NATIONAL QUALITY FORUM

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DISPARITIES STANDING COMMITTEE

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THURSDAY JUNE 15, 2017

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The Disparities 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., Marshall Chin and Ninez Ponce, Co-Chairs, presiding.

PRESENT:

MARSHALL CHIN, MD, MPH, FACP, Co-Chair NINEZ PONCE, MPP, PhD, Co-Chair PHILIP ALBERTI, PhD, Association of American Medical Colleges SUSANNAH BERNHEIM, MD, MHS, Yale New Haven Health System Center for Outcomes Research and Evaluation (CORE) * MICHELLE CABRERA, SEIU California JUAN EMILIO CARRILLO, MD, MPH, New York-Presbyterian, Weill Cornell Medical College LISA COOPER, MD, MPH, FACP, Johns Hopkins University School of Medicine * RONALD COPELAND, MD, FACS, Kaiser Permanente TRACI FERGUSON, MD, MBA, CPE, WellCare Health Plans, Inc. KEVIN FISCELLA, MD, University of Rochester * NANCY GARRETT, PhD, Hennepin County Medical Center ROMANA HASNAIN-WYNIA, PhD, Denver Health DAVID NERENZ, PhD, Henry Ford Health System YOLANDA OGBOLU, PhD, University of Maryland Baltimore, School of Nursing

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THOMAS SEQUIST, MD, MPH, Partners Healthcare
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CHRISTIE TEIGLAND, PhD, Avalere Health
NQF STAFF:
HELEN BURSTIN, MD, MPH, Chief Scientific Officer
ANDREW ANDERSON, PhD, Senior Project Manager
MADISON JUNG, Project Analyst
MAURICIO MENENDEZ, MA, Project Analyst
ELISA MUNTHALI, MPH, Vice President of Quality
      Measurement
TARA MURPHY, MA, Project Manager
ERIN O'ROURKE, Senior Director
ALSO PRESENT:
IGNATIUS BAU, JD, Consultant
* present by teleconference
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I	4
1	P-R-O-C-E-E-D-I-N-G-S
2	9:03 a.m.
3	CO-CHAIR CHIN: Good morning. So we
4	can get started now. And so just in terms of an
5	overview of the agenda, so you notice at 12:30
6	that's where we have the item about the social
7	risk factor adjustment discussion. And so that's
8	fixed, because the public knows that that's
9	happening at 12:30. And a number of people are
10	going to be calling in for that. So we have that
11	sort of as a fixed element of the agenda.
12	This morning, we have two or three
13	main items to cover. One is that overnight the
14	staff did work their magic. And so that we do
15	have sort of a draft of the policy
16	recommendations for us to go over as a committee
17	and to spend time on. So we'll talk about that
18	in a moment.
19	A second item then is, like, somewhat
20	a deeper dive into that in terms of also then are
21	there any practical suggestions we have in terms
22	of implementation and any concrete examples we
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1	can give that will help flesh out the report.
2	A third item that is, if we have time,
3	we can go revisit the disparity-sensitive
4	condition criteria, disparity-sensitive measures
5	criteria that was raised yesterday. And
6	hopefully we'll have some time to basically
7	revisit that in terms of potentially improving
8	those criteria.
9	And so, again, what happened after our
10	meeting yesterday, then Erin and Drew, they took
11	the notes that Tara had made. And then they did
12	some initial correcting of the wording of policy
13	recommendations.
14	Ninez, Ignatius, Helen, and I reviewed
15	and edited it a little bit. And so you'll see
16	that there are going to be two documents. One is
17	going to be shown on the screen, which is going
18	to be a one-pager, which is sort of the editing
19	and final result of that in terms of the draft.
20	The second is a hard copy you have in front
21	of you where Ignatius, he basically made this
22	table where you have, like, three different

columns where one are the ASPE recommendations, 1 2 and then there are the National Academy of Medicine recommendations. 3 And the third then are our draft NOF 4 5 recommendations. And so you'll see how they compare and complement one another. 6 7 I think at the end of yesterday we mentioned that one of the first things we would 8 do is we would revisit the five different 9 original policy recommendations in our conceptual 10 11 model. 12 This was the one where there's that 13 diagram with the quality, well, the measurement 14 and quality circle in the top part and the latter part with then what you do with the measures. 15 16 We're going to incorporate it into this discussion in that the five are either 17 18 headers or else subdomains within, like, the most 19 current draft recommendations. So we can cover that also in the course of this discussion. 20 21 But maybe first, Tara and Judy, 22 anything you want to talk about in terms of,

1	like, your first crack at things. Then we'll
2	turn it over to Ignatius to describe that file he
3	created?
4	CO-CHAIR PONCE: Can we check first
5	though on who's on the phone, who is joining us?
6	CO-CHAIR CHIN: Great, yes. Ninez
7	made a comment, who's on the phone also?
8	MEMBER BERNHEIM: Susanna's here.
9	MEMBER COOPER: Lisa's on the phone.
10	CO-CHAIR PONCE: Good morning, Lisa.
11	MEMBER COOPER: Morning.
12	CO-CHAIR CHIN: Good morning.
13	MEMBER SANCHEZ: Eduardo Sanchez is on
14	the phone.
15	CO-CHAIR PONCE: Hello, Eduardo.
16	CO-CHAIR CHIN: Great.
17	MEMBER BERNHEIM: Susannah's also on
18	the phone. I'm not sure if you heard me.
19	CO-CHAIR CHIN: Yes, great.
20	CO-CHAIR PONCE: Thanks. Good
21	morning.
22	CO-CHAIR CHIN: Okay. So we'll turn

1 it over to Erin and Drew and then to Ignatius 2 just in terms of overview. DR. ANDERSON: Good morning. 3 So I'm 4 just going to walk through the revised 5 recommendations based on your input yesterday. Right now, we've distilled it to four main 6 7 strategies. 8 And so the first strategy is to 9 implement health equity measures. So this is a big bucket that includes a number of 10 11 recommendations. And I'll just briefly run 12 through it. So the first one is investing in the 13 collection of social risk factor data through 14 15 electronic health records, surveys, et cetera. 16 The second is stratifying performance 17 scores by social risk factors to proactively 18 include equity in payment programs and quality 19 improvement. The third is to include the five 20 21 equity domains that the committee came up with. 22 So that's the culture of equity, structure,

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access, quality, and collaboration and
 partnerships.

The next is to prioritize outcome 3 measures over process and structure measures; 4 5 implement health equity measures into existing programs, aligning health equity measures across 6 7 payers, so this one of the recommendations that 8 were previously there; and then to reduce the use 9 of measures that don't promote health equity to reduce measurement burden. And then we'll make 10 11 sure we clean up some of this language, too. 12 So the second strategy is to 13 incentivize health equity through payment 14 reforms. So this includes all of the payment 15 discussion that we had yesterday. 16 So the first is investing in 17 preventative care and primary care for 18 individuals with social risk factors. 19 Directly adjusting payment for organizations serving individuals with social 20 21 risk factors, so that's one of the NAM --- lines 22 up with one of the NAM recommendations.

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The third here is a larger bucket 1 2 which is to redesign payment models to support health equities so it includes some of the 3 recommendations for mixed model payment programs, 4 advanced payments, equity bonuses, pay-for-5 performance for equity. 6 7 The next one is looking at linking 8 health equity measures to accreditation programs, 9 then supporting outpatient services and enabling services with additional payments. 10 11 The third strategy is supporting 12 organizations that disproportionately serve individuals with social risk factors. So this 13 14 was considering comparing organizations to peer organizations, so peer comparisons, ensuring 15 16 safety net organizations have fair playing fields 17 in the value-based purchasing programs, and then 18 considering additional payment for organizational 19 factors that are not under the control of safety 20 net organizations, providing coaching and quality 21 improvement disparities education. And this is related to building equity into the quality 22

improvement process.

2	The next is prospectively monitoring
3	the financial impact of value-based purchasing on
4	organizations caring for individuals with social
5	risk factors.
6	And then, lastly, the last one here is
7	ensuring safety net providers are included in
8	incentive programs. So this goes back to that
9	conversation about certain organizations or like
10	a safety net not being included in an accountable
11	care organization. So the example here we have
12	is also rural health or rural hospitals.
13	The last strategy is developing and
14	implementing a research agenda for achieving
15	equity through the use of equity measures and
16	payment and quality improvement. So this goes
17	back to the conversations that we had about
18	evidence and developing an evidence base for a
19	lot of the concepts that the committee has come
20	up with from the beginning of this project,
21	really, to support these recommendations.
22	So building that out, it's funding

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your demonstration projects, conducting policy
 simulations to demonstrate how community
 interventions mediate drivers of disparities,
 assessing the economic impact of disparities from
 multiple perspectives. We talked about looking
 at the impact of quality of life rather than just
 monetary units.

8 And then, lastly, we have rewarding 9 health plans and providers who invest in data 10 systems that capture the linkages within its 11 services and across social services.

So what we wanted to do was kind of walk through, get your initial reaction to the recommendations and then walk through different parts of it to build out some more examples and kind of flesh out what the committee really means by each one of these strategies.

18 CO-CHAIR CHIN: Wonder if, before we
19 do that dive, if it would be helpful to have
20 Ignatius do the overview of the other document,
21 too. Then we'll dive into it.

22

MR. BAU: So what you have is sort of

a crosswalk. The first column is the NAM
 recommendations, obviously limited to Medicare,
 which was the charge. And then second, the
 middle column are the recommendations from the
 ASPE report, also limited to Medicare. And so it
 will use the word beneficiaries rather than
 patients or individuals.

And then I tried reorganizing the list 8 9 -- I missed one in the editing process -- into where the parallel recommendations are similar 10 recommendations to NAM or ASPE, where it doesn't 11 12 show on the printout. But what the shaded points 13 are are the original five strategies that were in 14 the original framework. And so again, I'm not prioritizing; I'm just putting them into those 15 16 relative buckets.

And so generally the first strategy
that Drew just walked through, the measurement
and the inclusion of the equity measures,
generally fit into Strategy 1 for ASPE.
And then the second strategy that Drew
walked through that the committee came up with

yesterday around incentivizing through payment reform generally crosswalks to Strategy 3 for ASPE.

And then the third strategy that the committee came up with focused on safety net organizations crosswalks to Strategy 3, Consideration 2.

8 And then the final strategy that the 9 committee came up with, Strategy 4 around the 10 research, crosswalks to the ASPE Strategy 3, 11 Consideration 3.

12 So there is a lot of synergy. Again, 13 one of the things folks might want to consider, 14 there were no strategies that ASPE proposed that 15 the committee didn't touch on in one way or the 16 other. And so at least there's that consistency. 17 MEMBER BERNHEIM: I don't think that 18 people on the phone have access to that document. 19 Could it be emailed to us? 20 MS. JUNG: Hi, this is Madison. Yes, 21 I'm drafting an email right now to send out to

22 you all.

1

2

3

1 CO-CHAIR CHIN: Good point. So 2 thanks, Ignatius, Tara, and Drew. So before we dive into this in more detail, maybe go slide by 3 4 slide, but do people have any initial just over-5 arching sort of impressions on is this generally on the right track or off base or whatnot? 6 So Romana has her hand up first. 7 8 MEMBER HASNAIN-WYNIA: I actually have 9 a question. So yesterday when we ended with looking at the five topics for the roadmap and 10 11 discussed not really diving into some of those 12 topics, is this the kind of revised version of

13 the roadmap then? Is this the roadmap, the 14 strategies? I'm just trying to frame this so I 15 understand where we are. Or are these components 16 of the roadmap?

MS. O'ROURKE: Sure. So we took the five strategies and revised them based on your feedback and then tried to work them into some of the other parts of the conversation. So I think the vision would be that those five high-level strategies could go into the roadmap diagram.

And then in the report, we include all these 1 2 details about the substrategies and considerations. 3 4 CO-CHAIR CHIN: So for example, if you 5 have the old diagram, again, the one that had the circle at the top and at the bottom, and 6 7 originally there were five things at the bottom 8 there, those five would be replaced by --- I 9 think that there were four major headers we'll march through. All the five are actually 10 11 somewhere in here. Some of them are now, like, subheaders as opposed to main headers. 12 13 MEMBER HASNAIN-WYNIA: So these are 14 not replacements. These are just kind of 15 drilling down on those ---16 CO-CHAIR CHIN: It's both a drill down 17 as well as a recategorization. 18 MEMBER HASNAIN-WYNIA: Okay. 19 CO-CHAIR CHIN: Bob? I had kind of a 20 MEMBER RAUNER: 21 comment and question. Actually, I really like where a lot of this is going. And I have a 22

question. And maybe it's for -- Christie will 1 2 maybe be able to answer this. It's that I like the fact that we're 3 4 pulling out of EHR data. Because if you're 5 uninsured or have a high-churn environments, your 6 stuff isn't in claims data. So by pulling it out EHR's, where there's more continuity, that's 7 8 sometimes a better source actually than claims 9 data. And Christie, are there other --- when 10 you do your research, is it almost always on 11 12 claims data, or do you have a --- what other 13 sources do you use? 14 MEMBER TEIGLAND: Yes. We've basically used that Axiom data that we are able 15 16 to match to every member in the claims database 17 at the nine-digit ZIP Code level. 18 We are able to pull in just some 19 minimal information from the CMS MMR files, 20 monthly reports, monthly member reports. But 21 that's really just dual status and low-income subsidy status which are available elsewhere. 22

1	So yes, the EHRs really do not have
2	this information for the most part. We have
3	access to lots of EHR data. We have
4	relationships with the five big ones, and it's
5	just not there. It's not populated in our
6	experience.
7	CO-CHAIR CHIN: So we'll do Emilio,
8	Philip, Michelle, and Nancy, and then we'll cycle
9	through the phone folks.
10	MEMBER CARILLO: Yesterday we, at
11	different times and from different angles, we
12	talked about the importance of promoting the
13	collaborations' and partnerships' collective
14	impact. You know, the healthcare sector has
15	their core priorities in healthcare and clinical
16	work, social agencies, legal aid agencies, et
17	cetera, how they could all, kind of, work
18	together.
19	And to what extent can we strategize
20	or recommend that, to the extent that Medicare is
21	involved in the payment of some of these other
22	social agencies, that there be an effort to try

to promote these partnerships, to create links.

