the bulk of my questions. Also to be
7	able to aggregate your data by payer contract.
8	MS. KNUDSON: Yes, we can. If I put
9	my care group hat on, you know, using the
10	Minnesota Community Measurement, that is all
11	aggregated together, you know, from a usability
12	point of view. Our care group colleagues would
13	get reports from each of their payers which would
14	directionally show different levels of
15	performance.
16	But these measures themselves, they
17	are drillable down to conditions, procedures, et
18	cetera. So you can also understand those
19	drivers. And what we have heard from care groups
20	is directionally, you know, the different payers
21	may be kind of honing in on the same things using
22	a slightly different methodology. But that's the

1	credibility about these measures is that when we
2	bundled all of our data together at Minnesota
3	Community Measurement it's pretty much singing
4	the same song. So the standardization of the
5	approach has been really useful.
6	CO-CHAIR ASPLIN: Thank you. Andrea
7	and then Jennifer.
8	MEMBER GELZER: Hi. Thank you.
9	I would just note that this is a
10	widely-adopted measure, even by state Medicaid.
11	We do it in multiple states. And we're seeing it
12	increasingly being adopted and, you know, have
13	supported it.
14	And it's a given that this wouldn't be
15	used in a vacuum without a, without quality, you
16	know, metrics. And the quality and to me, as
17	a resource use measure, you know, it's the start.
18	It's an overall global cost and then you or
19	and then you need to go digging. And you have to
20	have the data, obviously, to do the digging. But
21	more and more we are able to do that, and not
22	just payers able to do that, but providers as

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2	The quality metrics are driven by
3	that we would pair with this measure are, you
4	know, driven by the population and driven by the
5	issues that we observe in the population. I
6	would say that, you know, let experience with the
7	measure inform it and improve it going forward.
8	But it's a valid measure.
9	And I would ask the measure developer
10	how what are the main categories and areas
11	that were changed from the beginning to the
12	current iteration, if any?
13	MS. KNUDSON: Yes. The only
14	difference is really in our truncation limit. We
15	boosted that from 100,000, or our Winsorizing, to
16	125. And that is just in recognition of
17	inflation and where medical costs are at. So
18	that is really the only substantial change.
19	MEMBER GELZER: Thank you.
20	CO-CHAIR ASPLIN: Thank you.
21	Jennifer.
22	And then one quick comment. For those

of you on the phone using the raise-hand function, after you've given a comment or asked a question if you could lower your hand so we know whether you're asking to speak again or not. Thank you.

MEMBER EAMES HUFF: Hi. 6 I just want 7 to say I agree with all the comments so far that 8 have been talking about the support to the team 9 on a high priority measure. I want to drill down a little bit more on the performance gap area. 10 And I think the evidence that we showed does 11 12 indicate there's variability.

13 My question is more about since this 14 is a relative score, how does looking at the, for example, the medical variability that's included 15 16 here, how does looking at medical group 17 variability from year to year, how does that 18 adjust since it is a relative score in terms of 19 thinking about how improving opportunities are having an effect? 20 21 MS. KNUDSON: Yes, I'll start and then

ask one of my colleagues, if I don't cover it

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1 sufficiently, to add on.

2	We do that in a couple of ways. We
3	always index performance to the current year.
4	And in order to so we understand where any
5	group or drill level is performing relative to
6	current performance of peers.
7	However, we also in our reporting
8	suite offer the capability to index those last
9	two years previously also to the current year, so
10	you can always see how you're moving over time.
11	And all of that's available in a class of
12	different measures as well.
13	Does that help, Jennifer?
14	MEMBER EAMES HUFF: Yes. Thank you.
15	CO-CHAIR ASPLIN: Let's see, Jack,
16	probably the last time.
17	And then we're going to move to our
18	first vote in this area.
19	MEMBER NEEDLEMAN: Okay. Well, this
20	is interesting because Jennifer read the variance
21	in these measures differently than I did. And
22	what I'm about to say, you know, I think it's

important, let me start out by saying I think it's important to have a measure of resources, measured resources over time given the goal for efficiency.

5 But I found that when I look at the 6 variance on the resources measure, not the cost 7 measure but the resources measure, the standardized pricing model, with the exception of 8 9 a few groups that are at the tail that seem to be 10 more extreme, folks seem to be pretty tightly 11 clustered. And when I look at the report you 12 provided of the 3-year data on the groups, it 13 looks like about half the groups are going up 14 over three years and half the groups are going down, none by very much on this measure. 15

16 So, since one of the elements of 17 importance is room for improvement, and variation 18 in performance, I'm wondering if you can provide 19 a little bit more insight into how much variance 20 are you actually seeing in this measure, leaving 21 aside the three or four or five groups that are 22 at the extreme tails, which could be very

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peculiar patient experiences that year for those groups?

3	But how much variance are you seeing
4	and how much improvement are you seeing over
5	time, not in the index but in the actual measure
6	itself, which is a measure of resource use? How
7	much change or trend over time are you seeing?
8	And how consistent is that across the groups?
9	MS. KNUDSON: Yes. Thanks, Jack, for
10	that astute question. Because we're not just
11	managing for the tails. If we did that, we
12	wouldn't be making an improvement. And really to
13	sort of be one with the results of these data is
14	really important for the different users and
15	these folks who are being measured. Because I
16	will give you an example from our own delivery
17	system, our west side delivery system here in the
18	Twin Cities.
19	Even a point of improvement in
20	resource use is about a \$4 million improvement in
21	affordability that we can return to patients and

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purchasers. So even the small, even around the

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averages, it's really important to really drill 1 2 into the data and look for performance. It is very hard to get like a 10 point improvement. 3 So that is not how the numbers should 4 5 be interpreted. And so we're really looking to those utilization metrics and other things that 6 7 help with usability to drive those. It's sort of 8 a steady pace of an improvement portfolio. And 9 even at a half a point improvement, that is a lot of dollars to be returned. 10 11 CO-CHAIR ASPLIN: Thank you, Sue. 12 Janis, a quick comment? 13 MEMBER ORLOWSKI: I want to raise 14 concerns regarding the disparities adjustment in 15 this measure. And --16 CO-CHAIR ASPLIN: Yes, can we table 17 that? Because that I know is going to come up 18 later on. But if could just hold off and get 19 into our votes on importance, if you don't mind. 20 And remind me, so I don't, don't miss --21 MEMBER ORLOWSKI: But you don't think 22 it's critical to the importance? You feel it's a

separate subject? 1 2 CO-CHAIR ASPLIN: I think it's going to be in the validity section. So it should be 3 tied to the second vote. 4 5 All right, very good. With that, let's move the first vote in importance to 6 7 measure is under the category priority. 8 And, Rachel, how are the folks on the 9 phone going to vote? Do you want to quick go over how we're going to handle that today? 10 11 DR. ROILAND: Sure. So, hello, 12 So for the folks who are participating everyone. 13 on the phone, we have reached to you individually 14 and told you who of the staff is going to be your proxy. And they will be emailing or texting us, 15 16 whatever works best for them. So that's the 17 process that will be happening. 18 And we have our clickers labeled so we 19 know who's getting what. 20 CO-CHAIR ASPLIN: All right. So, 21 qood. And any questions from those on the phone?

22 We are ready to roll.

1 MEMBER WEINTRAUB: Yes, I have a 2 question. Can you hear me? CO-CHAIR ASPLIN: 3 Yes, we can. So if I was to look 4 MEMBER WEINTRAUB: 5 and get an email from someone as my proxy, I 6 don't see it. 7 Is that Troy? CO-CHAIR ASPLIN: 8 MEMBER WEINTRAUB: It's Bill 9 Weintraub. CO-CHAIR ASPLIN: Bill. 10 I'm sorry, Bill. 11 12 MEMBER GELZER: And Andrea Gelzer. 13 I'm having a hard time locating the specific email. 14 15 DR. ROILAND: Okay. We'll send an email right now. Just one moment, please. 16 17 (Pause.) 18 DR. ROILAND: Bill and Andrea, if it 19 works better for you, you can actually just chat it to us in the webinar platform. Would that 20 21 work for you? 22 MEMBER GELZER: That would be great.

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1	MEMBER WEINTRAUB: Yes, well let's try
2	it and make sure it works. We'll try on this
3	first go-around.
4	MEMBER FIESINGER: This is Troy. I
5	think chatting it would be easier for me, too.
6	Then I don't have to jump between screens on the
7	computer.
8	DR. ROILAND: Okay.
9	Irvin, can you set up the voting
10	slide, please.
11	MR. SINGH: Yes, absolutely. So
12	MEMBER WEINTRAUB: All right, so you
13	want us on the phone to put it in right now?
14	DR. ROILAND: Let Irvin read out what
15	we are going to be voting on and the voting
16	options. And then once he is done with that he
17	will ask you to submit your votes. And folks
18	can, who are on the phone if you prefer you can
19	submit it through the webchat. Or if you want,
20	you can submit your vote through the email or
21	text that we had arranged before. But whatever
22	works best for you, we'll figure it out up here.

1	MEMBER WEINTRAUB: All right. So,
2	just give us feedback that it works after this
3	first vote; okay?
4	DR. ROILAND: Sure. We definitely
5	will.
6	MR. SINGH: Good morning, everybody.
7	We are going to commence the voting process. And
8	just want to make sure that the voting platform
9	is working okay, making sure that your votes are
10	being captured.
11	The first thing we're going to do is
12	run a test vote to make sure that the clickers
13	are working and that you're able to submit a
14	response. So go ahead and submit your test vote
15	now. And just point your clickers to this
16	direction because this is where the receiver is.
17	DR. ROILAND: And for folks on the
18	phone, you can't see the voting slides. We're
19	not able to show them on the webinar platform.
20	So the test slide, your voting options are 1 for
21	high; 2 for moderate; 3 for low; and 4 is for
22	insufficient.

1	So, if you could submit those via the
2	method that works best for you we'd appreciate
3	it. Thanks.
4	MEMBER WEINTRAUB: All right. So it's
5	not clear to me how to use this chat function. I
6	typed "chat" and what I see here is several
7	messages. How do I respond back with a chat?
8	MEMBER BECKER: At the bottom this
9	is Larry at the bottom you see a box that says
10	"send" next to it?
11	MEMBER WEINTRAUB: No.
12	DR. ROILAND: Bill, if you are
13	comfortable with saying it over the phone you can
14	do that or you can email me.
15	MEMBER WEINTRAUB: Well, let's see if
16	this works.
17	DR. ROILAND: Okay.
18	MR. SINGH: Does everybody who has a
19	clicker showing like a number on the remote when
20	you hit it?
21	MEMBER NEEDLEMAN: Mine didn't.
22	CO-CHAIR ASPLIN: I just want to

reassure everybody, we'll pick the pace up as we 1 2 go on. (Laughter.) 3 4 CO-CHAIR ASPLIN: This is only going 5 to happen once. Rachel, did you 6 MEMBER WEINTRAUB: 7 check? Did you see the chat response? 8 DR. ROILAND: Hi, Bill. Yes, this is 9 Rachel. I have your vote on the chat response. And I also have a vote from Andrea Gelzer and 10 11 Troy. And Mary Ann, I have your text. Yes, I 12 have your vote as well. 13 MEMBER RAMBUR: And do you have 14 Betty's? I sent mine via text and email. 15 DR. ROILAND: Yes, I got it. 16 MEMBER RAMBUR: Thank you. 17 MR. SINGH: And, Dr. Ratliff, I also 18 captured your vote, too. DR. ROILAND: And, Larry, this is 19 20 Rachel. I got your vote as well. So we should 21 be all, so we should be all good to go. Sorry 22 about that.

	• • • • • • • • • • • • • • • • • • •
1	MEMBER BECKER: Terrific.
2	MR. SINGH: So it appears that the
3	voting platform is good to go. We've got
4	everybody situated and all the clickers are
5	going. So now we are going to be commencing our
6	official vote for Measure Number 1598, Total
7	Resource Use Population-based PMPM Index on the
8	first criterion on a high priority.
9	Your options are 1, high; 2, moderate;
10	3, low; and 4, insufficient. Please vote now.
11	(Voting.)
12	MR. SINGH: Everybody in the room and
13	everybody on the phone or everybody in the
14	room, can you please submit your vote one more
15	time.
16	(Voting continues.)
17	MR. SINGH: One last time.
18	MEMBER WEINTRAUB: Did you get
19	everybody on the phone? Do you want us on the
20	phone to do it again?
21	DR. ROILAND: No, we can resubmit your
22	votes. Thank you though.

1	MEMBER WEINTRAUB: Okay.
2	MR. SINGH: Dr. Weintraub, can you
3	please submit your vote via your proxy? Thank
4	you.
5	MEMBER WEINTRAUB: Oh, you want me to
6	do that rather than the chat now? I'm still, I
7	don't see email from a proxy to respond to.
8	MR. SINGH: The chat can work, too.
9	MEMBER WEINTRAUB: All right. I will
10	do it again on the chat. All right? We'll try
11	it again. Please let me know if you get it.
12	DR. ROILAND: We have your vote, Bill.
13	Thank you.
14	MEMBER WEINTRAUB: Thanks.
15	CO-CHAIR ASPLIN: We're just sorting
16	through the proxy issues here with the number of
17	people we have on the phone to try to get the
18	right denominator. Once we get rolling this is,
19	this is going to be much more efficient. This is
20	not going to be a Chicago-style vote, however.
21	DR. ROILAND: Can we do it one more
22	time? And if not, we can maybe move to a hand

1 vote. 2 CO-CHAIR ASPLIN: I think it's worth the time to get this because it's going to be 3 really cumbersome to do anything else. 4 5 MR. SINGH: So, we're at 19 now. Okay, so voting is now closed. 6 The results for --7 8 CO-CHAIR ASPLIN: For clarity, we're 9 voting on high priority, last time. Those of you 10 on the phone, we already have your votes. 11 So, all votes are MR. SINGH: Okay. 12 in. The voting is now closed for priority one 13 for high priority for 1598. The results are 100 14 percent high. MEMBER MARCINIAK: That wasn't my 15 16 vote. I'm from Chicago. I feel very comfortable 17 with that. 18 (Laughter.) 19 MS. O'ROURKE: For those of you on the 20 phone, we're just discussing in the room how to 21 proceed with voting. So apologies for the delay. 22 Why don't we just, if everyone is

1 comfortable, take a vote by hand on this 2 criterion just to get us back on track. And then we'll try the clickers again for the performance 3 4 gap vote. 5 So, people on the phone, we have your If you don't want to change, no action 6 votes. 7 needed for you. 8 In the room, if you could just raise 9 your hand as we go through. Well, first let me say, does anyone 10 mind voting publicly? Okay, so if you, for high 11 12 priority, if you wish to vote high, please raise your hand now. 13 14 (A show of hands.) MS. O'ROURKE: Okay, we have eight in 15 16 the room. 17 If you wish to vote moderate. 18 (A show of hands.) 19 MS. O'ROURKE: We have two in the 20 room. 21 And if you wish to vote low. 22 (A show of hands.)

1	MS. O'ROURKE: We have one in the
2	room.
3	When we add those to the phone votes
4	we have our correct total?
5	DR. ROILAND: So we have 16 for high;
6	2 for moderate; and 1 for low. And that equals
7	19; right? Okay. So that's the vote for high
8	priority for Measure 1598.
9	MS. O'ROURKE: And we apologize for
10	that. We are going to get you back on
11	conversation while we fix the voting software in
12	the background. So apologies. Thank you for
13	your patience, everyone.
14	CO-CHAIR ASPLIN: Very good. Thank
15	you.
16	So, we are going to move on to the
17	performance gap. And we will also be voting on
18	this gap here, an opportunity for improvement.
19	And before moving to the vote, are there any
20	additional comments? We did discuss this a
21	little bit. Are there any additional comments on
22	the performance gap in this measure, an

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1 opportunity for improvement? 2 (No response.) CO-CHAIR ASPLIN: None in the room. 3 4 And I'm not seeing any online. 5 So, if we could move ahead to -- Are we ready or do you want to do another manual 6 7 vote? 8 Let's try the software. MS. O'ROURKE: And if it doesn't work the first time we'll just 9 move to a manual vote and get someone up to 10 11 reboot it for us. 12 So, Irvin, if you could read the 13 platform. 14 MEMBER WEINTRAUB: So, we should go 15 ahead and use the chat function? 16 MS. O'ROURKE: Yes. If you are 17 online, please go ahead and chat your votes to 18 us. 19 In the room, if you could use the clickers. 20 21 MR. SINGH: Okay. So we will be 22 voting on the second criterion and that is gap in

1	care/opportunity for improvement for Measure
2	1598. Your options are 1, high; 2, moderate; 3,
3	low; and 4, insufficient.
4	Please begin voting now.
5	(Voting.)
6	MR. SINGH: This one looks good.
7	So, the results for the second
8	criterion gap in care/opportunity for improvement
9	is as follows:
10	We have 8 votes for high; 10 votes for
11	moderate; 3 votes for low; and 0 votes for
12	insufficient, which equals out to 42 percent
13	high; for number 2, 53 percent; for number 3,
14	low, 5 percent; Number 4, 0 percent for
15	insufficient.
16	CO-CHAIR ASPLIN: Very good, thank
17	you.
18	And we will move on to the final vote
19	in importance which is measure intent. Are there
20	any comments prior to the voting? If not, we can
21	read the slide. We'll have some additional
22	information about the specific nature of the

1 vote. 2 Let's move on to measure intent. 3 MR. SINGH: Okay. So we are voting on 4 the third criterion, measure intent for Measure 5 Number 1598. Your options are number 1, high; number 2, moderate; number 3, low; and number 4, 6 7 insufficient. 8 Please vote now. 9 CO-CHAIR ASPLIN: For those of you on the phone, the description of this third vote is 10 the measure intent of the resource use measure 11 12 and the resource construct is clearly described. 13 (Voting.) 14 Okay. So the results for MR. SINGH: measure intent is 12 high; 2, moderate, and 6 15 16 votes; number 3, low, 1 vote; and there were 4 17 insufficient. So just to reiterate, for 1 high, 18 19 there's 12 votes; number 2, moderate, there's 6 20 votes; number 3, low, is one vote; and number 4, 21 insufficient, 0 votes. 22 CO-CHAIR ASPLIN: Very good. So those

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are our votes on importance.

2	And we can move on to scientific
3	acceptability. And our lead discussant for the
4	first section of scientific acceptability is
5	Herbert Wong. Herbert.
6	MEMBER WONG: Very good, Brent.
7	So, I'm thinking about for the
8	purposes of efficiency, talking about the
9	scientific acceptability both in terms of
10	reliability and validity all in one conversation
11	because they often kind of spill over into these
12	different characters. When we do the voting
13	itself, I think that we can go systematically
14	through this.
15	So, you know, just as a reminder for
16	folks that the numerator for this particular
17	measure is a risk-adjusted total resources that
18	are associated with treating our members. This
19	includes professional facility in-patient and
20	out-patient. It includes pharmacy, labs,
21	radiology, ancillary, and behavioral health.
22	The denominator is really a care group

average. Right? And it's designed to be 1 2 somewhat flexible, depending on what the -whoever is deploying it is. So you have a 3 numerator aligned to values and you have a peer 4 5 group. There are a number of exclusions that 6 7 are included in this particular metric. They're 8 excluding services that are not office-based. 9 They are excluding convenience care clinical They exclude providers that are not a 10 visits. physician, physician assistants, and nurse 11 12 practitioners. 13 They look at service lines for 14 specialty-based services, practice, and 15 specialty. 16 They include the following 17 specialties: family medicine, internal 18 medicines, pediatrics, OB/GYN, and pediatrics. 19 There are a number of other 20 adjustments. Basically member aged over 64 are 21 excluded; members aged -- under age 1 are also excluded. 22

1	There is a criteria there that the
2	enrollment has to be more than 9 months,
3	basically excluding anyone who has less than 9
4	months, up to a year's time.
5	Members who are not attributed to a
6	primary care provider is also excluded.
7	One of the things that was mentioned
8	earlier on was the dollars per member has to be -
9	- if it's above \$125,000, those components are
10	excluded.
11	The risk adjustment is designed for
12	age, gender, and diagnoses.
13	In terms of the reliability testing,
14	when they first started when this was first
15	approved they basically deployed three different
16	methods in terms of looking at reliability. They
17	deployed 90 percent random sample, a
18	bootstrapping technique, and the analysis of
19	performance over time.
20	The data that they employed was from
21	health partners looking at the years 2007, 2008,
22	2009, for 19 individual providers in this
particular area. And, roughly, the members in --1 2 for each of these years was roughly 250,000 to 300,000 members. 3 In terms of the new data, looking at 4 reliability they looked at I believe it was the 5 years 2014 and 2015, and they had roughly 470,000 6 7 members involved there. 8 So, in terms of reporting the 9 reliability, they honed in on the bootstrapping and 90 percent sample. Over all, the results are 10 consistent across -- are consistent within a 11 12 There is some variation across the group. group. 13 So, in general, the assessment from 14 both the staff here at NQF, and members' preliminary analysis of that, kind of gave the 15 16 assessment in terms of reliability over all, in 17 terms of the testing, as high. And that's in generally I'm speaking. 18 19 In terms of scientific validity, again 20 the data source that they deploy were the same 21 years that they used for the reliability, again 22 focusing on health partners' commercial

population again, with roughly 470,000 members. 1 2 They examined correlations between measure components and measure scores with other 3 markers of utilization. 4 5 There are a large number of tables that I'm sure that folks have kind of reviewed 6 there that look at these correlations. 7 I won't go through them all there. 8 9 Here are some of the take-aways I think I have looking at both the reliability and 10 the validity. I think that in general I think 11 12 that committee members, at least in the preliminary stages, looked at reliability and 13 14 kind of rated it as high over all. When they looked at validity, I think 15 16 that folks kind of rated that in a more moderate level a little bit. 17 18 The big concerns that kind of emerged 19 from this conversation were, one, concerns about 20 attribution. The second concern was a concern 21 about some of the conceptual bases of trying to pull this metric together. Namely, why is it 22

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that one used a 9-month cutoff as opposed to something else?

There is a notion of generalizability 3 4 that much of the testing was done in a localized 5 And so there was some question of whether area. or not this particular metric is applicable on a 6 7 nationwide scale. And then there were also some 8 comments about how looking at some of the 9 specialty groups that were relatively narrow, looking at some of them, but didn't include other 10 11 specialty groups.

12 My own general comments about this is 13 this notion that when you look at this particular metric I think that one has to be a bit cautious, 14 in particular looking at the peer group. 15 So you 16 do have a denominator. You do have a -- you have 17 a numerator of a group that you want to compare. 18 You have a denominator where you want to 19 benchmark it to another group.

20 There is some notion there from a 21 conceptual point of view of how you could have 22 some flexibility of choosing that. So, for

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instance, if it's cutting across a geographic 1 2 space, if you have a large health plan and you're looking at this, and how you choose your 3 4 denominator, your peer group becomes important. 5 So, for instance, if you have two different locations, one is, say, New York and 6 7 one is in Florida, if you don't choose the right peer group what's -- who's to say that you have 8 9 the right metric, that is the right average, unless you thought all about how one is basically 10 doing that? 11 12 There the exclusion of \$125,000, there 13 were some comments, I think, that reviewers had 14 of whether or not that was a bit arbitrary. And I know that it was well-established back in 2012 15 16 that the developers basically increased that rate 17 from 100,000 to 125,000 to reflect some inflation 18 sort of basis there. 19 I think that for the 9-Let's see. 20 month period some additional sensitivity analysis 21 could have been done to kind of demonstrate that 22 this is not, should not be a concern, whether or

not you remove some of that restriction, some 1 2 comparison groups there. So, I would say that over all the 3 4 approach, both in terms of reliability and 5 validity, are pretty well-accepted methods in the literature and that the approach is pretty solid 6 7 in terms of how they approached it. 8 I think that some sensitivity analysis 9 might be in order for some of these parameters. I think that some of the conclusions 10 11 that one can come up with is that for these 12 particular metrics is is generalizable within 13 groups, but one has to be cautious when looking 14 at it across groups. So high level kind of comments on both 15 16 reliability and validity. I'm sure that the committee members will kind of add their two bits 17 18 to it as well. CO-CHAIR ASPLIN: 19 Thank you, Herbert. 20 So, we are going to address and assess 21 reliability first. And then we will have the conversation around validity and several things 22

that I have heard mentioned here around 1 2 attribution, truncation changes, exclusions, et cetera, will be talked about in the validity 3 4 section. MEMBER WONG: Yes. 5 CO-CHAIR ASPLIN: Any specific 6 comments on the reliability? Sue, do you have 7 8 anything to respond initially to on reliability 9 before we get the committee comments? Or would you just want to wait for committee members? 10 11 MS. KNUDSON: You know, I think the 12 most general comment I'd have -- and I'd ask Gary 13 and Chad, too, because we are all intently 14 listening -- is so it's our understanding attribution, with this round of review of our 15 16 measures, continues to be guidelines. So we have offered the attribution method that we have used 17 18 within our health plans. 19 What I'll add onto that is in our work 20 across the state with Minnesota Community 21 Measurement we analyzed different attribution So, first-off, the inclusion of the 22 measures.

specialties in ours, what works, that works in our market. And that is widely accepted by our group.

And so when we do apply the measures, 4 5 either statewide like we did, or nationwide, as that comment was made, it is important to have an 6 7 agreeable attribution that we were able to derive 8 to that. What we found here in this state was, 9 you know, most of the models are returning the 10 same types of results. So, it's as much about 11 the inclusion of a type of providers as the culture that you're operating in. 12

13 So that would just sort of be my general comments on attribution, which I think is 14 -- follows both of these sections. And then the 15 16 other comments about the peer group, the 17 truncation limit, and the 9-month continuous 18 enrollment we'll handle in the reliability. 19 CO-CHAIR ASPLIN: Okay. Comments on 20 reliability? Cheryl.

21 CO-CHAIR DAMBERG: Thank you. I 22 appreciate the information provided on the

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reliability in terms of consistency of results, 1 2 test/re-test. But I don't think I saw in the materials any signal-to-noise test to be able to 3 4 look at whether you are able to discriminate the 5 performance between providers. And that was concerning from my 6 7 perspective, given that this type of measure is 8 frequently used in the context of value-based 9 payments. 10 MS. KNUDSON: Do you want us to handle 11 all the reliability questions now, Brent? 12 CO-CHAIR ASPLIN: Yes, that would be 13 great, Sue. If you could respond to that, that 14 would be great. Okay. We'll start with 15 MS. KNUDSON: 16 that signal-to-noise one. I'm going to have Gary 17 respond to that. 18 MR. KITCHING: Sure. In that paper, 19 when we ran our paper we looked at the bootstrap 20 analysis. And what we did was we compared the 21 bootstrap analysis, or the result, to the actual 22 result. And that's kind of the noise, if you

think of it that way; so the differences within a
provider group.

When you compare that to the what 3 4 you're trying to measure against, so that's 5 across all provider groups, and this is the spread between each provider group is about 110 6 So the signal-to-noise issue, what 7 percent. 8 we're looking at is less than 1 percent would be 9 the noise. And the signal then is all the 110 10 percent. 11 So, really, if you look at a provider group that has a range of, say, 0.9, the noise in 12 there is going to be, like, 0.89 to 9.1, or 9.1. 13 14 But the spread that we're talking about is over the course of, you know, 100 points. 15 So you'd be 16 able to confidently say that that person, the 17 ranking we gave them is their result. And I 18 think that's what we're, what we're trying to 19 conclude, or that's what the paper concludes. 20 And that's what that testing mechanism does.

21 We've also done the reliability, which 22 I think you're referring to, which is I think

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people actually try to think about that 0.7 reliability stat. We've done that test as well, and it's on our website. And we're actually just performing that now. And we'll have it up there soon.

Those results have the same, conclude the same results, but that 0.7, if you have a 600 and above population size, that returns back a reliability score that's positive as well.

10 CO-CHAIR ASPLIN: Thank you. Jim. 11 MEMBER NAESSENS: Yes. Actually, most 12 of my comments are more about the attribution methods. And as a result of attribution in this 13 14 whole process we've experienced in Minnesota Community Measurement, you know, experience where 15 16 there's actually a little bit different 17 attribution applying the same total cost of care 18 and research. And in that attribution process it 19 turns out that they used similar definitions of 20 specialties, really focusing, understanding as an 21 intended frame to the primary care practice. 22 But in the way that the attribution is

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applied we end up identifying lots of patients 1 2 who see many nurse practitioners and physician's assistants in specialty clinics. 3 But because 4 they're labeled all physician assistants and 5 nurse practitioners as primary care providers, we see many referral patients being counted and 6 7 captured in our system and attributed to us as 8 primary care patients and being included in these 9 measures.

10 So, for example, only 3 percent of our 11 primary care practice gets picked up because it's 12 only a selected care group. But, also, 60 13 percent of the non-primary care patients who get 14 captured have cancer in the care patients, which 15 will really skew the information.

16 So, if we're accepting a method and 17 saying that it's valid without an actual -- with 18 only a recommended patient attribution method, 19 how do we say that -- or what, what sort of 20 standard does National Quality Forum have to put 21 on a measure whose underpinnings are not really 22 valid in terms of patient inclusion?

1	The other comments, while I just have
2	the floor, would be some of the things that Herb
3	mentioned as exclusions are actually exclusions
4	in their attribution, not exclusions in their
5	measures. So the only exclusions, it's primarily
6	who's between that age of 1 and 64, outlier
7	patients get truncated, they don't get excluded.
8	And the threshold, if the intent of eliminating
9	outlier patients is to make a more normalized
10	distribution, it still leaves a chunk of patients
11	about 20 percent higher than the mean in the
12	distribution.
13	In our experience with the data across
14	Minnesota we have 5 percent of the whole
15	population being outliers, which doesn't
16	normalize that distribution very much.
17	What I would recommend that we do in
18	terms of approving the handling of outliers is to
19	actually exclude them. Just like the Medicare
20	spending per beneficiary excludes patients who
21	are transferred between systems, in this case
22	many of those outliers are actually not being

1	handled by the primary care group who is
2	monitoring and managing most of the patients.
3	The specialty practice is only seeing part of the
4	care, and those patients would also be best to be
5	just left out of the analysis rather than skewing
6	information. They'd be handled in a very
7	different fashion.
8	CO-CHAIR ASPLIN: All right. So a
9	couple different issues. Taroon is going to the
10	first part of your comment, Jim, relative to the
11	NQF's position.
12	DR. AMIN: So, and there's many of you
13	on the committee that participated in the
14	original construction of what we discussed in
15	terms of the measure specifications. And this is
16	what actually is going to key up for conversation
17	later this afternoon as it relates to our
18	attribution panel.
19	To address the attribution question in
20	particular, as we looked at the measures, as we
21	looked at cost and resource use specifications,
22	originally this standing committee, former

members but the standing committee, outlined 1 2 there are several components that could be submitted as specifications for guidelines. 3 So, by nature, some elements of measure submission 4 5 while they're important to understand for context, were not part of the measure 6 specifications that would be under review for 7 8 this committee. 9 And one of those elements is the That certainly, so that is 10 attribution model. 11 the current construct of what this committee 12 should evaluate this measure by. 13 I think, Jim, you're pointing out a

14 really interesting challenge with that construct which, obviously, has been challenged by our 15 16 Attribution Committee, which will be part of our 17 conversation later today around whether that 18 needs to be not just a guideline but essentially 19 a specification in the measure. However, that is not what is in front of the committee at this 20 21 point.

22

The committee's current guidance to

the developers and current evaluation process 1 2 still allows that to be a guideline. I think you will, each of you will have to struggle with how 3 4 to interpret that in the context of the validity 5 and the reliability of the measure specifications. 6 And I will keep the second point 7 8 around exclusions up for the committee 9 discussion. I don't know if that answers your 10 11 question or may or may not be satisfying, but 12 that is currently what the evaluation process that we've laid out is structured as. 13 14 CO-CHAIR ASPLIN: Thank you, Taroon. 15 So, my sense is that we're going to 16 have more issues to talk about on the validity 17 side than the reliability here. So I'm just 18 going to ask Jack or Srinivas, did you have 19 reliability comments or questions? Jack, go 20 ahead. 21 MEMBER NEEDLEMAN: Just very quickly. 22 I want to reinforce what Cheryl said. And I

think Jim's comment underscored the issue. 1 2 The data that's available for constructing these measures is at the individual 3 4 patient level. But the unit of analysis is the 5 group or the medical group or what the -- or the individual provider, whatever the aggregate is 6 7 that's actually in those reports. And the 8 reliability measures should focus on what's 9 happening at that level. And, frankly, I'm not seeing very -- I'm not seeing as much as I would 10 11 like to see to really evaluate the reliability 12 there. 13 A lot of reporting of what the 14 population, stability at the population level, 15 but not a lot of reporting of the stability at 16 the group levels and the intergroup levels. And 17 it's very had to assess how reliable this is in 18 practice as opposed to how reliable it is at the 19 population level, where it looks very stable. 20 CO-CHAIR ASPLIN: Sue. 21 MS. KNUDSON: Yes. I just want to 22 clarity, Brent. Those are our group. That is

1 the group-level testing. 2 MR. KITCHING: Population level. Population at the 3 MS. KNUDSON: Yes. 4 group level, so 66 groups. 5 MEMBER NEEDLEMAN: Yes, but just to be 6 What has to happen is we've got to be clear. 7 looking at what the averages are across the 8 groups, not what the averages across the 9 population and how stable. A 90 percent sampling from, or bootstrapping at the population level is 10 11 not the same thing as getting a separate set of 12 bootstrapping or estimates of the stability of 13 the measure group by group and looking across the 14 different groups at that. Yes, this is Gary 15 MR. KITCHING: 16 again. Yes, we did the -- the sampling is 17 actually within the group. So the random sample 18 that we take, with replacement for the bootstrap 19 technique, is within the 66 groups. So in 20 essence you sample them 500 times within that 21 whole, within the group. And then you compare that end result to the actual. And that's how we 22

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know that the resulting variation is within that particular group.

There again it's across the entire 66 population of groups, that's the 110 percent. So we're confident that we know the signal-to-noise ratio and we can tell the difference between performance for each of those 66 groups. So it is a group analysis.

9 CO-CHAIR ASPLIN: Are you satisfied, Or this seems like an important -- because 10 Jack? I, I interpret it, just like they said, that the 11 12 testing was at the group level. So maybe I want to make sure we don't have -- we're not talking 13 14 past each other here, that we all agree on what 15 was done. So, does that make sense, Jack? 16 MEMBER NEEDLEMAN: It makes sense. 17 Again, the relevant number here is not those .00

18 -- I forget, there was a third zero before you 19 get to the first figure number. But that 110 20 percent variance. And that's got to be compared 21 against the variance across the groups to figure 22 out how stable and reliable the measure is. If

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we're trying to measure intergroup comparison, 1 2 110 percent actually looks large as the degree of uncertainty around what's a relatively small 3 4 group variance in the RCI measure. Yes, I think, just in 5 MR. KITCHING: layman's terms I'll just try and communicate what 6 7 we're trying to test here. 8 So, if we take any one of those 9 provider groups, the resulting score, those three bars, if you look at the graphic, they're pretty 10 There's no difference between the index 11 tight. 12 scores for all the different testing techniques 13 that we put in place. So, for any different 14 group there's no difference in the results, depending on what sampling we did for it. 15 16 The 110 percent it's at the range of 17 performance across our whole network. So we have some provider groups that are performing at 70 18 19 percent of average; other provider groups that 20 are at the 1.8 percent of average, so 80 percent 21 higher than the average. 22 So the difference between one provider 1 group that's performing really well -- 70 percent 2 of average; another group of 80 -- 100, yes, 80 3 percent above average of 1.8; that's actually the 4 range we're measuring. So we can tell that 5 provider group that's at the very best performer 6 or very worst performer, or highest performer, is 7 that high at 1.8.

8 MEMBER NEEDLEMAN: Yes, but if you 9 pull into the 10 to 90 percent range as opposed 10 to the extremes you get a much, much smaller 11 variance than that. Much smaller.

12 MR. KITCHING: Well, I mean obviously 13 it's 10 percent of average and 90 percent, so, 14 yes, I would agree. There's still a 1 percent variation in that performance score. And that's 15 16 still vaque. I mean, there's still 20 points 17 between 10 percent above and 10 percent below 18 average. And you're still looking at that 1 percent variation in that person's score. 19 And 20 he's not going to go from 10 percent below to 10 21 percent above, he's only going from 10 percent below to 9 percent below. And that's the noise. 22

1	MS. KNUDSON: And as I mentioned
2	before, 1 percent is still meaningful.
3	CO-CHAIR ASPLIN: Srinivas.
4	MEMBER SRIDHARA: Thank you. So, I
5	wanted to just comment a little bit about sort of
6	practical implementation, so just for context as
7	I mentioned before. Prior to my current role
8	here, Advisory Board, I was the Maryland HCC
9	director, and we tried to actually implement this
10	measure set along with several other
11	organizations as part of an NHRI Robert Wood
12	Johnson Foundation.
13	So, just in terms of some of the
14	things that we're talking about, whether the
15	attribution being guideline instead of a
16	specification, two comments on that: one from
17	having sat on the Attribution Committee; and two
18	from sort of the actual approach here.
19	These sorts of flexibilities, be it
20	the attribution approach or the local reference
21	populations, actually make adoption more likely.
22	And including sort of some conversations around

how you might define primary care. All of these and how someone might go about implementing it actually are important in getting it through and actually using it, convincing the provider 4 groups, tuning it to your local population and making that work.

That said, that makes it harder to 7 8 sort of say how do we measure reliability across 9 nation due to, you know, sort of external validity that was just discussed as well. 10 So, you know, you wish there was a national benchmark 11 12 to compare it to and make that easier to do, but 13 in terms of comparing local provider populations, 14 usually, at least we found that you had a better 15 success, say, comparing to other providers that 16 are under the same payment models or related factors that are going on. 17

18 So in that way in sort of 19 statistically performing it and doing it and 20 convincing folks in a practical side, it made 21 sense. So, I think there is a tradeoff between getting very explicit and specific on how you do 22

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every element of it, which helps us do the 1 2 scientific study of it. But in terms of application, I think even if you endorsed it that 3 way I think individual folks or groups who would 4 implement it would have to necessarily tune it to 5 make it applicable in their population. 6 I think on the attribution part, you 7 8 know, we've discussed some of that. And I think 9 we have a whole lot of debate in the Attribution Committee around whether it should be a 10 11 fundamental unit of, you know, the specification 12 or is it flexible? And I think, again, in terms of evaluation it makes it easier if you have a --13 14 you know, you need the attribution as context, at least for the evaluation, which we've talked 15 16 about here. But I think, again, in terms of 17 applicability it's you would want the 18 flexibility. 19 The second is some of the concerns 20 around, say, the 9-month, you know, period of 21 enrollment, et cetera, these are to me things that are relevant for commercial population. 22 And

1	then I think it makes sense if you thought about
2	what is the average enrollment period and sort of
3	if you look you know, and people do, actuaries
4	do PM calculations and comparisons across
5	commercial populations, 9 months is probably a
6	pretty good number, if you think about it. It's
7	different, say, if you did Medicare, and
8	certainly very different if you did Medicaid.
9	And so I think that's, that's an
10	important thing to keep in mind here. You know,
11	something that I wish this group had taken on, I
12	know that was mentioned already about lack of
13	that kind of data in their population, but
14	thinking about how to apply it to Medicare or
15	Medicaid, they've done some work to think about
16	it. But I think figuring out how this might
17	apply in those populations would be important and
18	specific guidelines.
19	I just wanted to provide that for
20	context.
21	CO-CHAIR ASPLIN: All right, very
22	good.

1 We are going to move on to the vote on 2 reliability. Irvin. MR. SINGH: Okay. 3 So we're going to 4 be voting on the reliability criterion for 5 Measure 1598. Your options are Number 1, high; Number 2, moderate; Number 3, low; Number 4, 6 7 insufficient. Voting has begun now. 8 (Voting.) 9 MR. SINGH: Okay, so all votes are in. Voting is now closed. 10 11 So the results for reliability for 12 Measure Number 1598 are there's 10 votes for 13 high; 7 votes for moderate; 1 vote for low; and 1 14 vote for insufficient, which accounts for 53 percent high; 37 percent moderate; 5 percent low; 15 16 and 5 percent insufficient. 17 CO-CHAIR ASPLIN: Thank you. 18 We then turn it over to Mary Ann Clark 19 who is the lead discussant on the validity section of scientific acceptability. Mary Ann. 20 Yes, hi. I guess I was 21 MEMBER CLARK: under the impression I was doing the 1604 22

reliability and validity, so I kind of focused on 1 2 that. CO-CHAIR ASPLIN: Well, Herb sort of 3 4 covered both here. Maybe --5 MEMBER CLARK: Yes. CO-CHAIR ASPLIN: -- I have it wrong 6 7 in the documentation. So that's, that's fine. 8 We can just open it up. We've already raised 9 many of the validity areas that committee members want to address. 10 11 MEMBER CLARK: Right. 12 CO-CHAIR ASPLIN: So --13 Right. MEMBER CLARK: 14 CO-CHAIR ASPLIN: -- that's fine. We 15 can table your comments till 1605 then. That's 16 okay. 17 Yes, Janis? 18 MEMBER ORLOWSKI: Based on the 19 discussion where a number of the reliability 20 issues were raised, the vote is surprising. And 21 I think it would be helpful if, it would be 22 helpful to hear both sides of the story. You

1 know, again, the vote does not reflect the 2 discussion we had. And that makes it difficult to be able to hear both sides, is my comment. 3 4 CO-CHAIR ASPLIN: I quess it depends 5 on how you interpret the conversation. Because I -- Is there a concern though that you think was 6 7 not being addressed in terms of questions about reliability? 8 9 Brent, maybe I can help. DR. AMIN: Maybe I can help. 10 11 So, the conversation around 12 reliability focused a lot in terms of -- and 13 Jack, I'm going to, Jack and Herb, I'm going to 14 ask you guys to weigh in here -- it sounds like there was a lot of concern around the reliability 15 16 testing approach that was used by the developer. 17 And I think the question that's being raised is 18 did, generally -- it sounds like the committee, 19 while it had some concerns around the reliability 20 testing generally still moved it with a high 21 rating. 22 And I think there's a question of, you

know, can we have a little bit of discussion 1 2 around everybody sort of reconciled that. Is that a fair question that's being 3 4 raised by a committee member? So given, Herb, 5 your discussion, and Jack, that you had raised this concern, maybe having a little conversation 6 7 around how you weighed the testing here, not 8 necessarily -- and others who may agree to that. 9 MEMBER WONG: Right. So I'll, I think I'll start it off or at least kick it off. 10 11 I think that, you know, from -- I 12 think that part of the thought process here is to think a little bit about the measure from two 13 14 aspects of it. One is a conceptual basis, and the other is from the testing aspect of it in 15 16 terms of the reliability. I think that part of 17 the conversation had drifted towards a conceptual 18 basis of that. And some of these components, 19 whether, you know, one of my comments, for 20 instance, is looking at the denominator and 21 making sure that we have the right baseline and 22 things of that nature. That gets into a space

1	that's a little bit, I would say, conceptual.
2	Right?
3	And there is some flexibility that is
4	basically built into that.
5	When you go into reliability in terms
6	of looking at the data of what they have and what
7	they have done, the methods are traditional,
8	standard. The approaches are really out there,
9	as has been well known, it's well documented how
10	you do those sort of things. And they have done
11	that.
12	And the, in terms of the findings on
13	it, you know, one of the things I characterized
14	from taking a look at the tables on that in terms
15	of what was reported out, that in my judgment if
16	you take a look at those correlations and things
17	of that nature, it seemed to be performing better
18	when you look at it from a group perspective.
19	But if you look at it from across groups there
20	was greater variation. There was greater
21	concerns there.
22	So, you know, in that judgment, you

know, from my thinking of it, it would be in 1 2 either the high or moderate space over all. So trying to separate some of the concepts versus 3 4 what they had deployed. So, you know, high level 5 kind of characterization there. I'm not sure if Jack has anything to 6 7 add. 8 MEMBER NEEDLEMAN: Yes. Very quickly. 9 I, the comments of the developers got 10 me back looking at the documentation, and on 43 of the -- page 43 of the PDF there is actually a 11 12 group by group description of the results of the 13 reliability testing. And I went back to look at 14 that. It's not clear from the earlier 15 16 summary description, but I did go back and look, 17 and the variance at the group level in these 18 measures between the 90 percent sample, the 19 bootstrap sample, is in the third decimal place 20 of a measure that's measured somewhere in the, 21 you know, where the relevant number is in the first and second. 22

1	So, I, having looked at that data I am
2	now comfortable the reliability of the measure is
3	fine. We can discuss the validity a little bit
4	more.
5	CO-CHAIR ASPLIN: Thank you both for
6	jumping on that. Thank you.
7	All right, so I have heard a few
8	different topics come up. Attribution is really
9	a we could talk about that from a validity
10	standpoint or usability. And it sounds like
11	that's going to be one, another one of those
12	issues that will be difficult for us to fully
13	resolve, given the current guidance to developers
14	and the charge of this committee today. And
15	maybe another moving target in terms of the
16	overall endorsement process over time.
17	Exclusion, truncation, and then,
18	Janis, I believe you had some comments earlier
19	around. that came up in the importance dialog
20	around sociodemographic factors. Do you want to
21	make those comments now? Great.
22	MEMBER ORLOWSKI: I would say that my

1	comments fall into two specific areas regarding
2	the risk adjustment for sociodemographic status.
3	First is that I believe that the two
4	tests that were done are inadequate. I believe
5	that taking a look at income and poverty level at
6	a 5-digit ZIP Code is an inadequate measure. And
7	there's been much reported about this particular
8	thing.
9	I also find a black versus non-black
10	again surprising and unreliable. And so I do not
11	believe that there has been adequate assessment
12	of disparity.
13	The second comment that I would make
14	is that the developer says that by using these
15	two measures, both of which I already said I
16	believe are inadequate, I see no more than X
17	percent movement. So that in one case 97 percent
18	of the hospitals had no movement. The other 95
19	percent. And when you look at it at the level of
20	the hospital, I would argue that you are looking
21	at it to say that there is minimal movement, that
22	that may be an appropriate statement.

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And so, for example, 5 percent of the
hospitals across the United States are large
academic medical centers and they care for 25
percent of Medicare patients and 40 percent of
Medicaid. So, so to have a 5 percent of hospital
movement you'd have to say which hospitals.
Are urban hospitals affected by this
movement? Are rural hospitals? And I don't
believe that I have enough information to be able
to take a look at those particular variables.
And so I would say, and then I think
the third thing is is that the we've already
talked about this before is that for the
majority of this measure you're bunched between
10 percent and 90 percent. And I'm not sure that
these measures help you look at variations in SDS
within the population.
CO-CHAIR ASPLIN: For clarity, some
of, the middle section of the comments sounded
like it may have been related to the 2158
measure, the Medicare Spending Per Beneficiary,
since this is not a hospital accountability

1 measure? 2 MEMBER ORLOWSKI: Oh, you know what, 3 I'm sorry. I --4 CO-CHAIR ASPLIN: Okay. MEMBER ORLOWSKI: -- was reading from 5 my -- that's right. 6 CO-CHAIR ASPLIN: Okay. Now, other 7 8 comments on validity? Or do we -- Jack, go 9 ahead. 10 MEMBER NEEDLEMAN: Yes. I have a 11 question about measure construction because we 12 can't talk about validity until we know what's in 13 it. 14 So, standardized pricing model, and 15 I'm curious to know how, what standardized prices 16 are being used for the hospitals. Some 17 hospitals, some insurers that pay on the basis of 18 charges or discounted charges, still a fair 19 number still do it that way. Medicare pays on the basis of DRG. So I'm wondering at what level 20 21 is the hospital visit priced? Are we capturing 22 the differences in variations in charges for

hospitals? Are we simply looking -- and this is 1 2 both for the standardized measure but also the -it will be more important when we look at the 3 4 second measure in this group, the pricing, the 5 prices paid measure. So what's the level at which the 6 7 hospital prices are standardized and aggregated? 8 Individual charges? Individual diagnosis? DRG? 9 I need to -- it's not, I did not see it specified 10 here. 11 CO-CHAIR ASPLIN: Sue. 12 MS. KNUDSON: So, two things. First-13 off, I just want to be crystal clear on the 14 previous commenter before Jack, Brent. We did 15 SDS testing but that is not the SDS testing as 16 described, that was our testing. So, I think 17 those comments do apply to the other measure and 18 So, we'll get to that because that is not ours. 19 not descriptive of the testing we did. 20 And then on this particular question 21 about the standardized pricing, Chad will be 22 taking that question.

1	MR. HEIM: Yes. So just to give a
2	real brief overview of how the key CRVs are
3	calculated, again, our approach hasn't changed
4	since the last endorsement. Key CRVs, which is
5	the resource use that we are using, base is a
6	linear scale where we are doing a patented
7	approach for assigned resources to draw
8	healthcare services. So we are getting that
9	relativity within using well-established CMS
10	weight at the starting point to get the relative
11	event.
12	And specific to your question, Jack,
13	we are using MS-DRGs for that relativity using
14	CMS weight system there.
15	And then to get the relativities
16	across in-patient to out-patient to professional
17	legal through a repricing scenario to get that
18	relativity going across.
19	CO-CHAIR ASPLIN: You have a follow-
20	up, Jack?
21	MEMBER NEEDLEMAN: Yes. Not on that
22	but a second question related to the
construction.

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2	You mentioned in the documentation
3	where drugs are carved out you're putting in the
4	average drug price across those. You said and
5	other carve-outs we deal with the lowest common
6	denominator. One of the most common carve-outs
7	is mental health/behavior health services. And
8	it's not discussed explicitly.
9	So, what percentage of your groups
10	have mental health or behavioral health carved
11	out? And how precisely are you dealing with
12	those carve-outs in the construction of these
13	measures?
14	MS. KNUDSON: That's a good question,
15	Jack. Glad you raised that.
16	You know, Minnesota has parity with
17	mental health benefits for years. As an
18	organization and one of the top providers of
19	mental health services and leaders in the state,
20	we are quite committed to both covering as well
21	as caring for patients and members with mental
22	health conditions. And so we have 100 percent in

our data.

2	We were just simply making that
3	notation because we know that in other markets it
4	could be, in historic data, carved out at higher
5	rates. But we do not have that issue, it's all
6	in.
7	CO-CHAIR ASPLIN: Any other Well,
8	one quick question I had, Sue. Are you aware of
9	users that are this is obviously developed
10	using the Hopkins ACG risk adjustment tool,
11	obviously a widely used commercial risk
12	adjustment methodology. Are you aware of anyone
13	using a similar approach with different risk
14	adjustment tools?
15	MS. KNUDSON: Yes, honestly that's
16	something that we talked about in the first
17	endorsement process, for some of the committees
18	who remember that dialog. Yes, I think, so for
19	example, different states might have a lot of
20	payers or providers who are used to the Optum ERG
21	risk adjustor. And it's something their
22	communities invested in, each organization

individually.

2	So I know lots of folks are maybe
3	using our specs but applying a different
4	commercial risk adjustor. I think the bottom
5	line in our testing around that was that for the
6	commercial population, given the disease
7	prevalence, et cetera. And ACG is the one we
8	used, but recognizing other markets use other
9	commercial risk adjustors and they're applying
10	them.
11	We do let them know that it's endorsed
12	with ACGs but I think it goes to their uptake and
13	what they're able to deploy quickly in their
14	marketplaces.
15	CO-CHAIR ASPLIN: Thank you.
16	Toy online and then Nancy in the room.
17	MEMBER FIESINGER: This is Troy
18	Fiesinger.
19	I appreciate your explanation about
20	SES and risk adjustment. I am still concerned
21	that if we include and, if possible, come up with
22	a test model in other diverse communities to see

if your data still holds true. It's clear that 1 2 there's going to be very large disparities in income and cost of care/quality of care. 3 And we 4 have patient net systems working hand-in-hand 5 with commercial systems. But it would help to have more 6 7 reassurance that's been tested in multiple 8 communities. 9 MS. KNUDSON: I'm not sure I 10 understand that question. But just here's what I 11 know. 12 In our SES testing we tested socioeconomic status variables and discussed 13 14 those. We did not test race, ethnicity, and 15 language per the NQF kind of position on that. 16 We take an approach as an organization, we are 17 very committed to health equity. And so if we 18 talk about race, ethnicity, and language, or REL, 19 for our quality measures, for example, we use a 20 segmentation approach and identify gaps in care 21 and work to close them. 22 But we did not do that testing because

1	it was specific around SES, which is different
2	variables, income, education, et cetera.
3	So, Taroon or one of the NQF staff,
4	I'm not sure if maybe you want to comment on that
5	direction?
6	DR. AMIN: I think we had a little bit
7	of conversation around this SDS question. I
8	think what might be helpful is to just if you
9	help our understanding, if you don't mind just
10	reviewing what you did in terms of SDS, just so
11	that we're all on the same page in terms of
12	methods that you used and the variables that you
13	tested, just so that we're all working off the
14	same songbook. And then everybody in the room, I
15	would just encourage you to take a look at the PA
16	as we are talking about this and just make sure
17	that we're all on the same page because it's,
18	obviously, an important question for everybody
19	and we just want to make sure we all understand
20	what was done here.
21	MS. KNUDSON: Okay, yes.
22	DR. AMIN: Is that a fair ask?

1	MS. KNUDSON: So Gary is going to go
2	over our approach to socioeconomic testing.
3	DR. AMIN: Thank you.
4	MR. KITCHING: Okay, yes.
5	So what we ended up doing was we took
6	two different data sources for our SES. We have
7	this one that's the census, that's at the track
8	level. Again, just for informational purposes, a
9	track level is at, you know, 1,000, an average of
10	1,000 patients up to 8,000 patient blocks. Not
11	any ZIP Code level or by ZIP, but actually a
12	little bit more precise. But still, you know, a
13	good swath of folks.
14	And then we have another database that
15	we purchased that's actually a commercial
16	database that has household-level data. So we
17	did the testing at both those levels just to kind
18	of verify. We know that people are going to have
19	that additional, more precise data set, so we
20	wanted just to make sure we test the census data
21	and then we go back and actually test on a more
22	precise data set to see if we see the same

findings.

2	And so we did that testing. We just
3	ran a, you know, a simple regression analysis. I
4	say simple, but obviously there's a lot that goes
5	into that. But we took a look at the income
6	levels. So we took the average of the income
7	levels that we have and use those tracks, put
8	that into the model. We took the ACG score, we
9	put that into the model clinical risk
10	adjustment.
11	And then we both put the commercial
12	population and then we expanded it out to the
13	Medicaid population because we wanted to make
14	sure we cut across to show that there is some
15	variation when you do include low income folks.
16	And we're saying that the Medicaid folks are
17	going to be at lower income than the commercial
18	folks.
19	And so when you put all that in there,
20	into the model, and then the table that we have
21	displayed shows you what factors are driving the
22	end result. And so then PMPM, the risk

adjustment PMPM, and the resource use would be the TCRV PMPM.

And so you can see in the one table already produced the top line, \$0.13 is going to be the total reimbursement attributable to the 1 percent increase in income. So that's kind of how that would bear out.

8 And then you look at the ACG score, 9 it's \$4.22. So there's obviously considerably 10 more association with the clinical risk than 11 there is with the income. And then, furthermore, 12 you go out to the commercial risk and Medicaid 13 and you have \$133 in that one example there.

14 So you compare \$0.13 for income versus 15 \$4.22 for ACG or clinical risk, and then the 16 payer market or the payer delineation of Medicaid 17 to commercial is \$133.

So, obviously, those factors are a lot more substantially influential on the end result, ACG and the payer, than there is on income. So we were able to include that income really has no discernible variation or driver on a provider

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score beyond when we already control for the ACG 1 2 and the clinical risk and the payer. So when you look at it that way, we 3 concluded, as I think most of you will, that when 4 you adjust for the ACG or the clinical risk and 5 the payer, you're controlling for most of the 6 7 variation that's going to come from any kind of an SES analysis or any SES adjustment that would 8 9 be needed. So that's kind of the approach we 10 11 took. When we tested it with the Experian data, 12 which is again the household level data, a lot 13 more accurate information, the same results bore 14 And, actually, the income had less of an out. 15 impact, to be honest. 16 MS. KNUDSON: And I would just note 17 that Gary has said in that opening comment that 18 we tested both sources we had available to us, 19 but understanding from an uptake point of view, census track is most available. But because we 20 21 had that secondary commercial source for our

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other business purposes, we wanted to do a more

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granular test to more inform the outcome of this 1 2 work. 3 MR. KITCHING: Thank you, Sue. Yes. 4 CO-CHAIR ASPLIN: Thank you, Gary. Thank you, Sue. 5 6 Nancy. 7 MEMBER GARRETT: So I just wanted to comment, a couple of comments on the SES 8 9 adjustment that this is. So, first of all, I think it's really 10 11 great that they went to the census tract level. 12 A lot of the work we're seeing in some of the Medicare measures has been at the 5-digit ZIP 13 14 Code level. And as Janis mentioned, that is really, a lot of research is showing that just 15 16 doesn't get precise enough to start to attribute 17 to individuals. So I think that's really 18 helpful. 19 And the extra step of looking at the 20 Experian data also I think is really interesting. 21 One caution I would give there is that we've been 22 trying to understand better how that, those kind

1	of commercially available data sets can be used
2	as a SDS indicator. And one of the things that
3	we worry about is that potentially people at
4	different income levels might have different
5	digital footprints and different availability of
6	that kind of data. So, you think about credit
7	cards scores; someone who doesn't have a credit
8	card might not show up.
9	And I think you had this data on 70
10	percent or something of the population. So
11	that's just a caution, I think, as we move into
12	this world of trying to creative with measures.
13	It's something to be aware of.
14	And I also wanted to note I'm a little
15	confused about the Medicaid part because in the
16	second measure with the population-based total
17	cost of care you have the analysis showing that
18	when you put Medicaid into the model that there
19	was more utilization from a cost perspective by
20	\$75 a person. And so but the cost of Medicaid is
21	reimbursed so much less that it averages out to
22	be less.

1	So, that's just something to keep in
2	mind. I know Health Partners' recommendation is
3	that these are used within populations so you
4	would use this only for Medicaid, only for
5	commercial. But it's just something to be aware
6	of, that that is potentially an indicator of the
7	impact of sociodemographic status on these
8	measures.
9	And then just to share a little bit
10	about some of the research we are doing at my
11	organization. We've been looking at the impact
12	of homelessness on different kinds of measures,
13	quality measures, utilization, et cetera. And
14	one of the things that we're learning is that for
15	something like length of stay that can be kind of
16	a bimodal distribution, so you can have people,
17	for example, experiencing homelessness might
18	have, there's a group of them who might have
19	lower length of stay than typical for a certain
20	DRG. And we think that's partly because those
21	folks are about the kind of social supports
22	available. But medical diagnosis might actually

require hospitalization in order to keep them safe because they don't have those community supports.

And at the other end of the spectrum 4 5 we have people who are in our hospitals for 6, 9 months because there's nowhere else for them to 6 7 go but they're medically stable. And so the 8 truncation of the outliers is going to wipe out 9 some of that, those effects that you see. But it also might, the other side of it might be pulling 10 11 that effort down.

12 And so there may be reasons 13 conceptually that we're not seeing a 14 relationship. But I think we'll be learning more 15 about it, so.

16 MS. KNUDSON: So, Nancy, thanks for 17 those comments. It's important. And you got the 18 results. You also understand that it's very 19 important to understand the population that a 20 provider might have as a whole, but then also 21 appreciate how we're recommending segmenting 22 these measures so that you can really get at that

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action and validity of pieces.

2	So, for this, for this commercial
3	population, you know, it sounds like you, you
4	have congruent comments with our findings. But
5	as any of us serving a homeless population and
6	also a large Medicaid population, it's important
7	for us to understand different methods to measure
8	and inform appropriate interventions for those
9	population.
10	But this is a commercial measure. As
11	Gary described, the clinical risk adjustment, as
12	well as the fact that it's segmented to a
13	commercial product, really drove these results.
14	CO-CHAIR ASPLIN: Thank you. Janis.
15	MEMBER ORLOWSKI: I just want to go
16	back to my comments and state I find it I, you
17	know, and a number of other people here may know
18	and may be familiar with the commercial risk
19	adjustment methodology. But I think it's
20	inadequate to use it for a measure that there's
21	not full transparency in that measure. And to
22	say that we have utilized this opaque methodology

and we've looked it and we find no difference 1 2 and, therefore, there's no disparity, it's just an inadequate measure for an NOF standard. 3 And I think what we have to do is we 4 5 have to be able to fully look at all the attributes, you know, of disparity measurement. 6 7 CO-CHAIR ASPLIN: Kristine. MEMBER MARTIN ANDERSON: This is a 8 9 little bit in a different direction, so I just 10 want to put it out there. When I think about validity of these 11 12 types of measures that are used in partnership 13 with other quality measures to tell something 14 about value, to me the validity test that you 15 really want to have is when you make a change and 16 then you impact this resource use measure, that 17 you are then able to show that the quality at 18 least maintains the same -- you know, there was 19 an impact; right? So you make a change and there 20 was an impact on the measure. That's test one. 21 And then test two is that then when 22 you look at the quality measurement you are

seeing the right interaction.

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2	And so I, I do think that as we think
3	about resource use measures and the validity of
4	them, for what they're meant for in the over all
5	purpose you need to figure out how to link it to
6	the quality measures and, also, how to link it to
7	intervention so that you know whether or not
8	someone can affect it; right?
9	So, maybe the easiest ones are things
10	like correlations with readmissions or things
11	that you know are going to relate to resource
12	use. But the harder ones I think around the
13	other quality measures.
14	Because I think when we say, oh well,
15	cost and quality are not correlated, we're saying
16	that largely because they're both all over the
17	board; right? And they can be in multiple
18	directions. I just think there needs to be more
19	work to try to figure out at least the value and
20	the validity question.
21	CO-CHAIR ASPLIN: Thank you. Cheryl,
22	Jack, and then Nancy you have another comment?