2 Like, we know how difficult it is with dual eligibles and trying to get Medicaid and Medicare 3 4 to kind of get their act together in terms of how 5 the payment structures are done so that there's one set of services for the patient. 6 So if we 7 can kind of find a way to recommend that payment structures promote collaboration among different 8 9 types of agencies. 10 CO-CHAIR CHIN: So maybe we can 11 brainstorm a little bit about some of the 12 wording, Emilio. Like there's some of it's in 13 here, but more generally. So for example, under 14 strategy -- I'm not looking at the written document -- so under, oh, it's this bucket that's 15 16 on the second page that talks about redesigning 17 payment models to support health equity. There's 18 one that talks about upfront payment to fund 19 infrastructure for achieving equity and 20 addressing social determinants of health. 21 CO-CHAIR PONCE: There's also the, 22 reward health plans providers who invest in data

systems that capture linkages. 1 2 MEMBER CARILLO: It's all there. CO-CHAIR PONCE: 3 Yes. 4 MEMBER CARILLO: But in terms of the 5 intent ---CO-CHAIR CHIN: Right. 6 7 MEMBER CARILLO: In terms of ---8 because the intent gets lost. This is all very 9 true and germane. But to just ---So have it as a 10 CO-CHAIR PONCE: 11 second, maybe have it as a separate --12 MEMBER CARILLO: -- trying to promote 13 collaboration, integration, partnerships through 14 payment redesign, as you have spelled out here. 15 CO-CHAIR CHIN: So maybe it's a 16 subbullet or --- so that we have, again, still very generally, addressing the social 17 18 determinants of health. But maybe one of the 19 subbullets is to dive deeper specifically trying 20 to encourage those partnerships and 21 collaborations. 22 Okay, good. So Philip, Michelle,

1	Nancy, then we'll cycle through the phone.
2	MEMBER ALBERTI: Great. Just one
3	comment on the conversation that Bob and Christie
4	had. So we talk a lot in this document about
5	social risk factors. And the things that we call
6	out, EHR surveys, are really only going to be
7	able to capture patient-level social risk
8	factors.
9	And I think when we talk this
10	afternoon, we'll all discuss the absence of
11	community- or neighborhood-level social risk
12	factors. So I would also urge us to call out
13	partnerships or working with public health
14	departments to capture neighborhood-level social
15	risk factor data as well. Because I think that's
16	really crucial.
17	And then the only other really small
18	point, when we're talking about the accreditation
19	programs, I think I'm going to beat Nancy's drum
20	a little bit. It's very specific to health
21	equity measures in accreditation programs. I
22	think it needs to be broader than that. I think

1	it's health equity or quality improvement-related
2	equity activities into accreditation, because
3	that's what they're really focused on.
4	CO-CHAIR CHIN: Thanks, Philip. One
5	issue that we haven't really talked about in
6	detail in the committee is this issue of the
7	patient-level versus community-level risk
8	adjustment.
9	I mean, right now in the current
10	draft, we kind of waffle here in this last one,
11	because we know we're having the afternoon
12	discussion. But we may need to revisit that.
13	I'd like to put it upon the afternoon discussion,
14	what do we say specifically about patient-level
15	and community-level. Okay. So Michelle
16	MEMBER TEIGLAND: One comment.
17	CO-CHAIR CHIN: Go ahead, Christie.
18	MEMBER TEIGLAND: I just wanted to say
19	that you could easily take the Axiom data which
20	is, you know disaggregated to the nine-digit ZIP
21	Code level and aggregate it up, even to the ACS
22	block level, right. So you could get whatever

1	circle of community you wanted by picking the
2	right configuration of nine-digit ZIP Codes.
3	So we have a tiny neighborhood,
4	average of five households. You could have
5	bigger neighborhoods, and you draw them
6	differently for different purposes. But it's
7	doable, very doable with the kind of data, with
8	that granular level of data.
9	CO-CHAIR CHIN: Thanks, Christie. So
10	we have Michelle, then Nancy, then the phone.
11	MEMBER CABRERA: Okay, so just
12	confirming, we are talking about the trial period
13	this afternoon, right? And I have, on my brain,
14	that report. And I do want to flag one thing.
15	And it's kind of got one foot in right now and
16	one foot in the later conversation.
17	But the fact that we are not allowing for
18	race as an adjustment factor, one concern I have
19	is that we're putting out sort of this call to
20	collect better data. But in order for data to be
21	collected, we have to have a purpose for it.
22	And if the purpose is sort of more

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policy-oriented, like, let's have a conversation 1 2 about this versus actionable, we're going to actually do something with it, I think that 3 4 there's going to be less of an impetus for people to focus on collection of race/ethnicity data in 5 their systems, again, if it lacks a purpose. 6 7 And so I think it's important for us 8 to connect the collection of race/ethnicity data 9 to some action and need. And so I'm just 10 throwing that out there as a question and a 11 concern. 12 DR. BURSTIN: And thank you for 13 bringing that up. Because I think it's, based on 14 so much of the discussion yesterday, discussing racism, et cetera, there are real reasons to look 15 16 at race/ethnicity language, et cetera. 17 I think the point of the Disparities 18 Committee, that we have woven into the evaluation 19 report for this afternoon, is it shouldn't be 20 used as a proxy for social risk. We're not 21 saying you shouldn't look at it, but don't use it 22 as a proxy.

1	I think we just need to be more clear.
2	Because you're right, this really just keeps
3	saying social risk. And it doesn't really
4	discuss a lot of the rich discussion yesterday
5	about the importance of race and ethnicity.
6	CO-CHAIR CHIN: And what we may be
7	able to do, help alleviate the concern also is
8	that, like, we have one of the recommendations
9	about stratifying performance data by social risk
10	factors. One of the examples that's been used in
11	the report is race, ethnicity, the inappropriate
12	stratification purpose for that quality
13	improvement purpose as opposed the social risk
14	factor adjustment being a proxy. So good point,
15	okay. So we have Nancy and then the phone.
16	MEMBER GARRETT: So could you put the
17	recommendation up about the research again,
18	further research?
19	CO-CHAIR CHIN: And maybe we'll march
20	through each of the different ones in more
21	detail. We'll march through if we need more
22	detail.

1	MEMBER GARRETT: Okay, thank you. So
2	I'm not a big fan of this one. And I think my
3	reaction is that saying further research is
4	needed feels like not the action of this
5	committee, really, that we want this committee to
6	be taking.
7	I feel like the discussion yesterday,
8	we were talking about the need for demonstration
9	projects. And we need to just try some things
10	and see what works.
11	But research in the connotation of
12	kind of the policy world often means randomized
13	control trials. And we're not going to have that
14	kind of gold standard for a lot of this work.
15	It's going to be observational; it's going to be
16	trying some things, tweaking, fast tests of
17	change.
18	It's really not research in that
19	traditional sense that I think we need next. And
20	so it just makes me nervous to have this as a
21	recommendation. It doesn't feel actionable
22	enough.

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I	4
1	CO-CHAIR CHIN: Maybe as we're going
2	to the next commenters, any discussion about
3	that, like, Nancy's point, that's an important
4	point to sort of figure out. Ninez?
5	CO-CHAIR PONCE: Sorry just
6	MEMBER COOPER: Well, this is Lisa on
7	the phone. And whenever you guys can get to me,
8	I'd like
9	CO-CHAIR PONCE: I want to, Lisa, this
10	is Ninez. I'm going to just comment on Nancy's.
11	And then we'll get to you next. Is that okay? I
12	think this was, the elements under this research
13	tried to think out of the RCT trial. Because
14	that's what was raised yesterday.
15	And I just want to clarify, the policy
16	simulations which I suggested was actually kind
17	of to work with ASPE, who's doing some policy
18	simulations for Study B.
19	So that's not that we're going to
20	do it, but that we think of innovative ways of
21	getting at these, for example, collaboration and
22	community engagement that doesn't necessarily

populate the data sets or systematic reviews of 1 2 whether it works or not. So I think this is an appeal to thinking out of the box. 3 I wonder if there's 4 MEMBER GARRETT: 5 just a different word other than research agenda that we could use for the title of it? 6 Maybe it's Tests of Change or ---7 (Simultaneous speaking.) 8 9 MEMBER GARRETT: Yes. How about if you put 10 CO-CHAIR CHIN: -- basically substitute demonstration in for 11 12 research. And then maybe the bullets will be the same, but the strategy is basically demo projects 13 14 which would include things like policy simulations, economic impacts, and whatnot. 15 16 So I see nodding. Let's go to Lisa 17 and then Romana on this particular topic. Lisa 18 first. 19 MEMBER COOPER: Okay. So I actually 20 want to push back a little bit on not using 21 research. I think that maybe the recommendation 22 isn't so much that health systems or payers do do

the research, do research research.

_	
2	But I do think it's important to
3	encourage collaboration with researchers so that
4	these demonstration projects are done in a
5	rigorous way, so that we actually get the answers
6	we need about whether or not these efforts are
7	effective.
8	And I don't think it's I think
9	it's a problem that we continue to have research
10	be a bad word when we're talking to people who
11	are systems change people and policymakers. I
12	think that we should encourage partnerships with
13	researchers and rigorous methodology in testing
14	out these different approaches.
15	So actually, I don't know whether
16	research agenda should be the term, but I think
17	it's okay to have research in there and to
18	actually be explicit about encouraging
19	partnerships with health equity researchers who
20	can help to inform the evaluation of these
21	projects.
22	CO-CHAIR CHIN: So another possibility

1	would be to have demonstration and research in
2	the title. So development, demonstration
3	projects, and research for achieving health
4	equity, et cetera. Romana?
5	MEMBER HASNAIN-WYNIA: So I'm kind of
6	in between Lisa and Nancy on this one, honestly.
7	So I completely understand Nancy's point. And I
8	do think we, again, need to think about the
9	audience. But I also don't want to shy away from
10	research.
11	So I'm actually wondering whether we
12	should just say something along the lines of:
13	develop and implement demonstration programs with
14	rigorous evaluations of those programs,
15	partnering with researchers.
16	Because I do think, again, who is the
17	audience? And there is this kind of, oh, if it's
18	research, then it's very diffuse, and we get back
19	into thinking about randomized control trials.
20	And I just think there might be a little bit
21	of a, almost a knee-jerk, negative reaction to it
22	from the end audience. I'm a researcher. I

1	don't like that. But I think it's true.
2	So I'm wondering if we could just
3	tailor it a little bit to say, demonstration,
4	rigorous evaluation, partnering with researchers.
5	There are demonstrations that just don't get
6	evaluated.
7	CO-CHAIR CHIN: So what I'm hearing
8	MEMBER CARILLO: Can I chime in on
9	that really quickly?
10	CO-CHAIR CHIN: Yes.
11	MEMBER CARILLO: The NIMHD has that
12	mission and goal on purpose. That's what they
13	do, you know, try to bring the two worlds
14	together. So, you know, we might make some
15	mention of that, given that that's a body that's
16	trying to do that, to bring research into
17	disparities in minority health.
18	CO-CHAIR CHIN: I think I'm hearing
19	general consensus that people want to have the
20	ideas of demonstration, evaluation, and research
21	in it. People are attuned to some insensitivity
22	regarding language and that maybe we won't

1	wordsmith here. Maybe staff gets first crack,
2	but like, language that encompasses everything in
3	a way that is most appealing to some of the
4	target audience. Is that the general okay.
5	Do you want to say something, Ninez?
6	CO-CHAIR PONCE: I think that's fine.
7	I just think that if demonstration projects is
8	the top line, then kind of the innovative, quasi-
9	experimental, simulation approach, the use of
10	Axiom data, then I think I don't want that to get
11	lost.
12	Because also there's I think all of
13	us around the room know of really innovative
14	projects going on right now that aren't under the
15	umbrella of a demonstration project but then
16	could, with good partnerships with researchers
17	who understand the context, could come up with
18	something faster.
19	Because the other thing, too, with
20	demonstration projects is I think it's going to
20 21	demonstration projects is I think it's going to take some time. So that's just I hope that

rejoinder and --1 2 CO-CHAIR CHIN: Okay. Well, I still 3 have Tom ---4 CO-CHAIR PONCE: And Tom. CO-CHAIR CHIN: -- Tom and Romana on 5 this topic. Tom? Okay, Romana? 6 7 (Laughter.) 8 MEMBER HASNAIN-WYNIA: So I guess my 9 question, based on Ninez's point, is are we, with this strategy, are we trying to set something for 10 11 the future, or are we trying to be real time, 12 current? 13 Because I was reading this strategy as 14 something akin to developing, and Ignatius wrote 15 down the evidence base for what we're proposing. 16 So I guess, you know, I guess there's --- I have a little bit of a disconnect in terms 17 18 of is this strategy forward, or is it what's 19 happening now? Or are we trying to gather 20 information from what's already happened that may 21 be innovative, community-based interventions, et cetera? 22 That might ---

1	CO-CHAIR CHIN: It's probably all of
2	the above.
3	MEMBER HASNAIN-WYNIA: Yes.
4	CO-CHAIR CHIN: That they're going to
5	want to have something, also just sooner rather
6	than later. And some of it's going to be more
7	fundamental.
8	MEMBER HASNAIN-WYNIA: Well, this
9	reads as future.
10	CO-CHAIR CHIN: Yes.
11	MEMBER HASNAIN-WYNIA: So I'm just
12	CO-CHAIR CHIN: Okay, okay. Helen,
13	phone, Tom, Christie.
14	DR. BURSTIN: I was being so, so
15	patient. I think what was tripping me up I think
16	is this term research agenda. And I think,
17	having been at AHRQ for a long time, research
18	agenda sounds very passive. And I think that's
19	part of what we're hearing in this room.
20	And I agree with everybody who's
21	spoken, to be perfectly honest. I think at the
22	end of the day, we want to be able to have real

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generation of real-time evidence, implementation
 research to drive and push this forward, not to
 develop another research agenda.

So maybe some of this is just to maybe really just make that first --- that strategy more action-oriented, and drop the word agenda. Because that just sounds very AHRQ-y passive to me.

9 CO-CHAIR CHIN: So where we'll leave this is that we'll leave it in the hands of the 10 capable staff to come up with first crack with 11 12 And then maybe by email, we can do, like, this. 13 the wordsmithing by email once staff has its 14 first crack at it. I'm confident that you'll come up with a very close next draft. 15 Yes. 16 MEMBER COOPER: Do you think 17 implementation and dissemination research still 18 has a negative connotation? 19 DR. BURSTIN: No, that's better. 20 CO-CHAIR CHIN: And maybe, Ninez, if 21 you could email staff then, for the bullet about

22 policy simulations, some wording that you think

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would work well.

2	Okay, we said the phone folks. Then
3	we'll circle back to Tom and Christie. So anyone
4	on phone want to make a general comment? We're
5	going to march through each slide in more detail,
6	but this is like the overall impressions,
7	overarching thoughts.
8	MEMBER BERNHEIM: This is Susannah. I
9	have two quick comments. One is we refer a lot
10	in here to health equity measures. And I just
11	want to, on the definitional front, I think we
12	mean sort of anything that falls in the five
13	categories that we created.
14	But we talked a fair amount yesterday
15	about whether some of those should be
16	prioritized, whether groups should have to cover
17	all categories, whether some are precede
18	others.
19	So I just want to not have lost some
20	of that conversation. I don't think we came to
21	any consensus, but to just sort of lump them as
22	one thing, we should just be really clear what we
mean by health equity measures and if there's any 1 other guidance besides to use them. 2 So that's And maybe we can talk through that when we 3 one. talk about slide 1. 4 5 And then the other thing for me is I 6 just --- I worry in all of this work about us 7 ever being in a place where we are promoting 8 things that essentially create a sort of tiered 9 system of healthcare. So I want us to be cautious about 10 11 language that suggests that safety net hospitals 12 always need sort of a handicap. There are lots of measures and lots of situations in which 13 14 safety net hospitals perform as well or better 15 than other hospitals. So I want to just, in 16 those places where we're sort of saying, like, 17 oh, let's make the comparison more fair, I'd like 18 us to add language that says sort of based on а 19 circumstance, or a particular measure, or a 20 context, right. 21 Because that's going to be appropriate 22 in some cases, but if what comes out of this

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committee is sort of a deepening of the good, 1 2 rich people's hospitals and the bad poor people's hospitals, we're really doing ourselves a 3 4 disservice. I just want to express a note of 5 caution for things that might lead us in that direction. 6 7 CO-CHAIR CHIN: So I take it, like, 8 the second point is more, almost like language in 9 framing, so not disagreeing with the idea that a safety net may need special consideration in 10 11 certain times. So it's more sort of a 12 language/style issue. 13 And your first point about, like, the 14 five domains, I think you're right. It wasn't total consensus, or we haven't explored it in 15 16 enough detail. And when we go to the first 17 slide, we'll talk about that in more detail. 18 MEMBER BERNHEIM: Thanks. 19 CO-CHAIR CHIN: Others on the phone besides Susannah? 20 21 MEMBER SCHOLLE: Good morning, it's And I'm sorry, I joined a little bit 22 Sarah.