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1	CO-CHAIR DAMBERG: Oh, I just wanted
2	to follow up on Kristine's comment.
3	So, I view validity as do providers
4	have control over their ability to influence
5	things, recognizing multiple factors will
6	influence this outcome? And I think the issue of
7	SES comes into play in terms of their ability to
8	affect all of the utilization of care that may be
9	also under control.
10	So I think that's sort of the issue
11	that's on the table.
12	And, you know, I personally have some
13	concerns about the extent to which they fully
14	explored the SES space here. And so I do have
15	reservations on that front.
16	CO-CHAIR ASPLIN: Jack.
17	MEMBER NEEDLEMAN: I want to make a
18	comment on the SDS methodology and then to a
19	couple of other aspects of validity.
20	I don't fault the developers here on
21	their SDS testing. We have seen this kind of
22	approach done before on other measures and it

1	seems to be the way people have been presenting
2	the data. But I think and this is the point -
3	- when we are concerned about SDS, to some extent
4	we're concerned about unmeasured need for
5	populations that are disadvantaged that are not
6	captured in the risk adjuster. And for that, the
7	kind of regression analysis that was done here
8	may make sense.
9	But there are at least two other
10	aspects at the provider level that we're
11	concerned about SDS. And this particular
12	methodology does not speak to it. And I think NQF
13	has to think about how to deal with these issues.
14	One is the issue that providers that
15	disproportionately treat the poor and
16	disadvantaged populations have fewer other
17	resources to deal to provide care to those
18	folks. And, therefore, it shows up in increased
19	use of other resources on things like
20	readmissions.
21	And that's a provider-level data.
22	It's based upon the proportion of the population

in the practice that is disadvantaged. And the 1 2 individual level measurement doesn't get at it. And the other issue that we're dealing 3 with is the issue Nancy raised, same thing, 4 5 higher proportion of patients who are disadvantaged in communities with fewer 6 7 resources, within fewer resources at family 8 level, and the provider has to replace those with 9 additional care. And, again, that's going to be 10 something we see at the group level based upon 11 the aggregates in the care that's provided for 12 those populations. It's not going to show up, 13 clearly, in a linear regression in which the high 14 income people and their experience complete offset the lower income people in a way that does 15 16 not capture the concern that we have about SDS at 17 the provider level.

So I think NQF really needs to think about what guidance you need to, we need to give people about these measures if we're really going to understand the impact of concentrated low income or disadvantaged populations in provider

groups and their impact on the care that those 1 2 groups are providing. So, I want to say that. In terms of the other issues of 3 4 validity here, I think we come back to the issue 5 of how much variability can a group expect in this measure just from the luck of the draw, not 6 7 because of poor performance or anything. This is a measure with very tight variance in that 10 to 8 9 90 percent population. So, if a 1 percent, 2 10 percent variation year by year, not about reliability but just the luck of the draw of who 11 12 the patients were this year, is there then it 13 could completely substantially shift where a 14 group is ranked but also what the group ought to If they're reacting to small, you know, 15 do. 16 random variations in use around individual 17 patients then I think you've got a problem here. 18 And I think we need to think about the 19 variability, within-group variability from random 20 years, not the patients, random years versus the 21 degree of variability we're seeing across the 22 groups. And I'm not sure it's that high. Ι

1 think it may be a problem around the resource use 2 measure here, but I'm not quite sure about it 3 yet. So this is Bill. 4 MEMBER WEINTRAUB: 5 Let me comment. I tried raising my hand. Ι don't find it's working very well. 6 Because I think Jack raises a very 7 8 important point. But, you know, this runs 9 through, this problem of stochastic error runs throughout when we're trying to apply broad --10 11 apply measures broadly to large groups. Some 12 people are just going to stand out just on a stochastic basis not looking very good. 13 Or 14 others may look particularly good when they're 15 And that's in the nature of this. not good. 16 People have tried to use statistical 17 approaches like Bayesian hierarchical modeling. 18 And I don't see that within this measure. 19 Have the developers thought about 20 that? 21 MS. KNUDSON: So this is Sue. I'm 22 going to give a shot here with a high, kind of

high level response, and then would ask Gary and 1 2 Chad to comment as well on some of the details. You know, this measure is not going to 3 solve all of our problems from a population 4 health issue when we think about the full panel 5 of patients we care for across the full spectrum 6 7 of commercial, Medicaid, and Medicare. When you wrap in the different ages that people are and 8 9 how that might customize the needs that they have and/or the interplay with their income levels and 10 11 education and health literacy. And, honestly, even for those of us 12 13 who are well-educated, sometimes when you are 14 thrown in the middle of a catastrophic diagnosis you are not at your best performance level. 15 So, 16 we can all -- if I put my care delivery hat on --17 we can all relate to the things you are saying. 18 As it relates to provider 19 accountability, I think it would go back to the 20 culture question I would have. You know, that 21 comment I made earlier. And moving, seeing directional improvement in both the resource use 22

1	metric and quality, that we have examples that
2	we've worked with a provider in Northern
3	Minnesota, for example, that the resource use,
4	really high in the pharmacy component for their
5	patients with diabetes. They realized they had
6	some large group of patients on the higher end of
7	BMI, and they were prescribing pens, which were
8	very expensive. Patients were going to multiple.
9	They switched over to vials. And, you
10	know, it was both a price piece, so getting into
11	total cost of care, but a resource use component
12	that sort of led them there as well. Just and
13	then you sort of keep digging. And at the same
14	time realized better quality improvement in their
15	quality results for those patients.
16	So, the examples are there. It goes
17	to accountability. We're just looking for
18	directional movement at the same time.
19	And then getting back to the SES
20	component and what we can do as groups, I think
21	it's important. I know as a provider ourselves -
22	- and I'm not a clinician but I work side by side

with the clinicians, and I in my career have been an administrator in our care group. And our approach is really to understand individual patient needs.

5 At the same time we're understanding our overall population health results. 6 And that 7 means segmenting the population, as we have 8 talked about, in some important ways, but also 9 tailoring those interventions, whether it be for low income people, we will understand who's at 10 11 higher risk for a readmission and wrap some 12 community services around them. Whether it's our 13 partnering with the firefighters for post-14 discharge visits and really identifying food scarcity issues that are the results for the 15 16 readmission.

17 But that's a strategy largely in our 18 low income population. So I'm just saying it's 19 sort of an all hands on deck.

20 And for our commercial population for 21 which these measures are intended to endorse --22 be endorsed, we have, we have a purchaser

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population, large, small, and independent groups 1 2 that are funding their group insurance. And we also have that important group as a constituency 3 4 to make sure that we're providing high quality, 5 most affordable solutions for them. And so it's, you know, as a provider 6 7 we've got to be accountable across the whole. 8 And as a payer, we also need to help providers by 9 segmenting these measures. And what we have in front of us today is sort of a commercial, that 10 commercial segment. 11 So, I know it gets very challenging 12 13 when we think about the broad panel. So those 14 would be my sort of high-level comments just acknowledging the comments and concerns that are 15 16 being raised, but also trying to hone in on what 17 this measure is intended to do. 18 CO-CHAIR ASPLIN: Thank you, Sue. 19 Srinivas. 20 MEMBER SRIDHARA: Yes. Just a comment 21 on the SDS work. I haven't been engaged with 22 NQF's work in it in the past. So just as a -- I

may be missing the point perhaps; I don't know. 1 2 So, from a public health background, critical obviously, and we need to measure it. 3 However, I think in practical terms, if we skip 4 ahead a few sections to usability or feasibility, 5 if you insisted on being able to have information 6 7 that could tie particular location level of this 8 kind of information, this would be nearly 9 impossible to implement anywhere for anything. It's a -- at least if you're going on a claims-10 11 based analysis. 12 So unless you happen to have an 13 approach to do that, I'm not sure what else they 14 can do other than these sort of applications of, 15 you know, census tract or other data that you 16 might get from census, or if you take the 17 experience-type data that they have. I'm not 18 sure you can realistically implement it. I think 19 it's a worthwhile line of questioning how you 20 might use it or as guidance to the end user. But 21 I certainly wouldn't want it to be a part of the 22 measure definition in any way because then it

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1	would make it nearly impossible to use because
2	most of them would not have access to that kind
3	of information.
4	So just a comment.
5	CO-CHAIR ASPLIN: One quick comment
6	I'll make on validity as well. It's somewhat
7	usability but it speaks to the validity.
8	So the context of these measures, and
9	I'm going to speak now from the standpoint of
10	leader at Fairview which had a shared savings
11	contract with HealthPartners, had a commercial
12	population at risk. It's always in the context
13	of this, paired with the total cost measure,
14	paired with your contract performance. Right?
15	So you have a shared savings
16	agreement. And I'm not saying this solves all
17	the validity questions, it's just I never had a
18	situation where the three didn't match. Right?
19	So, you know, you're upside down on your shared
20	savings but your resource use looks really good;
21	never happens. Right? So they were always in
22	agreement relative to the results of our shared

savings outcome. And then these two measures 1 2 paired really helped us try to understand where practice patterns may be driving cost and 3 4 research use versus the pricing problems were 5 driving total cost of care challenges. And so from that standpoint it all 6 7 held together very well in terms of validity. 8 And, you know, I found it very useful from that 9 perspective. 10 Helen. 11 DR. BURSTIN: Thanks. I just want to 12 make a brief comment to some of the broader 13 conceptual issues raised by Jack and Janis about 14 the over all approach. One thing we have heard repeatedly is 15 this is continuing to be a difficult issue. 16 At 17 times I think it's fair to say we don't -- the 18 data are not yet available in a form that's 19 readily accessible to perhaps get at the best 20 variables. That's number one. And we continue 21 to struggle with that throughout the process. 22 I think the second issue is that the

original work of the SES panel -- and some of you were on that original panel -- specifically focused in on individual-level variables, not provider-level variables, so not percent Medicaid, for example, but individual level factors.

7 And, actually, one of the things after 8 a recent discussion on recent readmission 9 measures we looked at is our Disparities Committee in the next couple of months is going 10 11 to spend a section of time specifically thinking 12 about how would we begin thinking about the use 13 of the provider-lever and community-level 14 Because, again, it's something that factors. keeps coming up. A lot of concerns were raised 15 16 that that may not be the best approach in terms 17 of adjusting for provider-level differences and 18 then being able to see provider-level differences 19 in the outcome.

20 But those are issues very much on our 21 radar. I think, you know, this particular 22 measure at least laid out their methodology. And

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I think you have to judge it based on the data
they have available at this time and whether you
think it's adequate certainly.

And then lastly, at least for the 4 5 measures we have been looking at to date, including the recent cost measures as well as the 6 7 readmission measures, the first issue I mentioned about the availability of adequate data to assess 8 9 SES and SDS has made us indicate that these measures should come -- be reexamined on an 10 11 annual basis as part of the annual update for the 12 measure developer to ask about the availability 13 of newer adjusters. Because I think as we get 14 better adjusters -- and again, we're going to continuously be left with this question of are 15 16 the adjusters adequate to the past of what's 17 available? And if we had better adjusters we 18 would find more differences. And then as we 19 begin to explore, how do we move into looking at provider and community-level factors which other 20 21 papers in other areas have found to be quite significant? 22

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1	CO-CHAIR ASPLIN: Janis.
2	MEMBER ORLOWSKI: Just to respond.
3	So, Helen, that sounds great. And back to what
4	Jack was saying.
5	I think when you take a look at this
6	the question is is if, for example, in a
7	community there is 20 percent of the population
8	that has increased needs, whatever the increased
9	needs are: whether they're dual-eligible;
10	whether there's high mental health issues;
11	whether there's, you know, poverty; what you want
12	to do is you want to be able to incent the
13	providers and the hospitals and, you know,
14	everyone within the health field to continue to
15	provide care to those individuals and not e
16	"hurt" in a measure like this.
17	So if 20 percent of your population
18	ends up to have higher burden of care, what can
19	we do so that, you know, there's, there's two
20	responses: one is, you know, we're just going to
21	be on the lower end of this measures. That's
22	response one.

	- -
1	Response two is, you know, you I
2	try to limit the number of individuals that you
3	care for. Completely the wrong thing that you
4	want to incent.
5	And so, I like the idea of taking a
6	look at the burden of, you know, sort of the
7	burden of the SDS within the community. I think
8	that's a very interesting and probably gets us
9	away from this incremental, you know, patient by
10	patient, you know, what are the factors that
11	address them.
12	So, very nice.
13	CO-CHAIR ASPLIN: Very good.
14	MEMBER WEINTRAUB: Good in principle,
15	but can you do it? Can you get the adequate
16	measures to allow you to accomplish that? That's
17	always the question.
18	DR. BURSTIN: At least on the
19	readmission side, for example, people have been
20	pulling some community-level indicators. For
21	example, housing vacancy in a health affairs
22	paper last year off census looked to be

important. Again, those are probably indicators
of what's happening.

The other piece I just want to mention 3 to this group as well is we are increasing 4 5 recognizing, even before the impact report, but particularly since the impact report came out 6 just a few months ago on SES factors, that some 7 of what we think may be SDS is probably 8 9 unmeasured clinical complexity. And if you look at the SDS -- if you look at the impact report, 10 11 for example, they raise issues of, you know, 12 measures of frailty are probably playing into 13 percent dual-eligibility influence and at least 14 on the Medicare side. So I think these are going to be 15 16 issues we're going to try to tease out. I think 17 it's probably just time for all of us to have 18 sort of a risk adjustment 2.0 reboot. How do we

19 really look at risk adjustment broadly? And how 20 much are we picking up that's SDS that's really 21 clinical complexity that we need to recognize and 22 take care of, as opposed to some of these other

factors. So I think it's a really big, important
issues.

Just one last quick thing. 3 The other 4 thing the SES panel had said when that report 5 came out a couple of years ago is risk adjustment 6 is just one approach. And I don't want to forget 7 Payment differences, as we just saw, is that. 8 part of the 21st Century Cures Act in terms of 9 comparing. Like providers to like providers is another. 10 11 The third one that this group has 12 emphasized was stratification, you know, the fact 13 that they have emphasized the use of 14 stratification by payer is something you could 15 include, for example, as part of the measure 16 going forward. 17 CO-CHAIR ASPLIN: All right. So I'm 18 just doing a -- going to pull back for a second -19 - time check. We lost our break. We were 20 supposed to be about done with 1604 at this 21 point. We already are going to have a working 22 lunch. So just, just saying. Try to keep your

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comments concise.

Nancy, Mary Ann, then we're going to vote on validity.

4 MEMBER GARRETT: So just one thing to 5 add to Helen's list of possible alternative approaches to risk adjustment. Another one that 6 was suggested by a recent National Academy of 7 8 Sciences report is actually identifying measures 9 and labeling them as to whether they are sensitive or not to social disparities. 10 So I 11 mean like a diabetes measure where there's lots 12 of outcomes in the measure, like is your blood 13 pressure in control, et cetera, highly influenced 14 by the resources you have available to you. And something like central line infections in the 15 16 hospital maybe not so much.

And if we can categorize measures according to how sensitive they are, then that would inform how they're used to move money around between, you know, systems and that kind of thing. So just another thing to add to your idea.

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1	DR. BURSTIN: And that's actually part
2	of our disparities work as well. We're going to
3	take up our old disparities sensitivity algorithm
4	and refresh it with the current Disparities
5	Committee and think about and the impact
6	report also very clearly said you need equity
7	measurement. And we think that's part of it. We
8	see this as really an interconnected set of
9	issues. And this is just bringing it around.
10	CO-CHAIR ASPLIN: Mary Ann.
11	MEMBER GARRETT: If I could make one
12	other quick comment.
13	CO-CHAIR ASPLIN: Oh, I'm sorry.
14	MEMBER GARRETT: Sorry.
15	Just I, I just want to also make the
16	point that while we're talking about a commercial
17	population for this measure, there's certainly a
18	lot of disparities within commercial populations.
19	And just as one example, my health system runs a
20	small food shelf. And a lot of the patients that
21	we give food to have commercial insurance.
22	So I don't want us to assume that

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there aren't issues within commercial populations
as well as we're thinking of this.
CO-CHAIR ASPLIN: Mary Ann.
MEMBER CLARK: Yes, hi. Just a couple
of things.
One is the discussion about I don't
know if we've discussed the pharmacy costs and
how to account for that. Before it was estimated
for the patient members who did not have who
had it paid for through a PBM, for example. And
I'm trying, I'm trying to remember that percent
of members where that was the case.
Can you remind me of that?
And then also, if it was a large
percentage was there any type of sensitivity
analysis on that? You know, I know that you, you
used an average for that, for that provider, I
believe, on pharmacy costs for the patients who
did not have pharmacy cost data.
MR. HEIM: Yes, this is Chad.
Our carve out rate for data that we're
doing the testing on was about 20 percent

pharmacy carved out.

2	MR. KITCHING: And then this is
3	Gary and then that will vary depending on the
4	provider because, obviously, providers are going
5	to have different rates of carve-outs. And
6	tested that down and the lowest one we got to was
7	about 70 percent of people had carve-outs or
8	had pharmacy at a 30 percent carve-out rate.
9	We're going to do an analysis right
10	now that kind of tests that all the way down to
11	see where it be breaks, to be honest. We never
12	did that before because we never experienced it
13	in our market. Most folks, to be honest, have a
14	high only a low percentage of that carve-out.
15	And that came back invalid.
16	So we're going to try to test that
17	down to, again, see where that carve-out level
18	breaks. And we'll have it on our website at some
19	point in the future.
20	MS. KNUDSON: But we haven't had that
21	be an issue with the users so far.
22	MR. KITCHING: Yes, it hasn't been an

1	issue in our market or anybody across the nation
2	that have actually depended on the measure.
3	Again, just for because we want to do our due
4	diligence, we want to make sure we test that
5	down.
6	MEMBER CLARK: Okay, great. And then
7	just one other questions I had.
8	We haven't talked about validity. And
9	I know I mean face validity. And I realize
10	that, you know, the important thing is the
11	empirical testing. But I know that you did some
12	extensive face validity testing as well. And
13	that's kind of where, in one sense where, you
14	know, it's pretty valuable to your, you know,
15	your users there.
16	So I was just curious if you might be
17	able to summarize briefly what was found in that
18	face validity testing?
19	MR. HEIM: Yes. So, a couple
20	examples, one with our business. When we run
21	our, run our total cost of care and resource use
22	results we make those available to our provider

networks for them to review and vet. And we have a 45-day comment period for them to review those results.

And in addition, we meet frequently internally with medical directors in a broader relation in going through those results. And as well as then meet with the providers frequently to walk them through those results.

9 Other examples for face validity is 10 implemented at measurement where there's a multi-11 stakeholder committee with numerous stakeholders 12 having, in essence going through NQF endorsement 13 through over a year-long process re-vetting the 14 measure and providing input on that as that was 15 rolling out.

16 And then same was true when we rolled17 out research use with measurement.

18 And then the other example would be
19 NHRI who have -- are just like measurement, they
20 have regional stakeholders involved reviewing and
21 vetting the measures as well.

MEMBER CLARK: And in terms of what

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you found though, in general there were no 1 2 issues? Or if there were issues, how were those, you know, addressed? 3 4 MS. KNUDSON: You know what, we did 5 not have issues with the measure. I think most of the things that we -- if we ran into anything 6 7 it was in the "how to" in rolling this out. But 8 it wasn't in the measure itself. 9 And so we haven't had any of those 10 issues. And I think many of the national 11 organizations who have taken up the measure, or 12 our local constituents who wrote in positive 13 comments would also help with that face validity 14 piece, as well as Brent's previous comment. So, thanks for that from usability from a Fairview 15 16 perspective. 17 That's commonly what we hear from 18 organizations. And, you know, we're so super

19 transparent because of the idea that we want to 20 compete on our results, that I think that really 21 helps particularly our clinical colleagues 22 because they've never really seen anyone be this

1 transparent with methods. And all that 2 consultation and data sharing to drive an improvement portfolio that goes along with it. 3 4 So it's partly in the "how to." MEMBER CLARK: Thank you. 5 All right. 6 CO-CHAIR ASPLIN: Thank 7 you. 8 Let's move to the vote on validity. 9 We've had a good conversation, good discussion. And unless I see any objections to moving to the 10 11 vote, I think we should move forward with that. 12 So, Irvin. 13 MR. SINGH: Thank you. So, we're 14 going to begin voting on validity for Measure 15 Your options are 1, high; 2, moderate; 3, 1598. 16 low; or 4, insufficient. 17 Please vote now. 18 (Voting.) 19 MR. SINGH: So all votes are in. 20 Voting is now closed for validity for Measure Number 1598. The results is as follows: 21 22 2 votes for high; 14 votes for

moderate; 2 votes for low; and 0 votes for 1 2 insufficient. That accounts for 11 percent of the votes being high; 78 percent of the votes 3 4 being moderate; 11 percent of the votes being 5 low; and 0 percent for the votes for insufficient. 6 7 The measure passes for validity. 8 CO-CHAIR ASPLIN: Thank you. Bill, 9 you have -- I think just from a time check standpoint we're going to try to plow through and 10 11 finish 1598. And then we'll break to grab lunch 12 for about 15 minutes and then do a working lunch and consider 1604. So that's the overall game 13 14 plan. And, Bill, to your comments, please, 15 16 as the discussant on feasibility. 17 MEMBER WEINTRAUB: Right. So, 18 obviously, this is a much simpler one than what 19 we just discussed. The measure has been around and it's 20 21 been retested. It's been shown that people can 22 apply it. However, so we seem to be really

1 feasible from that standpoint. Also, no new data 2 is required; it's all administrative data. Again, it suggests high feasibility. 3 4 There are a couple of caveats though. Well, I 5 mean this really applies to the commercial space rather than Medicare and Medicaid, which is fine 6 7 as long as we keep within that space. 8 The other caveats are that the data 9 we're seeing are from Wisconsin and Minnesota, as I understand it. This is applied widely. 10 But 11 we're not seeing data guite as widely as we 12 might. 13 And, finally, that it does require 14 applying some commercial software. So there is some expense related to it. 15 16 But that's really it. I mean, I think 17 that this is really pretty simple and does not 18 require additional data collection, which is very 19 qood. 20 CO-CHAIR ASPLIN: Thank you, Bill. 21 Any other comments or questions 22 relative to the feasibility of Measure 1598? Ι

1	see none in the room and I do not see any hands
2	raised online.
3	So, without objection, I think we
4	should move forward to the vote on feasibility
5	for 1598.
6	MR. SINGH: Okay, thank you.
7	So we're going to be voting on
8	feasibility for Measure Number 1598. Your
9	options are as follows:
10	Number 1, high; number 2, moderate;
11	number 3, low; number 4, insufficient. Please
12	begin voting.
13	(Voting.)
14	MR. SINGH: So all votes are in. And
15	voting is now closed for feasibility for Measure
16	Number 1598. The results is as follows:
17	14 votes for high; 4 votes for
18	moderate; 0 votes for low; and 0 votes for
19	insufficient. That accounts for 78 percent of
20	the votes for high; 22 percent of the votes for
21	moderate; 0 percent votes for low; and 0 percent
22	votes for insufficient.

1	This measure passes for feasibility.
2	CO-CHAIR ASPLIN: Thank you, Irvin.
3	Jack, you're the lead discussant for
4	usability on this measure. Your comments,
5	please.
6	MEMBER NEEDLEMAN: Okay. So, again,
7	I think the conversation here can be relatively
8	short. The first measure of usability is it's
9	used. And it has been wide it has been
10	extensively used. If anything, according to the
11	documentation we received, the use has expanded,
12	which suggests a high level of usability.
13	When I look at the measure and when I
14	look at the comments that have been made two or
15	three things stand out in terms of usability.
16	One is part of what makes this usable is the
17	disaggregation by type of service that is
18	provided. So you get those as well.
19	And without that it would be a lot
20	more difficult to make use of the measure. But
21	that is present. That seems to be part of the
22	methodology, so that solves that problem.

1	The attribution issue was raised in
2	some of the online comments about the
3	appropriate, you know, usability. Similarly,
4	comparison groups were raised in some of the
5	online comments, with specifically the example of
6	gynecologists being treated as primary care
7	providers and yet having potentially very
8	different kind of resource use pattern than other
9	primary care providers. That would seem to be
10	solvable in terms of the groups that are using
11	it, in terms of getting appropriate comparisons.
12	But overall, the usability looks like
13	it meets those criteria by virtue of the fact
14	that it's been widely used. And folks like Brent
15	have indicated that it was useful to them.
16	CO-CHAIR ASPLIN: Thank you, Jack.
17	Any comments, additional comments
18	before we move forward?
19	Yes, I would just for my own
20	perspective add quickly, I had opportunity to
21	work with ACOs, track 1, track 3, primary ACO,
22	commercial shared savings, Medicare Advantage,

1	with, in multiple markets with regional carriers
2	and national carriers. And, quite frankly, for
3	feedback on cost and resource use, the
4	HealthPartners measures are completely in a
5	league of their own. There's nobody that's
6	close, in my experience, in terms of actionable
7	feedback on your cost and resource use.
8	Nancy?
9	MEMBER GARRETT: So, I was just going
10	to share that my experience as a provider in the
11	market in Minnesota where Minnesota Community
12	Measurement has adopted this measure, and I think
13	it's great that HealthPartners is providing a lot
14	of the kind of analytic tools and ability to
15	disaggregate the data.
16	Community Measurement, so what they're
17	doing is they're calculating this on a system
18	basis. So, for my medical system I get a report
19	for commercial patients showing these two
20	measures, the resources and the total cost of
21	care across all my commercial patients. And it's
22	super helpful because otherwise we're getting a

different report from the rate payer, and they 1 2 all say different things. And so now this aggregates together in a much bigger population. 3 4 But that organization isn't adopting 5 all of the tools that HealthPartners provided 6 since we're in a contract with them, and so in that sense it's been less usable because keep in 7 8 mind that this measure, it includes utilization 9 within your own provider system but also external utilization. So anyone attributed to you for 10 11 primary care, it's all the services they're 12 using, no matter where they are. And if you don't have any information on that, there's, you 13 14 know, a lot less ability to kind of use those 15 figures. So, that's not a fault of the measure 16 17 but it's just kind of a practical reality of 18 implementation of this. 19 CO-CHAIR ASPLIN: Thank you, Nancy. 20 I think we'll move forward, unless 21 there's objection, to a vote on usability. Irvin. 22

1 MR. SINGH: Thank you. So, we're 2 going to begin voting on usability and use for Measure Number 1598. Your options is as follows: 3 Number 1, high; number two, moderate; 4 number 3, low; number 4, insufficient. Please 5 begin voting now. 6 (Voting.) 7 MR. SINGH: So all votes are in. 8 And 9 voting is now closed for usability and use for Measure Number 1598. The results is as follows: 10 11 13 votes for high; 5 votes for 12 moderate; 0 votes for low; and 0 votes for insufficient. That accounts for 72 percent of 13 14 the votes for high; and 28 percent of the votes for moderate; 0 percent votes for low; and 0 15 16 percent of votes for insufficient. 17 This measure passes for usability and 18 use. 19 CO-CHAIR ASPLIN: Thank you. So the 20 measure has passed all the must-pass criteria, as 21 well as feasibility and usability. So our final 22 vote on this measure is the overall suitability

1 for endorsement. 2 And, Irvin, could you walk us through this? 3 4 MR. SINGH: Yes. So we're going to 5 begin voting on overall suitability for endorsement for Measure Number 1598. And the 6 7 options are number 1 for yes, and number 2 for 8 no. 9 Please begin voting now. 10 (Voting.) MR. SINGH: John, if you could please 11 submit your vote now. 12 13 MEMBER RATLIFF: Excuse me. Sorry for 14 the delay. 15 So everybody's CO-CHAIR ASPLIN: 16 voted. We're at 17. We've been at 18 the last 17 few. 18 MR. SINGH: John, can you please email 19 your vote. 20 CO-CHAIR ASPLIN: While we're waiting 21 for that vote, Operator, if you could prepare. 22 Our published agenda has opportunity for public

and member comment right now on the published 1 2 agenda. And so, before we break for lunch we just want to honor that published agenda in case 3 someone has dialed in and would like to make a 4 5 comment at this time. Irvin's got the results here. 6 And then, Operator, if you could open up the lines 7 8 for public comment. 9 MR. SINGH: So all votes are in. And voting is now closed for overall suitability for 10 11 endorsement Number 1598. The results is as 12 follows: 13 18 votes for yes and 0 votes for no. 14 It accounts for 100 percent for yes. Thank you. 15 CO-CHAIR ASPLIN: Thank 16 you to the committee. I get an F for honoring 17 breaks so far today. We'll try to improve, 18 although we're behind the 8 ball now. But, 19 hopefully, we got a lot of the comments out. And 20 1604 we'll have some similar topics I'm sure. 21 But, Operator, could you see if there 22 are any public comments at this time.

	т.
1	OPERATOR: Yes, sir.
2	At this time if you would like to make
3	a comment, please press star then the number 1.
4	Okay, and at this time there are no
5	public comments.
6	CO-CHAIR ASPLIN: Thank you. And
7	thank you to the HealthPartners team. We're
8	going to break for 15 minutes and reconvene. The
9	lunch is available here in the room. So 12:15
10	Eastern we'll start with the conversation on
11	1604. Thank you.
12	Sorry. Are there any comments in the
13	room on 1598?
14	(No response.)
15	CO-CHAIR ASPLIN: All right, very
16	good.
17	(Whereupon, the above-entitled matter
18	went off the record at 12:00 p.m. and resumed at
19	12:18 p.m.)
20	CO-CHAIR ASPLIN: Okay. We are going
21	to move ahead and get started with 1604. And
22	I've been informed we have an option on

importance to measure.

2	We have an option on importance to
3	measure for Measure 1604, given the similarities
4	between Measure 1604 and 1598. That's 1604 and
5	1598. The Committee has an option to roll its
6	votes from 1598 and having them apply on 1604
7	just for this category, for importance to
8	measure.
9	Unless if there's objection to
10	that, we can hold a separate vote. And if there
11	are specific comments on importance to measure
12	that people would like to make in distinction for
13	1604 versus 1598, we obviously will entertain
14	those.
15	Larry, you were the lead discussant,
16	did you have any differences in terms of your
17	comments on importance to measure for 1604?
18	MEMBER BECKER: Not substantive.
19	CO-CHAIR ASPLIN: Is there objection
20	to using our votes for importance to measure only
21	from 1598 and applying those to 1604?
22	(No response)

1	
1	CO-CHAIR ASPLIN: Seeing none, anyone
2	online have an objection?
3	(No response)
4	CO-CHAIR ASPLIN: Hearing none, we
5	will apply the votes for importance to measure
6	from 1598. And it will pass that criterion and
7	that includes all three votes, correct?
8	MS. DUDHWALA: All three votes.
9	CO-CHAIR ASPLIN: Very good. So we
10	will move to scientific acceptability. And Mary
11	Ann, I apologize because I misread the notes that
12	were very clear now that I read them. And when I
13	called on you last time.
14	But, Mary Ann is our lead discussant
15	for scientific acceptability for 1604.
16	Mary Ann are you online? She maybe
17	thought we were going to take a little bit longer
18	on importance to measure.
19	Mary Ann, if your
20	MEMBER CLARK: Sorry about that. I
21	had a little emergency I had to attend to here.
22	But I am back now. So, we're talking about the

2 CO-CHAIR ASPLIN: Correct. We applied our votes for importance to measure from 1598 to 3 4 1604. So we went through that with lightning 5 speed. So now we are on scientific 6 7 acceptability. And we do have to do a full 8 discussion of the acceptability. 9 MEMBER CLARK: Okay. So I need to 10 vote on the other one I guess, right? CO-CHAIR ASPLIN: You do not. 11 We --12 MEMBER CLARK: Oh. Okay. CO-CHAIR ASPLIN: Didn't do individual 13 14 So we accepted their votes from 1598 just votes. 15 for the importance to measure criteria. Those 16 three votes. 17 MEMBER CLARK: Okay. 18 CO-CHAIR ASPLIN: So, take us through 19 the scientific acceptability on 1604 if you 20 would, please. 21 MEMBER CLARK: Sure. Let me just 22 bring up my documents here. I think in general

it's going to be fairly similar, you know, to the
 resource use measure.

I mean, but we're looking at it from a cross perspective where a, you know, allowable -- allowed payment perspective. So, that's really the difference.

You know, the same -- the data has
been updated, you know, from the previous
endorsement. So we have a new data set being
used.

But basically the numerator is the total per member per month medical costs, and pharmacy costs. And then of course risk adjusted with the same ACG risk adjustor. And then that being divided by the comparison group measure.

In terms of the exclusions, it's the same exclusions as before. Members under the age of one, members 65 and over, and members with less than nine months of enrollment.

Let's see, commercial payer claims.
And for the socioeconomic testing of course the
Medicaid data was used as well.

1	And let's see, the measure was tested
2	at both the data element and the score level on
3	the for reliability. And again, using the
4	same methods as in the resource use measure, the
5	90 percent random sample and bootstrapping sample
6	as well as changes over time.
7	Let's see the results, you know, of
8	those two tests for reliability, they were
9	basically what we talked about for the other
10	measure. So, I don't know how much we want to go
11	into that here.
12	I mean, there was some data that
13	looked at, you know, the results of the first
14	endorsement compared to this endorsement, I
15	guess. And they did change slightly, I guess.
16	It looks like the variance actually
17	got a little smaller. And let's see, it looks
18	like in terms of the provider performance across
19	the years that the data was relatively consistent
20	across all three years with a difference on
21	average of about three percent.
22	So, let's see, what were some of the

issues? I think in general people felt like this
 measure was reliable.

And I think in terms of the concerns voiced, they were very similar to the resource use measure. Had to do with attribution methods. Some people wanted to know more about the risk adjustment method being used.

8 But, in general, I think, they -- the 9 comments were that the reliability was high and 10 that the measure is clearly defined and 11 implemented.

Let's see here, the same -- a similar concern is on the other measure about the testing of the data that was in a one payer that was restricted to, you know, a certain geographic region of the country. And whether that would have an impact on the generalizability of the results.

So, I think, -- let's see. In terms
of answering the questions for reliability that
were posed, let me get to those here.

22

Are all the data elements clearly

defined and the appropriate codes included? 1 Is 2 the logic in the calculation clear? Can it be consistently implemented? 3 And is the construction logic clear? 4 5 I don't think that most people had issues with that. 6 7 In terms of the testing, is the sample 8 adequate and generalized to widespread 9 implementation? And do the results demonstrate sufficient reliability so that the differences in 10 11 performance can be identified? Yes, so again, 12 these testing results for the empirical test were 13 fairly similar to the resource use results as well. 14 15 So, I don't know if anyone has any 16 other questions or anything to add to the 17 reliability. 18 CO-CHAIR ASPLIN: Thank you, Mary Ann. 19 MEMBER CLARK: Yes. 20 CO-CHAIR ASPLIN: I appreciate it. 21 So, let's start with reliability in terms of comments, questions, concerns about reliability 22

1 on measure 1604. 2 I do not see any hands in the room or Nancy, do you have any comments on 3 online. 4 reliability? 5 MEMBER GARRETT: No. COOCHAIR ASPLIN: All right. 6 Very 7 qood. Let's move forward to the vote then for 8 reliability on 1604. Irvin? 9 MR. SINGH: All right, thank you. So we're going to begin voting on reliability for 10 11 Measure Number 1604. Your options are one high, two moderate, three low, or four insufficient. 12 13 Voting has now begun. 14 (Voting) 15 Andrea Gelzer, we're MS. DUDHWALA: 16 just voting on reliability for Measure 1604. If 17 you could enter your vote. 18 MEMBER GELZER: Did you get it? 19 MS. DUDHWALA: Yes. We got it. 20 MR. SINGH: Okay. So all votes are 21 in. And voting is now closed for reliability for 22 Measure Number 1604.

1 MS. O'ROURKE: We got an extra vote. 2 So, to avoid any corruption concerns, if we could all just vote again. 3 4 MR. SINGH: All right. So we're going 5 to begin voting again on reliability for Number 1604. Please vote now. 6 7 (Voting) 8 MS. O'ROURKE: I think we're missing 9 So if you could -- if everyone could hit two. their clicker one more time. 10 11 MEMBER WEINTRAUB: Did you get the 12 phone-in votes? MS. O'ROURKE: I believe we have all 13 14 the phone-in votes. So, the missing vote -- oh, we have 18. 15 16 MR. SINGH: All right. So all votes are in and voting is now closed for reliability 17 18 for Measure Number 1604. 19 The result is as follows: ten votes 20 for high, eight votes for moderate, zero votes 21 for low, and zero votes for insufficient. That 22 accounts for 56 percent of the votes for high, 44

percent of the votes for moderate, zero percent 1 2 of the votes for low, and zero percent of the votes for insufficient. 3 This measure passes for reliability. 4 CO-CHAIR ASPLIN: Thank you. 5 We'll now open up the conversation on the topic of 6 7 validity. Comments from committee members related to validity for Measure 1604. 8 Jack? 9 MEMBER NEEDLEMAN: It's just, I need some clarifications from the developers of how 10 price is paid or included in here. Again, around 11 hospitals for example, some payers maybe paying 12 13 DRGs. Others may be paying discounted charges. Is the -- what is the basis for 14 including -- for the prices that are in the 15 16 model? Where there are variations in how the units of payments? 17 18 MR. KITCHING: So the full cost 19 measure again, is using a loud amount, which the 20 plan liability plus the member liability, and 21 then looking at -- specifically at the riders. 22 The prices select, for example, hospitals, could

They could be on a DRG payment system 1 be varied. 2 or they could be on a discount or fee-for-service basis as well. 3 4 But all those payments are aggregated 5 up from the hospital from what the plan is 6 paying, but as well as the member liability. And that's rolled together for the total cost of care 7 8 for the all-in-one. 9 I would just add that the majority is prospectively priced. 10 11 CO-CHAIR ASPLIN: Thank you. Other 12 questions from the committee relative to 13 validity? 14 (No response) 15 Seeing none online CO-CHAIR ASPLIN: 16 and none in the room, let's move forward to the 17 vote on validity for Measure 1604. Irvin? 18 MR. SINGH: Thank you. So, we're 19 going to begin voting on validity for Measure Number 1604. Your option is as follows: 20 number 21 one high, number two moderate, number three low, and number four insufficient. 22

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1	Please begin voting.
2	(Voting)
3	MS. O'ROURKE: So we have another
4	phantom vote. It got to 19. So we're going to
5	need to do it one more time in the room. The
6	folks on the phone, we have your votes. No
7	action needed on your part.
8	People in the room, please vote one
9	more time.
10	(Voting)
11	MR. SINGH: All right, so all votes
12	are in. And voting is now closed for validity
13	for Measure Number 1604.
14	The result is as follows: three votes
15	for high, 14 votes for moderate, one vote for
16	low, and zero votes for insufficient. That
17	accounts for 17 percent of the votes for high, 78
18	percent of the votes for moderate, 6 percent of
19	the votes for low, and zero percent of the votes
20	for insufficient.
21	This measure passes for validity.
22	CO-CHAIR ASPLIN: Thank you. We'll

1	
1	now move onto feasibility on 1604. Bill, do you
2	have any additional comments relative to
3	feasibility for Measure 1604?
4	MEMBER WEINTRAUB: No. Exactly the
5	same comments I had on the previous measure.
6	CO-CHAIR ASPLIN: Thank you. Now open
7	for committee discussion, comments, questions
8	related to feasibility.
9	(No response)
10	CO-CHAIR ASPLIN: Seeing none in the
11	room, I see no hands raised online. Let's move
12	forward to the vote on feasibility for Measure
13	1604. Irvin?
14	MR. SINGH: We're going to begin
15	voting on feasibility for Measure Number 1604.
16	Your options are one high, two moderate, three
17	low, or four insufficient. Please start voting.
18	(Voting)
19	CO-CHAIR ASPLIN: In the room, just
20	hit your button again in case we're missing one.
21	MR. SINGH: Okay. So all votes are
22	in. And voting is now closed for feasibility for

Measure Number 1604.

2	The result is as follows: 12 votes
3	for high, six votes for moderate, zero votes for
4	low, and zero votes for insufficient. That
5	accounts for 67 percent of the votes for high, 33
6	percent of the votes for moderate, zero percent
7	of votes for low, and zero percent of votes for
8	insufficient.
9	This measure passes for feasibility.
10	CO-CHAIR ASPLIN: Thank you. Relative
11	to usability. Jack, any additional comments on
12	1604?
13	MEMBER NEEDLEMAN: Yes. I actually
14	have a question for the developers on this. The
15	earlier measure uses standardized prices to so
16	it's basically utilization weighted
17	standardized price weighted utilization measure.
18	And then you get that disaggregation
19	by different types. This includes the actual
20	prices paid. So, you see a price-weighted
21	utilization measure, where actually the prices
22	are being paid.

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1	If in terms of usability you want to
2	be able to know how you want to be able to
3	disaggregate how much of the effect is associated
4	with pricing, how much you're paying versus the
5	volume of use.
6	And in the documentation, it's not
7	part of the measure, but in the documentation
8	there is a price index which looks like it's the
9	ratio of the total TCI measure and the RUC
10	measure.
11	I could not see in the materials
12	provided whether that calculation is done down to
13	the individual types of services that are being
14	provided. Which would clearly affect the
15	usability.
16	You have to know whether you're paying
17	a lot more for hospitals then the average. Or
18	whether you're paying a lot more for your E&M
19	services then average in order to figure out
20	whether you're getting value for those additional
21	payments.
22	So, I'm just asking the developers,
_	

does that calculation of the price index, not an 1 2 inherent part of the measure, but part of your documentation, is that carried out down to the 3 individual types of services there for which data 4 5 is provided? Hi Jack. This is Chad. 6 MR. HEIM: And that's where the actual billing starts 7 Yes. 8 playing out when you're using these measures 9 together. But yes, it's a simple ratio of the 10 11 cost divided by the research use. And then 12 that's drillable all the way down to the 13 procedure level. 14 So you can start understanding within 15 a hospital setting or a professional setting, 16 E&Ms if the price is driver or utilization is 17 driving. 18 MEMBER NEEDLEMAN: Great. Thanks for 19 the clarification. 20 CO-CHAIR ASPLIN: Other comments or 21 questions related to usability? Troy, you have a 22 comment?

1 MEMBER FIESINGER: Yes. A question 2 for the developers. Can you ask them if the implementation cost as a pair of measures. 3 I'm 4 thinking of smaller systems or smaller physician 5 groups that want to use this. It ties into my usability question. 6 7 MS. KNUDSON: You know, we don't 8 really get into that at all with the users. It's 9 -- but what I will say is most of our users have been able to bring this up with their existing 10 11 staff. 12 And the only external cost is the 13 commercial risk adjuster. But some of them, and 14 many of them already have those licenses in So it wouldn't be incremental cost. 15 place. 16 For some of the organizations that 17 have brought it up from scratch like NHRI or 18 Minnesota Community Measurement, the risk 19 adjuster, at least the one Johns Hopkins makes 20 available, they do have a much significantly 21 lower cost research based license fee that is 22 very affordable. Like around the thousand-dollar range versus what us as commercial payers would pay.

3 So often these tools are already 4 available by the users. And if they're not, they 5 seem to be for these organizations that give a 6 much more affordable price break and then 7 existing staff.

8 And then we have seen some care 9 groups, you know, work with their consultants. But they're not hiring like brand-new 10 consultants. It's their existing relationship. 11 12 So -- but I don't have a specific 13 number for you. But that's our observation. 14 MEMBER FIESINGER: Okay. That's still 15 helpful. And then are you able to aggregate, it 16 sounds like all the different commercial payers 17 data, for the organization if you're contracted 18 to it? 19 MS. KNUDSON: Yes. If you're 20 contacted to do it as a vendor, we just require 21 the vendors to, you know, the software is free of

charge. But we do have a license agreement for

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And that is because we have a 1 the resource use. 2 patent on our resource use. And our whole idea was to put this 3 stuff out there in the public domain free of 4 So we didn't want folks to commercialize 5 charge. it and then have additional funding be an 6 7 impediment of users adopting it. So we do require vendors to license it 8 9 one client at a time. Which is super easy to do. 10 MEMBER FIESINGER: Okay. Thank you. 11 CO-CHAIR ASPLIN: Thank you. Seeing 12 no other comments, let's move to the vote on 13 usability for 1604. Irvin? 14 MR. SINGH: Okay. Thank you. So, we're going to be voting on usability and use for 15 16 Measure Number 1604. Your options are one high, 17 two moderate, three low, and four insufficient. 18 Please begin voting. 19 (Voting) 20 MR. SINGH: Okay. So all votes are 21 in. And voting is now closed for usability and use for Measure Number 1604. 22
The result is as follows: 12 votes 1 2 for high, six votes for moderate, zero votes for low, and zero votes for insufficient. 3 And that 4 accounts for 67 percent of the votes for high, 33 5 percent of the votes for moderate, zero percent of the votes for low, and zero percent of the 6 7 votes for insufficient. 8 This measure passes for usability and 9 use. 10 CO-CHAIR ASPLIN: Thank you, Irvin. 11 And we can now do our final vote, overall 12 suitability for endorsement. The yes/no 13 question. We can move to that at this time, 14 Irvin. Thank you, Brent. 15 MR. SINGH: So, 16 we're going to begin voting on overall 17 suitability for endorsement for Measure Number 18 1604. Your options are one yes, two no. 19 (Voting) 20 MR. SINGH: Okay. So all votes are in 21 and voting is now closed for overall suitability for endorsement of Measure 1604. 22

1	The results is as follows: 18 votes
2	for yes, and zero votes for no. And that is 100
3	percent of votes for yes.
4	CO-CHAIR ASPLIN: Thank you. So this
5	concludes our discussion of Measure 1604. We are
6	going to open up before the developers leave
7	here, open up for public comment on I'm going
8	to start it with 1604.
9	So, if there are comments online,
10	Operator, can you open that up for 1604. And
11	just for anyone who's online and has a comment
12	for 2158, we're going to do that next before we
13	start the conversation on it.
14	So, 1604 any public comments on the
15	total cost index, 1604. Operator?
16	OPERATOR: Okay. At this time if you
17	would like to make a comment, please press star
18	then the number one.
19	(No response)
20	OPERATOR: And there are no public
21	comments at this time.
22	CO-CHAIR ASPLIN: Thank you. Are

there any comments in the room on 1604? 1 2 (No response) CO-CHAIR ASPLIN: Thank you. 3 And with 4 that I'd like to thank Sue Knudson, Chad Heim, 5 and Gary Kitching for your comments and support 6 in terms of the conversation today. It was very 7 helpful to have you on the line to answer 8 questions. 9 So, thank you to the three of you. MR. KITCHING: You're welcome. 10 11 MS. KNUDSON: Thank you. 12 CO-CHAIR ASPLIN: And with that, I'm 13 going to hand this over to Cheryl. Because she's 14 going to be leading the conversation on 2158. And we've had a request to do the public comment 15 16 first. 17 So Cheryl, go ahead. 18 CO-CHAIR DAMBERG: Sure. So we're now focused on Measure 2158. The measure -- excuse 19 20 me, the Medicare Spending Per Beneficiary. 21 This is a hospital only measure. My 22 understanding is that there is a measure in

development that will focus on physicians. 1 2 But, before the committee begins its work, because I know folks on the line 3 4 potentially have been waiting a long time, we're 5 going to accept comments at this point. So Operator, can you find out if there 6 7 is anyone who would like to make a comment on 8 2158? 9 Yes, ma'am. At this time **OPERATOR:** 10 if you would like to make a comment, please press star then the number one. 11 12 (No response) 13 OPERATOR: And there are no public 14 comments at this time. CO-CHAIR DAMBERG: All right. 15 And are there any comments from folks in the room? 16 17 MR. WETZEL: Yes. One comment. Hi, 18 this is Scott Wetzel. And I am filling in for 19 Janis Orlowski, who unfortunately had to leave. 20 But one comment we wanted to make was 21 on SES and our concerns with that. The WUMC is concerned with the conclusions drawn from the SES 22

1	analysis of the Medicare Spending Per Beneficiary
2	Measure and the impact that it has on hospitals
3	who care for disadvantaged patient populations.
4	As highlighted earlier by Dr.
5	Orlowski, we have concerns with the variables
6	used. Particularly concerning the black/non-
7	black variable. And request additional insights
8	from the developer as to other variables that
9	were considered for this measure.
10	We also have questions around the
11	income-to-poverty ratio variable. Which resulted
12	in a plus or minus difference of 0.01 or less for
13	97 percent of hospitals.
14	Due to the tight clustering of
15	performance scores for this measure, a difference
16	of 0.01 may significantly affect hospitals caring
17	for disadvantaged patient populations that may
18	require higher utilization of services. So, we
19	request great detail as to whether any particular
20	type of hospital was among those who were that
21	moved 0.01 or more under this measure.
22	These comments were submitted to the

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committee beforehand. So they are included on 1 2 the worksheet as well. That's it. Okay. 3 CO-CHAIR DAMBERG: Thank you. 4 Are there other comments before we get into 5 discussing the measure? 6 (No response) 7 CO-CHAIR DAMBERG: All right. Seeing 8 I am mindful of our time. Brent did a none. 9 great job of getting us mostly back on track. But, we're running about 25 minutes behind 10 11 schedule. 12 So, I would ask committee members to 13 stay focused in your comments. And similar to 14 the past two measures, I think most of the discussion is going to fall into the validity and 15 16 reliability sections. 17 What I would like to do is begin by 18 asking the measure developers to come to the 19 table and give us a very brief overview of the 20 measure. We have two folks with us today, John Pilotte from CMS and Sriniketh from Acumen. 21 So, please come to the table and join 22

1	us.
2	(Off mic comments)
3	CO-CHAIR DAMBERG: Okay. So for those
4	on the phone, if you couldn't hear, Kim Spalding
5	Bush is here from CMS in lieu of John.
6	DR. NAGAVARAPU: So, thanks very much
7	for the opportunity to speak and answer your
8	questions. I'll give just a very quick overview
9	along the NQF evaluation criteria.
10	So the Hospital MSPB Measure measures
11	total Medicare Parts A and B standardized
12	allotted amounts during episodes of care for
13	hospitals paid under the inpatient respective
14	payment system across all conditions and
15	admissions. The incentive care are designed to
16	include the period immediately prior to, during,
17	and in the 30 days after hospital discharge.
18	In terms of importance to measure and
19	report, the measure addresses a high priority
20	aspect of rising Medicare expenditures in a
21	particular setting in which there are performance
22	gaps.

The intent is to incentivize hospitals 1 to coordinate care for patients and reduce 2 unnecessary utilization and adverse outcomes 3 during the period of time encompassing the 4 5 inpatient stay and immediately after. And there are a large number of hospitals that are covered 6 by the measure, over 3200 with at least 25 7 episodes and 20 percent. 8 9 The measure has been a well-accepted 10 measure that served a purpose both on its own and 11 informing hospitals about costs. As well as 12 serving as kind of a tool to reorient hospitals 13 towards the new emphasis in areas in CMS programs 14 on bundled payment sorts of programs and care coordination. 15 16 In terms of scientific acceptability, 17 in the pre-evaluation comments, we saw questions 18 about the reliability threshold. And wanted to provide numbers for a higher reliability 19 threshold of 0.7. 20 21 And 93 percent of providers at the 22 case mean of 25, meet or exceed the reliability

threshold of 0.7. The requirement of a higher 1 2 threshold then that maybe difficult given that there's natural variation spending across 3 4 patients that we actually want the measure to 5 reflect. In terms of test/retest results from 6 7 year to year, as was across random samples within 8 the year, the Spearman ranked correlations and 9 Pearson correlations are very high. Especially considering if you think 10 11 about kind of a time series model with just a 12 standard moving average process, the maximum 13 correlation you can get is 0.5. And so the correlation above a 0.8 in 2014 and 2015 is 14 15 incredibly high. 16 In terms of validity, we know a lot of the discussion will focus on socioeconomic 17 18 status. We did use income-to-poverty ratios at 19 the zip code level as well as race defined by black and non-black. 20 21 We use those items in risk adjustment 22 and then at calculated measure scores for

hospitals based on the new risk adjustment equations.

The results cited in the submission form showed that there's not much of a difference in terms of measure scores. With a large percentage of hospitals within a .01 change greater than 95 percent and 97 percent, depending on the specification.

9 The reason we use income-to-poverty at the zip code level is to strike a balance between 10 11 the desire to look at individual beneficiary 12 attributes, as well as looking at the community 13 attributes that everyone's talking about in the 14 previous session. Because we do think those sorts of community attributes are an important 15 16 aspect of this that wouldn't necessarily be 17 captured by a Census tract.

However, we saw the pre-evaluation comments. Realized that people wanted to see something that was more targeted towards individual beneficiaries. So we also ran an analysis recently looking at the fact of

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1 individual dual status.

2	We ran risk adjustment specifications
3	with dual eligibility dummies, recalculated the
4	measures and looked at changes in the measure.
5	For greater than 90 percent of providers, the
6	change in the measure is less than .01. Sort of
7	varying between .008 change on one end, versus
8	.005 or 6 on the other.
9	The measures have and that's
10	something we're happy to talk about. As we're
11	familiar with the other analyses that we haven't
12	fund along this dimension. And happy to talk
13	about sort of the community attributes and how
14	that factors into performance on the measure.
15	In terms of the other sort of standard
16	metrics, for validity, the predicted ratios are
17	remarkably stable across risk four deciles. And
18	we can talk about the longer HCC look back and
19	potential problems with that.
20	And the reasons why it doesn't
21	increase predictive power to and it provides
22	support for the 90-day look back.

individual dual status.

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1The measure is highly correlated with2spending at the hospital referral region level in3an other publically available measure of resource4use. And it's also correlated with service5utilization rates.6We realize there are some questions

and pre-evaluation comments about correlations
with readmissions. And so we looked at that in
order to see whether hospitals with readmissions
tend to have higher or lower measure scores.

What we found is that for hospitals 11 12 with less than 5 percent of their episodes having 13 readmissions, the measure score was approximately 14 .88 on average. For hospitals with greater than 20 percent of their episodes having readmissions, 15 16 the hospital measure scores were greater than one 17 with the hospitals with especially high 18 readmission rates, up along 1.2 or so. So we 19 wanted to be responsive to that.

In terms of feasibility and usability and use, the measure is reported in the hospital IQR, Hospital Compare, and Hospital Value-Based Purchasing Programs. It's used for payment
 modification and goes through rulemaking each
 year.

And so there's rounds of public comments that are taken in every year. So the measure is well vetted and it's -- there's opportunities for hospitals to comment on the measure periodically, and for CMS to take into account, changes that are suggested by hospitals where appropriate.

11 And the measure is highly actionable. 12 There's a question and pre-evaluation comments 13 about how hospitals can make use of this. And 14 how they can control their post-discharge 15 spending.

The hospital-specific reports that come with the measure is as long -- as well as the episode files, allow hospitals to understand where spending is being driven by, which providers in the post-discharge period are driving most of the spending.

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And that allows for physicians to

coordinate with providers in those specific 1 2 facilities in the post-discharge setting. As well as to take into account other more 3 4 systematic improvements across hospital 5 coordination with post-acute care facilities. The measure's been vetted through 6 7 multiple periods of public comment. And we're 8 happy to hear your feedback and answer your 9 questions. And so I can circle back to several of 10 11 these points with more detail if people are 12 interested. 13 CO-CHAIR DAMBERG: Thank you so much 14 for that great summary. And also appreciate some of your additional analytic work to address some 15 16 of the questions that were raised in the pre-17 review. 18 What I'd like to do now, is turn to 19 our reviewers. And Jennifer Eames Huff is first 20 up to review importance. Jennifer? 21 MEMBER EAMES HUFF: Hi. I'm going to say this morning Larry did a great job of setting 22

the context of the importance of cost and
 resource use. So, I'm going to jump directly to
 the measure.

4 So, in terms of high priority, to 5 demonstrate this, the developers' site data, I think which we are all familiar with, the percent 6 Medicare expenditures account for the gross 7 8 domestic product as well as how much hospital 9 costs account for Medicare expenditures in total. The staff review scored this as high. 10 11 And the comments were overwhelmingly in agreement 12 with the review. 13 In terms of performance gap, they used 14 2015 data. And the Medicare spending per 15 beneficiary, the hospital measure score was .99 16 with a standard deviation of plus or minus .99. 17 The provider score ranges from a 18 minimum of .59 to a maximum of 2.25. The median 19 value was .99. And they had the 25th and 75th 20 percentile of the measure score as .94 and 1.03. 21 They also did a similar analysis for the cost piece. So, the mean -- Medicare 22

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1	standardized cost. Mean Medicare spending per
2	beneficiary, the hospital amount was
3	approximately 20,000 with a standard deviation of
4	1800 dollars.
5	The provider amounts range from a
6	minimum of approximately 12,000 to a max of
7	46,000. The median was 20,221. The 25th and
8	75th percentile amounts were around 19,000 and
9	around 21,000.
10	They also did an analysis of the
11	provider score changes between 2014 and 2015.
12	And the results showed that 47 percent of
13	hospitals improved on their measure score. Which
14	is defined as having a lower score.
15	In terms of disparities, I think we
16	just it was focused on the SDS risk
17	adjustment. And I think we just heard the
18	measure developer summarize that. So, I'll skip
19	over that and say the staff review was scored as
20	high.
21	In general the comments were
22	supportive of this particular area, I think.

There's overall agreement, but there were some 1 2 caveats. Concerns were raised with regards to the opportunity for improvement and the challenge 3 4 for hospitals to affect change in what this 5 measure covers. And there were also some critiques 6 7 about the SDS. Which I also think we heard some 8 of that in the public comment. The intent of the measure is to incent 9 hospitals to coordinate care and reduce 10 11 unnecessarily -- unnecessary utilization during 12 the episode. This is also scored as high. And I 13 didn't see comments on this in the updated 14 measure sheet. 15 CO-CHAIR DAMBERG: All right. Thanks 16 Jennifer. Why don't we start by seeing if anyone 17 has any questions, comments in the room before we 18 turn to the phone. 19 (No response) 20 CO-CHAIR DAMBERG: All right. Seeing 21 none in the room, any folks on the phone have questions? 22

1	(No response)
2	CO-CHAIR DAMBERG: All right. Hearing
3	none, I think we can move to a vote.
4	MR. SINGH: Okay. So we're going to
5	begin voting on Measure Number 2158 regarding a
6	high priority. Your options are one high, two
7	moderate, three low, or four insufficient.
8	Please begin voting.
9	(Voting)
10	MR. SINGH: Okay. So all votes are in
11	and voting is now closed for high priority for
12	Measure Number 2158.
13	The results is as follows: 18 votes
14	for high, zero votes for moderate, zero votes for
15	low, and zero votes for insufficient. That
16	accounts for 100 percent of votes for high.
17	And this measure passes for high
18	priority.
19	CO-CHAIR DAMBERG: All right. Thank
20	you. Right, we're now going to shift to what I
21	think is going to be a little more challenging
22	space. Dolores Yanagihara has offered to take us

through the scientific acceptability. 1 2 MEMBER YANAGIHARA: Offered? (Laughter) 3 4 CO-CHAIR DAMBERG: You're a really 5 good volunteer. I'm sorry. CO-CHAIR ASPLIN: Cheryl, could we 6 7 just take the remaining --8 Oh, I'm sorry. CO-CHAIR DAMBERG: 9 CO-CHAIR ASPLIN: The remaining votes 10 for gap and intent. And then we can move onto science. 11 12 CO-CHAIR DAMBERG: Okay. 13 CO-CHAIR ASPLIN: So we've got two 14 more just sub-criteria votes here. 15 CO-CHAIR DAMBERG: Sorry. I'm kind of 16 new at this game. 17 CO-CHAIR ASPLIN: No, no. It's okay. 18 I think everybody wants to get to that section 19 for discussion. 20 CO-CHAIR DAMBERG: All right. So, the 21 next section is, I'm going to need your help. 22 CO-CHAIR ASPLIN: It's 1B, gap in

1 So, Irvin, you want to just walk us care. 2 through the voting slides, please? Sure thing. 3 MR. SINGH: So, we're 4 going to be voting on gap in care/opportunity for 5 improvement for Measure Number 2158. Your 6 options as follows: one high, two moderate, 7 three low, four insufficient. 8 Voting has now begun. 9 (Voting) Looks like our denominator 10 MR. SINGH: 11 is off. So, we might need to start voting one 12 more time. 13 All right. So we're going to start 14 voting again for gap in care/opportunity 15 improvement for Measure Number 2158. Please 16 submit your votes. 17 (Voting) 18 MS. O'ROURKE: So we have the phone 19 votes, right? So folks on the phone, you are 20 okay. Folks in the room, we're going to clear 21 the slide and vote again. 22 We're having the same issue where it

seems to have only captured the high votes. 1 So, 2 if you could vote one more time. MR. SINGH: Vote now. 3 4 MS. O'ROURKE: I'm sorry, vote now. 5 (Voting) Okay. So all votes are in 6 MR. SINGH: 7 and voting is now closed for gap in 8 care/opportunity for improvement for Measure 9 Number 2158. The results is as follows: 12 votes 10 11 for high, six votes for moderate, zero votes for low, and zero votes for insufficient. 12 That 13 accounts for 67 percent of the votes for high, 33 14 percent of the votes for moderate, zero percent of votes for low, and zero percent of votes for 15 16 insufficient. 17 This measure passes for gap in care 18 and opportunity for improvement. 19 CO-CHAIR DAMBERG: Great. So we have 20 one more component. And that is measure intent 21 that we're going to vote on next. 22 MR. SINGH: Okay. So we're going to

be voting on measure intent for Measure Number 1 2 2158. Your options are one high, two moderate, three low, and four insufficient. 3 4 Please submit your vote now. 5 (Voting) So it looks like our MR. SINGH: 6 7 denominator is off. We had a couple of phantom 8 So, we have 20 this time. I don't know votes. 9 how that happened. Just bear with me while I restart the 10 11 vote. Please submit your vote now. (Voting) 12 MR. SINGH: All right. So all votes 13 are in and voting is now closed for measure 14 15 intent for Measure Number 2158. The result is as follows: 13 votes 16 17 for high, five votes for moderate, zero votes for 18 low, and zero votes for insufficient. That 19 accounts for 72 percent of the votes for high, 28 20 percent of the votes for moderate, zero percent 21 of the votes for low, and zero percent of the votes for insufficient. 22

1 This measure passes for measure 2 intent. CO-CHAIR DAMBERG: 3 Great. Okay, so let's go back to scientific acceptability. And 4 Dolores, do you want to walk us through the 5 6 components? Thank you. MEMBER YANAGIHARA: Okay. So, we'll 7 8 start with reliability. So the numerator for 9 this measure is basically risk adjusted average 10 spending. So, observe to expect tons of national 11 average spending. 12 The denominator is episode weighted 13 median spending nationally. And the exclusions 14 are zero dollar claims, transfer -- acute to acute transfers, those hospitals not paid through 15 16 IPPS, the top and bottom one percent, those 17 patients who may have incomplete data, so part A 18 only, became deceased, Medicare Advantage, or 19 Medicaid Primary. 20 And then certain hospitals with -that focus on psychiatric rehab, pediatrics, or 21 22 primary cancer or research focused.

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1	Some of the one of the issues
2	raised with kind of the specifications was the
3	disability code used. There was a suggestion
4	that using the OREC code, the original reasons
5	for eligibility code, would have been preferable.
6	And then there was one comment about
7	kind of a concern about just basing performance
8	on DRGs is limiting. It's not kind of the full
9	scope.
10	In terms of testing for reliability,
11	there was new data that was provided. The data
12	was from all of the hospitals for 2015 from
13	January through December 1.
14	There was no real testing done on the
15	data element aside from the regular CMS testing
16	that's done, the auditing that's done and data
17	analysis that's done to look for data
18	completeness. But at the measure score level
19	there was testing done.
20	There were two different kinds of
21	test. Well, two different kinds of tests and
22	then two variations within one of the tests.