1	late. It's early. Which slides are you
2	referring to right now? Is it slide 67?
3	CO-CHAIR CHIN: Right now, we're
4	looking at everything as a whole, just like
5	general questions about everything as a whole.
6	We're eventually going to march through each of
7	the different four domains and go over each point
8	in more detail.
9	MEMBER SCHOLLE: Okay.
10	MS. JUNG: I believe it's slide 69.
11	CO-CHAIR CHIN: Anyone else on the
12	phone before we go to Tom?
13	MEMBER SANCHEZ: Yes, this is Eduardo.
14	I just want to underscore the discussion about
15	the comment made about not characterizing one set
16	of the system or one part of the system as always
17	being the part of the system that needs help.
18	One good example is immunization rates. And
19	federally qualified health centers are as good or
20	better than they are in the private sector. And
21	there's a couple of other examples.
22	And I would bet, that if we looked at

cultural competency as a measure, we'd also find 1 2 it's a little bit stronger in the safety net hospitals. It certainly has been my experience. 3 And then the whole conversation that's been 4 5 had about "research" and the words that we need to use, I think it's really, really important 6 that we talk about all the elements that have 7 8 been discussed. 9 So I also, like Helen, agree with everything that everyone has said. That's kind 10 11 of easy to do. And the challenge is going to be 12 finding the words that convey the importance of rigor around evaluation that adds to evidence 13 14 base. And that's it. Thanks. Thanks, Eduardo. 15 CO-CHAIR CHIN: 16 Anyone else on the phone? 17 (No audible response.) 18 CO-CHAIR CHIN: Okay. So we have Tom, 19 Michelle, Romana. 20 MEMBER SEQUIST: So I wanted to go 21 back to the --- this has nothing to do with research, the research discussion --- just the 22

1	discussion of individual-level and community-
2	level risk factors. I think that so as I, I
3	mean, it depends on if our it depends on the
4	use of the measure. It sort of gets to, like, is
5	it a useful measure to say you are a Medicare
6	expansion state or not? Not if you're a
7	hospital. It's not that useful. Because you
8	unless you're going to pick up your hospital.
9	So community as I have been
10	envisioning, as we've been talking about
11	community-level risk factors, they are still an
12	exposure for an individual patient.
13	So if I say I used geocoded data or
14	other sources of data to identify food deserts or
15	lack of availability of pharmacies, walkable
16	sidewalks, anything that sort of predicts that,
17	you still apply it to a patient and say so
18	going back to, like, the electronic health record
19	discussion and how we can collect and store that
20	information, I think you still want to store that
21	for a patient.
22	Like you want to know if your patient

1	does live in a neighborhood where there are not
2	grocery stores, where there are not safe venues
3	for exercise or where whatever the thing is
4	that we are measuring, so that's sort of an
5	individual use of a community risk, sort of a
6	built environment factor for that patient.
7	That's different, I guess, than
8	not I guess, but that's different than a
9	community-level assessment that you might apply,
10	that health plans might use, that big hospital
11	systems might use, that public health officials
12	might use.
13	So there are I don't want us to
14	feel like community-level risk is not an
15	individual it should not be sort of available
16	and recorded for individual patients. Because it
17	should be part of the care plan that we're
18	delivering for patients.
19	And so it should be we should still
20	push on the EHR vendors and others to help us
21	store that information, even though it's not a
22	factor about that patient or that that patient

1	created. It is something they are experiencing.
2	CO-CHAIR CHIN: The whole value really
3	of showing that, independent of individual
4	patient effects, there are neighborhood-level or
5	geographic-level factors that impact the outcome
6	of a given patient. Yes?
7	MEMBER SEQUIST: Right. And we still,
8	importantly, want to record that for that
9	patient.
10	CO-CHAIR CHIN: Yes. So we'll come
11	back to that maybe when we do the risk factor
12	discussion, in terms of what this then translates
13	to in terms of recommendations and all. Yes. So
14	it was, what, Michelle, Romana, then Philip.
15	Yes?
16	MEMBER CABRERA: I just want to
17	comment on the safety net provider conversation
18	earlier. And I think this shows up actually in
19	the NAM and ASPE reports in talking about low-
20	quality safety net providers.
21	I think there's a real difference
22	between how you score on a certain test and

whether or not you're actually delivering quality 1 2 of care. And I don't think we actually know enough yet to be able to draw that conclusion. 3 Ι 4 haven't said anything about it yet. 5 But this baked-in assumption that 6 and Bob and I were having this conversation about 7 safety net clinics, if you don't have the data 8 system or the staffing to appropriately collect 9 the data, you might just be sending whatever you 10 have. And then that gets interpreted as, wow, 11 you suck on quality, right. 12 And I know this is true for some of our 13 county-based public hospitals in California as 14 well. They're in the process of trying to update 15 their data collection systems. But purchasing 16 some of these systems is really expensive. And 17 they don't have the extra money to buy the system 18 to collect the data to show whether or not 19 they're on par or not with their competitors, 20 right. 21 And so in California, for example, we 22 have no certificate of need, zero. It's all

market-based where you cite a facility or not. I know a lot of other states still have certificate of need. I don't know how that works in those states.

5 But all I'm saying is that, if you're 6 interested in having healthcare resources that 7 are located in and around communities that ---8 vulnerable communities, and you're operating in a 9 completely market-based system, what happens to 10 those providers who are still left in those 11 communities matters.

Because otherwise, just like their ability to pay for rent, their ability to access healthcare services is just going to go somewhere else. And it's just going to be another barrier to care.

17 So I think that, in saying they are 18 low quality, they're low quality based on the 19 scores that we have. We do have an interest, in 20 the equity conversation, in ensuring that those 21 resources are there/available. Yes, high 22 quality, but there's a distinction between how

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you're scoring, how things are impacting you, and whether or not you're good quality.

You know, I do think that it's an 3 4 important goal. I'd like to maintain it. Maybe 5 we can massage the language to make sure that we're clear again in underscoring. We don't want 6 7 to give a people a pass, but at the same time, we 8 do want to figure out a way to support the safety 9 net. CO-CHAIR CHIN: So that whole topic is 10 11 another one where we'll have to be very careful 12 with the wording. Because there's a lot of 13 nuance. There's important nuance in the 14 discussion. And so we'll need to flag that as an area that may need some special attention. 15 16 So in terms of, like, general 17 comments, we'll finish with, like, we have what, 18 Romana, Philip, Emilio, Bob. And then we'll 19 march through, like, the slides starting at slide 20 1 for Strategy 1 for more details. Go ahead, 21 Bob. 22 MEMBER RAUNER: It's actually, it's

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crazy for me to look at this and realize it's 1 2 exactly what we're trying to do with our FQHC project in Nebraska right now. So we have a 3 4 quality improvement project, seven FOHCs. 5 Most of them have bad data, honestly. 6 And that's what they're reporting to HRSA. So if 7 you go to the HRSA website and look at all these 8 FQHCs, most of that's really bad data. And the 9 prevalent challenge we find, and what I really like about this report is one of the problems 10 11 they have is they don't have a good quality 12 person. 13 And of the seven FQHCs we're working 14 with, five have had turnover of key staff in just 15 six months. And that turnover is partly because 16 they don't have an infrastructural payment to 17 support that person. And it keeps turning over, 18 the kind of the grant to grant thing. 19 And so I really like the fact that there's 20 writing or explicit that they need upfront 21 payment for that infrastructure to actually get 22 good data out of the FQHCs.

And since we have funding, so we're 1 2 actually working with our state department of HHS to change the way they've structured their grant 3 in the past to address those actual issues. 4 And 5 it's amazing to me this actually just parallels what that's coming up with. 6 7 And the other thing is the long term. 8 It's a five-year grant now because of what 9 happens with the FQHCs. They get the quality improvement next year, and then they get another 10 11 one next year, another next year, and they've got 12 12 different things running at the same time with 13 no general plan to it.

14 And this, I think, really helps inform 15 that issue with the FQHCs in collecting the data 16 and maintaining the staff to do that. Because a 17 lot of them just don't have that. Like, say 18 Henry Ford Health Center has that staff in place. 19 But a lot of FQHCs just don't have the funding 20 for this kind of thing. But they really need it. 21 So I really like where this is going, partly because of that. 22

1	CO-CHAIR CHIN: Thanks, Bob. So we
2	have Romana, Philip, Emilio, then we'll go to
3	slide 1. So Philip, then Emilio.
4	MEMBER ALBERTI: Just a quick comment
5	about Tom's comment. And of course, you're right
6	in terms of individuals live in neighborhoods.
7	Those characteristics are appended to them in
8	some way in this multi-level model.
9	But so just a couple of experiences
10	from New York City. The meaningfulness of
11	geography doesn't always fit with a five or a
12	nine-digit ZIP Code. So I think, you know,
13	public health departments actually play a real
14	role in doing that kind of community engagement
15	to understand where boundaries tend to be. I
16	don't see that as the role of a hospital or a
17	health system to kind of do that geocoding.
18	So if we assume that we can get a good
19	address in an EHR and have the linkages that you
20	can then make to public health data sets
21	alleviate some of the data collection burden for
22	the health system, which I think is also

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something that you raised yesterday in terms of we're going to ask more work to do this, where can we actually alleviate some of that burden?

So thinking about that kind of 4 5 partnership then also speaks to, I think, what you and Emilio were getting at in terms of really 6 7 formalizing the kinds of collaborations and 8 partnerships necessary to do this work both in a 9 data identification way across individual characteristics, hospital characteristics, 10 community characteristics, but then also the 11 12 interventions that you develop to address those kinds of SDS differences within communities. 13 So I think there's a lot of benefit 14

15 for calling out the role of public health 16 agencies and other government agencies and kind 17 of identifying meaningful geographies where we 18 can append individuals.

19 MEMBER SEQUIST: It's Tom. I don't 20 know if this comes through in any of the stuff 21 we're doing, but maybe we need to sort of call 22 out, like, the audience that we're -- that the

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measures that we're talking about when we make 1 2 specific statements? Because everything you're saying is 3 4 totally right. And so, like, as we're thinking 5 about these measures or these recommendations, are we talking about state public health 6 departments? Are we talking about hospitals, or 7 8 are we talking about payers? 9 Because, and I know you could probably 10 say that for every quality measure, like, 11 regardless. But just because we're getting to

12 this social risk factor space, it's even more 13 clear.

14 Or there are even, I think, bigger implications around who is the audience that 15 16 we're directing these particular recommendations 17 at, just so that we're --- because this 18 conversation has been great in sort of sorting 19 out when we say community risk factors are we 20 talking about patients experience of them? Or 21 are we talking about public health departments and how they should be enabling the measurement 22

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2	So I don't think we do much of that in
3	our documents right now. But maybe that's,
4	because we're talking about social risk factors,
5	we need to be doing more of that?
6	CO-CHAIR CHIN: Yes, it's a great
7	point, Tom. We were brainstorming with staff at
8	the end of it yesterday a little bit about this,
9	that we're not sure what the right way is going
10	to be with this yet.
11	For example, is there like a document
12	similar to what's in front of us right now which
13	were, like, the global recommendations or the
14	amendments that, like, for each one, to say who's
15	the perspective. Or do you have, like, different
16	versions of these recommendations, one for
17	payers, one for providers, one for the
18	government, or who knows.
19	But, yes, I think the general point,
20	there needs to be clarity somehow, whether it's
21	in the format or in the text or whatnot, so you
22	know what's applying to what or who's the

attendant thing needs to come through. 1 2 So Emilio, then we're going to go slide 1. 3 4 MEMBER CARILLO: Yes. Again, staying 5 on topic with the community-based measures, neighborhood measures. We have the POIs, the 6 prevention quality indicators. 7 8 AHRQ measure, which, you know, 9 endorsed by NQF, discussed a lot in other committees of the NQF. And the problem is that 10 11 these prevention quality indicators, which are widely used by state departments and researchers 12 13 and everybody else, they basically address the 14 geography in terms of the outcomes. And everybody says, well, wait a 15 16 minute, what about the SES social determinants in 17 those geographies that the PQI is measuring? 18 So I think that, in terms of tying 19 things together, I mean, we may want to be 20 thinking in terms of some of those existing 21 measures, how we can tie this in, understanding 22 that the PQI, the number of people that are

involved on the geography is -- that's too broad.
 But nevertheless, how we can begin to make some
 of these things connect.

CO-CHAIR CHIN: Yes. It's coming up again and again, the patient level, community level. So maybe when we do get to the specific slides, we can sort of, where appropriate, sort of try to drill down a little bit in terms of this.

10 So let's go to slide 1. And Sarah is 11 first in line. So we'll, for people on the 12 phone, we're going back to, and we're going to 13 march through each of the different 14 recommendations.

15 So slide 1 was the Strategy 1, 16 implement health equity measures, where the first 17 bullet is: invest in the collection of social 18 risk factor data. So we're going to look at this 19 slide, so people can comment on whatever they 20 want to on the slide, or ways to improve it, and 21 whatnot. But, Sarah, you have first crack. 22 Okay. My comment was MEMBER SCHOLLE:

1	on a different slide, so I'll hold off.
2	CO-CHAIR CHIN: Okay, Michelle and
3	Bob, just from the past few, yes.
4	(Off the record comments.)
5	CO-CHAIR CHIN: Philip.
6	MEMBER ALBERTI: It's a question,
7	maybe a proposition. And I think this gets back
8	to something that Susannah mentioned earlier. We
9	have all this health equity measure. We have
10	health equity measures and then kind of health
11	disparities measures. And they're not the same
12	thing.
13	So I think we just need to be really
14	explicit when we're saying, if we're stratifying
15	performance scores, is that an equity measure or
16	a disparities measure? I think being just very
17	clear about those two terms is crucial.
18	CO-CHAIR CHIN: And so this is, maybe
19	it's in the text, and it's a point that Susannah
20	raised yesterday also. Right now, in the current
21	document or the conceptualization, what you're
22	calling a disparity measure, so a general measure

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1 stratified by a social risk factor, that's under 2 the quality/equity domain. But again, we can clear it based on the language. 3 4 That may be a place to start, because this is where we had discussed -- so that third 5 bullet about include five equity domains: the 6 culture, structure, access, quality, and 7 8 partnerships, so people like that general 9 framework. Remember yesterday we had this 10 discussion about the five and what can we use for 11 12 accountability and what can we use for quality improvement and whatnot. I think it was Sarah 13 14 who mentioned, the way she worded what's on the slide here, access and quality are in some ways 15 16 the end goals. Culture, structure, and 17 partnerships are means to the goals. 18 That's about as far as we got in terms 19 of, like, well, accountability measure or a 20 measure for quality improvement. 21 And so, do people have any suggestions 22 on ways to make this clearer? Or do we want to

be more specific, or is this the level of 1 2 specificity which we feel comfortable with? Michelle? 3 I do think the one 4 MEMBER CABRERA: 5 thing that's missing, if we break it out by the goals and then the means, is something on data or 6 7 transparency in the means to the end, right. 8 CO-CHAIR CHIN: And we can make sure 9 that it's in there. But I think it's in the structure domain that there's a sequence that 10 11 ranges from collecting the data to then having 12 the quality improvement process to look at the 13 disparities in the root cause analysis and then 14 the reporting and transparency. That was 15 intended to be there, so we can go back and make 16 sure, but that would be ---17 MEMBER CABRERA: Yes. You're right. 18 CO-CHAIR CHIN: Yes. 19 MEMBER CABRERA: Yes, okay. 20 CO-CHAIR CHIN: Ninez? 21 CO-CHAIR PONCE: Just a point of clarification from the group, what aligning 22

health equity measures across peers means, what does align mean?

CO-CHAIR CHIN: So we'll get to that in a moment. But if we can drill down first on this third bullet, this one about, like -- it's come up, and we haven't really sort of resolved this.

8 There were questions, for example, 9 like, well, you'd use them as a whole, all five, or can you look at a subset of ones? Are the 10 ones that you use for accountability are the ones 11 12 that you use for purely a quality improvement purpose? A general discussion, but I don't know 13 14 if we came up with any sort of consensus. So this was as far as the thought we had in terms of 15 16 where there was agreement.

MEMBER HASNAIN-WYNIA: Marshall, what
was your question? Can you clarify your
question?
CO-CHAIR CHIN: Well, okay. On one
hand you can say, well, we're done with point 3.