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1	So there was a test/retest done. The
2	first one was done between 2014 and 2015. And
3	for that test/retest, about three quarters of the
4	hospitals that were high or low, were steady
5	between those two periods.
6	And the correlations were both a
7	Spearman correlation and the Pearson correlation
8	were both very high. Over a .8.
9	There was also a test/retest done with
10	random subsets within 2015. That one the
11	agreement between the subsets was a little bit
12	lower, but still over 70 percent of the high or
13	low quintile hospitals stayed in the same
14	quintile.
15	And again, the Spearman rank
16	correlation was high, .82. Pearson was a little
17	bit lower, .7. But that was expected.
18	The other test that was done was a
19	reliability test. And that was done for
20	hospitals with greater than or equal to 25
21	episodes.
22	For and I think that Sriniketh

brought some additional information that I'll try 1 2 to incorporate in here. But, 68 percent were over a .9 reliability. 3 And then he added that 93 percent were 4 5 over a .7 reliability. Which means there would be 7 percent that were, you know, less than .7 6 7 reliability. 8 Ninety-nine percent were above .4. 9 Which was the threshold that you had originally Some -- the concern -- the basic concern 10 used. 11 raised was the .4 reliability and you adjust 12 that. 13 So, I think that was my notes, what I 14 had for reliability. CO-CHAIR DAMBERG: All right. 15 I'm 16 going to open it up for questions, comments. For 17 those on the phone, please raise your hand and 18 I'm going to start with Nancy in the room. 19 MEMBER GARRETT: So I have a question 20 about risk adjustment. Is this the right place? 21 Or is that validity? That's validity. 22 CO-CHAIR ASPLIN:

1	MEMBER GARRETT: Okay.
2	CO-CHAIR DAMBERG: Bill?
3	MEMBER WEINTRAUB: Hi, so I have a
4	question for the developer and for CMS. So, at a
5	really at all the hospitals this looks
6	reliable.
7	But what can we say about the
8	individual hospital? Because we're looking at
9	thousands of hospitals. And some hospitals, and
10	this is more part of my comment this morning,
11	similar.
12	Some hospitals may stand out on a
13	stochastic basis either looking poor or looking
14	very good when it's inappropriate. Or just
15	looking like everybody else when really they
16	really should be they really are an outlier,
17	just on the basis of the number.
18	Especially for some of the hospitals
19	where the numbers are small. There are various
20	approaches to that. None of them are entirely
21	satisfactory.
22	And I just wonder the thoughts of the

developer and CMS? 1 2 DR. NAGAVARAPU: So real quickly. On the original disability point. It wasn't noted 3 in this mission form. But we did use the 4 5 original reason for disability. So, that -- yes. And so the 6 7 disability flag, wherever that's expressed, is 8 the original reason for disability. 9 CO-CHAIR DAMBERG: Actually, can I 10 follow up on that? Because that was my comment. 11 DR. NAGAVARAPU: Yes. Sure. 12 CO-CHAIR DAMBERG: So did you guys use 13 the enrollment database or the integrated data 14 repository? It's from the 15 DR. NAGAVARAPU: 16 enrollment database. 17 CO-CHAIR DAMBERG: Okay. So the 18 reason I raise this, because we've been, in work 19 that I do for CMS, been using that same variable. 20 And it turns out that at age 65 it resets to aged 21 into Medicare. 22 Whereas the variable that's in the

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integrated repository, it's the OREC variable. 1 2 It retains their disability status beyond age 65. So, it's an easy tweak for you guys. 3 4 But, I just wanted you to be aware of 5 So if you did your cost tabs, you wouldn't that. find anybody over the age of 65 who is disabled. 6 7 DR. NAGAVARAPU: And just to make sure 8 about that, there is a current reason for 9 eligibility that's also included in EDB. And 10 we're not using that. 11 So, we're not using current disability. We're using EDB disability. 12 13 CO-CHAIR DAMBERG: Yes. No, you want 14 the OREC. But you want it from the integrated 15 data repository. 16 And I don't know sort of all the ways 17 Medicare data flows. But somehow or other it 18 doesn't get reset in the IDR. It's kind of 19 strange. 20 DR. NAGAVARAPU: So, on the other 21 comment, so we did some additional numbers just to get a sense of how much hospitals are moving 22

around in the type of comment that's being made there.

Because the reliability numbers reflect that in part in the sense that we're calculating reliability. Kind of a signal to the within metric for each hospital.

7 And trying to understand how much the 8 within variance is relative to the between 9 variance, and I think that's a point that maybe Dr. Needleman and Dr. Naessens had brought up in 10 11 the last session. And so the reliability metric 12 speaks to that a bit directly in terms of how 13 much hospitals can be distinguished from one 14 another.

We've also done some examination of quintile rank stability that was mentioned in the summary by Dolores. We looked into that a little bit more. We would expect some movement across quintiles across years. And actually that's desirable.

21 We want hospitals to be able to 22 improve on the measure. And so we would expect

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1 rankings to change over time.

2	But, we also think there should be
3	some stability and not just noise. That we're
4	distinguishing something about these hospitals.
5	And we looked into one number where 94 percent of
6	hospitals that are in the highest quintile of
7	spending in 2014 are in the highest quintile
8	files in 2015.
9	So while there is some movement across
10	quintiles, the limited amount that Dolores
11	mentioned, there's not drastic movements across
12	time.
13	And then we have some information on
14	some simple calculations of confidence intervals.
15	I know some people asked about this.
16	We did some simple calculations. And
17	for example you can distinguish sort of high
18	performers from other hospitals.
19	So, about 75 percent of providers can
20	be statistically distinguished with a 95 percent
21	simple calculation of a confidence interval from
22	the 10th percentile. So, from high performing

1 providers. To give you a sense of that. 2 CO-CHAIR DAMBERG: Okay. So --3 sorry. 4 MS. SPALDING BUSH: Can I -- oh, 5 sorry. CO-CHAIR DAMBERG: 6 That's okay. 7 MS. SPALDING BUSH: This is Kim. Ι 8 hope you guys can hear me. I would also just add 9 that we did set the case minimums in the interest of protecting those smaller hospitals from having 10 11 one or two cases that, you know, sent their score 12 too far in one direction or another to protect 13 the stability there. 14 I mean, we also do a -- and Sri can 15 speak better to the actual way that we do this. 16 But we address outliers. So we take a look at the difference 17 18 between the expected cost and the observed costs. 19 And when they're way off, they do dial that back 20 a little bit to help mitigate some of the impact 21 of those outlier payments for certain pieces. 22 But I think would also potentially

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1	have a bigger impact on a smaller hospital.
2	CO-CHAIR DAMBERG: All right. Thank
3	you. Jack?
4	MEMBER NEEDLEMAN: This comment/
5	question sort of straddles the reliability/
6	validity dimensions. So, I apologize if I slide
7	into validity.
8	But, I think it's important to as
9	we think about the reliability here, to
10	understand what's being measured. And therefore
11	how we ought to be testing the reliability or the
12	validity.
13	This is fundamentally a price-weighted
14	measure of utilization. And because DRG is
15	included in the risk adjuster, all the
16	differences in prices that are associated with
17	the DRG are sopped up in the risk adjuster.
18	The DRG may also pick up any
19	differences across DRGs in the amount of non-
20	hospital use that is associated with specific
21	DRGs. But it ought to be sopping up the price,
22	the standardized price that is in that is part

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of this estimate.

2 So, given that it's doing that, what the measure is fundamentally measuring is all the 3 4 variations in non-hospital care associated with that hospitalization. 5 And my -- so, given that, and given 6 7 the role of the DRG and the risk adjuster, I'm 8 wondering, have you done any analysis of the 9 reliability or any of the other measures of variability taking the DRG price out of the 10 11 measure? 12 So we're really looking at just the 13 variability and the non-hospital components of 14 Which is really what the measure is use. capturing in terms of the variability. 15 16 DR. NAGAVARAPU: Thanks for that. So, 17 that's exactly right. That DRGs used in risk 18 adjustment sort of net out the standardized cost 19 of DRG. There is still some variation from the 20 21 inpatient stay in terms of Part B costs. So, the 22 extent to which physician services are used and

so on, will have an impact.

2	In terms of the results there, the
3	fraction of variation accounted for by that is on
4	the order of 15 percent. Whereas the fraction
5	accounted for by post-discharge spending is
6	higher.
7	What we have done is some basic
8	analysis as to where the post-discharge spending
9	is coming from. And to get a sense of what's
10	sort of driving the variation in that to speak to
11	the point about, you know, just focusing on post-
12	discharge. And it seems like a lot of that
13	variation is coming from particular post-acute
14	care facilities. So, it's skilled nursing
15	facility intensity of use, for instance, and home
16	health.
17	But we totally agree that the post-
18	discharge portion of this is a key aspect of
19	understanding what's driving the variation in
20	performance across providers. And there's
21	certain key post-acute care facilities rather
22	than later readmissions, for instance, that seems

to really be driving a lot of that variation. 1 2 CO-CHAIR DAMBERG: And I'm going to 3 turn to folks on the phone. John, do you want to 4 start? MEMBER RATLIFF: Just a quick 5 Yes. question. You note that you use 25 episodes for 6 your reliability testing. That's kind of your 7 cutoff, like each facility having to have 25. 8 9 And that you also looked by restricting the number of facilities. 10 11 So this is where you have 50 episodes. 12 And you note that you drop the number of hospitals. And then you don't really give us 13 14 like a real -- reliability, excuse me, score, when you increase the number of episodes. 15 16 And I was wondering what you saw with 17 that? Or if the developer would just like to 18 comment on that? 19 Like how much of an increase in your 20 reliability you reached by kind of decreasing the 21 number of hospitals? By going to hospitals with a higher number of episodes? 22
	2.
1	DR. NAGAVARAPU: Yes. Thanks for
2	that. So, I have the numbers right here in front
3	of me actually that we can send everyone
4	afterwards.
5	But, if you look at the .7 threshold,
6	if you use a threshold of five episodes,
7	reliability is at 94 percent. And are between 93
8	and 94 percent for a lower episodes.
9	And then it stays fairly stable. So,
10	you know, it stays at 93 percent all the way
11	through to a case minimum of 75 episodes.
12	And it doesn't really show an increase
13	until you get to about 110 episodes as a case
14	minimum. Where it increases only slightly to 95
15	percent.
16	That's for .7 reliability. You know,
17	for .4 as well as .8 and .6, it's also very
18	stable across case minimums.
19	And I think what that's telling us is
20	that, you know, the measure is picking up
21	something real that's not sort of swayed very
22	dramatically by the exact sample that's being

included here. 1 2 CO-CHAIR DAMBERG: Bill, I think 3 you're next in the queue. 4 MEMBER WEINTRAUB: Did you say Bill? 5 I'm not listed as one of the people to be speaking right now. 6 CO-CHAIR DAMBERG: Okay. 7 Thank you. 8 Maybe your hand was still up on the site. 9 MEMBER WEINTRAUB: Oh, I never lowered 10 it. Sorry. 11 CO-CHAIR DAMBERG: Okay. Thanks. Ι 12 have one question regarding the reliability. So if approximately 7 percent or below .7, does CMS 13 intend to use the measure results if it falls 14 15 below that reliability threshold? 16 MS. SPALDING BUSH: Yes. I think for 17 all of our payment and quality measures, we do 18 set the case minimum. And then we, you know, 19 kind of place where generally hospitals are 20 meeting an acceptable standard of reliability. 21 And they do use the measure then for 22 all hospitals that meet that case minimum.

	21
1	CO-CHAIR DAMBERG: Any other comments
2	on this before we turn to talking about validity?
3	MS. SPALDING BUSH: Can I just add to
4	that? I'm sorry.
5	CO-CHAIR DAMBERG: Sure.
6	MS. SPALDING BUSH: It's hard to hear.
7	I'm really sorry. We also, you know, we split
8	that balance between being inclusive, capturing
9	enough hospitals. And then setting a threshold
10	so high that hospitals start to fall out.
11	So, I think that's where we I think
12	that's where we try to land. In that place where
13	we've got a reliable measure. Where we've not
14	had a whole lot of hospitals drop out.
15	Especially in something as important as measuring
16	costs.
17	CO-CHAIR DAMBERG: Great. Thank you.
18	Any other comments before we move to validity?
19	(No response)
20	CO-CHAIR DAMBERG: Sure. All right,
21	before everybody forgets what we just discussed,
22	let's take a vote on reliability.

1 MR. SINGH: Okay. So we're going to 2 begin voting on reliability for Measure Number 2158. Your options are one high, two moderate, 3 4 three low, and four insufficient. 5 Voting has now begun. (Voting) 6 7 Larry, if you could MS. O'ROURKE: 8 submit your vote in the comment box, that would 9 be great. Thank you. 10 MEMBER BECKER: Did you get it that time? 11 12 MS. O'ROURKE: Nope. Still not seeing 13 it. If you want, you can tell me right now if 14 you're comfortable doing that or you can email it 15 to me. 16 MEMBER BECKER: Reason it's not 17 working. Well, one. 18 MS. O'ROURKE: Okay. Thank you. 19 MR. SINGH: Okay. So we're going to 20 try that one more time because the other votes did not come in. 21 22 So, bear with me while I reset it.

Ĩ	2:
1	And I'll let you know when to resubmit the vote.
2	MS. O'ROURKE: Folks on the phone, we
3	have your votes. So, it will just be people in
4	the room will need to revote.
5	Apologies. We're having the same
6	issue where it's only capturing highs.
7	MR. SINGH: Okay. So, please resubmit
8	your vote again for those that are in the room.
9	(Voting)
10	MR. SINGH: Okay. So all votes are
11	in. And voting is now closed for reliability for
12	Measure Number 2158.
13	The results is as follows: eight
14	votes for high, ten votes for moderate, zero
15	votes for low, and zero votes for insufficient.
16	That accounts for 44 percent of the votes for
17	high, 56 percent of the votes for moderate, zero
18	percent of votes for low, and zero percent of
19	votes of insufficient.
20	This measure passes for reliability.
21	CO-CHAIR DAMBERG: All right. Now we
22	can turn to validity. Dolores?

I	
1	MEMBER YANAGIHARA: All right. So,
2	the first part of validity is the specifications.
3	And I think there was a general sense that the
4	measure specifications were consistent with the
5	intent of the measure.
6	There was one question raise, or
7	concern raised about the ability of hospitals to
8	influence the total amount. Especially, I think,
9	the post-acute care piece.
10	In terms of testing, there was new
11	data that was used, empirical testing at the
12	measure score level.
13	The first test was looking at the
14	correlation with other measures of spending and
15	service utilization. And the second testing was
16	looking at cost variation by time period within
17	the episode.
18	So in terms of correlations, the first
19	one was correlated with risk-adjusted per capita
20	spending at the HRR level. The correlation there
21	was greater than .5. With a range, I believe of
22	like .51, .61 or something like that. I think

there was a range there.

2	And then the correlation with post-
3	acute not SNF, well I guess skilled nursing
4	and inpatient service per episode was .52. So,
5	moderate correlations there.
6	Variation by time period, 84 percent
7	of the variation was accounted for by post-acute
8	care. And 11 percent by the three days prior and
9	the in-depth admission length of stay.
10	So, there was a concern raised about
11	why you use different tests this times then the
12	first time around. Which I think focused on the
13	condition specific measures of utilization.
14	And there was a question raised about
15	whether a moderate correlation with the other
16	measures of utilization and spending were
17	sufficient. If they should be stronger.
18	And then again, the question of being
19	able to control the post-acute care. Because
20	that was where most of the variation in spending
21	occurred.
22	And then there was one question

1	raised, it may be more of a spec question. But
2	anyway, it was about in certain situations, I
3	think that's IRF, which I'm not sure if that's
4	inpatient rehab facility, I was guessing. Okay.
5	So, that that sometimes that can
6	actually extend beyond 30 days if they're in the
7	IRF longer then the 30 days after the whole
8	amount is included. And so there was concern
9	about that and the impact of that.
10	In terms of threat to validity, there
11	was some testing done on exclusions. It was
12	found that the there was minimal impact and
13	high correlation coefficients. Let's see, there
14	was I think, okay, so it's 1.6 percent of
15	cases excluded due to acute transfer. So that's
16	not too much.
17	And a high correlation, .95. About
18	eight percent of episodes were excluded due to
19	death during the episode. Very high correlation
20	with and without those of .99
21	For overlapping episodes, that
22	accounted for about 12 percent of exclusions.

1	And again, a very high correlation of whether you
2	include them or exclude them of .99.
3	Removing the top and bottom outliers,
4	there was a that was the one top and bottom
5	one percent. There was a correlation of .93. So
6	again, quite high correlations whether you
7	include or exclude those populations.
8	Some of the concerns raised were
9	someone raised a concern about cancer hospitals
10	being excluded. But there may be some general
11	hospitals that have a lot of cancer patients that
12	might be included and that, you know, how would
13	that impact them? And that was the main concern
14	on exclusions.
15	In terms of risk adjustment, the risk
16	adjustment is based on the CMS-HCC model. But
17	there's no adjustment for sex in this one.
18	Let's see, it includes age disability,
19	ESRD status, long-term care status, severity of
20	illness, and the MS-DRG of the index submission.
21	And then ordinary least squares linear regression
22	is used.

	2
1	In terms of discrimination, the R
2	squared for across all MBCs was .3. And then
3	overall was .48.
4	In terms of calibration, they looked
5	at there was a comment about the 90-day look
6	back period, and was that sufficient? So they
7	looked back 365 days to see what affect that had.
8	And basically the R squared of .3014
9	went to .2997. So, basically no impact there.
10	But it did cause 6.7 percent of the episodes to
11	be excluded because of the longer look back
12	period.
13	We looked at adding institutional
14	status. And there was minimal improvement to the
15	R squared. But it decreased the number of other
16	variables that were statistically significant.
17	And so that was not included.
18	Terms of predicted ratios, I think Sri
19	talked about this. By risk decile is very
20	consistent in all the deciles.
21	And then in terms of SDS testing, they
22	used income to poverty, and also race: black/non-

The F test showed both significant 1 black. 2 predictors, both of those were significant predictors. 3 But when they added it to the risk 4 5 model, it didn't have much impact at all. So, it was a plus or minus .01 for 97 percent of the 6 7 hospitals. And nearly 100 percent correlation. 8 There were a lot of concerns raised 9 about the SDS. I think we heard some of that from AAMC. 10 11 And then there was a question about 12 using zip code level. I think Sri explained that the reason for doing that was to kind of find a 13 14 balance between individual income impact and community income impact. 15 16 And let's see, oh, there was a 17 question about who were the three percent that 18 were affected more than .01 percent or .01. And 19 whether those were certain categories. For 20 example, like rural hospitals or something like 21 that. And so I don't know if you have more 22

information about that. But if you do, that
 would be great.

And then people raised the issue with 3 4 the connection to quality. And so the point was 5 that sometimes there's more services that are provided that can actually lead to better 6 7 outcomes. But we don't know what the outcomes 8 In this case, it's just spending. are. So, 9 there was a question about that. I'm almost done. This is a long 10 section. 11 12 (Laughter) 13 MEMBER YANAGIHARA: In terms of 14 meaningful differences, they stratified results by hospital characteristics. So geography, 15 16 teaching hospitals and rural or urban. And the 17 results were as expected based on literature. 18 There was a request by a member, or 19 more then one member maybe, that they would like to get information on the source of differences 20 21 for the higher and lower cost hospitals. 22 So, kind of understanding that more.

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1	Like what was really driving that? And then,
2	again the link to quality was brought up.
3	In terms of missing data, I'm not sure
4	if this is actually missing data or not, but two
5	comments were that there's no Part D data. So,
6	that is true.
7	And then Medicare Advantage is not
8	included. And so you know, there may not be
9	missing data for Medicare fee for service, but in
10	terms of like understanding the context and the
11	whole market, that Medicare Advantage would be
12	missing.
13	So, those are my notes.
14	CO-CHAIR DAMBERG: Terrific. Yes,
15	Taroon?
16	DR. AMIN: Before we get into
17	conversation on this, Dolores, I think you did a
18	great job by the way. There were a few pre-
19	meeting comments that were submitted related to
20	this measure. As particularly related to this
21	section, that I just wanted to highlight.
22	We heard from the AAMC on this, from

the federation. There were some questions around 1 2 the variable that was used in the SDS evaluation as it relates to the ASPE report. 3 4 And then from the AMA, some questions around the level of analysis. And concern about 5 using this measure at a physician level. 6 But 7 it's not specified as such. 8 So those are the only other two 9 comments that are related to validity that came 10 I just want to throw that into the up. discussion. 11 12 CO-CHAIR DAMBERG: All right. So why 13 don't we start with Nancy. 14 MEMBER GARRETT: So I have a couple of 15 initial comments here. One is, to me the major 16 validity concern here is actually the title of 17 the measure. 18 I brought this up the last time we 19 reviewed it. And I'm sure when something's 20 written into statute, we can't change the title. 21 But, to me it's just ruining this 22 thing. I mean, this measure should be called

something like resource use per hospital episode.
 It's not a true cost measure. And it's certainly
 not a per beneficiary measure.

It's per episode. And so it just
seems really misleading. And given that, you
know, this is available to the public and it's
meant to be used by consumers, it seems really
important that the title is accurate.

9 So, I think that's a real validity
10 concern that the title doesn't match what the
11 measure is.

12 And then the second thing I wanted to 13 bring up is something that we noticed using the 14 data in Minnesota. Which is that there's a real 15 bifurcation between rural and urban hospitals on 16 these results.

17And we find that the hospitals in the18more urban settings in the state have higher19scores. And then rural have lower scores on this20measure.

21 So like in Minnesota for example, the 22 Minnesota average is .9. And every single urban

	1
1	hospital is .94, .95, .96. And every single
2	rural hospital is under .88.
3	And so I actually corresponded with
4	the measure developers about this a couple of
5	years ago. And one of their responses was, well
6	there's research showing that urban hospitals use
7	more resources.
8	And so, that could well be the
9	explanation. But it also makes me worry that
10	maybe there's something about the risk adjustment
11	that isn't picking up tertiary care and some of
12	the complexity of patients referred into some of
13	these facilities in the urban areas.
14	So, I don't I haven't done that
15	analysis across other states. So I don't know if
16	that is something that you've seen other places.
17	But to me, that's a real concern about how this
18	measure is actually playing out.
19	CO-CHAIR DAMBERG: Did you want to
20	comment on that?
21	DR. NAGAVARAPU: Yes. So, I'll let
22	Kim respond to the title issue. But the

rural/urban. On average rural hospitals do have 1 2 lower scores than urban hospitals. I think in the materials that you all 3 4 saw, it sort of scores nationally. And the mean 5 for urban hospitals is 1.0. Whereas for rural hospitals is .95. 6 7 However, the one thing I want to point 8 out, is if you look at the percentiles and the 9 distributions of rural hospitals and urban hospitals, the distributions overlap a fair 10 11 amount. Right? 12 So, I wouldn't think of this as a 13 measure that's somehow segmenting off for urban 14 and rural hospitals. There are a large swath of urban hospitals that are performing better then 15 16 the large set of rural hospitals. 17 So, I think what you're seeing in 18 terms of the difference in average is true. 19 Although the size of the difference seems to be 20 larger in Minnesota than nationally. But those distributions are 21 22 overlapping a fair amount. So, I do think

there's something exclusive about the evidences 1 2 that's preventing urban hospitals from having this source. 3 4 MS. SPALDING BUSH: So it -- oh, I'm 5 sorry. No problem. CO-CHAIR DAMBERG: 6 7 MS. SPALDING BUSH: Just regarding the 8 title of the measure, you're right. It was 9 written in with the statute and for inclusion in 10 the Hospital Value-Based Purchasing Program. 11 When it displayed on Hospital Compare, 12 it does have a different name. Because that site 13 is for beneficiary consumption, theoretically 14 although a payment measure maybe of more interest to others as well. 15 16 But, it's called like Medicare -- or spending per hospital patient with Medicare, I 17 18 think. Something like that. It gives you the 19 sense that it is a hospital related measure and 20 it has to do with payment, so. 21 CO-CHAIR DAMBERG: Brent? 22 MS. SPALDING BUSH: We had the same

	2
1	feeling about the title in CMS that you did.
2	CO-CHAIR DAMBERG: Brent?
3	CO-CHAIR ASPLIN: My question is about
4	the risk adjustment model and the 90-day look
5	back period. Could you just comment on that?
6	Is it either there's a benefit of
7	a look back period, in which case I don't think
8	90 days is enough if you apply how the HCC model
9	works for risk adjustment in Medicare Advantage.
10	You would never just look at a quarter. Or you
11	would miss a ton of risk in your population.
12	Or there's really no benefit in the
13	look back period and you're going to capture
14	whatever you're going to capture in the three
15	days prior to the episode. And you'll get your
16	HCC diagnosis there.
17	Would you just speak to that? Because
18	the 90 days to me just seems hung in the middle.
19	Sri?
20	DR. NAGAVARAPU: Yes. No, that's a
21	good question. So when we developed this, we
22	tested a variety of look back periods. As you

noted, Medicare Advantage looks at the previous year.

What we did is look at sort of 90 3 4 days, 180 days, and so on. And up to 365 days, to get a sense of how predictive power changes. 5 And the trade off there is potentially 6 improvements in predictive power versus losing 7 8 more beneficiaries because of people's move, they 9 get out of Medicare Advantage, you may lose people the further you look back based on the 10 11 restrictions we have. Right? However, what we found in the analysis 12 13 here, and what we found in previous analyses as 14 well, is that moving to a further look back actually slightly reduces the R squared in moving 15 16 from 90 days to 365 days. And we think what's 17 happening is a problem with sort of false 18 positives in the sense that there are some 19 conditions that you would pick up if you look 365 20 days back that resolve by the time you get to the 21 inpatient stay.

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And we think that's one possible

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explanation for what we're seeing. That the 90-1 2 day look back actually performs a bit better in terms of predictive outcome. 3 4 But we have looked at a range of --5 when developing the measure for exactly the concern you have. 6 MS. SPALDING BUSH: 7 Yes. And the 8 difference there being it's predicting just the 9 cost of this episode. So that per -- it maybe that those 90 10 11 days pick up the conditions that are most directly impacted, you know, the reason that 12 13 person was admitted, their, you know, their current state at the time of admission. 14 15 And what we would expect the cost to 16 be for them post-discharge as a cur -- you know, 17 as compared to things we just pick up that they 18 happen to have as an acute condition that hasn't 19 been treated lately, you know, if we went back a 20 year. 21 CO-CHAIR DAMBERG: All right. I'm 22 going to turn to Jack. And I think we need to

I	
1	try to wrap this up soon. So,
2	MEMBER NEEDLEMAN: I actually have
3	just a few comments. I think the measure is, as
4	much as we looked at it originally, and it's as
5	worthy of endorsement as the first one was.
6	I think there are a couple of things
7	that should be noted here. Not necessarily for
8	the development of the measure. But for your
9	thinking about what you've got and how to analyze
10	it.
11	You show a fair amount of variability,
12	like 25 percentage points in your index between
13	the you know, the 10th and 90th percentile.
14	And that's a lot.
15	But it's even worse than that, because
16	you have standardized out about half the costs,
17	which are the hospitalization costs. So, the
18	variability around the non-hospital costs are
19	much larger.
20	And I think it's very important for
21	usability purposes, as well as for interpret
22	ability purpose that you do a lot more analysis

on where that -- what those variations in
 spending are.

You mentioned readmissions as one of 3 4 the major potential sources of that variability, 5 and SNF use as the second major source. And we need to understand that a lot better. 6 We need to understand that particularly if it's going to be 7 8 used in a value-based payment system, so we're 9 also going to be correlating with the outcome. 10 So, I would encourage you to think 11 hard about that. The second thing again, just a 12 general comment. 13 This is not a measure of resource use 14 because of the standardization of prices. To the extent that you've got individual visits or 15 16 individual days in the SNF there, yes, you've got some measure of differential resource use. 17 18 But within a hospital, you don't have 19 any variation in resource use. Because you've 20 used a standardized price for it. A little bit 21 on the Part B, but only a little bit on the Part 22 в.

	24 I
1	And if we're going to understand how
2	hospitals influence those other costs, we better
3	have a better understanding of what's happening
4	in the hospital then this measure provides.
5	With regard to risk adjustment and SDS
6	risk adjustment, since Jan isn't here, let me
7	channel her. When your Yale colleagues were here
8	presenting some other measures, we raked them
9	over the coals over using zip code level measures
10	of income rather than census track level
11	measures.
12	And we were told in subsequent work,
13	it's just really hard to get the beneficiaries
14	matched up to their census tracks. Even though
15	we supposedly have the address stuff.
16	So, it was not feasible. We just had
17	a measure, two measures earlier today in which
18	health partners managed to match their patients
19	up with census tracks.
20	I don't find the argument that the zip
21	code better captures the full range of resources
22	available, either to the patient or in the

community, as compelling as understanding better 1 2 the local circumstances in which the beneficiary Particularly if you're trying to apply 3 lives. 4 that as a measure of what resources the beneficiary has. 5 6 So, I want you to -- I want to 7 strongly encourage you to go back and reconsider 8 the SDS analysis. We talked about the other 9 problems of, you know, high disparity, you know, high disadvantage using facilities which are not 10 11 captured in your risk adjuster either. 12 But, I really do want you to go back, 13 if we're going to be doing risk adjustment around 14 SDS, you've got to figure out how to get the --15 and you're going to use some geographic proxy for the circumstances of individual beneficiaries. 16 17 You really do have to go back to the 18 census track as the basis for that calculation, 19 not zip codes. 20 CO-CHAIR DAMBERG: Nancy, did you have 21 one last question before we wrap up? 22 I just wanted MEMBER GARRETT: Yes.

to second that comment. I feel like the approach 1 2 here to risk adjustment for SDS is really not adequate for where we need to be. 3 And especially given the really big 4 5 impact that readmissions has on this particular measure and all of the discussion that's been 6 7 going on around readmissions and the strong link 8 to socioeconomic circumstances of the 9 beneficiary. 10 So, I think that there's more we need to do here. 11 12 CO-CHAIR DAMBERG: And jut to follow 13 onto that. I guess I was a little confused. And 14 maybe you could say more about the analysis you 15 did, adding dual status. 16 And it sounds like your results differ 17 a significant amount from what the IMPACT Act 18 analytic group found. And wondering if you could 19 say why you think that's the case? 20 DR. NAGAVARAPU: Thanks. So, let me 21 start with that point. And then I'll circle back 22 to all the other points.

		24
1	So, on dual status. So we're very	
2	familiar with the ASPE report. I came in,	
3	actually was the support contract period to do	
4	the analysis for ASPE. So we know those results	
5	very well.	
6	If you remember from the report, the	
7	key distinction that they're making in the report	
8	is a comparison between safety net hospitals and	
9	non-safety net hospitals. Where safety net is	
10	defined as greater than 20 percent dish.	
11	When they look at the magnitude of	
12	difference in measure scores in 2015 and fiscal	
13	year 2015 between those two groups, the	
14	difference is .01. And so the difference is	
15	relatively small. Where we think of the standard	
16	deviation here as .09.	
17	So, that's the first point. I think	
18	there is a question as to what is driving that	
19	.01 difference between safety net hospitals and	
20	non-safety net.	
21	And so we did some analyses to look	
22	into it that the ASPE report didn't get into.	

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And basically what we did is, we divided up 1 2 hospitals by the fraction of their episodes that are in the -- that are for dual beneficiaries. 3 And looked at different thresholds to 4 5 compare hospitals that we would classify as heavily dual. Like above a certain threshold. 6 7 Versus non-heavily dual. Where the heavily dual are going to 8 9 correspond to some extent to the safety net hospital. Because we want to understand what's 10 11 driving that .1 in the ASPE report. 12 And what we -- .01, sorry. And what we saw in that, in the discrepancy there, is we 13 looked at the -- we calculated the measure for 14 non-duals in those hospitals. 15 16 And what you see is that even on non-17 duals, the hospitals perform worse on the MSPB 18 measure then in the high dual concentration 19 hospital, as compared to the low dual concentration. And so if you look at the number, 20 21 I have it written here. That's right. 22 So if you use the threshold of greater

than 50 percent for dual episodes as the marker 1 2 for what's a dual hospital and what's a non-dual hospital, and then calculate the MSPB measure for 3 just non-duals in both of those fee sets of 4 5 hospitals, that measure is .04 larger for nonduals in hospitals with greater than 50 percent 6 7 dual episodes versus others. 8 So, what that's saying is that both 9 for duals and non-duals, these hospitals seem to be more expensive. It's not something that's 10 11 driven specifically by dual status. 12 Now, it could be some sort of 13 spillover type affect that everyone had 14 mentioned. That's a possibility. Another possibility is that these are just inefficient 15 16 providers. 17 And so I think it's something that we 18 really do need to dig down into. I think more 19 research on that is required. 20 But, that seems to be what's driving 21 this result in the ASPE study to some extent. 22 And that's something we could dig into more with

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1 the safety net definition.

2	For in terms of clarifying what we
3	did with dual status, we understand the concern.
4	The concerns about census track. We thought zip
5	code is a good way to get at sort of both of
6	these concerns at the same time. About the
7	individual level and the community level
8	attributes.
9	But we recognize that the people
10	wanted to focus more on the individual level.
11	That's why we went straight to dual status to
12	look at this.
13	And what we did is use a dual dummy in
14	the risk adjustment model for the MSPB measure.
15	Calculated the MSPB measure both with and without
16	the dual dummy and look at changes in the
17	measure.
18	And saw that greater than 98 percent
19	of hospitals have a change in magnitude less than
20	.201, so.
21	CO-CHAIR DAMBERG: So, I think the
22	challenge with risk adjustment is, you know, for

1	∠
1	most providers, it's probably not going to make
2	much difference. But it's always, there's sort
3	of a handful of providers where the difference
4	can be quite large.
5	And I guess the question is, is have
6	you looked at that in terms of how much impact it
7	has on those that have a really large fraction
8	say of duals?
9	DR. NAGAVARAPU: Yes. No, that
10	sorry, thanks. One way we've looked at that is
11	first to just see how many hospitals are sort of
12	moved by to sort of large changes in MSPB
13	measure score by including SDS factors or dual in
14	risk adjustment.
15	Looking at the table of numbers for
16	SDS, you know, we said the number that it's
17	something like 98 percent or 97 percent or so,
18	within .01. But, if you look at the other
19	hospitals, it's very rare that any hospital is
20	above .1 in the change in either direction.
21	There's only one hospital that's above
22	.03 and one hospital that's below minus .03 in a

So it's very tightly confined. 1 change. For 2 duals it's similarly tightly confined in terms of the numbers. Even the min and max are guite 3 4 tight. And I can pull the data up for you in a 5 second. So if you look at the .1 percentile, 6 the change is minus .016. And if you look at the 7 8 99.9 percentile, the change is .029. So it's not 9 huge fluctuations for hospitals. It's like minor fluctuations. 10 11 CO-CHAIR DAMBERG: All right. Thank 12 Sure, Helen? you. I think there's been so 13 DR. BURSTIN: 14 much attention to the ASPE report, I just want to clarify one additional thing. 15 16 So, the actual table from the ASPE 17 report points out a four percent difference. Is 18 that what you're talking about, the .04? Four 19 percent difference using dual beneficiaries. 20 And then they specifically then looked 21 at this question of medical complexity using a claims-based frailty index. Planning that half 22

of it's potentially addressed by in fact duals 1 2 isn't just poverty of course, it's for functional status, it's disability, et cetera. 3 4 And so they then found about half of 5 that was taken up by these potentially unmeasured clinical complexity. So at least their 6 7 recommendation was that this should potentially 8 be adjusted for. 9 So again, even if it's a small effect, 10 I just want to clarify the perspectives of both 11 CMS and the developer. Just because again, 12 there's this report that's now fresh out on the 13 street saying something that's slightly 14 different. 15 DR. NAGAVARAPU: Yes. So, the table 16 I had in mind for the .01 for the fiscal year 17 2015 is further down in the report. And I think 18 it's in the section where they talk about policy 19 simulations. 20 For this table they showed the four 21 percent total effect for social risk. What this 22 table is not doing that sort of the supplementary

results that we have help confirm, is that that 1 2 four percent could be something that's driven by the types of hospitals that dual eligible 3 4 beneficiaries are in, versus themselves. 5 And so the four percent sort of 6 includes both of those effects. Now, they try to 7 get it that with that second column there with 8 the within hospital. 9 But if you look at what they do for within hospitals, it's a random affects model. 10 11 And so it doesn't actually net out the mean 12 within a given hospital. All it's doing is making adjustment 13 14 that's basically relating to sort of the clustering. Taking into the account the air 15 16 structure. 17 And so really what they would want to 18 do in that second column to try and see how much 19 is due to which facilities people are concentrated in versus the dual individuals 20 21 themselves, would be around like a fixed event 22 sort of specification. Which they don't have

2	Now, the analysis we did that sort of
3	tries to look at these sorts of hospitals where
4	duals are more concentrated and look at what's
5	happening for non-duals, does provide some
6	indicative evidence that there's something going
7	on here. Where the types of facilities that
8	duals maybe clustered into, are facilities that
9	are inefficient not only for duals, but also for
10	non-duals in this measure.
11	DR. BURSTIN: Right. But part of what
12	this analysis is suggesting is that dual status
13	is an indicator of clinical complexity. So
14	inefficiency could be related to under-measure
15	clinical complexity, I think, is what the report
16	is urging. As you can see.
17	DR. NAGAVARAPU: Yes. No, and I think
18	it's possible. I think the HCC model that we
19	have now does a good job of taking into account a
20	lot of clinical factors that may affect dual
21	status.
22	And that's why I think that the MSPB

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measure doesn't do that much when we risk adjust 1 2 for dual. Because a lot of those factors are already captured by the existing HCC flags. 3 To the extent that there is additional 4 5 clinical complexity that's involved there, that's a possibility. I think what goes hand in hand 6 with this decision though, is a policy decision 7 8 about, given these sort of very small size 9 effects, do we actually want to create a separate standard for dual eligible beneficiaries? 10 11 Or do we create a lower standard of 12 care essentially by allowing that to enter into 13 this? I'm not sure. 14 So, can I actually CO-CHAIR DAMBERG: 15 comment on that? 16 DR. NAGAVARAPU: Yes. 17 CO-CHAIR DAMBERG: So, we also, full 18 disclosure, did some analysis, not on this 19 But, one of the things that specific measure. we were asked to look at for the IMPACT Act was 20 21 within provider variation on a particular 22 measure.
	2
1	And I'm curious for, let's say dual
2	versus non-dual within these hospitals if you
3	compute the same measures. Like how much
4	disparity is there? And is it sort of large and
5	consistently negative?
6	So, I think that's type of analysis,
7	if you haven't done it, and I'm happy to share
8	with you work that we did, that might be
9	informative in terms of your decision making
10	around adjustment.
11	DR. NAGAVARAPU: Thanks for that.
12	Yes, so we actually do have some results
13	comparing them.
14	And if you use that 60 percent
15	threshold in the preliminary results that we had
16	in order to respond to some of these pre-
17	evaluation comments, what we see is that the
18	measure score for non-dual episodes is around
19	1.04. And that's also the area that we see for
20	overall measure score as across all episodes.
21	And so that suggests that the dual and
22	non-dual is actually quite close. At least in

1 that segment of hospitals where duals are very 2 heavily concentrated. CO-CHAIR DAMBERG: So, I'm mindful of 3 4 time But, I think what I've heard is probably 5 the socioeconomic demographic adjustment conversation is not at an end. And we encourage 6 7 you to continue to work to evaluate the impacts 8 of SES factors on this measure. 9 Any other comments before we move to 10 voting? 11 (No response) 12 CO-CHAIR DAMBERG: All right. Seeing 13 none, let's tee up the voting. 14 MR. SINGH: Okay. Well, thank you 15 So we're going to begin voting on Chervl. 16 validity for Measure Number 2158. Your options 17 are one, high; two, moderate; three, low; and 18 four, insufficient. 19 Please vote now. 20 (Voting) 21 MS. O'ROURKE: If you could submit your vote through the comment. Or you could just 22

say it over the line too if you're comfortable 1 2 doing that. MR. SINGH: We're about to break --3 we're about to break our record because we're at 4 5 20 right now. Okay. So we'll have to 6 MS. O'ROURKE: reset again. Sorry about that folks. 7 MR. SINGH: So, I'm going to reset the 8 9 So please bear with us one second. voting. 10 MS. O'ROURKE: Everyone else on the 11 phone, we have your votes. You don't need to 12 send them again. 13 Larry, we do need yours still though. 14 And Dr. Weintraub as well too. MEMBER BECKER: This is Larry. 15 I got 16 disconnected. Did you get my vote? 17 MS. O'ROURKE: No, Larry. So if you 18 could submit it again that would be appreciated. And we need to revote in here too. So, you can 19 20 submit it when you get a chance. 21 MR. SINGH: Okay. So for those that 22 are in the room right now, please submit your

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1 voted. 2 (Voting) MEMBER BECKER: Did it come across? 3 4 MS. O'ROURKE: Yep, Larry. I got it. 5 MEMBER BECKER: Great. Thanks. And Bill Weintraub, 6 MS. O'ROURKE: could you please enter your vote as well? 7 8 Okay. So all votes are MR. SINGH: 9 in. And voting is now closed for Measure Number 2058 with regards to validity. 10 11 The results are as follows: three votes for high, nine votes for moderate, five 12 votes for low, and zero votes for insufficient. 13 14 With regards to percentages, that is 18 percent for high, 53 percent for moderate, 29 percent for 15 16 low, and zero percent for insufficient. 17 This measure passes for validity. 18 MS. O'ROURKE: Just to be fair. We 19 need 60 percent, Elisa, Helen? Or at 53 are we 20 at consensus not reached? 21 DR. BURSTIN: High or moderate. 22 MS. O'ROURKE: Oh for -- sorry.

2	CO-CHAIR DAMBERG: All right. So, we
3	are now going to move to feasibility. And John,
4	I think you appoint to just a quick overview
5	on that.
6	MEMBER RATLIFF: So feasibility we
7	should be able to move through quite swiftly.
8	The staff recommendation was high feasibility.
9	The data elements that are utilized
10	for this measure are routinely generated already
11	by the developer. And routinely used in day to
12	day practice.
13	There won't be any kind of increased
14	demands on practitioners. Or any kind of
15	increased demands on the developer for use of
16	this measure.
17	One of the comments that was brought
18	up in the opening comment period from the
19	committee was that while these measures are
20	routinely developed, and it will be feasible for
21	CMS to do this, it will be difficult if not
22	impossible for independent calculation of the

measure.

2	Without presumably going through RSDAC
3	or going through another licensing agent for CMS
4	data and then obtaining that. So while this is
5	feasible for use by CMS, it may be difficult to
6	independently verify CMS' calculations or
7	independently calculate using the metric.
8	Otherwise, no one else had any
9	concerns with feasibility. And I would agree
10	that it's a feasible measure.
11	CO-CHAIR DAMBERG: All right. Any
12	comments?
13	(No response)
14	CO-CHAIR DAMBERG: I'm seeing none in
15	the room. Anyone on the phone?
16	(No response)
17	CO-CHAIR DAMBERG: All right. I think
18	we can move to vote.
19	MR. SINGH: All right. Thank you,
20	Cheryl. So we're going to be voting on
21	feasibility for Measure Number 2158. Your
22	options are one, high; two, moderate; three, low;

1 and four, insufficient. 2 Please vote now. (Voting) 3 MR. SINGH: All right. We were so 4 But we're at 19. Which is over our 5 close. denominator. 6 7 So we're going to have to restart 8 again one more time. So please bear with me while I reset the slide. 9 All right. So for those that are in 10 11 the room, please resubmit your vote. 12 (Voting) MS. O'ROURKE: And is Bill Weintraub, 13 14 are you on the line still? 15 MEMBER RATLIFF: Perhaps you're on 16 mute? 17 MS. O'ROURKE: Bill, is that you on 18 the line? 19 MR. SINGH: I guess all votes are in. And voting is now closed for feasibility on 20 Measure Number 2158. 21 22 With the results is as follows: 12

votes for high, five votes for moderate, zero 1 2 votes for low, and zero votes for insufficient. And that gives us 71 percent of the votes for 3 4 high, 29 percent of the votes for moderate, zero 5 percent of the votes for low, and zero percent of the votes for insufficient. 6 7 And this measure passes for 8 feasibility. 9 CO-CHAIR DAMBERG: All right. Thank 10 So, our last criteria, our lead discussant you. 11 had to leave early. So, I'm going to throw it 12 open to the committee to see if anyone has any comments or issues related to the usability. 13 14 And let's start with Brent. 15 CO-CHAIR ASPLIN: So, the first 16 comment should not affect our voting today. But, 17 this just for CMS in the room. 18 You know, I don't think it's 19 appropriate for this measure to be used for 20 physician accountability in MIPS or a value 21 modifier program. It wasn't specified or built 22 for physicians.

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1	But like I said, that's a quick
2	comment. And I don't think it really affects our
3	task today.
4	Two comments or suggestions for the
5	usability of the reports. One is state and
6	national averages are helpful. It would be great
7	to do a column on hospital referral region.
8	Which I don't think would be that difficult.
9	But, there's a lot of variation across
10	states. And to some of the comments around
11	rural/urban, et cetera, an HRR column in addition
12	to the state and national, I think would be more
13	informative in terms of your local marketplace.
14	And then the other comment is that the
15	subcategories of spend are really what's
16	important. It would be really great if you
17	could, kind of similar to the HealthPartners
18	total cost index and the resource use index, if
19	you could do utilization percentages within major
20	diagnostic classifications for the various levels
21	of post-acute care.
22	Because there may be good bench

marking data out there. But I'm frankly not 1 2 aware of good bench marking data to drive performance. 3 And next site of care is the most 4 5 important decision in total episode spent for 6 people coming out of an anchor admission. And by 7 diagnostic category would be really great to help 8 guide clinicians around. 9 You know, 20 percent of beneficiaries with diagnosis X or DRG X for this category need 10 11 skilled nursing care. And your average is 35 12 percent for example. 13 And the problem with the reports as 14 they are today, is it's just dollars spent. 15 Which is also helpful. 16 But it isn't granular enough to really 17 drive action or improvement in understanding 18 where you are relative to at least average 19 utilization for the various levels of care. Does that make sense? 20 21 CO-CHAIR DAMBERG: Nancy? 22 MEMBER GARRETT: So, I also have, I

guess suggestions on how to make this more 1 2 So, I think one of the reviewers usable. commented that in practice this measure is 3 difficult for hospitals to consume because the 4 5 data is not readily there to really understand what's driving their score. 6 7 And I do appreciate the files that you 8 make available. What we found is that it takes a 9 lot of effort to get those files and put them 10 together in a way that gets you some answers. 11 And even then the answers aren't 12 complete, because all the data elements aren't 13 there. So you can see for example, what post-14 acute providers are referring to most. But not 15 Prado it by where the biggest costs are. 16 And so just if there's a way to make 17 that system more usable, I think that would 18 really help the ability for people to -- for 19 providers to act on this. As it is, it's kind of another data 20 21 point that we know we're being measured on. But 22 it's really hard to take that next step of, okay,

what are we going to do to improve? 1 So. 2 CO-CHAIR DAMBERG: Thanks Nancy. Sri? MEMBER SRIDHARA: 3 Yes. So I'm 4 probably following up with somewhat -- just some more comment. So it feels like a very helpful, 5 quick first measure. 6 7 That I think when we do our work we 8 usually try to implement it so that it's a good 9 measure you can get out the gates with. But it doesn't help you say, what should be your action 10 11 steps next? So, it feels like a bit of a blunt 12 instrument is what it amounts to. 13 And so what we usually do is put this 14 in and then have some other episode measures to where we can do some of this more refined parsing 15 16 of data to drive action. So, that's really it. CO-CHAIR DAMBERG: 17 Great. I'm not 18 seeing any more hands in the room or online. So 19 why don't we move to vote on this. Because I 20 know we have a few more agenda items to go before 21 the end of today. 22 MR. SINGH: All right. So we're going

1 to begin voting on usability and use for Measure 2 Number 2158. Your options are one, high; two, moderate; three, low; and four, insufficient. 3 4 Please cast your vote. 5 (Voting) 6 MR. SINGH: We've gone over our denominator this time. It's like a pattern here. 7 8 So, I'm going to reset the slide. So bear with 9 me for one minute. And just for the 10 MS. O'ROURKE: record, our denominator is going to be 18 for 11 12 this count. Because Bill did email his votes to 13 us. 14 So, just FYI if you notice a change in 15 the denominator. 16 MR. SINGH: Okay. So if you'll please 17 submit your vote again. Those that are in the 18 room. 19 (Voting) 20 MR. SINGH: Okay. So all the votes 21 are in. And voting is now closed for usability and use for Measure Number 2158. 22

And the results is as follows: five 1 2 votes for high, ten votes for moderate, three votes for low, and zero votes for insufficient. 3 4 That gives us 28 percent of the votes for high, 5 56 percent of the votes for moderate, 17 percent 6 of the votes for low, and zero percent of the votes for insufficient. 7 8 This measure passes for usability and 9 use. One more 10 CO-CHAIR DAMBERG: Okay. vote to go. This is the overall. 11 12 MR. SINGH: Yes. So we're going to be 13 voting on the overall suitability for endorsements for Measure Number 2158. 14 Your 15 option is one yes, and two no. So please cast your vote. 16 17 (Voting) 18 MR. SINGH: For those that are in the 19 room, can you please submit your vote one last 20 time. We're missing one. 21 (Voting) 22 MR. SINGH: Okay. So all votes are

1 And voting is now closed. For overall in. 2 suitability for endorsement for Measure Number 2158, the results is as follows: It's 16 votes 3 4 for yes, and zero votes for no. 5 Oh, so -- well 16 votes for yes and one vote for no. That gives us about 98 percent 6 7 8 MS. O'ROURKE: Yes. 9 MR. SINGH: So 98 percent for yes. MS. O'ROURKE: Could we redo that just 10 11 for the record? Just to be safe. People on the 12 phone, we have all your votes. So, in the room, 13 please? 14 Hopefully this is our last vote of the And we'll try to find the source of the 15 day. 16 gremlins or Russian hackers, whatever you want to 17 say they are. 18 MR. SINGH: Got some at NQF -- there 19 is -- okay. So for those that are in the room, 20 please resubmit your vote. 21 (Voting) 22 MR. SINGH: So the last one with

feeling this time. So, for overall suitability 1 2 for endorsement for Measure Number 2158 is as 17 votes for yes, and one vote for no. 3 follows: 4 And that gives us 94 percent of the 5 votes for yes, and 6 percent of the votes for no. CO-CHAIR DAMBERG: All right. 6 Thank 7 I just wanted to quickly see if there was you. 8 any additional member or public comment at this 9 time, both in the room. And Operator, if you want to ask if 10 11 anyone on the phone has a public comment. 12 Okay. At this time if you **OPERATOR:** 13 would like to make a comment, please press star 14 then the number one. 15 (No response) 16 OPERATOR: And there are no public 17 comments at this time. 18 CO-CHAIR DAMBERG: Great. And there 19 are no comments in the room either. 20 We are going to take a very quick 21 break. And I would ask people if they could be back in the room by 2:30. Because I know the NQF 22

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1	staff have a few more items they want to get us
2	through.
3	But, they also know we need a leg
4	stretch. So, back in a few minutes.
5	(Whereupon, the above-entitled matter
6	went off the record at 2:23 p.m. and resumed at
7	2:33 p.m.)
8	CO-CHAIR ASPLIN: Good afternoon. What
9	we have left this afternoon is an overview of the
10	cost and resource use measurement landscape. And
11	then, some discussion about episode-grouper based
12	measures. And the overall project update for
13	cost and resource use. And the staff are going
14	to lead us through this conversation, so I will
15	turn it over to Erin.
16	MS. O'ROURKE: Thank you. And I want
17	to introduce Ashlie Wilbon, who has joined us at
18	the table. I think she's worked with many of you
19	in the past. So, Taroon, Ashlie, and I can kind
20	of drive the slides and we're going to skip
21	around a little, so feel free to jump in if you
22	have any comments.

1	So, if we could skip to Slide 28,
2	let's keep going, because Rachel went through
3	this in the morning. Again, you saw this slide.
4	So, again sorry, one back. We did just want
5	to quickly refresh you on what measures are
6	currently in the cost and resource portfolio.
7	We covered three of these today, the
8	others are the ones that we actually just looked
9	at over the summer, the episode of care for AMI,
10	heart failure, and pneumonia. Next slide.
11	So, to just give you an idea of where
12	these are used in federal quality initiatives, as
13	the team just was saying, the spending preventing
14	measure is used in the Hospital IQR program, as
15	well as the Hospital Value-Based Purchasing
16	Program. You can also see similar use of the
17	three episode of care measures, with the
18	exception of the pneumonia measure is right now
19	only for reporting. Next slide.
20	So, we're going to kind of combine the
21	next section, if that's okay, and then, open it
22	back up for any input the Committee might have on

So, I wanted to just briefly give you an 1 gaps. 2 idea of some of the measures that are coming through the pipeline. Next slide. 3 These are some that we've seen through 4 5 the MAP process, as well as in recent legislation. Just to give you a quick refresher 6 7 on the MAP, the MAP is the body that NQF convenes 8 to provide input on the selection of measures for 9 federal value-based purchasing and public 10 reporting programs. 11 Each year, the MAP is given a list of measures by HHS that they're considering 12 13 implementing through the rule-making process and 14 does a review, going measure by measure and making a recommendation about whether they 15 16 support its use or not. 17 Similarly, MAP also does some work to 18 identify gaps in measure development and does 19 work to support alignment across the public and 20 private sectors, as well as settings, different 21 levels of analysis and populations to try to promote care coordination and reduce the data 22

1 collection burden. Next slide.

2	We've been working to try to integrate
3	the MAP and CDP processes more closely. We know
4	that endorsement and selection are really two
5	processes that need to work in parallel and we
6	want to make sure that you're getting the
7	information that you need from the MAP work to
8	support your conversations about endorsing the
9	measures.
10	Similarly, we want to make sure we're
11	giving the MAP what the CDP standing committees
12	feel is the most relevant information about the
13	measures that are coming under consideration for
14	the various federal programs.
15	So, staff has started to undertake
16	some work where we will reach out to measure
17	developers who have measures under consideration
18	for MAP to encourage them to bring them in for
19	endorsement work.
20	We also, you may have noticed in the
21	preliminary analysis, include some information
22	about MAP's review of measures in the use and

usability section. Similarly, when we do a 1 2 preliminary analysis for the MAP committees, we include relevant feedback from the CDP standing 3 committees and your reviews on any measures that 4 have come before a standing committee before they 5 6 go to MAP. 7 So, we do want to make sure that 8 information is flowing between the two processes and both our endorsement and selection committees 9 feel supported by the information we're 10 11 providing. Next slide. 12 DR. AMIN: Erin, before you move on --13 MS. O'ROURKE: Yes? 14 DR. AMIN: -- could we go back to that So, I just wanted to 15 slide for a second? 16 reiterate for the group, many of you have been 17 part of the standing committee since we 18 originally started our work in cost and resource 19 use measurement, and so, I wanted to just take a 20 second to reflect on the fact that we went from 21 having -- actually many of the measures that we 22 looked at today, these were the first measures

that we ever looked at. And so, now, three years later, we have a significant number of cost and resource use measures that are endorsed.

So, as Erin talked through, in terms 4 of the current measures that are in the 5 portfolio, what's really important for us is to 6 7 get some guidance, and we can get it today and we can certainly get it from you all following the 8 9 meeting today, around where we want this domain 10 of measurement to go, in terms of, we sort of 11 describe it as gaps, but we've talked about, 12 actionability has come up a few times during our 13 conversation today, the use of these measures in 14 different settings, condition-specific measures, 15 but we also want to have a coherent portfolio. 16 This is an opportunity for an area of measurement 17 where we can be much more strategic in the types 18 of measures that we want to see. 19 Secondly, and as Erin described and

I'll just highlight, we have the opportunity in
the fact that this is a new area of measurement,
but also a really important area for use of these

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measures in programs, where we have the 1 2 opportunity to see these measures, proposed measures, early in the MAP process, sometimes 3 before they even get to the standing committee. 4 So, what Erin's going to walk through 5 is some of what we believe is going to be coming 6 7 down the pipeline for you to be evaluating in the next several cycles of our work. And I say 8 9 several cycles, because it looks like there's going to be quite a bit of work coming down in 10 this area of measurement. 11 12 But we want to make sure that you all 13 are familiar with the fact that, as we have these 14 conversations, the purpose of our discussion is 15 not only for our reports and for transparency 16 purposes, but it also feeds the MAP process as the MAP committees think about using these 17 18 measures in programs. 19 And so, the preliminary analysis and the scientific review that's done in these 20 21 committees have multiple uses and is really the foundation for the MAP recommendations for the 22

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various programs.

2	And so, we look at these two processes
3	as interconnected and the flow of information
4	going from one process to another, with the staff
5	really serving as that conduit. And so, with
6	that, I'll turn it back over to Erin, as we talk
7	through some of the measures that have been
8	proposed in the various MAP work groups.
9	MS. O'ROURKE: Sure. So, on that note,
10	next slide please. To just give you an update of
11	what we've seen through the MAP process that has
12	not really come before the Standing Committee
13	since you've last convened, in 2014-2015, MAP
14	took a look at a number of ACO-level measures for
15	the Medicare Shared Savings Program.
16	One is an application of 2158, the
17	Spending Per Beneficiary Measure you all reviewed
18	today, however, at the ACO level, not for the
19	hospital level of analysis as you reviewed today.
20	Also, the Total Per Capita Cost Measure that I
21	believe this Committee evaluated a few years ago
22	and was not endorsed. Similarly, MAP did not

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1 support that measure for implementation in the 2 Shared Savings Program. Next slide. So, this, I apologize for, the font is 3 4 rather small, but in the year before last, MAP 5 actually looked at quite a few measures under consideration related to cost and resource use. 6 7 You can see there are a number of episode-based 8 payment measures for various conditions that were 9 under consideration for some of the hospital programs, the IQR and the value-based purchasing 10 11 program. 12 There was also a spending per 13 beneficiary of post-acute care for the home 14 health, inpatient rehab facility, long-term care 15 hospital, and skilled nursing facility settings. 16 Next slide. 17 DR. AMIN: So, Erin -- sorry to keep 18 jumping in. 19 MS. O'ROURKE: No, no. 20 DR. AMIN: Can we go back to this 21 slide? So, one of the things that we wanted to point out with this is, there is a real need, 22

again, just going back to my previous comments, there is a need, as you can see with the number of measures that are coming out for cost and resource use and what they're focused on, there really is a need for guidance around how and which types of measures we're actually developing for cost of care measures.

8 And you can see the myriad of 9 conditions that have been already proposed, and they're all -- essentially, the recommendations 10 11 to the MAP were based on the question of whether 12 these are important areas for cost measurement. 13 They might be important clinical areas, but are 14 they really important cost drivers for the 15 system?

And so, again, we may need to really think about, as part of our work, as we think about the next phases of work, how do we really think about breaking down these episode-based measures and how do we come up with a conceptual model for how we're going to be able to prioritize?

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1	And give some guidance to the field
2	about what types of measures we want to be seeing
3	here for cost of care, because some of these are
4	already being developed, there's a lot of
5	development dollars going into this, we want to
6	make sure we're really addressing some of the
7	high impact areas and in the last row, high
8	impact care settings, and making sure that we
9	have a level of harmonization of the measures
10	that we're seeing across these various settings.
11	MS. O'ROURKE: So, this is actually,
12	to go back to a point, Brent, you raised during
13	one of our orientation calls was, legislatively,
14	there have been quite a few updates around cost
15	and resource use measurement.
16	In particular, the Improving Medicare
17	Post-Acute Care Transformation Act of 2014. The
18	IMPACT Act required the development and reporting
19	of measures of resource use for LTACHs or SNFs
20	and home health agencies.
21	And then, the Medicare Access and CHIP
22	Reauthorization Act of 2015, MACRA, which

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1	repealed the sustainable growth formula and
2	streamlined clinician quality reporting programs
3	and incentives into the Advanced Alternative
4	Payment Models requires the use of cost and
5	resource use measures. Those are included in
6	both tracks of the Quality Payment Program, both
7	the new Merit-based Incentive Program, as well as
8	the Advanced Alternative Payment Models.
9	So, just to give a very high level
10	overview of the MIPS Program, MIPS includes four
11	domains: quality, resource use, clinical practice
12	improvement activities, and advancing care
13	information.
14	The resource use domain will include
15	a number of measures, including the Total Per
16	Capita Cost for All Attributed Beneficiaries,
17	Medicare Spending Per Beneficiary, and up to
18	other 41 episode-based measures. These are still
19	in development, but focusing on acute care,
20	procedural, and episodic care. Next slide.
21	So, I want to kind of reframe some of
22	these questions here, pulling in some of Taroon's

points about not just what information the MAP 1 2 needs, that you can see on these slides, but also to go back to the guestion about, does the 3 4 Committee have input on what are some outstanding gaps in development? 5 Any guidance you'd want to put there 6 7 of where we should try to perhaps make recommendations around where to put development 8 9 dollars, any outstanding gaps you see in the 10 portfolio. So, in combing the past two sections, 11 on both the MAP work and any gaps that remain in 12 the portfolio. 13 DR. AMIN: Recognizing that many of 14 these forty-some-odd episode measures may already 15 be in development. 16 MS. O'ROURKE: Yes. 17 DR. AMIN: So, some of that may already 18 be in development. So, I think, really, the 19 fundamental question here is, as we think about 20 these two important processes, are there any sort 21 of recommendations, observations that you have as the Committee around how we can continue to 22

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1	improve the information flow and also, where we	
2	might, as a Committee, focus on prioritization of	
3	guidance to the field for this area of	
4	measurement?	
5	If we're looking at doubling,	
6	potentially even tripling the size of this cost	
7	of care portfolio in the next three to four	
8	years, how do we start to rationalize what we	
9	really need to be looking at in this cost of care	
10	domain?	
11	CO-CHAIR ASPLIN: So, with that, we'll	
12	open it up for discussion and comments from	
13	Committee Members. Srinivas, do you have a	
14	comment?	
15	MEMBER SRIDHARA: Still up from	
16	CO-CHAIR ASPLIN: Cheryl?	
17	CO-CHAIR DAMBERG: So, it seemed as	
18	though, from that first slide that had all those	
19	different conditions, there's pretty heavy	
20	emphasis on the hospital setting. And I guess I	
21	just need to understand better what's in the	
22	measure development pipeline vis-a-vis cost for	

ambulatory care and ambulatory care conditions. 1 2 MS. O'ROURKE: So, I think that is something we haven't really seen yet, other than 3 the language in the proposed rules about the up 4 5 I was just looking today, to 41 measures. there's some commenting open on the MACRA 6 7 website, with some information about the various episode groups and the triggers. 8 9 But those measures are still in 10 development and we haven't really seen what they 11 might look like, they haven't come to the MAP 12 process yet. 13 CO-CHAIR ASPLIN: Jack? 14 MEMBER NEEDLEMAN: We spent a fair amount of time talking about usability today, 15 16 even as we abbreviated it in some cases, but I 17 think that's critical. And I don't think the way 18 we're getting the data on these measures, either 19 we or the MAP, is facilitating our assessment of 20 the usability or the appropriateness of the use, 21 given the validity of the measure. An awful lot of the payment measures 22

wind up in a grid system, with very sharp edges, 1 2 based upon your location in a distribution, not the absolute level of your spending or resource 3 4 use. 5 And we have not been asking -- we got 6 told how many people changed quintiles, but we 7 didn't get told how many people, how many 8 hospitals or how many systems or how many 9 provider groups wound up being shifted from one payment category to another, either a bonus to 10 11 nothing or to a penalty. 12 And yet, those are the way the 13 measures are being used in the systems that the 14 MAP is evaluating. And the assessment of how 15 well they perform needs to be done against use, 16 not more abstract levels of r-squares or anything 17 else. 18 So, I think that's one of the key 19 lessons I draw from this, for both our group, our 20 work, and the MAP work, in terms of enhancements 21 and guidance on how to do it and guidance for the 22 developers on what to provide.