There's conceptualization of these five different

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And then when they are later bullets that 1 areas. 2 are relevant, they can just be more specific and operationalized by CMS or others in terms of, 3 well, what are they going use then for an equity 4 measure, versus do we think --- is there any 5 quidance we want to provide to them? 6 7 So, for example -- if we thought, for 8 example, well, the only way you're really going 9 to get improvement in an organization is if you truly do address all five of those, well, then 10 you need to think about, well, do they become 11 12 accountability measures or not? 13 Or it may turn out, for example, 14 there's some special examples. Like, some of the ones like culture can be easily gamed in terms of 15 16 the surveys. So maybe not great for 17 accountability. So I mean, that was the nature 18 of some of the discussions. 19 And it may be that this is the best we 20 But I guess I just want to throw out can do. 21 there, do people feel this is the best we can do, 22 or do we want to get more specific or more

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prescriptive in our recommendations? 1 2 So we had I think we had Ron, we have Traci, Bob. 3 MEMBER COPELAND: So I think in part, 4 5 in recapping yesterday's conversation on this topic, you've already provided the answer. 6 Ι 7 mean, I think what's missing here is just the 8 fact that this breakout of access and quality are 9 end goals, that the surrogate for that was they 10 are distinctive, and they are probably 11 appropriate measures to go down the 12 accountability path. Whereas these other three were not 13 14 because of some of the nuance you talked about. 15 But from the overall five components framework 16 kind of roadmap, all five are relevant. 17 So I think if we're having a roadmap 18 conversation, it's all five. And if we're 19 talking about distinguishing those that are more 20 amenable to accountability metrics versus 21 something else, this was the breakout I think that came out in conversation. 22

1	So that distinction is not evident if
2	you just look at what's captured here. So I
3	would just say, if you have access and quality
4	are end goals, in parentheses something that
5	connects that to eligible or suitable for
6	accountability and this notion of all five still
7	relevant from a roadmap standpoint, I think that
8	was the distinction we made yesterday.
9	CO-CHAIR CHIN: Okay. Yes, so that's
10	maybe the current edit. So I see nodding of the
11	heads. So that access and quality, some language
12	there about appropriate for accountability. The
13	other three appropriate for the overall roadmap
14	and quality improvement purposes. So Traci and
15	Bob on this point.
16	MEMBER FERGUSON: So I think that
17	I'm a visual person. So that if we could use
18	sort of the five domains which, I think, are all-
19	important and all-necessary when you're
20	evaluating organizations or evaluating the
21	process of how adding an entity is going to get
22	to a point of addressing disparities and moving

towards healthcare and health equity, that we 1 2 sort of utilize, and maybe we describe how an organization or individual will rate themselves 3 on each of those elements and say whether, in 4 terms of culture, structure, access, quality, and 5 partnerships, are you high or low? 6 7 And so you can see if you are -- you just put it, almost sort of label those vertically and 8 9 then horizontally. You can see where you score. 10 So they can get a quick assessment of where they stand to say, well, where do I need to 11 12 focus on? And that could help, again, whether 13 it's an individual group practice or a larger 14 community of where they need to focus so that it is --- all of those are important. 15 16 And that when you see organizations or 17 you see a microcosm of the member, the physician, 18 and all of the concentric circles working 19 together, all those individuals will all score 20 very high on all those domains.

21 And so until you have that at each of those 22 concentric circles, you're going to see those

1 gaps. So I think that it's -- be able to
2 describe it in a little bit of detail in terms of
3 examples.

4 And then as Dr. Copeland said about 5 being able to say that these are -- access and 6 quality are sort of the measurements that we're 7 going to sort of hold you accountable, but if you 8 want to assess --- just like you do cultural 9 competency, doing an assessment or a survey, they'd be able to do, well, how would you assess 10 11 yourself as an entity in terms of healthcare, 12 health equity?

13 CO-CHAIR CHIN: So one of the things -14 - thank you, Traci. One of the things I like about Traci and Ron's comments, which I think are 15 16 also reflected in some of the NCQA reports that 17 Sarah presented yesterday and in the second NAM 18 report on best practices for at-risk populations, 19 is that they talk about, like, the process of 20 improvement also. 21 So it's not just like the

accountability process, which of course is very

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1	important. But how do you help organizations get
2	there? And I think that's embedded in what work
3	we've done. That also, in our text, we can make
4	sure that we have made that clear also.
5	Bob and Philip, you're also on this
6	point? So Bob and then Philip.
7	MEMBER RAUNER: I was going to talk
8	about the alignment of health equity measures
9	across peers and so
10	CO-CHAIR CHIN: Yes, we're going to
11	finish on this point, and then we're going to
12	back to Ninez's point. And then just lead your -
13	that was perfect there.
14	MEMBER ALBERTI: So yes to everything
15	that Traci and Ron said. I think that was
16	exactly right, and I think that we also talked
17	yesterday about, in terms of the upfront
18	payments, where those could be used, right.
19	So is it contingent upon having the
20	culture and structure in place to then do the
21	work? Or is it contingent on not having that and
22	using that equity bonus to develop a piece of the

1 structure? 2 I think if we could take Traci's idea, a depiction of this across the next set of 3 4 recommendations in Strategy 2 and show how each 5 of these domains are involved in those different kinds of proposed value-based purchasing schemes, 6 7 when it's highlighted for accountability, when 8 it's a, we must do this in this domain to get 9 into this new structure, I think that could be a way to kind of merge those two ideas. 10 11 CO-CHAIR CHIN: Right. So we'll come 12 back on the next slide. I can't remember if it 13 was you or someone that made the recommendation 14 on the bonus payment, for example, that people need to basically be at point where they've 15 16 demonstrated they have, likelihood to succeed, 17 almost. 18 MEMBER ALBERTI: Yes. 19 CO-CHAIR CHIN: Anyone else on this 20 particular bullet before we go to Ninez and Bob 21 regarding the aligning issue? Okay, Ignatius?

MR. BAU: I just wanted to underscore

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that, while I agree that access and quality are 1 2 what we should hold organizations accountable for, if we just say that culture or structure and 3 4 partnerships are only a means, then they 5 potentially lose out on this sort of notion of value. 6 7 Because if you're not demonstrating improvements on the access and quality, then you 8 9 don't get to the other domain. So somehow in the 10 language to make sure that we see, when it comes 11 to designing a value-based payment system, that 12 the other three means are also part of that 13 equation. 14 So in other words, that we don't drop 15 them as sort of preconditions that you're on your 16 own for but that we see this as a unified whole. 17 CO-CHAIR CHIN: So please pipe in if 18 you see other bullets along the way, Ignatius, 19 where that can be operationalized. Anyone else 20 on this bullet before we go to the aligning one? 21 MEMBER FISCELLA: Yes. This is Kevin. 22 Just a comment on access. I guess, in the text,

will we be referencing work that's going on with 1 2 existing access measures? Since access and quality are the end goals, we want to make sure 3 4 that we have good measures of access in a 5 comprehensive sort of way. And I know a lot of work has been done by others on that. 6 That'd be great, 7 CO-CHAIR CHIN: 8 If you can email staff the things you may Kevin. 9 have in mind. The current conceptualization, there was, like, these three or four As: like 10 11 affordability, accessibility, and one or two 12 other As. That was the working model right now. 13 So if there're other things that you think could 14 be added, that'd be helpful. Please email staff. 15 MEMBER FISCELLA: Okav. 16 CO-CHAIR CHIN: Okay, great. Let's 17 move to to ---18 CO-CHAIR PONCE: Sorry, just one quick 19 --- to make sure that our note writers are in 20 this, from what I heard from Ron, it's include 21 all five equity domains. So that it's clear, the word all in front of the five. 22

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CO-CHAIR CHIN: Then correct me if 1 2 we're interpreting you wrong, Ron. I think you said that all five are essential for the overall 3 4 roadmap. For accountability purposes, access 5 and quality seem suitable. The other three, and here's where 6 7 Ignatius' point -- and it's kind of tricky, is 8 that, all should be part of this overall roadmap. 9 They're necessary to achieve equity, but for various reasons whether measurement or gaming or 10 11 whatnot, they may not meet the same criteria for 12 accountability, with a caveat then that, like, I 13 guess whatever -- viewing some of these later 14 bullets, like, Philip had the point about, like, 15 for example, do we have an infrastructure upfront 16 payment? 17 Do you need to demonstrate that you 18 have a reasonable culture of equity at that point 19 in time. So that part's a little bit sort of, 20 kind of vague. And I think we need to sort

> through. Is that fair, Ron, in terms of the ---MEMBER COPELAND: Yes. I mean to

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integrate all those thoughts, I think it's a very 1 2 strong verbal endorsement of these five as the way, the pathway, so all critical and 3 complementary, and so forth. 4 But as it comes to the specific 5 question of what's ready for prime time 6 7 accountability, because the metrics are available, more robust, et cetera, that's why 8 9 those other two are separated, not because they 10 necessarily, at least so in my mind, carry more 11 weight than the others. 12 It's just where the state of data 13 collection, maturity of information, 14 availability, and so on, that's not there yet. So that says not only are all five important, but 15 16 a statement could be said, as this process 17 matures, the expectation would be that, as these 18 other areas become more mature in terms of 19 readiness for accurate measure, they should be 20 considered for accountability as well. 21 But we're really endorsing the 22 package. It's just timing of where each one of

1	those areas is at this stage of the game. That's
2	my view.
3	CO-CHAIR CHIN: Very good. Thank you,
4	Ron. You're on a roll these past couple of days,
5	by the way.
6	(Laughter.)
7	CO-CHAIR CHIN: Yes. So Ninez has
8	been very patient. We had a 15 minute
9	digression. Can you restate your question or
10	point about aligning? And then Bob wanted to
11	speak on this also.
12	CO-CHAIR PONCE: It's just a question
13	for help from the committee to exemplify
14	clarify that for me.
15	MEMBER RAUNER: So one of the things
16	that drives the clinics crazy is that all the co-
17	payers want something slightly different, you
18	know, classic being diabetes. Some want, was it
19	tested; some want was the Alc under control? In
20	some of them, the A1c was 9. Some it was 8, and
21	that drives the clinics crazy trying to report
22	these separate things.

1	So when we create a health equity
2	measure, we need to do the same thing. It's like
3	some people ask for race and ethnicity
4	separately. Some will conflate the two.
5	Whatever comes out needs to be consistent so
6	that, hopefully, CMS and HRSA and your Medicaid
7	MCO are asking you for the same information, not
8	having you run it differently for HRSA, for CMS.
9	Because a lot of the UDS measures have
10	not always aligned with NQF. They are now
11	starting to align, finally. That's been a
12	challenge, because of the lack of alignment
13	between different programs.
14	CO-CHAIR CHIN: And besides the burden
15	issue, there's been the issue that if, like, 20
16	percent of your patients are Medicare, maybe
17	that's not enough to drive you to do a lot of
18	infrastructural changes. If 80 percent of your
19	payer mix is using the same equity measure, then
20	all of a sudden it gets more of an impetus for
21	you to say I've got to do something about it.
22	MEMBER RAUNER: Yes.

1 CO-CHAIR CHIN: Any other comments on 2 alignment? Michelle.

MEMBER CABRERA: Just to double down 3 4 on Bob's comments, I mean, I think one thing that 5 I hear a lot, whenever we bring up sort of the intersection of reducing disparities in payment 6 reform, is significant pushback, even from people 7 8 who seem to be aligned with your end goal on, 9 please don't make me do more, right. 10 And then, when we try to do a trial period, it's, like, we don't have the data. 11 So I 12 think that whatever we do, we have to figure out 13 a way to make sure that it is clear that the 14 burden question can't prohibit us from getting to

15 that end goal.

And I think yesterday, some folks threw out some ideas about how to get around that. But it would be nice if we had a sense of what we think some core health equity measures are to start to sort of push that out as this is kind of the gold standard for what you should be collecting, right, across different payers so
that there's a sense of, this would be the gold
 standard that we are striving toward if we could
 get there, right.

So I feel like that's a whole other
level of work, but it's important, nonetheless,
because that's going to continue to be a barrier
otherwise.

8 CO-CHAIR CHIN: Thanks, Michelle. So 9 one other thing, a question is, I just want to point a thing that Philip had raised earlier 10 11 about disparity measures. The other ways in here 12 is that you look at the second bullet. It's the 13 point that, I think, it was Susannah had raised 14 about -- it was when she was talking about, well, her view was that risk adjustment, you're trying 15 16 to avoid the negative unintended consequences. 17 Whereas, the stratification by risk factor, she 18 phrased as being, like, more proactively 19 achieving equity.

20 So that's the other place, besides the 21 third bullet that we specifically talk about the 22 stratification by risk factor of a given

performance measure then to be used in payment 1 2 and for quality improvement. Nancy -- okay, I think it was Ninez, Nancy, and then Helen. 3 CO-CHAIR PONCE: Again, just for 4 5 clarification and for our diligent note takers, the alignment -- so for the safety net slide 6 7 bullet, we talk about rewarding for improvement. 8 So does aligning mean we won't look at 9 improvement for the non-safety net? So just want to make sure that's -- I assume that that's not 10 11 the case, but just so that that's implicit. 12 CO-CHAIR CHIN: It's a great question. And I think there's another bullet where there's 13 14 a mismatch between Ignatius's table and what's on these slides. Let's listen to the whole issue, 15 16 like, improvement, absolute threshold, disparity 17 reduction. So let's maybe deal with that bullet 18 and then we can think about this. Yes, Nancy, 19 then Helen. 20 MEMBER GARRETT: So I just want to 21 offer a few thoughts on the first one, invest in the collection of social risk factor data through 22

1

EHR surveys, et cetera.

2	I just feel like we need to be more
3	specific with that one. It feels a little bit
4	too general, like, yes, that's true, but it's
5	really not specific as to who should invest and
6	why? And what's the benefit? And what social
7	risk factor data? And in what form should we
8	collect it? It feels like we have an opportunity
9	to be more specific and have more of an impact.
10	And so just walking you through how my
11	organization has been thinking about this, I
12	brought forward an initiative last year to start
13	universally screening everybody in our
14	organization on outpatients on food
15	insecurity.
16	And in order to do that, in order to
17	get support for the organization, I really had to
18	bring forward, okay, well, what's the reason we
19	would do this? And the reason that really
20	resonated with people is, if we understand who
21	has an issue with food insecurity and we can get
22	them connected to resources, then we can have

more of an impact on health.

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2	It's this whole idea that we all
3	understand that medical care is a very small part
4	of what really influences health. That's what
5	really motivates providers. We're trying to do
6	the right thing for our population and trying to
7	improve care.
8	And then a side benefit is that
9	eventually, if we can demonstrate, that by having
10	this investment, that we have better outcomes,
11	then potentially we can make the case of payers,
12	that we should have additional payments for if we
13	have food insecurity coded or if we have
14	homelessness coded, et cetera.
15	And so that's the argument for the
16	standard collection. But it's really the, can we
17	make a difference with our population and improve
18	health, that resonates.
19	And so I'm just wondering do we want
20	to be more specific here? Are we saying that we
21	think CMS should have incentives for collecting
22	social risk factor data? Should we put forward a

set of standards that we think should be used,
 whether it's the IOM questions, the Accountable
 Health Communities questionnaire.
 Because right now, everyone's doing it

differently. And so we don't really have the
ability to standardly report, as we are saying in
the second bullet. So I just feel like we should
seize the opportunity here to be more specific
and have some action on that one.

10 CO-CHAIR CHIN: A little discussion on 11 this topic. So at a minimum, it sounds like the 12 text, we need to make points about it's not just, 13 like, demographic features, but it's like some of 14 these sort of functional things that you're 15 mentioning, like the food insecurity.

We can reference some of these, the state of the work, some interesting tools, and stuff that's compared for the efficacies and all in the text. So let's just --- a suggestion to think about, should we add more specificity, more teeth to this? And if so, how would you reword it, or what would you want to convey? So

Ignatius? 1 2 MR. BAU: So I was just pulling up the So in the Oregon Medicaid Coordinated 3 reference. 4 Care Organizations, the coordinated care 5 organizations have a 1 percent withhold unless 6 they do complete data reporting that includes stratified race/ethnicity and stratification of 7 8 their quality measures by race and ethnicity. 9 So again, that's already been improved 10 by CMS. I don't think you want to be that But that could be a full example. 11 specific. 12 CO-CHAIR CHIN: Thanks, Ignatius. 13 Michelle, you have a lot in your head, so do you 14 have any specific suggestions on ways that you 15 might bolster this? 16 MEMBER CABRERA: I agree with everything Nancy said. I just think it's a 17 18 project, frankly, that flows out of this, to 19 figure out what our recommendations would be and 20 who you could hire, hearing from a lot of folks 21 about, and particularly the measure developers on

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what could be helpful to them, us, and sort of

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figure out what that middle ground is.