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1	I think one of the issues for us, we
2	are the Cost and Resource Use Committee, we often
3	don't measure resources because of standardized
4	pricing, the issue has been, in the value-based
5	payment, was the fact that people were looking at
6	value.
7	And I guess, one of the questions, in
8	terms of where the appropriate forum is, is, are
9	these grids, which integrate both information on
10	quality and information on resource use, a
11	measure in and of themselves or is it only the
12	separate components that the measures and,
13	therefore, how do they get evaluated?
14	And to the extent that the grid is the
15	measure, should the grid be coming into this
16	Committee with a broader mission of assessing
17	cost, resource, and value measures? So, those
18	are the issues I would raise for consideration.
19	CO-CHAIR ASPLIN: Martin?
20	MEMBER MARCINIAK: So, four years ago,
21	we came here and we had basically the same
22	conversation we had today and I made the comment

to a couple of you in passing as we went through today, which caused me to kind of scratch my head a little bit.

To Janis's point, the dialogue this time seemed much the same, but the vote was very different. Four years ago, I found, mistakenly, in actually revoting at some point to sort out where our true feelings were about the measures.

9 But at the end, we end up with a 10 conversation of, well, what are we measuring? 11 We're not measuring cost, we're not measuring 12 resource, and, thereby, we're not measuring 13 value.

And so, a couple of years ago, I got excited about the fact that I actually started seeing measures coming through that were what I would call therapeutically-aligned, so, the pneumonia one, right?

So, how can you measure cost without
context, was the conversation four years ago?
Once again, today we had a conversation of cost
without context, and that's the part that I have

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1	a hard time resolving when I go back to the
2	office is, well, what do you share with people?
3	Well, we passed three resource
4	measures, that's what we're calling them. They
5	don't measure efficiency and they don't measure
6	value. And so, I would like to see, as we
7	continue to move forward with these conversation,
8	a degree of trying to drive the dialogue together
9	a bit more.
10	Because, at least at that point, it
11	will become more meaningful, because then you'll
12	understand what's happening in an ambulatory
13	setting, you'll understanding what's happening in
14	a hospital.
15	And, frankly, to the comment that
16	somebody had made about the group that was here
17	from Yale three years ago that got a really hard
18	time, and then, the young lady gave me a hard
19	time, because I explained that I couldn't
20	understand what she was doing well enough to tell
21	my parents, who use these systems.
22	There seemed to be, again, a lack of

congruency with respect to what the ultimate pull-through ends up being. So, we approve something here, we're not always sure exactly how you differentiate what's the patient populations, problematic, and then we approve it and it's used broadly and we don't wrestle with that which we have wrought, really.

So, that's my two cents for this. 8 Ι 9 would like to see more communication, not less. 10 So, you tend to wax and wane based on the level 11 of activity, but there were some things that were 12 on the, I guess the chart, that I don't recall 13 having seen. Things that we had elected not to 14 recommend out to the broader group. Some of 15 them, again, were disease-specific, sort of 16 resource and cost total.

17 It would be nice to see a little bit 18 more of that, because that would allow me to 19 reestablish in myself some context of, that we 20 are trying to link the stories between cost, 21 resource efficiency, and value. Because most of 22 my day job is about talking to hospitals and

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other groups about what value is and I still 1 2 haven't found a good definition of what that 3 means. 4 CO-CHAIR ASPLIN: Troy, and then, 5 Dolores. MEMBER FIESINGER: Hello, this is Troy. 6 7 Appreciate hearing long-term care mentioned, 8 because the question for me and my practice and 9 being a family doctor is measures that look at long-term treatment in the outpatient setting, 10 11 diabetes, heart failure, et cetera. 12 The sub-population that comes up very 13 often in our discussions with management of care 14 plans especially is, those high-cost, high-risk 15 acute patients. 16 And I don't know if there are any 17 measures looking specifically at that population 18 that have multiple illnesses, are in the hospital 19 often. Are there any benchmarks to compare how 20 we're doing with them? Do they just cost a lot 21 and that's the best we can do, or are there areas 22 to improve?

1	Second, in the post-acute care
2	setting, that are ACO, really looking closely at
3	SNF use versus LTACH use, home health PT versus
4	going to a clinic for PT, so care setting
5	measures addressing those subsets of use for
6	those services, but not just in the post or
7	discharge setting, but home health in particular.
8	A pattern I see is home health being
9	used and really care, but that's not covered.
10	I appreciate the comments that we just heard on
11	value with the care bill especially increased
12	risk for lower cost, but all we ask, do a good
13	job quality-wise. Measures that balance those
14	two with the value would be very helpful.
15	CO-CHAIR ASPLIN: Thank you. Dolores?
16	MEMBER YANAGIHARA: So, my comment is
17	related to feedback that we get from providers
18	all the time, in wanting to have a consistent set
19	of measures that they can be measured on across
20	their whole patient population.
21	And I know that there is lots of
22	reasons why that's challenging, because not every

measure is applicable to every population, but if 1 2 you think about it, the HealthPartners measures were specific to commercial, and then, there is 3 4 the Medicare measure we just looked at, was specific to Medicare. 5 And there may be reasons for that, but 6 7 it makes -- it drives the providers crazy to have 8 similar measures, and those two aren't exactly 9 similar, but that only apply to part of their patient population. 10 11 So, I mean, I don't -- like I said, 12 there's lots of reasons why that gets very 13 challenging to do, but -- and then, that also has 14 to be balanced with, sometimes we start getting -- so, we have total cost of care is not as 15 16 actionable, but it's applicable to everybody. 17 And then, you start drilling down into very 18 condition-specific thing that are maybe more 19 actionable, but then don't apply to as large of a 20 population.

21 So, like I said, I recognize there's 22 a lot of challenges, but I think to just keep in

1	mind that the more we do kind of payer-specific
2	kind of stuff, the less impactful it will be,
3	because the providers are trying to respond to
4	all these different signals.
5	CO-CHAIR ASPLIN: Larry?
6	MEMBER BECKER: Yes, thank you very
7	much. So, I wanted to reflect on a couple of the
8	prior comments and particularly Jack's. And
9	perhaps this is what Jack was saying, in that
10	there are a lot of measures and there are a lot
11	of measures outside of the cost and resource use
12	measures.
13	And understanding those may provide
14	context and a larger picture and fill in some of
15	the voids in maybe our perceptions, maybe our
16	realities about what we're looking at on cost and
17	resource use.
18	And that it would be helpful, perhaps,
19	to see where there may be complementary measures
20	that are sort of filling in those blanks, because
21	I have a sense that a lot of these measures are
22	aimed at trying to get a complete picture and

when we look at it from simply the cost and
 resource use perspective, we're sort of getting a
 narrow context, if you will.

And so, to the extent that other things that are happening to fill in measures could be complementary, I think it would be helpful for us to at least see and understand those in the context of the work you're asking us to do.

10 CO-CHAIR ASPLIN: Thank you. Jim? 11 MEMBER NAESSENS: Thank you. Actually, 12 I was going to reflect back on more what Martin 13 said and also Dolores. And I was going to give 14 almost the opposite recommendation that Dolores 15 gave, that as measures proceed and as we're kind 16 of evolving down the path, and we look at the 17 usability for the providers or we look at the 18 usefulness for the consumer, global measures are 19 less useful.

They don't give us an idea of where we can change, what's the best one. I'm coming in with cancer, I really -- maybe the cancer

practice here is very different than all the other practices.

So, the more and more we can move 3 towards measures, maybe not disease-specific or 4 5 certainly not payer-specific, but if we think of a clinical domain, whether it's obstetrics, 6 7 whether it's primary care, whether it's orthopedic surgery or some groups like this, and 8 9 recommend that measures be focused in those fairly extensive, large domains, we should be 10 11 able to bring more of the quality measures with 12 the cost and utilization measures, get more 13 meaningful measures that are useful for providers 14 to make changes and also useful for consumers to 15 start selecting places. 16 CO-CHAIR ASPLIN: Srinivas? MEMBER SRIDHARA: Yes, I think Jim 17

18 mostly said what -- similar comments. So, thank 19 you. If I could extend that, I think in terms of 20 a role for this group, in particular, is I think 21 the process being described, a lot of what's 22 coming and sort of how can we provide guidance,

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and it almost seems like taking this conversation and providing a framework to what is needed and crafting that is what it's necessary.

Because it's -- to also go back to 4 5 something Martin was saying, in terms of aligning with the therapeutic context, or if you think 6 about for, whether it's a hospital, a clinician, 7 anyone, they're operating in specific service 8 9 lines or categories of service that they're doing 10 in general, whatever that is, or specialities, and we need something that aligns well with that, 11 12 so that it drives that action.

13 It could be that you still have 14 measures that are applicable across, like, these cost of care measures, like the total cost of 15 16 care measure we looked at today, but there's 17 probably a push to say, in the coming time, we 18 want those to be applied in specific service areas and contexts and bring that through, and 19 20 that's how we would like to approve it. 21 And that might be a way that, even for

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CMS or others that are going to be using this in

how they, say, do MIPS or something else, then they have a sense of how to tailor it to the different service lines. But I think we could probably help to provide that framework as a group.

Kristine? CO-CHAIR ASPLIN: Thank you. 6 7 MEMBER MARTIN ANDERSON: I think when -- so, what I struggle with is, whenever we have 8 9 these measures that have layers and layers of 10 algorithms, right, so they're going to have a 11 grouping algorithm, they're going to have a 12 measurement algorithm, they're going to have a 13 risk adjustment algorithm, et cetera, that it's 14 never true that it works equally well for all 15 populations.

And so, one thing that I struggled with today and I think on this question of use, that we need to continue to struggle with, is that, if they don't work well for a particular population, so a population-based measure does not work well for individual physicians or certain types of characteristics of individual

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physicians or some places with a claims stream really does not well represent the care process, there isn't a way to articulate, here's where it shouldn't be used.

5 And so, once they get endorsed, we have these conversations, but once they get 6 7 endorsed, they can get used anywhere. And so, I know that NOF has been hesitant to walk into the 8 9 -- down the road of appropriate for what use, but 10 when you get to these types of measures that have so many layers of algorithms and they're reliant 11 12 on blunt information at the base, I think it's 13 important that that kind of conversation be had 14 in the endorsement process or the MAP process or somewhere. 15

16 CO-CHAIR ASPLIN: Thank you. Nancy? 17 MEMBER GARRETT: So, one thing that 18 I've been thinking about in regards to this 19 portfolio is just about price. And so, whenever 20 I've been involved in total cost of care type 21 measurements across populations, I'm always 22 struck by how much price is a driver of the

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results. Utilization is important too, but price 1 2 is really big, in terms of differentiating performance. 3 And what role would NQF have there, in 4 5 terms of having more measures of price and having more price transparency? So, that's kind of a 6 7 political question, but an important one, I think, because it's a really key part of cost. 8 9 And there is some work in Minnesota, 10 where Community Measurement has created some, 11 really, price measures for several procedures 12 that are high volume, like MRIs, where we've 13 aggregated average allowed price across all 14 payers, so that for one -- you can compare the 15 cost of that procedure across all providers. 16 And that's on our website. That's 17 something we've done as a community, but it's not 18 a perfect measure by any stretch, but it is kind 19 of a baby step towards more transparency. So, 20 just something to think about. 21 CO-CHAIR ASPLIN: Thank you. I'm going 22 to make a quick comment and then, I'm going to

1 hand it over to Ashlie and we can move into some 2 of the grouper conversations, if that's all 3 right?

To me, the urgent area is around physician accountability around resource use, because we don't have any endorsed measures there, and MIPS is coming up. And I just think this whole process is way too labor intensive to use the CDP to try to sort out MIPS.

10 And I don't know what level of 11 stakeholder engagement and dialogue there is 12 across CMS and MAP and physician groups, et 13 cetera, around, what is this resource category of 14 MIPS really going to look like, and Advanced 15 Alternative Payment Models?

We need a total per capita cost measure in Medicare, we need one. I know it didn't get over the bar when we talked about it last time, the total per capita spending, but I don't see primary care groups and physicians to be accountable for episodes, it just doesn't make sense.

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1	And so, there needs to be some version
2	of the HealthPartners measures or something like
3	that in Medicare, I think. And where it fell
4	apart was on attribution, that's where it fell
5	apart.
6	And I think we have to sort through
7	that by having dialogue about use, which is not
8	part of the CDP, the Consensus Development
9	Process, but if CMS could clarify use and there
10	could be at least a modest amount of agreement
11	among physician groups and CMS about how the
12	resource use category of MIPS is going to move
13	forward, so that you could Pareto chart out all
14	the docs and this is generally who we're going to
15	use a total per capita measure for and these are
16	the physicians we're generally going to use an
17	episode-grouper for, and then some ambulatory
18	non-procedural specialists who are in single
19	speciality TINs are going to be left out.
20	And I don't know what to do about
21	them, right? So, what do you do about
22	rheumatology? Huge spend, not really going to

1 fit a grouper, and if you're a single specialty
2 rheumatologist group or solo practitioner, where
3 do you fit?

I don't know, but let's solve for the 20 after we get the 80 figure out, right? I don't have the answer for everything, but I don't want to go through 45 measures in this process and then find out that that's not how they're going to be used. Helen?

I think so many of 10 DR. BURSTIN: Yes. you raised great points and lots of work I think 11 12 we all need to collectively do for the future. 13 We do know that the measure we just talked about, 14 the MSPB Measure, is being respecified to the physician-level, to the TIN-level, so that will 15 16 be coming back to you. And they'll adapt --17 again, it may not answer all of that, but at 18 least that is one thing we know that is coming 19 down the pipe.

20 But, again, you've raised a lot of 21 really important issues about really thinking 22 about what's needed, frameworks, et cetera, that

I think are exactly what we'd like to have come 1 2 out of this incredibly smart Committee. DR. AMIN: Yes. So, I think these are 3 4 excellent comments. I think there's a lot of ideas here, in terms of -- Ashlie, did you have 5 some comments? I didn't mean to jump in. 6 7 MS. WILBON: No. DR. AMIN: We're good. So, I think 8 9 there is a lot of work that we can do in terms of just even thinking about how we start linking 10 11 these cost and quality measures, whether that's a 12 measure developer responsibility, as the Linking 13 Cost and Quality Expert Panel sort of 14 recommended, or based on Srinivas's sort of proposal. That might be some activity that this 15 16 Committee can do, if we propose some additional 17 funding to be able to support that type of work. 18 So, Erin, if it's okay, we can move on 19 from this section, and I'll sort of move on to the next slide. And this is a little bit of a 20 shift of gears and I appreciate everybody sort of 21 working with us. 22

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1	And we have a few different conceptual
2	things that we wanted to talk about and we're
3	trying to stuff it all in the last hour here.
4	So, we're going to shift between multiple
5	different topics.
6	So, the next discussion, you have a
7	handout that's titled, it's on NQF letterhead,
8	that's titled Cost and Resource Use Measure
9	Evaluation Criteria Update Recommendations. So,
10	the purpose of this document is to review the CRU
11	criteria that are used for endorsement.
12	And over the past few years of
13	experience we've gained from deploying these
14	criteria in multiple CDP projects, there have
15	also been updates to the quality measure
16	evaluation criteria as well.
17	And so, the purpose of this document
18	in front of you is to there are several
19	recommendations that staff is making to update
20	the criteria for the Standing Committee to
21	consider. And from our perspective, these are
22	intended to simplify the criteria and make them

more	precise

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1	more precise.
2	In terms of, there are components that
3	are included here that are recommended for
4	removal, that we don't argue are important,
5	however, it is very unlikely that the Standing
6	Committee has ever made recommendations to not
7	endorse a measure based on these criteria.
8	And so, for us, they don't feel like
9	criteria if we're not really using them to
10	distinguish between different measures. So, the
11	first is on Criteria 1A, the measure focus.
12	Currently
13	MEMBER WEINTRAUB: Bill, just a second.
14	For those on the phone, which one of the
15	documents is this?
16	DR. ROILAND: It should be the one
17	titled Cost and Resource Use Measure Evaluation
18	Criteria Updates. If you don't have it, we'll
19	send it out to you right now. Apologies about
20	that, if you can't access it.
21	MEMBER WEINTRAUB: I don't see that.
22	I'm looking one the website, I don't see that.

	30
1	So, if you'll email it to me, I'd appreciate it.
2	DR. ROILAND: Okay.
3	CO-CHAIR ASPLIN: Maybe, can we also
4	bring it up on the screen for the webinar? Would
5	that be too much to ask?
6	CO-CHAIR DAMBERG: You can also post it
7	to the webinar.
8	MEMBER WEINTRAUB: That is too much to
9	ask? Okay.
10	DR. ROILAND: Yes, could we screen-
11	share this? Do we have it?
12	CO-CHAIR ASPLIN: Can we vote on it?
13	(Laughter.)
14	DR. AMIN: That was good Brent, that
15	was good. Sorry, Bill, we're pulling it up and
16	then, we'll also send it to you.
17	MEMBER WEINTRAUB: Great.
18	DR. AMIN: And I'll do my best to
19	actually walk through it in detail. So, the
20	first criteria, Criteria 1A includes two
21	components.
22	The first is that the measure focus

address a specific national health goal/priority identified by HHS or the National Priorities Partnership convened by the NQF. And we are recommending removal of this component of 1A, since, really, measuring costs conceptually is very difficult to argue is not important to measure.

And, really, it's the second half of 8 9 this criteria which is related to what we're actually looking at, actually demonstrating that 10 11 it's a high impact aspect of healthcare, meaning 12 that it affects a large number of individuals, 13 that it's a condition, potentially, that's 14 affecting a large number of individuals, or a leading cause of morbidity or mortality, or it's 15 16 just high resource use and severity of illness. 17 And so, this is really the component

18 that is of importance here. And so, this is 19 where we recommend that we continue to maintain 20 focus and remove the first component. The second 21 is around performance gap. Clearly, we've had a 22 lot of discussions around that today, I think

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that stands.

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2	And then, the third is, 1C, the intent
3	of the resource measure and the measure construct
4	are clearly described and the resource use
5	service categories that are included in the
6	measure are consistent with and representative of
7	the intent of the measure.
8	And so, the challenge here is that,
9	oftentimes with this section of the evaluation
10	criteria, is that, the importance to measure and
11	report criteria is intended to be conceptual in
12	terms of what the intent of the measure is
13	supposed to be focused on, whereas scientific
14	acceptability really gets us into the measure
15	specifications.
16	And so, 1C often has the tendency of
17	drawing us right into the most the heart of
18	the where people are really concerned about
19	the specifications, where really that's not the
20	intent.
21	And, quite frankly, it is repetitive
22	of what we're looking at with the reliability,

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meaning the specifications are precise, and then, 1 2 the validity, meaning the specifications are consistent with the intent. 3 4 And so, we are recommending removal, 5 since this is really repetitive and, quite frankly, would be more structured if we included 6 7 it in the reliability and validity evaluation of 8 the measures. 9 And then, for reliability, we just included, this is to be consistent with the 10 quality measures evaluation criteria, which is 11 12 looking at the specifications. We have not had 13 an eMeasure specified cost and resource use 14 measure yet, but it likely is coming. Cheryl might be working on it. 15 16 (Laughter.) 17 CO-CHAIR DAMBERG: It's going to be a 18 hybrid. 19 DR. AMIN: Yes, or at least a hybrid. 20 But either way, at least just making it clear 21 that we're looking for ICD-10 specifications and 22 then, we're using the eMeasure specifications,

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2	And so, this is not really this is
3	just to be consistent with the rest of the
4	quality measure evaluation. And so, that really
5	is the bulk of what we wanted to bring in front
6	of you today.
7	We believe that these are relatively
8	minor recommendations, in terms of clarity and
9	just to make your work actually a lot simpler, in
10	terms of structuring our conversations. So,
11	those are the recommendations that are in front
12	of you for evaluation. Erin, is there anything
13	else that you wanted to add, as it relates to
14	this
15	MS. O'ROURKE: No, I don't
16	DR. AMIN: discussion?
17	MS. O'ROURKE: I don't think so. You
18	covered it.
19	DR. AMIN: And so, I would welcome any
20	discussion. And if there isn't any, that is
21	okay, we'll take that as agreement and then move
22	on. But I certainly welcome any conversation on

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1	it.
2	MEMBER WEINTRAUB: This is Bill. To
3	me, this just does add clarity.
4	DR. AMIN: Thanks, Bill.
5	CO-CHAIR DAMBERG: Nancy?
6	MEMBER GARRETT: So, I just found under
7	1B, the disparities in care across population
8	groups, when we were going through that today, I
9	found that kind of confusing.
10	Because people interpreted that as,
11	should this be risk-adjusted for SDS? But then,
12	that was in the validity section. So, I don't
13	know if we're just not interpreting it the right
14	way, but it just doesn't seem to fit there.
15	DR. AMIN: We struggle with that as
16	well. The challenge is that this is yes. So,
17	the challenge is that the intent of this in the
18	quality measures evaluation criteria is that, one
19	of the reasons for including a measure is that it
20	might be sort of conceptually an area where there
21	is disparities of care. Now, whether the measure
22	is able to find the disparities is sort of the

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validity question.

In our work, I don't know that it
it is conceptually challenging to understand,
because, again, we have that same problem, where
we look at this and we're looking to see where
there's disparities and is that a validity
question?
That really is, that is a challenge as
well and I think that it does offer some
confusion as well. And it certainly added
confusion in our preliminary analysis work, in
terms of making sure that that was clear.
So, I mean, I would welcome additional
recommendations on that. We would have to
discuss with our measurement science colleagues
on the quality side to understand whether that
was an option to remove, but we certainly welcome
thoughts on that, if you have any, Nancy.
MEMBER GARRETT: Do they have to be
aligned to
DR. AMIN: No, they don't
MEMBER GARRETT: the cost and

quality measures?

2	DR. AMIN: They don't need to be.
3	MEMBER GARRETT: Okay.
4	DR. AMIN: They don't need to be.
5	DR. BURSTIN: It certainly would be
6	optimal, otherwise we have to explain why they're
7	different. So, if there's a reason to have
8	something in there, there has to be a compelling
9	reason why cost is different.
10	MS. WILBON: I wonder, too, if it would
11	just be an issue of just clarifying language. I
12	think this second bullet is really around, are
13	there such disparities in the population that
14	it's necessary to have this measure to help
15	illuminate that there are those disparities?
16	So, I think that disparities in care
17	exactly. So, I think it may be the wording of
18	it and the way that it so, maybe we can come
19	up with some new language, so that it's clearer
20	when we're going through the evaluation that the
21	context of the discussion is really around, is
22	this measure needed to help us understanding why

there are disparities in care? 1 2 Conceptually, that this measure is needed, it's important to have this measure for 3 4 that reason. So, I think there may be ways that we can massage that language a little bit. 5 CO-CHAIR DAMBERG: Any other comments? 6 7 So, did you want to take a vote on this or, like, 8 a show of hands? 9 (Laughter.) DR. AMIN: I will just --10 CO-CHAIR DAMBERG: No more electronic 11 12 anything. 13 (Laughter.) 14 DR. AMIN: No, I think we're -- unless there is --15 16 CO-CHAIR DAMBERG: Any objections? 17 DR. AMIN: -- any objections, we would just take it that way, I think it's fine. 18 And 19 then, I mean, this will have to go through other 20 bodies to look at, since it is a criteria review, 21 but we'll take that as input. Okay. So, Erin, 22 I'm going to turn it over to you on the SDS

Or whatever topic you want to cover. 1 slides. 2 MS. O'ROURKE: Why don't we do the SDS and then, I can turn it back to Ashlie for the 3 4 groupers? And that gets us on-schedule. We've got attributions scheduled after the grouper 5 6 work. So -- yes. 7 MS. WILBON: So, which topic are we on? MS. O'ROURKE: I'm going to just 8 9 quickly go through an update on our trial period for adjustment for socioeconomic and other 10 11 demographic facts, or SDS as we've been referring 12 to it. 13 So, just to refresh everyone on the 14 last this Committee, really, heard of this, we 15 convened you over the summer to provide input on 16 the three measures from CMS, Yale, the episode-17 based ones. 18 When we received an appeal about the decision to inverse them without any SES factors 19 20 in the risk adjustment model, the Committee 21 recommended upholding endorsement of the measures 22 as-is. That decision was ultimately ratified by

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1	the CSAC and the Board upheld the endorsement.
2	So, we did just want to close the loop
3	with the Committee on those. And thank you for
4	all the extra work you did to weigh in on those.
5	Next slide.
6	So, again, this is a topic that came
7	up throughout the conversations today, so I don't
8	really want to belabor it, but this is from the
9	ASPE report that we discussed quite a bit
10	already, just showing some of the challenges for
11	getting this data.
12	And as Helen said, it's really been
13	one of the major findings of our trial period is
14	just how challenging it is to get the data to
15	really link the empirical analyses to the
16	conceptual basis that we're seeing.
17	And as Helen said, NQF is committed to
18	continuing to do what we can to drive the better
19	data. We've been recommending at the annual
20	update that developers give us more information
21	about where they are.
22	So, I wanted to just highlight to the

Committee, that's one of the significant 1 2 findings, was this is still very challenging to do and we are committed to doing what we can to 3 4 improve the underlying measurement science here. 5 Next slide. So, again, what we found has really 6 7 been consistent with what's come out of ASPE. 8 Medicare patients with social risk factors tend 9 to have worse outcomes, regardless of provider. Dual enrollment in Medicare and Medicaid can be a 10 11 powerful predictor of poor outcomes. 12 Providers disproportionately serving Medicare patients with social risk factors have 13 14 worse performance on quality measures and experience somewhat higher penalties in value-15 16 based purchasing programs. And, really, tracking 17 with what's come out of our trial period is 18 better data and more study is needed here. Next 19 slide. 20 So, some initial results of our two-21 year pilot. We really want to get the right data to assess social risk, what we've got currently 22

is just not sufficient to show up in the empirical analyses. We've probably only had ten measures or so of all that we've looked at over the past two years end up having SES factors in their risk adjustment models.

6 We've seen a lot more come through 7 with a conceptual basis, but then it's really 8 just been a challenge to have that hold up when 9 you really crunch the numbers, similar to what, I 10 think, this Committee grappled with this morning.

Again, we do want to improve the quality of care for social risk factors, this is a key challenge I think the system is grappling with. We need to find ways to better account for the impact of social risk, so that value-based purchasing programs reward providers fairly.

17 And we want to get to, really, the 18 next generation of measures that are assessing 19 healthcare equity. And this is something our 20 Disparities Standing Committee is tasked with, 21 they are actually meeting at the end of this 22 month to really start to consider what measures

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of equity could look like. Next slide. 1 2 So, some key upcoming milestones. The trial period will end in April 2017. During the 3 4 June 2017 meeting, we'll reconvene the Disparities Standing Committee and ask them to 5 evaluate the trial period and make a 6 7 recommendation to the CSAC and the NQF Board 8 about whether or not we should continue to allow 9 SDS factors to be included in the risk adjustment models of endorsed measures. 10 11 So, is there any reasons to put the 12 previous policy that prohibited standing committees from consider this back in place? 13 But 14 after the Disparities Committee makes their recommendation, it will go through the CSAC and 15 16 the Board, I believe in July, for their input. 17 Next slide. So, again --18 DR. AMIN: So, Erin --19 MS. O'ROURKE: -- looking -- oh, sorry. 20 DR. AMIN: So, I think, there's the 21 Committee discussion around input to this 22 Disparities Standing Committee, there's been a

lot of conversation that we've had over the past day related to this topic of SDS and risk adjustment.

I just wanted to sort of reiterate 4 5 them as they relate to just input to the Disparities Committee, in terms of what I've 6 7 heard so far. There's been a lot of discussion 8 around unmeasured risk, that Helen described 9 quite a bit in some of her comments, that really needs to be explored by the field, in terms of 10 11 additional research.

12 Srinivas made the comment around, how 13 do we think about data, particularly data for 14 national measures, and what's actually available 15 for these measure developers to really use, if 16 we're expecting them to use for national 17 measurement and payment purposes? 18 Janis made some points around provider 19 and population-level adjustments, and what the 20 approach is that we might want to consider in 21 order to test the various measures that are in front of us. 22

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1	The last point, I think, that has come
2	up many times, both through our public comments
3	and then, through comments around the room as
4	well, is around the fact that, when we talk about
5	risk adjustment, the complexity of the
6	conversation is often very difficult for our
7	stakeholder groups to keep up with, quite
8	frankly.
9	The issues are so complex in terms of
10	the data that we're talking about, the way the
11	measures and variables are well, the way that
12	the variables are constructed to represent the
13	underlying construct, and then, the way that
14	these risk adjustment models work in analyzing
15	just even our conversation earlier around, what's
16	in the ASPE report versus what measure developers
17	are finding.
18	And actually having a relatively clear
19	discussion in our reports and in our discussion
20	around why there's these different findings.
21	And, oftentimes, this complexity is really
22	creating a lot of confusion and I think

frustration among our stakeholders around 1 2 differences in what they're seeing in literature versus what we're finding as a Committee. 3 So, I think all of those are 4 5 discussions that we've had today, in various I would certainly welcome other feedback, 6 forms. 7 but those are at least some of the key things 8 that I've heard today for the Disparities 9 Committee to consider. MEMBER WEINTRAUB: I think something 10 11 that could really be very helpful would be a 12 white paper on the kinds of risk adjustment that 13 NQF is looking to use. Maybe you already have 14 it, but if you do, I haven't seen it. And this can be written in a way that 15 16 people can understand. Now, not laypeople, but 17 that's not what we're really -- that's too heavy 18 a lift. But I think that the consumers of these 19 products can understand it, if it's well 20 explained. And if you go and try to just gather 21 that yourself from the literature, for most 22 people, that's a really heavy lift.

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1	CO-CHAIR DAMBERG: Larry, did you have
2	a comment? I saw your hand up in the meeting.
3	MEMBER BECKER: Oh, sorry, no.
4	CO-CHAIR DAMBERG: Okay. Jack?
5	MEMBER NEEDLEMAN: I think this issue
6	of SDS adjustment is a complex one, we've already
7	figured that out. But I think one of the reasons
8	is, we're trying to capture at least three
9	different kinds of things with it.
10	And I believe that it would be helpful
11	for committees considering this and for the
12	developers to think about how well the way in
13	which they're doing the risk adjustment or how
14	well they're doing their analysis addresses the
15	three concerns that we have?
16	The first concern is the one that
17	Helen stated and that just got repeated, that
18	there is some unmeasured fragility or unmeasured
19	need for care in these populations that are not
20	captured in the current risk adjustment
21	variables, and we need to take that into account.
22	The second is a slightly different

issue, which is, even if there's no greater 1 2 fragility or unmeasured need for care, because of the limited resources that these individuals have 3 or the neighborhoods that they live in have, the 4 healthcare system has to spend more on them to 5 meet their needs for care, because the resources 6 that we other expect them to have available are 7 not there. 8 9 So, the second issue is whether these 10 patients impose more demand on the system for

11 care. And if the system doesn't respond to that, 12 does it fall short in terms of the quality 13 outcomes? So, that's the second issue, which 14 needs to be articulated, frankly, better than I 15 just did it, but also needs to be examined when 16 folks are looking.