2	CO-CHAIR CHIN: Well, one more
3	possibility is the wording is sort of general
4	like this. There are a lot of specific examples
5	in the text. And so, Nancy, if you had a menu of
6	examples, like the policy tools that are
7	possible, so it may not be that we'd want to have
8	a specific recommendation from our committee, but
9	here's a list then of things that have been tried
10	that need to have further consideration, that
11	type of thing. So if you email staff, that'd be
12	great. Anyone else on slide 1? Oh, Helen, yes.
13	DR. BURSTIN: I actually had a
14	different comment, but I do want to build on what
15	Nancy said. And I do think invest is, again,
16	quite a passive verb for something this important
17	in a roadmap.
18	So I mean, whether it's, you know
19	support and incentivize the collection and use
20	of, or something like that, I think something
21	stronger here, even without a lot of specifics, I
22	think is required. Because otherwise, it just

looks like --- it doesn't feel much of a roadmap. 1 2 CO-CHAIR CHIN: Yes, support and 3 incentivize, guys. Okay. 4 DR. BURSTIN: Right. Support, 5 collect, and figure out verbs, but just --- and I 6 think incentivize is important. The comment I 7 actually going to make is a small one, but I 8 think it's important. And it'll sound strange 9 coming from me, but it's really not about measures, it's about measurement. 10 11 And then a lot of this isn't just 12 about saying here's a measure, here's a measure, 13 here's a measure, here's a measure. It's really 14 about a whole approach, that equity needs to get woven into measurement, so small but I think 15 16 important. Yes. 17 CO-CHAIR CHIN: Maybe this sort of 18 dovetails with the point about the roadmap and 19 the five equity domains, Romana's point about it 20 being sort of a process of improvement. Again, 21 reflecting both the NCQA report as well as well as the NAM report. Anyone else for ---22

1	MEMBER SCHOLLE: This is Sarah.
2	CO-CHAIR CHIN: Go ahead.
3	MEMBER SCHOLLE: Yes. This is Sarah.
4	On that point about data collection, one way to
5	strengthen that would be to tack it up to the
6	collection of standardized data, collecting it
7	directly from individuals rather than imputing it
8	or so that the information is both collected
9	directly from the individual and updated
10	regularly if it's something that could be
11	updated, like the food insecurity or something
12	you don't just ask once. You ask that over a
13	period of time.
14	CO-CHAIR CHIN: Thanks, Sarah. Anyone
15	else on the phone for slide 1 before we go to 2?
16	It's one of these.
17	Sorry, I thought that was an old one
18	up there.
19	MEMBER NERENZ: Sorry, on the bottom
20	bullet, two questions. One is I just have a
21	little caution that in some ways this is out of
22	our scope. Now, we can go ahead and make the

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point anyway, but if we say that Measure X, Y, or 1 2 Z should not be used, that may conflict with the recommendation from a different standing 3 committee saying that more of X, Y, or Z should 4 5 be used. So there's just going to have to be a little care and caution with how we frame that. 6 7 And I'm just wondering, do we have a couple 8 of tangible examples in mind of measures that 9 would be under this concept? Which measures specifically do we have in mind that do not 10 11 promote equity? Now, if the answer is 80 percent 12 of them don't, then, oh, okay. CO-CHAIR CHIN: Yes. 13 It was Tom 14 Sequist who made the point. And I think his point was more generally that -- because Bob's 15 16 point about measurement burden so that -- and 17 Michelle's made the same point, that it's going 18 to be an uphill battle getting anything added. 19 So I wonder if, it may be the easy fix is basically reduce the use of measures that 20 21 basically no longer are serving a core --- equal 22 in value because they've been maximized, topped

1 out, or ---2 MEMBER NERENZ: Okay. But that's 3 different. 4 CO-CHAIR CHIN: Yes, yes. 5 MEMBER NERENZ: I'm much more 6 comfortable with that. Then we just say how do 7 you make room for more? Well, you get rid of 8 something. 9 CO-CHAIR CHIN: Yes. 10 MEMBER NERENZ: But you don't necessarily get rid of it specifically because it 11 12 doesn't promote equity. You get rid of it 13 because it's bad for three other reasons. 14 CO-CHAIR CHIN: I think Tom would 15 agree, yes. 16 MEMBER NERENZ: Okay. 17 CO-CHAIR CHIN: Yes. Anyone else on 18 the last bullet? 19 MEMBER CARILLO: Yes. 20 CO-CHAIR CHIN: Emilio? 21 MEMBER CARILLO: Although it's 22 implicit it the various bullets, I think it'd be

good to specify that we're talking about 1 2 implementing health equity measures for the individual and the neighborhood community 3 4 geographic area population, to make that --- to 5 ascertain that we're looking not just at 6 individuals, but at the aggregate that carries all these social determinants. 7 8 CO-CHAIR CHIN: So to get into this 9 issue of, like, who's the target audience for different bullets or points and all. So maybe 10 11 that could be sort of embedded, and the solution, as that's being worked out, of being careful 12 13 about clarity, about the status of, like, to whom 14 that applies. I don't think we've sorted that out 15 16 yet, Emilio. But I think your point's really 17 important that that will need to be figured out, 18 Yolanda, then Bob, then we'll go to the yes. 19 second slide. 20 MEMBER OGBOLU: Yes. I just wanted to 21 piggyback on what Nancy was saying. Because it 22 sounded like she was also speaking to a real

issue for providers in terms of buy-in related to this whole idea of collection of social risk factor data.

I think many reports for years have been saying collect data. But we haven't really addressed a real issue in terms of investing in getting provider buy-in to understand how to use that data in a meaningful way.

9 So we do need to collect data, but we
10 also need to work on helping providers and other
11 organizations understand why this is important.
12 And that may not fit in here perfectly. But I
13 think that's really the root of the challenge of
14 collecting data.

CO-CHAIR CHIN: I think that gets into 15 16 the wider points that both Ron and Michelle have 17 made about the overall roadmap. In some ways, 18 embedded in that is the quality improvement 19 process by which there needs to be, as you said, 20 like, people realizing why there is this data and 21 what do you do about it.

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And so, Bob, and then we'll go to the

1 second slide.

2	MEMBER RAUNER: Yes. Just going to
3	follow-up a little bit on David. And I don't
4	know if you necessarily have to, like, retire a
5	measure, but the clinics regularly struggle with
6	burden where every different organization wants a
7	different report. And they complain almost every
8	time I meet with them about the numbers of things
9	to do. Even in a commercial ACO, you know,
10	you've got Medicare wanting its measures; you've
11	got Blue Cross-Blue Shield wanting its measures.
12	A clinic can really only focus on maybe two
13	to five quality measures at a time. And so you
14	just have to be groups have to be constantly
15	aware of that, that if yours doesn't align with
16	anybody else's it goes back to the alignment,
17	actually, quite a bit too. There's only so much
18	you can ask a clinic to do at any one time,
19	especially an FQHC that's understaffed.
20	And I think that's, for me that's probably
21	one of the biggest things, is just making sure
22	that you're not because it's rare that a

statistician or a regulatory body will ever 1 2 request less data. It's almost always more. But you have to realize that what the 3 4 people on the ground are having to work with sometimes now is probably one of our biggest 5 pushbacks from our FQHCs from our state of 6 Nebraska, what they're asking for. 7 8 CO-CHAIR CHIN: Let's go to slide 2. 9 This is another big one where there's a lot that's embedded in this. 10 11 So while people are thinking about it, 12 start off with one that Ninez raised. And it'll 13 also fit the category of -- we had talked about 14 it some, but there wasn't absolute clarity. And so if you look up from the bottom, 15 16 like, three bullets up, there's a sub-bullet that 17 says: reward some combination of improvement over 18 time, absolute threshold, and reduction 19 disparities. If you use reduction disparities they must also include absolute thresholds. 20 21 This is a hard one. Like, I think 22 there was clear agreement that people wanted to

include, like, improvement over time as part of 1 2 things. I also heard that, at least Susannah made a point that if you do look at disparities 3 reduction -- I think Philip made the same point -4 - that you also have to look at the absolute 5 threshold, because you don't want to have a race 6 7 to the bottom. But it's, like, the high performing group performing lower so you reduce 8 9 your disparities that way.

How about mixing this together? 10 Ι don't think we had clarity about that. 11 So the 12 last one is currently the vague worrying about 13 reward some combination, improvement over time, 14 absolute threshold, reduction of disparities, and 15 then the point about the protection of, if you 16 use the disparity reduction, then you also have the absolute thresholds. Can this be improved? 17 18 Okay, so I think Michelle had ---19 Michelle, then Nancy, then Bob. 20 MEMBER CABRERA: So a couple of 21 comments. One, on Bullet number 2, I'm wondering

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if our intention is to say for an organization

that serves any individual with a social risk factor, or is this intended to speak to those organizations that have volume on folks with social risk factors? So it's just a question on our intention.

6 The other one is, and I think this is 7 --- I think it's entirely missing. But I could 8 be wrong. I think we need to include evaluation 9 of existing or proposed payment reforms for their 10 impact on disparities and equity.

11 So it's a very different thing. 12 Because, again, it goes to that notion that for 13 some folks, in pursuing the triple aim, they 14 assume that elevating quality includes, you know, 15 means elevating quality for everyone when we know 16 that's not necessarily the case.

17 CO-CHAIR CHIN: Yes. So the second 18 one first. So I think, like, my guess is that we 19 can all agree that that should be done, the 20 existing programs, looking for whatever the 21 consequences are, with some stronger statements 22 that --- but really what should be done is sort

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of these things about proactively trying to
 reduce disparities. But we can make sure that
 the text has that in there also.

Your first point then, about, like,
the second bullet, does it mean any institutions
serving individuals with social risk factors or
those with large percentages? So any discussion
upon that particular point that Michelle has
raised?

I think it's an 10 MEMBER GARRETT: 11 interesting question, Michelle. I feel like 12 yesterday we were often discussing about organizations with a high proportion of people 13 with social risk factors. The fact is that 14 healthcare is very stratified in our country. 15 16 And so you end up with high concentrations of at-17 risk populations. So it's kind of the reality 18 that we're dealing with.

However, policies that would provide
augmented payments of some sort, regardless of
your threshold level, actually would probably be
more likely to be passed. Because then

everybody, you know, benefits in some sense. Or
 everyone can participate.

So if you think about, like, the DSH 3 4 payments there's, you know, even if you have a 5 fairly low level of Medicaid patients, you still 6 might be getting some small amount. So I think 7 it's kind of a policy question. And maybe we 8 leave that open. Because I could see both 9 arguments. 10 CO-CHAIR CHIN: Helen, you want to 11 comment on this issue? 12 DR. BURSTIN: So, I mean, I think it's somewhat related. I mean, number 2 we took 13 14 directly out of the NAM report, as I recall. And 15 so that language, in some ways is very 16 duplicative of Bullet 3 which was, I think, our 17 original thinking. And I wonder if we're trying 18 to sort of fit a square peg into a round hole 19 here. 20 I think we're seeing the same thing in 21 the third bullet, maybe more simply without 22 trying to get into this issue of, you know, what

proportion of people with social risk factors. 1 Ι 2 mean, it's just redesign payment to support health equity. And then, you know, I'm not sure 3 4 the adjust payment is necessary. 5 CO-CHAIR CHIN: I think they are different. 6 But, I mean, the equivalent of the 7 NAM was, like, they had one about, like, redesign 8 the incentive programs separate from direct 9 payment. 10 DR. BURSTIN: Okay. I'm not sure I 11 changed that. 12 CO-CHAIR CHIN: So, so far I hear, 13 like, the discussion with Nancy is maybe pass in terms of a formal recommendation. 14 15 MEMBER GARRETT: Recognition that, 16 again, because of the way the population's 17 unevenly distributed across providers, we really 18 do have to pay attention to the safety net 19 providers where they have a high proportion of 20 people with social risk factors. 21 And I mean, the fact is that low 22 levels of reimbursement through Medicaid is a

health equity issue. We are not spending the 1 2 same resources on those populations that we are on commercial populations. And that's a health 3 So what can our committee do to 4 equity issue. 5 make recommendations to start to remedy that? Do you think, like, 6 CO-CHAIR CHIN: later on when we have a, like, I think it's the 7 8 third strategy about the safety net 9 organizations, that adequately addresses that Or do you think any wording needs to be 10 issue? 11 changed in the second bullet? 12 MEMBER GARRETT: I really like that 13 it's consistent with the National Academy of 14 Sciences report. I think that's a really 15 important recommendation. And it's different than risk adjustment. I agree with you. 16 So I 17 think we should leave it and keep it consistent. 18 And then I haven't had time to digest the 19 next one. So when we get there, we can talk 20 about it. 21 CO-CHAIR CHIN: Okay. Okay, why don't we move on to, I guess, I think it was Ron and 22

Bob then.

2	MEMBER COPELAND: Yes. I was just
3	going to concur with what Nancy just said
4	regarding, really, 1 and 2. And then I think
5	there is a distinction between number 2 and
6	number 3. At least in my mind, in number 2, we
7	were talking about an organization at any level
8	having to demonstrate how much of its population
9	that it manages are folks that have measurable
10	social risk factors, however that would be
11	defined.
12	And on the basis of that adjustment,
13	payments would be to the organization just on
14	what you're starting the game with. When you
15	get to this redesign stuff, now you're talking
16	about, okay, you've already gotten paid or you're
17	adjusted for having a more high risk population,
18	if that's the case. And now our focus is
19	switching to what are you doing for improvement
20	of care outcomes?
21	And then what's the process or what's
22	the framework we use to evaluate or compensate

you for performance improvement as opposed to you 1 2 have a higher risk population. There are two aspects -- but one based on the makeup of your 3 population. The second one is rewarding and 4 5 recognizing performance improvement and what aspect of performance improvement do you want to 6 particularly incentivize? 7 8 CO-CHAIR CHIN: Now to, what you 9 mentioned, this redesign payment model, so any of those subbullets, do people have any suggestions 10 11 or comments on any of them? Bob? 12 MEMBER RAUNER: Yes, that's what I was 13 going to comment on. One thing I would add is we 14 talked a little bit yesterday about prioritization of the measures with the greatest 15

Eduardo Sanchez mentioned blood pressure control as probably, if you could pick one measure of all the UDS measures or all of the MSSP measures, it probably would have the greatest impact on health. So I think some prioritization on blood pressure control,

impact.

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obesity, or vaccinations, or the focus of the
 things that would make the biggest impact to
 control health or improve health.

So there is this issue CO-CHAIR CHIN: 4 5 of, like, I believe we have some time to go back to those disparity-sensitive criteria. 6 So you're 7 suggesting that, somewhere in one of these 8 strategies, what's the most appropriate to 9 prioritize health equity measures based upon some criteria such as it provides a disparity 10 sensitive measure? Do people want to do that? 11 So basically, saying that we should 12 13 prioritize health equity measures that meet some 14 type of criteria that, hopefully, we'll have a chance to go back and revisit? Romana? 15 16 MEMBER HASNAIN-WYNIA: Yes. I support I think that's a great idea. 17 that 100 percent. 18 I think we should have, like, you know, two, 19 three at the most, that we actually prioritize. 20 Because I think organizations will respond to 21 that, especially if they already have some level of infrastructure in place. So, David and I were 22

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1 talking about this last night.

2	So whether it's on blood pressure
3	control or thinking about something like diabetes
4	and looking at individuals with pre-diabetes, and
5	moving them into some kind of a DPP or
6	Medicare is paying for that.
7	So, I mean, something along the lines
8	where there is a broad impact and reach on
9	measures where we know disparities are very
10	prevalent, I think it would go a long way.
11	Because what I worry about with the roadmap,
12	and having a lot of aspirational goals, is
13	aspirational gets read as, we don't have to do
14	this right now, versus, Here's something that you
15	can do right now.
16	So, you know, you asked about, based
17	on certain criteria. I think obviously, you
18	know, prevalence of disparities, potential for
19	impact, and whether there are processes and maybe
20	some payment infrastructure already in place,
21	such as paying for DPP.
22	CO-CHAIR CHIN: Well, why don't we

have separate bullets. Because Bullet 6 here, 1 2 which is use high priority equity measures, and there could be some additional language about 3 4 what makes it a high priority measure based upon 5 the existing prior NQF report. And hopefully, we'll have a chance to basically update that 6 later in the hour. 7 That work, Bob? Okay, great. On the comments upon Bullet 3, so turn 8 9 back to that last subbullet, the one about the combination of improvement, threshold, reduction 10 11 of disparities. Can that be improved, that 12 statement? Or is that where we ended up? 13 David, you're sort of, like, an 14 auctioneer in terms of, like, the subtle so ---15 (Laughter.) 16 MEMBER NERENZ: Well, this is about 17 the third bullet in general, not one of the 18 subpoints. One thing that's missing here, but I 19 almost hesitate to bring it here, it could be 20 some sort of adjustment to the fundamental 21 building blocks of payments themselves, DRG 22 payments, outpatient fee-for-service payments in

1	Medicare, episode payments, I don't see it
2	implied here.
3	But in a lot of our thinking about,
4	you know, how we see the equity and disparity
5	problems we see, we have very commonplace
6	examples.
7	It takes two days longer to discharge
8	a patient who has no place to go. And now that's
9	a DRG payment issue. Or you've got a patient
10	with low literacy in the office, you're
11	explaining the new drug regimen, and it takes you
12	a half hour longer, and you still don't
13	necessarily get it. You know, that's a visit
14	complexity issue.
15	So we have very tangible things. You
16	could say, you know, maybe the criteria for
17	billing a Level 5 E&M visit could be tweaked so
18	that social risk factors become acceptable
19	criteria.
20	But we're just not talking about that
21	here. Now, maybe we say that's not in the NQF
22	scope, but we're talking about changing opinion

1	models. So it seems like it's in the game
2	somewhere.
3	CO-CHAIR CHIN: Do you have some draft
4	language, just as a starting point, that the
5	staff can play with?
6	MEMBER NERENZ: I'll give you one in
7	30 seconds.
8	CO-CHAIR CHIN: Okay. Yes, whatever.
9	MEMBER ALBERTI: So I agree with
10	Romana in making sure that we have a limited
11	number of metrics or measures that we're
12	targeting.
13	And I think another additional layer,
14	in addition to thinking about, you know, the
15	potential impact and prevalence of an inequities
16	in the evidence-based interventions, already
17	exists.
18	It could be to crosswalk those domains
19	with where healthcare distributors are currently
20	getting hit the hardest in terms of the penalties
21	or the lack of money they're receiving to
22	actually double the incentive to do this work.
<u> </u>	

Because there's a real chance that they'll save
 some cash.

And then something that's missing that 3 was on, I think, previous versions of this slide, 4 was ensuring that the flow of these payments go 5 towards SDOH. Or there was something about that. 6 7 And so rather than bring that back, I wonder if it's an opportunity to, you know, tie the 8 9 advanced payment to the culture/structure, the 10 partnerships, to make sure there's some contingency on the money that's going towards the 11 12 kinds of things that support the appropriate, you 13 know, the ability to measure or, you know, 14 whatever those things might be. CO-CHAIR CHIN: Support for the -- so 15 16 that things could be added. On this conception, 17 you think about, like, you have P4P, you have the 18 capitated or upfront payments to do general

19 infrastructure, and then a sort of -- related to 20 that is what you're saying in terms of the 21 upfront or capitated payments to address some of 22 these broader social determinants. But we can

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make it explicit.

2	Any other thoughts on slide 2? I'm
3	going to assume then that that last bullet about
4	combinations, that's the best we can do in terms
5	of that. Yes, Christie?
6	MEMBER TEIGLAND: Yes. I'll just make
7	one comment on, you know, the absolute
8	thresholds. I think they're still sort of built
9	in. I mean, if you think about how CMS does the
10	quality measures, the five star quality measures,
11	or URAC is doing their accreditation, for
12	example, you know, they have you still have
13	your rates from worst to best, right.
14	And so that whoever is doing the best
15	is your top threshold. And you're still measured
16	against that. But what the improvement measures
17	are trying to get at are those people who are
18	more in the lower levels.
19	And they're making progress, but
20	they're not up at the top. Their goal is the
21	top. And the top keeps shifting up, by the way,
22	as long as you have, you know, constant attention

2	And then the bottom, you know, the
3	threshold kind of takes care of itself or CMS,
4	for example, is saying you're not going to get
5	you're not going to be a you can't be a
6	contract anymore, right. They're taking away
7	their rights.
8	So maybe the bottom is important. But
9	I don't know if we need to put that here. You
10	know, I think it's baked in. So I don't know
11	that we we can probably clean that up, I
12	think.
13	CO-CHAIR CHIN: Well, like, there are
14	other programs, some end-stage renal disease
14 15	other programs, some end-stage renal disease programs. They do the same thing, where some is
15	programs. They do the same thing, where some is
15 16	programs. They do the same thing, where some is absolute, some is improvement. So they have
15 16 17	programs. They do the same thing, where some is absolute, some is improvement. So they have these combinations out there. So go to slide 3,
15 16 17 18	programs. They do the same thing, where some is absolute, some is improvement. So they have these combinations out there. So go to slide 3, actually on the health
15 16 17 18 19	programs. They do the same thing, where some is absolute, some is improvement. So they have these combinations out there. So go to slide 3, actually on the health MEMBER FISCELLA: Can I have one more
15 16 17 18 19 20	programs. They do the same thing, where some is absolute, some is improvement. So they have these combinations out there. So go to slide 3, actually on the health MEMBER FISCELLA: Can I have one more comment.

1	MEMBER FISCELLA: Yes. Invest in
2	primary care and preventive care for individuals
3	with social risk factors, that seems a bit vague.
4	I mean, that could be construed in lots of ways,
5	obviously. You know, it'd be great if we could
6	invest more in the infrastructure and primary
7	care. And I think that's an important point.
8	But I think an additional point beyond
9	that is the issue I brought up yesterday about,
10	you know, value-based design. And, you know,
11	it's at-risk right now with the ACA, and, you
12	know the potential repeal, which is that proven
13	and effective cures right now don't have
14	deductibles, or co-payments, and the whole issue
15	of applying that to drug payments gets out of the
16	way to reduce financial barriers for patients who
17	are low-income.
18	And I think that's an important
19	strategy, particularly as we move into higher
20	deductibles. I saw something the other day that
21	said that the current plan on the books that the
22	House approved would raise deductibles by 51

percent. And I think it's likely that 1 2 deductibles, for whatever reason, will continue 3 to go up. 4 So I think we need to say something 5 more explicitly about that in terms of use of value-based design to address the cost issue for 6 7 proven interventions, including access to primary 8 care. 9 We want more people to come into 10 primary care. And access to primary care in this country is not as good as it is in other 11 12 countries and probably has lots of downstream effects because of that. 13 14 CO-CHAIR CHIN: Yes, Kevin, thanks for raising that point. And could you also email 15 16 staff some draft language for that? Kevin's 17 point was, like, these value-based payment plans 18 where if it's good evidence base, then it's 19 better covered by insurance plans, so lower out 20 of pocket costs for the beneficiary. 21 So Kevin's point being that then high 22 quality care can be more affordable, then, to the

1	beneficiary. So that'd be great, Kevin, if you
2	can email staff some language.
3	MEMBER FISCELLA: Will do.
4	CO-CHAIR CHIN: Anyone else on the
5	phone for
6	MEMBER BERNHEIM: This is Susannah.
7	CO-CHAIR CHIN: Yes. Go ahead,
8	Susannah.
9	MEMBER BERNHEIM: The, just quickly,
10	on the second subbullet under the third bullet,
11	the pay for performance on equity measures piece,
12	I don't think anybody said this again. I
13	mentioned it yesterday.
14	I think it's important that we have a
15	caveat for this, that we somehow say, you know,
16	pay-for-performance on equity measures but ensure
17	that we don't reward, you know, narrow gaps in
18	care when there's overall poor quality so, again,
19	trying to avoid the situation where you do
20	terribly with all of your patients, right.
21	So if an equity measure is a this
22	really about when we're using stratification as

an equity measure, but I think it's an important 1 2 concept sort of to balance equity with avoiding incentivizing poor care for everyone. 3 4 CO-CHAIR CHIN: So, Susannah, you'll 5 be very proud that, if you look at the third 6 bullet from the bottom, there's the Bernheim 7 clause: If you use reductions in disparities they 8 must also include absolute thresholds. 9 MEMBER BERNHEIM: God. Okav, so I didn't understand that that's what you meant by 10 11 absolute thresholds. But that's fine. I think 12 that works fine. Great, sorry I missed it. 13 CO-CHAIR CHIN: Oh, no problem. If 14 it's not clear, if you have better language, please email staff. 15 MEMBER COOPER: So this is Lisa. 16 Ι 17 just wanted to say one more thing. And it might 18 have been said, and I missed in all of what was 19 going on with that third bullet from the bottom. 20 I think, if they use reductions in 21 disparities, and/or they use improvement over 22 time, they should also include absolute

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thresholds. Don't you think? I mean, if you 1 2 have improvements over time, but you're not reaching a threshold, you still need to use the 3 4 absolute threshold, right? 5 CO-CHAIR CHIN: Here's the discussion 6 that I was hoping that we'd have. So the 7 argument against that is that say you're --- a 8 safety net hospital has a really high population. 9 There's just no way you're going to be able to 10 get up to ---11 MEMBER COOPER: For them to ever reach 12 the ---13 CO-CHAIR CHIN: Right. So if you 14 required both, well, if you have what you suggested, Lisa, where if you improve, but you 15 16 don't improve enough, and you devolve down to the absolute threshold level, that would be a 17 18 disincentive. I can imagine combinations where 19 you reward a combination of improvement over 20 time, plus something for absolute threshold. 21 MEMBER COOPER: Yes. 22 CO-CHAIR CHIN: So it's where that's
pretty complicated. That's why that first phrase 1 2 is kind of vague there about some combination of. Okay. 3 MEMBER COOPER: I got it. 4 CO-CHAIR CHIN: Michelle? 5 I mean, in some ways, MEMBER CABRERA: 6 I think this is about trying to encourage folks 7 to go aspirational, right, and the fact that we 8 don't really know what we are going to be able to 9 fix with this tool of payment reform. And so I do think we have to have a 10 11 little bit of an open mind. And while the 12 absolute threshold goals are important, it's going to take some time to understand what's 13 14 moving the needle on some of this stuff and what 15 the impacts are going to be. And that's okay. Ι 16 mean, this is ---17 CO-CHAIR CHIN: Okay. So, Nancy, was 18 yours from the --- pass, and then you're up. 19 So Nancy, Philip, and then Traci. Okay. 20 MEMBER GARRETT: So I just --- I think 21 this is that concept of add-on payments for 22 social risk for the outpatient setting. I think

that's what this is supposed to be. So I guess I 1 2 would just more specific that CMS should add on payments for social risk for outpatient-enabling 3 4 services. 5 So it's not --- so this just doesn't mention social risk. And that was kind of ---6 7 that was the concept is it's an add-on payment 8 for social risk just like they did for hospital. 9 CO-CHAIR CHIN: Yes. I think, like, 10 those are two related and different concepts. 11 Remember, like, at the end of yesterday, there 12 was this general discussion about outpatients. 13 And I remember Bob made the point that, like, all 14 the money's in inpatients, so that just outpatient is just not a priority for different 15 16 folks. And so they are two related but separate 17 points, so let's see. 18 MEMBER GARRETT: So maybe there should 19 be a different bullet about add-on payment 20 I'm not sure if it appeared anywhere concepts. 21 else yet. 22 CO-CHAIR CHIN: Sure. So it'd be add-

on payments for patients with social risk 1 2 factors? 3 MEMBER GARRETT: Yes, in the 4 outpatient setting. 5 CO-CHAIR CHIN: Okay. So let's see, so is it a separate one is just sort of a 6 subbullet under either the last one or the first 7 8 Or maybe it applies to so many of them that one. 9 we just have a separate bullet? MEMBER GARRETT: It could be a 10 subbullet under the second one, definitely. 11 But 12 it's a specific example, but I just don't want it 13 to get lost. Because I think it's something --14 CO-CHAIR CHIN: Yes. 15 MEMBER GARRETT: -- that would fit 16 into the current policy context that we should 17 really be talking about. 18 CO-CHAIR CHIN: So is it a subbullet 19 under the second one or, like, an example in text 20 type of thing? Maybe a subbullet under the 21 second one? 22 MEMBER GARRETT: I think under Yes.

1 the second one.

2 CO-CHAIR CHIN: Okay. Maybe a subbullet in the second one. 3 Okay. Philip and 4 Traci. 5 MEMBER ALBERTI: Just an idea for that final subbullet, the combination one. 6 Maybe it 7 would make sense for us to give two or three 8 different scenarios, like, concrete scenarios of 9 threshold improving disparity, not disparity improving threshold saying the same. And just, 10 11 we don't have to append dollars to it, but to 12 give some texture to what we actually mean by 13 this might be helpful. 14 CO-CHAIR CHIN: And can you describe 15 your example in more detail? 16 MEMBER ALBERTI: So what would the reward be for an institution where the absolute 17 18 threshold is unchanged or minimally changed? But we actually see some reduction in the disparity 19 20 metric, right. So what would that look like? 21 Or a situation where there is, you 22 know, overall quality improvement for everybody

in the population, but the disparity is just as 1 2 wide as it always was? So, I mean, we could just give two or three different scenarios and think 3 4 through what that kind of reward system would be. CO-CHAIR CHIN: So maybe it's, like, 5 most examples of the third from the bottom 6 7 subbullet, the one about rewards and combination 8 improvement over time, absolute threshold, 9 reduction of disparities. So there, talking about examples of how you might reward more for 10 11 certain --- okay. Traci, then we'll go on to the 12 third slide. So this is more so a 13 MEMBER FERGUSON: 14 comment. And I don't know if this is something that we would be able to do for the report. 15 But 16 with the linked health equity measures to 17 accreditation programs, would it be possible to 18 include statements or their prior strategies, if 19 it's NCQA, URAC, where they are already aligned 20 with this, so that we have a better buy-in? 21 That we will speak to them to include as of, you know, better uptake to the end 22

I	
1	customer, CMS, that we've already gotten, you
2	know, this aligns with what NCQA is already doing
3	with patient-centered medical homes and, you
4	know, things like that. Could we add a little
5	bit more to that section?
6	CO-CHAIR CHIN: That's a great example
7	of, like, what staff has asked for, any specific
8	examples, or practical implementations,
9	suggestions we have. So when they write the
10	report, it could be more actionable and more
11	practical. So that would be a good example where
12	you'll maybe you could email staff those
13	specific examples, and that could be included in
14	the text on that particular part.
15	So let's go to slide 3.
16	MEMBER SCHOLLE: This is Sarah.
17	CO-CHAIR CHIN: Go ahead, Sarah.
18	MEMBER SCHOLLE: I wanted to make a
19	comment about slide 2 and slide 3. Because I'm
20	looking I've been looking at them in tandem
21	and wanted to just try to understand, if we can
22	clarify for the audience of this report, why some

things return in slide 2 and others in 3. 1 2 Because if you look at it, in some ways it could seem like it's not contradictory but it's not a 3 4 complete sent message. So, for example, the first bullet 5 under the Strategy 3 slide says risk adjust for 6 7 social risk factors and stratify performance 8 score. Where, in the previous one it was about 9 risk adjust for payment. So is this different from the previous slide? 10 11 And the same thing about the comparing organizations to peer organizations. 12 This could apply. It's not just for safety net 13 14 organizations. It applies more broadly for 15 organizations that are serving the proportion of 16 their membership or their patients who have social needs. 17 18 So I wonder, I guess I missed the 19 conversation about having a separate strategy 20 that focuses just on organizations that 21 disproportionately serve individuals with social risk. 22