17 The third issue is the fact that we 18 are not completely measuring resources. And the 19 question is, whether the resources that are 20 available in systems that treat a 21 disproportionate number of the disadvantaged 22 population simply have fewer resources and,

1	therefore, part of the explanation for why they
2	are doing a poorer job is they don't have the
3	resources to do as good a job?
4	That's not giving them a bye on it,
5	necessarily, but it does recognize that there's a
6	difference between inefficiently using your
7	resources to deliver effective care and not
8	having the resources to deliver effective care.
9	And so, one of the issues we're trying
10	to deal with here is getting at that, getting
11	evidence or suggestions that that might be the
12	case. So, those are at least the three reasons I
13	see for wanting to have SDS kinds of adjustments
14	and SDS analysis.
15	And if people aren't responding to
16	those issues or if they aren't responding to
17	questions related to those three goals, then we
18	don't have usable data to assess whether or not
19	the SDS adjustments are needed or appropriate.
20	DR. AMIN: Those are excellent
21	comments, Jack. And I think, Erin, as you're
22	thinking about feedback back to the Disparities
Committee, the last point that Jack noted might be particularly important for cost and resource use different than quality measures, and conceptually, the issue of disparities might be different in our area of measurement for that reason.

7 MEMBER WEINTRAUB: It might be 8 different, but it can be important in both. And 9 I think there's a real problem here, because the resources available to less advantaged people is 10 really a latent variable, because it's not the 11 12 things that you're actually measuring. That's 13 pretty, pretty tricky, but I think Jack, once 14 again, raises an excellent point.

CO-CHAIR DAMBERG: So, this is Cheryl. 15 16 I think this kind of dovetails back to the comment Kristine made, in terms of thinking about 17 18 how these measures are used. Because I know CMS has been considering how much they need to do 19 20 what I call a front-end fix, which is risk 21 adjust, versus a back-end fix, which is to drive 22 more resources to providers who are in your third

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bucket, Jack.

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2 And so, I think kind of as these measures get used in different applications, we 3 have to think about sort of the implications. 4 Because risk adjustment is fixing a 5 mismeasurement problem, but it still doesn't 6 7 address the resource disparity. CO-CHAIR ASPLIN: Just a quick comment. 8 9 And maybe this is saying the exact same thing in a slightly different way. I get the sense with 10 all the conversations, especially all the phone 11 calls related to the three measures as we went 12 13 through this trial period, that there's a belief 14 that there's some data out there that's going to lead to the holy grail of figuring out the 15 16 differences.

That it's there, we just haven't found the right data elements to put in the risk adjustment model. I just don't think that's where we're going to find it, because we're really, at the end of the day, measuring the outcome variable as cost to the payer, whether

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it's Medicare or a private payer.

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2	And the resources that HCMC is
3	expending to have the same level of readmission
4	with its population may be a lot higher than the
5	resources Mayo and St. Mary's are expending in
6	Rochester to have the same level of readmission.
7	And that's never going to be captured
8	by payments, and maybe that's exactly what
9	everybody else was saying, but I just don't think
10	it's in the risk adjustment model. It might be,
11	it's still open.
12	MEMBER WEINTRAUB: I think we're all on
13	the same page about that. There are things that
14	you'd like to measure, you know it's out there,
15	but can't.
16	DR. AMIN: Yes. Okay. Those are very
17	I mean, I don't mean to cut the conversation,
18	if there's additional comments, it doesn't sound
19	like there are any in the room, if there's anyone
20	on the phone on this topic? And then, I'd like
21	to ask Ashlie go ahead.
22	DR. BURSTIN: A couple people have

raised this question of the underlying resources 1 2 that go to different entities, now, that's not measure at all, and I'm not saying necessarily 3 that's a performance measure, but I guess one 4 5 question as we think about balancing measures or something along those lines, is that potentially 6 7 a gap to be able to understand the actual 8 resources of the entities being measured as part 9 of this effort? Just a thought to throw out 10 there. 11 MEMBER GARRETT: If I could just 12 respond quickly? I mean, I think it could be, 13 Helen. And, I mean, it's a really -- actually, 14 there's a simple way to measure it, which is 15 payer mix. 16 I mean, the percentage of commercial 17 patients you have, that's the way the healthcare 18 system is set up right now, to offset the costs for other populations that don't have -- that 19 20 have, as HealthPartners said, half the 21 reimbursement or less.

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And so, that's actually a simple way

to understand resources and how they're being 1 2 allocated. And then, you layer on top of that, pay-for-performance programs and all the other 3 ways money is moved around, but that's kind of 4 5 the basis of the system of inequality we have. DR. BURSTIN: That would certainly get 6 7 at the conceptualization of this that's about 8 poverty. I guess, the piece of this we still are 9 grappling with is whether there's truly just something we're not measuring that's different 10 11 across hospitals that may get at this complexity 12 too. 13 We constantly get letters from 14 hospitals and others who have raised issues. Α recent appeal we just got clearly pointed out in 15 16 our hospital, a quaternary hospital, this would 17 not be captured. Things like that I think are 18 important to note as well. 19 MEMBER NEEDLEMAN: On that point, you 20 see, every few years, MedPAC comes out with its 21 report and it shows that hospitals -- there's a Medicare deficit, right? Medicare payments are 22

less than cost in some hospitals than others, and
 typically it's the hospitals with large numbers
 of private payers.

So, you can reinterpret that as 4 5 saying, hospitals which have the option, have had the option of receiving more funds from private 6 7 payers are using those to top-up payments beyond 8 those they get from Medicare. It's not a 9 Medicare loss per se, it's a decision to invest 10 resources above the payment level in the Medicare 11 patients.

12 And other hospitals that don't have 13 that private payer base don't have that 14 flexibility. The finances and the amount of 15 resources per Medicare patient at UCLA-Harbor 16 look very different from those at UCLA-Reagan. 17 And the issue is, does that affect

18 their ability to deliver quality care? So, some 19 of that was supposed to be equalized by the 20 disproportionate share payments and so forth, but 21 those are the kinds of issues, I think Helen has 22 got it exactly right.

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It's not clear that it should be 1 2 covered in the measurement per se, but we need to have better studies of the actual resources that 3 are being provided to patients versus the 4 5 standardized payments that are the basis of most of the CMS cost and resource us measures that 6 7 we've been analyzing. CO-CHAIR DAMBERG: Srinivas, did you 8 9 want to make a comment? 10 MEMBER SRIDHARA: Yes. I mean, I think we're continuing to center around sort of claims-11 12 based sort of analyses and so, for the 13 fundamental question I think Helen is asking and Brent also mentioned, if we're talking about 14 actual costs, for health systems or anyone else, 15 16 that's everything from supply costs to personnel 17 costs. 18 I mean, there's costs and what we're 19 really talking about is this payment or spending 20 or something else that is unrelated. I think the 21 challenge is, you don't have standardized data 22 assets out there to get across everyone easily.

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1	So, I think it is undoubtably valuable, the
2	question is, how would you do it and do it
3	systematically?
4	And I think, in as much as NQF has
5	leverage in sort of pushing towards encouraging
6	those sort of democratization of that kind of
7	data, I think that would be meaningful. But
8	without that, I don't know how developers would
9	really get access to that in a way that would be
10	helpful to everyone.
11	CO-CHAIR DAMBERG: Any other comments
12	on the phone? Okay.
13	DR. AMIN: So, yes, let's move on. So,
14	I think, just a quick time check, we have half an
15	hour for all right. Do you want to do
16	attribution or grouper? You want to do
17	attribution?
18	MS. O'ROURKE: All right. Let's head
19	to attribution.
20	DR. AMIN: Okay.
21	MS. O'ROURKE: So, again, this is
22	something that we just wanted to give you a quick

update on what our Attribution Expert Panel 1 2 found. Srinivas and Troy were actually on that committee and have joined the Cost Committee, so 3 4 if there's anything we're missing, feel free to 5 chime in. Since this has been such a theme 6 7 throughout this Committee's work, we did want to 8 update you on what this panel found. Again, this 9 slide is some background. 10 As we continue to see this push to value-based purchasing, it's more imperative than 11 12 ever that we're able to accurately attribute 13 results to providers, as more and more payment is 14 determined by the results of cost and quality 15 measures. 16 However, we're finding it's also 17 increasingly challenging to do this, as we're 18 also trying to assess quality on outcome 19 measures, rather than process or structural 20 measures. 21 So, attribution, we've defined that as 22 the methodology used to assign patients and their

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1	quality outcomes to providers or clinicians. And
2	attribution models can help to identify a patient
3	relationship that can be used to establish
4	accountability for quality and cost.
5	And then, as we aim to move the system
6	from fee-for-service payment to Alternative
7	Payment Models, it's really highlighted the need
8	to better understand how patient outcomes and
9	costs can be accurately attributed, as we also
10	aim to move to a system built on shared
11	accountability. So, next slide.
12	So, the purpose of this project was to
13	get multi-stakeholder guidance for the field on
14	approaches to issues of attribution. We aimed to
15	identify key challenges, develop a set of guiding
16	principles, identify the elements of an
17	attribution model and explore their strengths and
18	weaknesses, and then, make recommendations for
19	developing, selecting, and implementing an
20	attribution model. Next slide.
21	So, here you can see who was on the
22	committee. It was chaired by Ateev Mehrotra and

1 Carol Raphael. Next slide.

2	So, we began this project by
3	commissioning an environmental scan from a team
4	of authors out of the University of Michigan and
5	University of Pennsylvania. They found about 163
6	models that are in use or proposed for use, about
7	17 percent of those were currently in use. The
8	vast majority used retrospective attribution and,
9	again, the majority, to a single provider,
10	usually a physician.
11	They found quite a lot of variation in
12	how models are characterized, some of the
13	attributes are on the screen before you. Program
14	stage, the type of provider attributed, the
15	timing, clinical circumstances, the payer or
16	programmatic circumstances, the exclusivity of
17	attribution, the measure used to make attribution
18	as well as the minimum requirement, and the
19	period of time for which a provider is
20	responsible. Next slide.
21	So, what we found in the commission
22	paper was that largely best practices have not

yet been determined. New models are built off of the previously used approaches and there hasn't been a lot of exploration of the tradeoff of -the pros and cons of different approaches and that kind of thoughtful consideration of why one model might be better in a given circumstances than another.

8 One of the real challenges to doing 9 that was a lack of a standard definition for an 10 attribution model, makes it very difficult 11 currently to evaluate across models to determine 12 which one may be better in a given circumstance. 13 Next slide.

14 So, some key challenges that the 15 committee highlighted. First was that greater 16 standardization among attribution models is 17 needed to allow comparisons between the models 18 and to really allow best practices to emerge. 19 There's little consistency across 20 models, however, there is evidence that changing 21 attribution roles can significantly alter results 22 and how a provider may perform on a value-based

1 purchasing program.

2	And there is currently a lack of
3	transparency on how results are attributed and
4	providers have no way to appeal the results of a
5	model that may wrongly assign responsibility to
6	them. Next slide.
7	So, to start to address these
8	challenges, the committee came up with a number
9	of products. They first developed guiding
10	principles, they made a series of
11	recommendations, and they created the Attribution
12	Model Selection Guide.
13	These products allow for greater
14	standardization, transparency, and stakeholder
15	buy-in. And we're hoping to lay the groundwork
16	to develop an evidence base that will allow for
17	evaluation of attribution models in the future.
18	Next slide.
19	DR. AMIN: Erin, maybe I can jump in
20	here and just talk through some of the principles
21	no, you can continue on to the next slide
22	just talk through some of the principles. And

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1	then, I'll just walk through the guiding	
2	principles and you can walk through the	
3	MS. O'ROURKE: Yes.	
4	DR. AMIN: Selection Guide. And so,	
5	some of the guiding principle preamble here was	
6	to acknowledge the complexity and the	
7	multidimensional challenges with implementing	
8	attribution models.	
9	And then, really grounding, and it	
10	should be grounded in the National Quality	
11	Strategy is, attribution models can play a	
12	critical role in advancing these goals.	
13	Recognizing attribution models can refer both to	
14	the attribution of patients for accountability	
15	purposes, but also the attribution of results of	
16	a performance measure.	
17	What was pretty critical was to	
18	highlight the absence of a gold standard for	
19	designing and selecting an attribution model.	
20	And, really, the attribution model must	
21	understand the goals of each use case.	
22	So, key criteria for selecting an	

attribution model are really actionability, 1 2 accuracy, fairness, and transparency. And I think that's reflective of some of the 3 conversations we've had today around attribution. 4 So, moving on to the next slide. 5 So, the goals that were -- the guiding 6 7 principles that were discussed were that 8 attribution models should fairly and accurately 9 assign accountability. That attribution models are an essential part of measure development, 10 implementation, and program and policy design. 11 12 And so, this obviously interacts with 13 the conversation we had early today around an 14 attribution model is still a quideline, as it relates to our cost and resource use 15 16 specifications. That we should consider choices 17 among the available data are fundamental to the 18 design of attribution models. 19 Attribution models should be regularly 20 reviewed and updated. They should be transparent 21 and consistently applied and they should align 22 with the stated goals and purpose of the program.

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1	And so, again, this relates to Jack's early point
2	around the use of a measure and the measure
3	specification.
4	And so, the Selection Guide noted that
5	in the current state that there's a tension
6	between the desire for clarity around attribution
7	models fit for purpose and the state of the
8	science related to attribution.
9	And there's a desire for rules to
10	clarify which attribution models should be used
11	in any given circumstances, but the problem is,
12	there's not enough evidence to support the
13	development of such rules at the current time.
14	And so, the goal of the Selection
15	Guide was really to aid measure developers,
16	standing committees, such as this, and program
17	implementers on the necessary elements of
18	attribution that should be specified a priori.
19	And it is intended to represent the minimum
20	amount of elements that should be shared with
21	accountable entities. So, Erin, can you just
22	walk us through the Selection Guide?

1 MS. O'ROURKE: Sure. So, really, the 2 Selection Guide asks a series of questions, and if you look at the committee's final report, 3 4 there is a little more context here, they go into 5 some of the pros and cons and some of the different things you might consider as you answer 6 7 each question. 8 So, Question 1 asks about the context 9 and goal of the program. Again, the committee 10 really stressed that how you're -- what you are trying to achieve is fundamental to your 11 attribution model. And there's a need currently 12 13 to balance between aspirational goals as well as 14 what's feasible and practical. 15 So, again, you see in the second 16 column a series of questions that the committee 17 asked program implementers and measure developers 18 to consider as they weigh their choices around 19 attribution. 20 The next question is, how do the 21 measures relate to the context in which they're being used? Particularly, asking some questions 22

focusing on the inclusion and exclusion criteria, 1 2 as well as, does the model attribute enough individuals to draw fair conclusions? 3 The next overarching heading would be, 4 5 which units will be affected by the model? Again, some additional questions here on what 6 7 units are eligible, the degree to which the 8 accountable unit can influence outcomes, again, 9 are there -- do the units have sufficient sample 10 size to meaningfully aggregate measure results, 11 and are there multiple units to which the model 12 could be applied? 13 And then, finally, how is attribution 14 performed? What data is used, do all parties have access to that data? What are the 15 16 qualifying events for attribution, do those 17 events accurately assign care to the right 18 accountable unit? What are the details of the 19 algorithm used to assign responsibility? Have 20 you consider multiple methodologies to ensure

22 of the attribution computation?

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reliability of the model? And what is happening

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So, again, the final product, if you
will, that the committee came up is a series of
recommendations. They are designed to build on
the principles and the Attribution Model
Selection Guide. They're intended to apply
broadly to developing, selecting, and
implementing attribution models in the context of
public and private sector accountability
programs.
The committee recognized the current
state of the science, they considered what they
can achieve right now, as well as what's the
ideal state for the future regarding attribution,
and stressed the importance of aspiration and
actionable recommendations to drive the field
forward.
So, the first recommendation is to use
the Attribution Model Selection Guide to evaluate
the factors to consider in the choice of an
attribution model. The committee stressed that
currently there is no gold standard, different
approaches may be more appropriate than others in

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a certain situation.

2	The model choice should be dictated by
3	the context in which it will be used and
4	supported by evidence. And developers and
5	program implementers should be transparent about
6	potential tradeoffs between the accountability
7	mechanism, the gap for improvement, the sphere of
8	influence of the accountable entity, as well as
9	the scientific properties of the measure. Next
10	slide.
11	Attribution models should be tested.
12	Attribution models for quality initiative
13	programs should be subject to some degree of
14	testing for goodness of fit, scientific rigor,
15	and unintended consequences, recognizing the
16	degree may vary on the states of the program.
17	However, given where we are now, models would be
18	greatly improved by rigorous scientific testing
19	and making the results of that testing public.
20	And when used in a mandatory
21	accountability program, models should be subject
22	to testing that demonstrates adequate sample

1	size, appropriate outlier exclusion, and/or risk
2	adjustment, to allow fair comparisons, and
3	sufficiently accurate data sources to support the
4	model. Next slide.
5	Attribution models should be subject
6	to multi-stakeholder review. Given that there is
7	no gold standard right now, the perspective on
8	which approach is best is really influenced by
9	stakeholder interests.
10	Attribution model selection and
11	implementation in various public and private
12	sector programs should use a multi-stakeholder
13	review to determine what model may best fit their
14	purposes. Next slide.
15	Attribution models should attribute
16	care to entities who can influence care and
17	outcomes. Right now, models can unfairly assign
18	results to entities who have little control over
19	the patient's outcomes.
20	And for a model to be fair and
21	meaningful, the accountable unit really must be
22	able to influence the outcomes that it's being

held responsible for, either directly or by collaborating with others.

And as care is increasingly delivered by teams and we're moving to a system of shared accountability, models should reflect whether the accountable entity can influence, rather than directly control.

8 DR. AMIN: So, Erin, before we move on 9 from this, I just want to link this to our prior 10 conversation around, clearly the tradeoff between 11 an ideal state of what the care delivery system 12 looks like currently and then what our ideal 13 state is, and then, the culture of care delivery 14 that may exist in different communities.

15 So, that really came up in our total 16 cost of care discussion. But, ultimately, the 17 question of who should be attributed, there 18 should be some ability to influence the outcome. 19 And then, I'll just sort of finish off with the 20 last one.

21 Which is -- if we can move on to the 22 next slide? Which is, attribution models used in

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mandatory public reporting or payment programs should meet minimum criteria. And that goes back to Jack's point earlier in this conversation around, for several of these programs, we're looking at the measure, but we're not looking at the program.

7 And so, there is an element, 8 particularly for mandatory public reporting or 9 payment programs, that attribution models should 10 be clearly articulated, should be able to -- the 11 accountable entity should be able to meaningfully 12 influence the outcome, adequate sample sizes and 13 exclusions, and several other components.

14 So, the discussion item that we had 15 here for this conversation was really, as we 16 think about the implications of -- as we think 17 about the outcomes of this Attribution Committee, 18 what are the implications for our work for the 19 Standing Committee?

In particular, the question around,
how do we think about attribution models for
measure specifications going forward and how do

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we think about these concerns in terms of measure 1 2 endorsement review? And so, that's really sort of at a 3 4 very high level what this committee sort of 5 reviewed. I think what might be helpful is we'll sort of share, again, the details of the Standing 6 7 Committee review and we can discuss it in more 8 detail at a later time. But those are 9 essentially the discussion items that we had for 10 today. MEMBER BECKER: So, this is Larry, can 11 12 I ask a question? 13 CO-CHAIR DAMBERG: Sure. Go ahead, 14 Larry. MEMBER BECKER: So, I couldn't read 15 16 through that slide where you had all the 17 committee members and the people I could read, I 18 didn't know all of them. So, pardon me for this. 19 But I wondered whether you had real patients who 20 use the system in various ways as real input and 21 as real partners in putting this work together? 22 Because it seems to me that

attribution and who has control over what happens to the patient is in large measure what the patient thinks in terms of who they think should be either quarterbacking or whom they are getting their advice, if you will, from.

So, while you might think that it's 6 the primary care doc, as an example, it might be 7 8 the surgeon or it might be some specialist or --9 so, understanding and really working with the patients to understand how they use the system of 10 11 healthcare, given various sort of types of 12 healthcare issues, I would think would be 13 incredibly important.

And now, you've put up the list and I'm looking at this and virtually everybody on this list has got multiple initials after their names, which tells me that there aren't a lot of patients involved here.

DR. BURSTIN: Yes, Larry, this is Helen. I mean, it's certainly a fair point, we had several consumer and purchaser reps at the table, I guess all of us at some level have to

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1	interact. But I certainly hear your point. The
2	committee did spend a lot of time thinking about
3	how you would actually think about it through the
4	patient lens.
5	In fact, even looking at some of the
6	newer coding CMS is putting out where it is
7	really assigning even those codes prospectively,
8	they very much said, at the end of the day,
9	ensuring that it's the patient, that's sort of
10	the key thing to always keep an eye on, that they
11	know who is accountable for them. But it's a
12	fair point, certainly more work to do in that
13	space going forward, without a doubt.
14	CO-CHAIR DAMBERG: Other comments from
15	those on the phone?
16	MEMBER RAMBUR: I have a question, this
17	is Betty. So, when Vermont was negotiating its
18	all-payer total cost of care model, attribution
19	not surprisingly was a huge issue.
20	And one of the things that really
21	confounded identifying who's accountable was
22	issues related to nurse practitioners and PAs not

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being able to be attributed providers in Medicare, but could in commercial and Medicaid, but also the incident to billing. Did any of that issue -- did that issue come up in this committee's discussion?

I think the MS. O'ROURKE: Yes. 6 7 committee had quite a few conversations about how 8 you could appropriately include practitioners 9 like NPs or PAs and recognizing the shortcomings that a lot of the current models only assign to 10 11 physicians. And as we're seeing other 12 practitioners increasingly deliver care, how to 13 appropriately include them in the attribution 14 models. 15 CO-CHAIR DAMBERG: All right. Any 16 other comments on the phone? Okay. 17 DR. AMIN: Thank you. 18 CO-CHAIR DAMBERG: Brent? 19 DR. AMIN: Oh, sorry. 20 CO-CHAIR DAMBERG: We have two comments 21 over here. DR. AMIN: Oh, okay. 22

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1	CO-CHAIR DAMBERG: Brent?
2	CO-CHAIR ASPLIN: Yes. So, the
3	framework is very helpful. It's a good
4	conversation. I think, this whole area could be
5	a thousand points of no for us, if we let it.
6	Because there's always going to be
7	tradeoffs for how granular it is and, I want an
8	episode around not just total knee replacement,
9	but right knee replacement, because that's my
10	sub-specialty.
11	And we could have a thousand different
12	resource episode measures of things like that.
13	And I just think, we can't let the perfect be the
14	enemy of the good in terms of moving forward in
15	general in this area.
16	And then, I would just add one other
17	comment around, just theoretically, if you step
18	back from it, a fee-for-service reimbursement
19	system isn't at all designed for accountability
20	around cost.
21	So, for those providers out there that
22	are really concerned about attribution, should

get themselves on Advanced Alternative Payment 1 2 Models, because almost all of them deal with this through prospective assignment. Maybe Track One 3 4 Plus will be an exception. And there are going to be enough 5 Alternative Payment Models that are specialty-6 7 specific or are population-specific for total per capita cost and use prospective assignment that 8 9 takes care of this. And I think, just like there's a 10 11 theoretical limit to risk adjustment, there's a 12 theoretical limit to trying to get attribution right in a fee-for-service environment. 13 And I 14 just, I think if we're trying to get it too perfect, you'll never satisfy everybody. 15 16 CO-CHAIR DAMBERG: I'm just going --17 MEMBER RAMBUR: This is Betty, if I 18 could just quickly comment? I agree with that. 19 It's more about the base and the trend is often 20 set from the fee-for-service world and the fee-21 for-service chassis, so that's sort of one of the 22 challenges in moving to real accountability for

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cost and outcomes.

2	CO-CHAIR DAMBERG: I'll make this
3	quick, because I know we're running out of time.
4	I didn't see any mention of unintended
5	consequences. And I know some providers have
6	told me that, like, when the primary care is
7	assigned responsibility, they may offload
8	patients to the cardiologist or wherever. So, I
9	think we need to be cognizant of how attribution
10	rules affect behaviors, because these measures
11	are being used in accountability and payment
12	ways.
13	The second thing that I would note,
14	and I think in the context of wanting more care
15	coordination, even in this kind of fee-for-
16	service environment, is, I didn't see any mention
17	of multi-provider attribution.
18	And I think that this comment came up
19	once upon a time in this Medicare Spending Per
20	Beneficiary Measure, because so much of the cost
21	and variations happening in the skilled nursing
22	facility. So, I would, again, raise that.

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1	And then, lastly, related to building
2	the science, I think I agree with that comment,
3	but I think measure developers and their sponsors
4	have to be committed to putting that information
5	out in the public domain.
6	And I know some measure developers and
7	their sponsors have been reluctant to do that,
8	because sometimes they think they're working in a
9	very policy-sensitive space. So, I would just
10	note that.
11	DR. AMIN: Okay. I Nancy, did you
12	have another comment?
13	MEMBER GARRETT: So, if I'm
14	understanding this correctly, one of the
15	questions is, whether the attribution algorithm
16	should be specified for measures in the cost and
17	resource portfolio, because we saw an example of
18	one where it was just recommended.
19	And looking at the guidance from the
20	committee, I really feel like it actually needs
21	to be, because a couple of reasons. It's such
22	a key part of how that measure ends up working

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and is defined, that to not have guidance on 1 2 that, but the rest of the measure, you're missing 3 a big part. But then, there's no standardization 4 5 around that. And then, also, to have harmonization and standardization of measures 6 across populations, you really need that, to be 7 using the same algorithm. 8 9 I am sensitive to some of the previous comments about how it doesn't allow you to take 10 11 into account local variation, so there is a 12 downside to that. But a lot of quality measures, attribution is built into how you define that 13 14 measure, and so, I don't think it should be different for the cost and resource measures. 15 16 DR. AMIN: So, I think we're going to have to -- we'll take that comment and we'll have 17 18 to flag it for future Committee discussion. 19 We're going to have to discuss that probably in 20 more detail, but it sounds like there's enough 21 there that we should think about at least moving 22 it into specifications or -- yes, basically, I

think that's the proposal. But we'll have to 1 2 have a more thorough conversation, given that we're at the top of the hour. Jack, last 3 comment. 4 MEMBER NEEDLEMAN: Just following up on 5 So, I don't have any -- two 6 Nancy's comment. 7 questions that we need to think about some more. 8 I think Nancy's right, that we -- the attribution 9 is central to a lot of these measures. 10 So, the question is, two questions, 11 what do we expect the developers to present to us 12 to help us understand the performance, their rationale for the choice of attribution measure 13 14 and its performance? And today, we simply had 15 somebody say, we used the current state-of-theart, which is plurality. Is that acceptable? 16 17 Which also raises the question, what's 18 our standard for -- can we develop some standards 19 or something beyond our gut feel for what 20 attributions look so questionable that we simply 21 would not accept them? And I don't think we have 22 that answer, we don't have standards right now or

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1	a way to even think about that question.
2	CO-CHAIR DAMBERG: Troy, I know you
3	have your hand up.
4	MEMBER FIESINGER: So, this is Troy.
5	I just wanted to chime in to something on the
6	committee. I appreciate everybody's comments,
7	certainly we had proxies for patient
8	representation, we didn't have them we just
9	tried very hard to think of ourselves and our
10	patients in that scenario.
11	We did look at nurse practitioners and
12	physician assistants and Medicare certainly
13	incorporates them. This methodology, we were
14	very aware of the tension between the perfect
15	method and an adequate method, and that's why we
16	looked at minimum standards.
17	An issue that came up often is, what
18	attribution model is necessary for cost or
19	payment accountability versus what method might
20	be used internally to assign responsibility
21	within the organization?
22	We talked a lot about unintended

consequences, so that may not have come through 1 2 in the summary. And, certainly, a lot of discussion about single attribution versus 3 multiple attribution. 4 5 The lack of data and research was problematic, just not a lot of this is in 6 7 studies, a lot of that work was done by people in So, when we try to look at evidence 8 the room. 9 base, there wasn't enough there to draw some 10 conclusions. But I appreciate everyone's input, your comments actually reflect a lot of what we 11 12 talked about at length in there --13 DR. AMIN: Thanks, Troy. Thanks, 14 that's great. A lot of really thoughtful feedback, so thank you all for sticking with us 15 16 in that marathon of various topics that were on our minds as it relates to the measurement 17 18 science of cost and resource use. I'll turn it 19 back over to the Chairs for our public and Member 20 comment and then, closing remarks. 21 CO-CHAIR DAMBERG: So, are there any 22 final comments from the public or the Members?

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1	OPERATOR: Okay. At this time, if you
2	would like to make a comment, please press Star,
3	then the number 1.
4	CO-CHAIR DAMBERG: Thank you.
5	OPERATOR: There are no public comments
6	at this time.
7	CO-CHAIR DAMBERG: All right. Thank
8	you very much.
9	DR. AMIN: So, I think this is closing
10	remarks from you all, from the Chairs. And then,
11	I think there was some timeline discussions that
12	Irvin's going to walk through
13	CO-CHAIR DAMBERG: All right. I just
14	want to say, on behalf of Brent, myself, and the
15	NQF staff, really appreciate you guys dedicating
16	not only today, a full day of working through a
17	lot of really complex issues, but also the time
18	you spent preparing for this meeting and
19	continuing to serve on the Committee.
20	MEMBER WEINTRAUB: Thanks for all the
21	work you guys have done putting this together and
22	making this easy for us.
1	MS. O'ROURKE: Sure. So, all right.
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2	On behalf of the staff, I just want to thank
3	Brent and Cheryl for their leadership today and
4	as we prepared for this meeting. And, again,
5	thank you to all of you for your going above and
6	beyond to come here in person or to hang in with
7	us on a very long web meeting, and bearing with
8	us for the voting technology. So, thank you so
9	much and safe travels home, everyone.
10	Irvin is just going to quickly run
11	through some of our next steps. I'll steal his
12	thunder and give you the good news that we can
13	cancel next week's post-meeting call, since we
14	got through all of our agenda today. So, taking
15	that out of your next steps.
16	MR. SINGH: Yes. So, just to sort of
17	echo what Erin was saying, so we had our in-
18	person meeting, which was today. We just
19	canceled the March 22 and March 24 meetings, so
20	we're going to take that off the board.
21	So, the next active steps in terms of
22	the entire Committee getting together is going to

1	take place on June 6, 2017, from 2:00 to 4:30
2	p.m. Eastern Standard Time, and June 8, 2017,
3	from 1:00 to 3:30 p.m., where we're going to
4	discuss the comments that we have received during
5	the public and Member commenting period, which is
6	going to take place between April 20, 2017 to May
7	19, 2017.
8	MS. O'ROURKE: So, I think with that,
9	that is all we have today. So, again, thank you
10	so much, everyone. We really appreciate all the
11	time you took to attend and to prepare for the
12	meeting. So, we'll talk to you in June.
13	(Whereupon, the above-entitled matter
14	went off the record at 4:02 p.m.)
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CERTIFICATE

This is to certify that the foregoing transcript

In the matter of: Cost and Resource Use Standing Committee

Before: NQF

Date: 03-15-17

Place: Washington, DC

was duly recorded and accurately transcribed under my direction; further, that said transcript is a true and accurate record of the proceedings.

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