1	I like that. What I wonder though is
2	whether some of the things that are in this
3	Strategy 3 slide should be in Strategy 2. And
4	instead, in Strategy 3, it should focus more on
5	supports that would only apply to those
6	organizations that serve a preponderance of
7	people with social needs. I'm trying to
8	understand the logic here.
9	CO-CHAIR CHIN: That's a great point.
10	I think you're right, that the intent was that
11	the committee thought that the safety net might
12	need additional support or that the general
13	provisions that might apply to a broader set of
14	organizations may not be sufficient for the
15	safety net. I mean, that's the intent.
16	Maybe what we can do is we can go
17	through Slide 3 so people understand Slide 3.
18	And then we can revisit your question about does
19	it make sense. All the points you made, Sarah, I
20	think are very important. So let's look at Slide
21	3, march through it, and then revisit Sarah's
22	point about does this really make sense now, or

1	does the way it is need to be reconfigured. So
2	Slide 3 is open now for discussion. Ninez?
3	CO-CHAIR PONCE: Well, perhaps an easy
4	fix, from hearing what Sarah said, would be to
5	move the first two bullets to Strategy 2. I
6	don't know exactly where. But we would
7	Because that's a, those two are
8	general approaches, and not necessarily what I
9	think Strategy 3 is, is about being protective of
10	institutions in this country that serve
11	predominantly vulnerable populations who have
12	social risk factors. Whereas one since the
13	first two are a general approach.
14	CO-CHAIR CHIN: So, the number one in
15	some ways I think that would be not controversial
16	at all. That's already in there. The number
17	two, we haven't really talked about regarding
18	everyone, the one about like comparing
19	organizations to other organizations.
20	This came in like Susannah's
21	discussion, where she talked about like the, I
22	guess what's in the Cures Acts, for the

readmissions. How there's comparison of 1 2 hospitals within peer groups. So, we didn't talk about that as a 3 4 So, maybe that's, so maybe flesh out that group. 5 second bullet. So, like what do people think 6 about the second bullet, as it pertains to the safety net, as well as more generally, in terms 7 8 of should it apply to all organizations? And, 9 Ninez, go ahead. 10 CO-CHAIR PONCE: Go ahead. 11 CO-CHAIR CHIN: Yes. Who was on the 12 phone who spoke up? 13 MEMBER BERNHEIM: It's Susannah. But 14 I can wait. It's always hard to know how to get 15 in queue. But just let me know when it's a good 16 time. 17 CO-CHAIR CHIN: Why don't you go. 18 We'll then have Ninez. And I think Nancy's on a 19 different topic. Or, okay, we're going to 20 Susannah, Ninez, and Nancy. 21 MEMBER BERNHEIM: So, I would, I'm not sure who just spoke about the idea that these 22

first two bullets belonged on Slide 2. But I'm
 concerned about that.

3	And this comes back to a common theme.
4	But it's one that I think is important, which is
5	risk adjusting for risk factors doesn't promote
6	equity, except to the extent that it is
7	protecting safety net institutions, right.
8	It's not encouraging anyone to do a
9	better job. It's just preventing us, if we think
10	that the measure is unfair. And so, it belongs
11	more with a concept around supporting these
12	organizations.
13	And similarly, doing peer grouping.
14	Again, it's more around who your comparison group
15	is. And in certain circumstances, when it makes
16	sense, to make the comparison group related to
17	the kinds of patients you serve. And I would
18	argue that that sometimes makes sense, and it
19	sometimes doesn't make sense.
20	But when we're doing that, and we're
21	changing the comparison group, it's not promoting

health equity except under this topic, which is

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that it is supporting the organization that serves those individuals. So, if we're going to have these two bullets, I feel pretty strongly they belong under this strategy, rather than the first one.

6 And the other thing I said earlier 7 that I'll just repeat here is, I would like to 8 see us say something about the context in which 9 you use these strategies. Because I think these 10 are the strategies that risk us veering down a 11 path that's around sort of classifying certain 12 organizations.

13 And mostly feeling like our health 14 equity strategy is to sort of separate the safety net hospitals and protect them, which I don't 15 16 think is -- you know, the best way to improve 17 equity is to strain some safety net 18 organizations, and create incentives. You give 19 them support through some of the other things that are here and incentives. 20 21 And so, the slide before is around the

incentives. And this, I think these two bullets

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belong on this slide. And they belong with
 something that says sort of, you know, as a
 secondary approach, in addition to, you know,
 direct support and incentives, which are stronger
 approaches. What we're really aiming at is
 health equity. So, I'd like to see these kind of
 conditional.

8 CO-CHAIR CHIN: Can you go back to 9 slide 1 and 2. Can we go back to 1 and 2, just to make sure we know where things are? So that -10 So, Slide 1, you see the second bullet is 11 - yes. 12 the one about stratifying measures for payment 13 and quality improvement. And then the next 14 slide. So, the second bullet has the direct 15 adjustment.

MEMBER BERNHEIM: And maybe thatbelongs on Slide 3.

18 CO-CHAIR CHIN: Which got back to
19 Christy's, Christy and Michelle's question about,
20 like we're talking about disproportionate share
21 hospitals, or any hospital that takes care of
22 patients with social risk factors, which at that

point we punted and said, let's keep the language 1 2 as it is, because it was the same language that was used in the NAM report 3 4 MEMBER BERNHEIM: But maybe it goes 5 under support, which is Strategy 3, as opposed to incentivize. 6 7 CO-CHAIR CHIN: So, what do people 8 So, Philip? Actually, first Ninez, Nancy think? 9 and Philip. Get some more thoughts out here. 10 CO-CHAIR PONCE: Yes. Just, Susannah, 11 that was me who suggested to move those two. But 12 again, open to hearing what others have to say. 13 I just wanted to point out for 14 clarification, the peer -- If you can go to 15 Strategy 3, please? The second bullet, and 16 consider comparing organizations to peer 17 organizations was one of the strategies we 18 proposed for the SDS, not social, and Risk 19 Adjustment Report. 20 I can see that that applies more for 21 protecting safety net providers. Because then 22 you're comparing, you know, within the peer

organizations. But I think there's going to be
 some cleanup afterwards.

But I just have a sense that it's, the first two are different. They're strategies across the health system to look at fair payment. And so, that's why I think that could be incorporated in either 2 or 1.

8 MEMBER BERNHEIM: But they aren't 9 strategies that incentivize equity. They're 10 strategies that support the safety net.

11 CO-CHAIR PONCE: I think, sorry, this 12 is Ninez again. I think it could also reveal 13 that, you know, that hospitals that are being 14 paid without the social risk factor adjustment 15 could do better if, you know, are not doing as 16 well in accounting for social risk factors.

17 So, it's not just are we unfairly 18 valuing the work with the current reimbursement 19 mechanism? But it's also I think illuminating 20 where some of the other providers who are doing 21 well currently, could be doing better in 22 addressing social risk factors.

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1	CO-CHAIR CHIN: Let's get some
2	additional thoughts out here. So, we have Nancy
3	and Philip.
4	MEMBER GARRETT: Yes, this is Nancy.
5	I just wanted to kind of follow on Ninez's point.
6	I think I disagree with what Susannah, with what
7	you were saying about the risk adjustment for
8	social risk factors is not a health equity issue.
9	And the reason I say that is because
10	plain and out, the reason for the original NQF
11	Committee was a lot of rising concern that money
12	is being moved away from safety net providers,
13	and to other providers.
14	And if you play that out the impact is
15	that the populations that are most vulnerable are
16	not getting the investment that they need to
17	improve their health. And so, to me that is a
18	health equity issue. It's not about the
19	provider. It's about the patients.
20	And that's the reason that it's such a
21	concern, and why we opened up the door to start
22	looking at this. So, I think I would just kind

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of disagree with that overall point. But --1 2 MEMBER BERNHEIM: I want to let other people talk But I want to make sure that what I 3 said was clear. 4 Because I don't want to be 5 misunderstood. Protecting safety net providers, and 6 making sure people feel like measures are fair is 7 8 absolutely a health equity issue. I'm saying, 9 it's not a mechanism to incentivize decreasing disparities. It's not a mechanism. It will 10 11 support health equity by supporting those 12 institutions. 13 So, I absolutely agree with the health 14 equity issue. I'm just suggesting that it's under the correct strategy. That it sits as part 15 16 of how we support these providers. That it 17 doesn't create a new incentive. 18 And Slide 2 is about incentives. So, 19 I'm just, I'm not saying it's not a health equity 20 I'm going, I'm trying to separate issue. 21 incentives versus support. 22 CO-CHAIR CHIN: So, one edit right

1	now, so go back to Slide 2. So, do people agree
2	then with moving, Susannah's suggestion to move
3	Bullet 2, directly adjust payment for
4	organizations serving individuals with social
5	risk factors, to Slide 3?
6	What you gain by that is that it's not
7	really an incentive. It's more support for the
8	safety net. What you lose is that if we want, if
9	you wanted vagueness about whether, you know,
10	Michelle's question about does it apply just to
11	safety net, or to all hospitals? We lose that.
12	That goes now to three.
13	So, that's the proposed sort of switch
14	on that one. How do people feel about that,
15	moving Bullet 2 to Slide 3? Romana?
16	MEMBER HASNAIN-WYNIA: I don't really
17	know that we should.
18	MEMBER COOPER: This is Lisa on the
19	phone.
20	MEMBER HASNAIN-WYNIA: Oops.
21	MEMBER COOPER: When you have time.
22	CO-CHAIR CHIN: Romana, and then Lisa.

1 MEMBER SCHOLLE: Yes. And Sarah too. 2 MEMBER HASNAIN-WYNIA: Okay. So, I don't think that we should move Bullet 2 from 3 4 Strategy 2. Because I think that we should be 5 incentivizing healthcare organizations, even if they're not safety nets to, you know, be 6 7 addressing social factors. 8 But to Nancy's point, I think that we 9 also need to, we need to do both. So, I don't think this is an either or. It might be an 10 11 addition, right. 12 So, I don't think that this is a move 13 this away from this, and put it in another 14 strategy. Because I think the intent for both is 15 appropriate, so long as the intent in Bullet 16 number 2, Strategy 2 is to incentivize across the 17 healthcare system. 18 And then I think it was Strategy 3, or 19 wherever it was around the safety net, to support 20 the safety net. Because I agree with what Nancy 21 said, and said very well. CO-CHAIR CHIN: Well, we have, we'll 22

do Lisa, and then Philip, who's cool. He's, as I
 said, he's down, right.

So, I basically agree 3 MEMBER COOPER: 4 with what Romana was just saying. I'm, you know, 5 thinking about the organization that I'm, where I And even though some of the practices may 6 work. 7 not be considered technically the safety net, 8 they do serve a lot of individuals with, you 9 know, that are socio-economically disadvantaged. 10 And if that got moved to a different 11 place, you know, it might get lost. I don't, I 12 also don't see any problem with kind of 13 reiterating certain principles across different 14 strategies. I think it's okay to, you know, 15 because there's some overlapping sort of 16 concepts. And I think they can be reinforced. 17 CO-CHAIR CHIN: So, for example, if 18 you --19 This is Sarah. MEMBER SCHOLLE: I'd 20 like to get in. 21 CO-CHAIR CHIN: So, if we ask you to 22 just duplicate it. So, we copy Bullet 2 and move

I	
1	it to Slide 3 so it's in both, does that work?
2	What does Slide 3 look like again, Slide 3?
3	It's a little different. It's,
4	there's some overlap with number, Bullet 1 and
5	Bullet 3. But a little bit different.
6	MEMBER HASNAIN-WYNIA: You did say in
7	addition to, and reference the bullet on Strategy
8	2.
9	(Off microphone comment)
10	CO-CHAIR CHIN: Okay. So, Philip has,
11	I've been ignoring Philip for the past five
12	minutes. So, Philip.
13	MEMBER ALBERTI: Thank you. So, I
14	think part of the issue is that maybe the overall
15	buckets are unclear, right. And so, I think
16	that's one issue. And I think the other issue is
17	maybe that some of these strategies actually dip
18	into both buckets, right.
19	So, I think, if I understand Susannah
20	correctly, if we keep Strategy 2 towards things
21	that actually incentivize action, right, and
22	those actions are focused on promoting equity.

1 So, that's the idea of tying some of these 2 advance payments to the culture and the structure. 3 This idea of actually rewarding the 4 5 closing or the minimizing of a gap, that's actually incentivizing action that is focused on 6 promoting equity. 7 8 In bucket 3 we might want to just 9 rename it, right, in assuring fairness and building capacity or something, right. 10 These are 11 things that, I think calling our fairness is 12 really important. 13 And so, the strategies that promote 14 fairness might also incentivize action. And I think it's okay if things appear in both buckets. 15 But we then have to sub-bullet it out to say how 16 17 this strategy ensures fairness. 18 And in the other bucket, how this 19 strategy will incentivize action. So, maybe bucket 2 is action, and bucket 3 is fairness and 20 21 capacity building. 22 CO-CHAIR CHIN: What do people think

So, if you basically reword 1 of Philip's idea? 2 the headers on two and, well, two is essentially the same header. Three becomes more of a 3 4 fairness header. What do people think of that? 5 Nancy? Well, I really think 6 MEMBER GARRETT: it's important that we have a strategy that calls 7 8 out protecting the safety net. So, I don't 9 support changing that. I think given all the discussion, and 10 all of what's going on in healthcare, and again, 11 12 how populations are unequally distributed across 13 providers, I think that that's a really important 14 thing for us to do. So, I would not favor that. But I also wanted to make one other point. 15 16 Should I wait? Unrelated. CO-CHAIR CHIN: 17 We'll come back to you 18 in a moment. So, both Hennepin County, and 19 Denver General, Denver Health, yes. 20 (Off microphone comments) 21 MEMBER HASNAIN-WYNIA: So, I completely agree. I don't want to lose the focus 22

on the safety net. In terms of, I'll just stop
 there. I don't want to lose the language that
 focuses on the safety net.

4 MEMBER ALBERTI: To clarify, what I 5 meant by ensuring fairness was ensuring fairness 6 for the safety net. I mean, we could be, 7 exclusively say that. But I'm thinking about how 8 these things in unfairness, that's what I had in 9 mind.

10 MEMBER HASNAIN-WYNIA: So, I agree 11 with that, with the motive there. But I think 12 that this kind of, without saying the safety net, 13 speaks to the safety net. But it also speaks to 14 other entities that may not be the safety net, or 15 be recognized as part of the safety net.

16 So, you know, you can look back at 17 Rushefsky's work and, you know, others that show 18 that primary care practices that are in under 19 resourced communities, and serve a high number of 20 patients with, you know, many social risk 21 factors, may not be part of the formal safety 22 net.

1	So, I like the language here because
2	it implicitly calls out the safety net, but
3	leaves it open also to others that
4	CO-CHAIR CHIN: So, thinking of
5	timing. We're supposed to break at 11:45 a.m.
6	And I think we should probably devote at least 15
7	minutes to the, going back to the disparities
8	sensitive measure issue, in terms of updating
9	those criteria.
10	So, we need to finish like these four
11	slides in the next 20 minutes. So, we'll do
12	Ignatius, Ninez, Tracy, Nancy.
13	MEMBER SCHOLLE: And Sarah.
14	CO-CHAIR CHIN: Sarah.
15	MR. BAU: So, I wanted to piggy back
16	on that comment, and propose that we actually use
17	safety net providers, rather than organizations.
18	Again, in MACRA there's a recognition of the role
19	of solo and small group practices, which
20	historically, again, especially minority and
21	under resourced communities have been part of the
22	safety net and never recognized.

1	And then I did want to call out, if
2	smaller practices are sort of included
3	potentially in these kinds of considerations,
4	there is precedent in the CMS value-based
5	modifier that they phased in by practice size.
6	So, at first there was, it applied to
7	everybody in groups of 100 and larger, and then
8	to groups ten and larger, and then finally
9	everyone. And so, that notion of again doing
10	even a time phasing of how incentives might work
11	would be another strategy to consider.
12	CO-CHAIR CHIN: Okay. So, a cut in
13	the place slide of where it says organizations,
14	providers, and organizations for safety net.
15	Okay. Tracy, Nancy, Sarah.
16	MEMBER FERGUSON: Yes. I just wanted
17	to just ensure that what we are proposing is for
18	all organizations. Because we have some
19	commercial organizations, very large commercial
20	organizations that they have a large commercial
21	book of business, but they're also now expanding
22	into the Medicaid population.

1	So, I don't want them to believe that
2	this is not, they're not a part of that. That
3	they can't necessarily benefit from doing this.
4	Because we see more and more of them going into
5	the Medicaid space.
6	So, you know, we are supporting those
7	smaller organizations. And those are truly
8	safety net. But these recommendations are for
9	all individuals. And I think we should just need
10	to claim that.
11	CO-CHAIR CHIN: So, sort of say the,
12	bolsters Romana's point of like making sure
13	things apply to both. The prior slide, the
14	incentives slide, that was more any organization.
15	This one was more specifically the safety net.
16	But then it argues there for some
17	degree of duplication between some of the points
18	on the slides if they apply to both situations.
19	Nancy, Sarah.
20	(Off microphone comment)
21	MEMBER COPELAND: Can I just get a
22	clarity on that? Because

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1	CO-CHAIR CHIN: Go ahead. Go ahead,
2	Ron.
3	MEMBER COPELAND: one of the
4	conversations is, what are we defining as safety
5	net? Is it who you take care of, this
6	disproportionality of individuals with high
7	social risk factors? Or some other designation?
8	If you're shaped this way, and if you
9	have this label. Or if you get funding from a
10	source, that's a safety net. So, I think we just
11	need to clarify who we're talking about here.
12	Because if it's an inclusive
13	organization, then any organization that's doing
14	this work, and has those criteria,
15	disproportionate service of individuals with
16	social risk factors, that's who this would
17	qualify for.
18	CO-CHAIR CHIN: Yes.
19	MEMBER COPELAND: Because it's the
20	disproportionality, those who are in that mission
21	space, that you want to make sure don't get hurt
22	by these incentives, and the whole process.

1	L.
1	CO-CHAIR CHIN: Yes. But understand,
2	it's what's in the header, disproportionally
3	served individuals with social risk factors. So,
4	that could be the definition of the text, like
5	how it's being defined for use, safety net.
6	Okay. So we have Nancy, Sarah, Ninez.
7	MEMBER GARRETT: I just wanted to
8	comment on your question, Marshall, about the
9	second bullet, and the peer comparisons. And I
10	would favor a little bit different wording.
11	Rather than having a fair playing field,
12	something like, to improve comparability with
13	MVBP programs.
14	Because as we talked about yesterday,
15	the peer grouping does not solve a lot of the
16	issues. It, you know, like you were saying,
17	Christy, within the dual population you might
18	have two equal proportions of duals across two
19	hospitals, and really different populations
20	underneath that.
21	And so, you know, it's a technique
22	that's going to potentially help improve

comparability. But it doesn't get to fairness. 1 2 And I feel like the, I'm a little struggling with the word fair. Because we're so far from that. 3 4 And what is fair? Is it, right now we 5 have a situation where we're investing a lot less in populations that are most vulnerable. 6 If we 7 invested the same amount in those populations, is 8 Maybe it's not. that fair? 9 Because we probably need to invest 10 more in those populations. So, that whole concept of equity is like giving people what they 11 12 need, which is not the same across everybody. 13 And so, I'm just reacting a little bit to the word fair. And I'm not sure it's the 14 15 right word for our work. 16 CO-CHAIR CHIN: So, does it work for 17 your, so in that first part, the first sentence, 18 so considering for parent organizations to peer 19 organizations to ensure safety net organizations 20 have something comparatively, have --21 MEMBER GARRETT: To improve 22 comparability within --

1 CO-CHAIR CHIN: To improve 2 comparability --MEMBER GARRETT: Within MVBP --3 4 CO-CHAIR CHIN: -- in MVBP programs? MEMBER GARRETT: Something like that. 5 CO-CHAIR CHIN: Now, the second 6 7 question was, the Philip Alberti clause may need 8 to risk adjust within comparison groups to ensure 9 fairness. 10 MEMBER GARRETT: So, you could say something like, risk adjusting within peer groups 11 12 may also help with comparability, or something. 13 I just --14 CO-CHAIR CHIN: Okav. I think the fairness 15 MEMBER GARRETT: 16 is too aspirational right now. I don't think 17 we're going to get there. 18 CO-CHAIR CHIN: Okay. So, replace 19 fairness with comparability language. Okay. 20 Sarah, then, Sarah. 21 MEMBER SCHOLLE: Sorry. I didn't take 22 it off mute. So, I understand the concern about

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the safety net population. I support that. But I think to the extent that the strategy should apply across organizations is stronger if we make it part of how things work overall, and not as a separate piece.

So, I think I disagree with other 6 members of the Committee on that. 7 Because what I 8 can see is that if we do this comparison to peer 9 organizations, then we'd be saying to organizations that serve a high income, or 10 11 advantaged populations, we expect to, we're going 12 to compare you to your peers serving that same 13 population.

14So, you're not going to deserve as15much of a bonus as others. Because we can tell16your population's advantaged. And then that17allows more resources to go to people,18organizations that are serving a more19disadvantaged population.20So, I think that by segregating this

20 so, I think that by segregating this 21 into a separate piece, and you're saying we're 22 advantaging, we're trying to advantage the safety

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net populations.

2	But really what we're trying to do is
3	say, let's readjust where the incentives go. And
4	that's a whole system strategy, not a strategy
5	just for safety net organizations.
6	So, that's one comment where, which I
7	actually would like to see the first two bullets
8	combined into Strategy 2. Because I think it's
9	part of an overall payment reform strategy to
10	support equity.
11	And I also am, I'm just looking for
12	some clarity here. In Strategy 1 we said, it
13	says that there should be stratification,
14	stratify performance measures. Strategy 2 says
15	directly adjust payment. And then Strategy 3
16	says risk adjust for social risk factors when
17	appropriate, and stratify performance scores.
18	So, what I, so are those all saying
19	the same thing? Are they different? So, I'd
20	like to read that as stratify and directly adjust
21	payments.
22	And then, so that the, I'm not sure

what the risk adjustment, where that's necessary,
if it is. And are we saying something different
just for safety net organizations about risk
adjustment?
CO-CHAIR CHIN: Thank you, Sarah.
MEMBER SCHOLLE: Is it still about
risk adjustment payments?
CO-CHAIR CHIN: Let's do this. That
we have Nancy and Philip for comments, or just
Philip at this point. Then we'll go back to your
original question of looking at two and three.
Are there ways to combine or move
things around? Or should we duplicate? We'll go
back to your original question. So, Philip, and
then we'll address as a Committee this risk
question you had.
MEMBER ALBERTI: I just want to make a
quick last plea for the word fairness. So, I
agree. And Romana and I had a nice off line
conversation about kind of the danger of
aspirational thinking when we really want to
actually do things. And I get that.

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1	Our members though, talk in the
2	language of fairness on this issue. Like, we
3	want, why are our hospitals being unfairly
4	penalized? We hear that over and over again.
5	And so, I think this is actually an
6	attainable aspiration, that we can move the way
7	in which we incentivize, reimburse, et cetera,
8	towards fairness. We hear that language all the
9	time. So
10	CO-CHAIR CHIN: Maybe intermediate
11	language should be the comparability language.
12	And instead of the stronger ensure, something
13	like improve fairness. Okay. So, comparability
14	language, and then improve fairness.
15	Now, back to the original question
16	Sarah mentioned about now to interrelate. And
17	can things be condensed, removed, or should they
18	be duplicated? And I just don't think we've come
19	to a sort of clear consensus on this yet.
20	So, if people can take a crack at
21	that, of trying to answer Sarah's question of
22	what should we do about two and three, and the

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degree of overlap. So, Ninez.

2	CO-CHAIR PONCE: I guess the, I agree
3	with Sarah again. But what I heard, as you just
4	said is, it doesn't, you know, limit us from
5	keeping the first two bullets here. So that it's
6	moved also in other sections that are
7	appropriate. And I can't remember now what
8	Strategy 1 and Strategy 2 is. But to move it up
9	into those other strategies.
10	CO-CHAIR CHIN: No, Ninez is sort of
11	the, two separate sessions, and then, but
12	duplicate where warranted. So, for example, the
13	comparison group, Ninez and Sarah are suggesting
14	duplicate that in two.
15	Or something like the coaching quality
16	improvement and disparage reduction. Well,
17	potentially everyone could benefit from that.
18	Another one, well, maybe those are the two that
19	are most relevant for potentially duplicating in
20	two. So, that's one
21	CO-CHAIR PONCE: And sorry. And
22	another amendment, listening to both Helen and
Philip is, because the first two are about 1 2 fairness, and fairness is, as well as comparability for the peer organization 3 4 comparisons, that fairness should also be in the 5 first bullet. So then, it's an explicit signal that 6 7 that's why we're repeating it here. Because it's 8 about fairness. To improve fairness, risk adjust 9 for social risk factors when appropriate, and 10 stratify performance score. 11 CO-CHAIR CHIN: As the, well, the risk 12 adjustment, this -- Well, it's tricky. 13 MEMBER SCHOLLE: I would just say that 14 there are those who will argue that risk adjustment makes them less reasonable. I would 15 16 just echo, though, Nancy's concern, fairness is a 17 controversial term. And it may not make our work 18 stronger. And it may bring more controversy. 19 So, I would use it strategically, not over use 20 it. Because I think it's going to bring us more 21 trouble. 22 CO-CHAIR CHIN: You cool with keeping

it in two and not in one? 1 2 CO-CHAIR PONCE: I don't want to get us in trouble. 3 4 CO-CHAIR CHIN: Okay. Okay. Okay, 5 Michelle. I almost feel like we MEMBER CABRERA: 6 7 need a like little statement that follows, like 8 between the strategy and the bullets, that 9 explains ourself a little bit, you know. Sort of like the, what's the, you know, walk people 10 11 through it. 12 And I think a lot of this under 13 Strategy 3 is about the concept of 14 accountability. I mean, I think that's what 15 we're dancing around here. And accountability in 16 the context of underlying inequity, right. 17 And so, if we could just say, put a 18 statement out there that's sort of helping the 19 ground people a little bit, I think that would 20 help ease some of this confusion. 21 MS. O'ROURKE: Absolutely. And that's all, something you'll see in the report. 22 There

will be statements under each of these bullets 1 2 explaining the Committee's discussion and thinking, and capturing all of this 3 4 conversations. 5 So, it will not go out in the report 6 with just this list. But we want to make sure And then 7 there's consensus on what the list is. 8 we can add in all of the discussion. 9 CO-CHAIR CHIN: And what I'm hearing 10 generally is that in theory Sarah's right, that 11 like this could be subsumed under Strategy 2 for 12 the safety net. However, the safety net is so 13 important. And there are a number of the bullets 14 that are, I guess there's Bullet 3 and Bullet 6 15 16 are specific to the safety net. That people 17 think the message will be stronger with sort of a 18 separate bullet. But then, duplicating in two 19 and three those things which apply to both. So, 20 qo ahead, Helen. 21 DR. BURSTIN: I just had one though. And actually Michelle's comment queued it for me. 22

It's less about, I think, from where I sit, 1 2 putting things underneath these, Erin, as opposed to potentially something on top. 3 4 So, one question might be, could you 5 have something about to improve fairness here, you know, consider the first two bullets. 6 Because in some ways what we're really saying is, 7 8 those are potential strategies. And the goal 9 here is to improve fairness. 10 CO-CHAIR CHIN: Okay. So, anyone on 11 the phone want to make any comments? So, the 12 current draft now is to have separate two and 13 three, duplication where warranted. Yes. That's 14 the card. Anyone on the phone first? And again, I don't 15 MEMBER CABRERA: 16 know if it's helpful to sort of like bracket it 17 out by accountability strategies, right. 18 So, there's public reporting. And as 19 it relates to public reporting there's this. 20 There's, you know, payment reform. And as I 21 relates to payment reform there's that. I don't 22 know.

1	I mean, I'm just trying to think about
2	why these things are included here at all, is
3	because of how we're trying to hold folks
4	accountable for different things. And there are
5	different accountability applications.
6	So, it's just, I don't know. Trying
7	to think about ways to make it easier for people
8	to digest the information, and understand why
9	these things.
10	CO-CHAIR CHIN: So, we're about to go
11	to Slide 4. So, does anyone want to make an
12	argument or amendment that is different than
13	separate Slide 2, separate Slide 3, and
14	duplicating where warranted?
15	Okay. So, let's go to Slide 4. So,
16	we'll try to do this before 11:30 a.m., and hit
17	the disparities sensitive condition discussion.
18	So, we had an early discussion. So,
19	the header's going to be reworked to something
20	having to do with some combination of
21	demonstration and evaluation, and rigorous
22	evaluation, and research. And so, staff's going

1 to take a crack at that. Getting rid of the word 2 agenda. Ninez was going to reword the policy simulation bullet. 3 CO-CHAIR PONCE: With Phil. 4 With 5 Philip. We're going to reword it. CO-CHAIR CHIN: Excellent. Why is 6 7 four under demos and research, versus -- I wonder 8 if that's now embedded under the one that Nancy 9 wanted to bolster, the one about, we had like a 10 vague invest language. 11 And then it became support incentive 12 last I think was the -- So, we may be able to delete four. Because it's in there. Or else a 13 14 sub-bullet within that one. 15 CO-CHAIR PONCE: This is Ninez. Ι don't want to delete it. I hope it goes 16 17 somewhere. 18 DR. BURSTIN: I think it should go 19 where we talked about it. 20 CO-CHAIR PONCE: Oh, okay. 21 DR. BURSTIN: It's good language. 22 CO-CHAIR CHIN: Okay. Why don't we

1	move to, well, can you hold Slide 1?
2	MEMBER COOPER: So, Marshall, it's
3	Lisa. Why is the economic impact under like the
4	research? Is that because it's like something
5	that needs to be studied in the demonstration
6	projects, or
7	CO-CHAIR CHIN: Okay.
8	MEMBER COOPER: I mean, I'm just
9	CO-CHAIR CHIN: Yes.
10	MEMBER COOPER: I'm just wondering why
11	it's like its own bullet for, I mean, there are
12	lot of other things that we could be assessing in
13	terms of the impact. So, why is it only the
14	economic impact?
15	CO-CHAIR CHIN: Right. So, first
16	Ninez's point. That's currently Bullet 4 under
17	Slide 4. That will be like a sub-bullet under
18	Slide 1, Bullet 1. It's the one about, it's now
19	support and incentivize social respecter data.
20	A good point, Lisa. So, is there a
21	different place to put it, or a way to reword it
22	so it's more integral, as opposed to purely the

research?

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2 MEMBER COOPER: So, I mean, if we're funding demonstration projects we should be 3 assessing like the impact. A variety of 4 5 different ways of looking at impact, right? Not only economic but --6 CO-CHAIR PONCE: 7 I am --8 MEMBER COOPER: -- you know, I guess 9 other. 10 CO-CHAIR PONCE: Well, that would, 11 let's give Ron a chance to --12 MEMBER COPELAND: Yes. That probably 13 I think is the staff's attempt to capture 14 something we discussed yesterday. And I don't 15 know if you were on that part of the conversation 16 or not. 17 But I was making the case that, as it 18 relates to how you put together the business case 19 for why any organization needs to take on the 20 issues of health and healthcare equity. 21 I said one of the things that's 22 missing, because of the economic and financial

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implications for supporting any major initiative
is, what's the financial gain from taking on
equity and achieving health equity?
And that starts with an understanding
of what, how much is it costing me to ignore it
now? How much is that impacting me in terms of
cost of people showing up in emergency rooms,
readmission rates, or whatever?
And when you look in the research,
when you look in the data today there's no recent
studies at all that try to quantify what the
economic price we're paying for not taking on
equity as our base case to start with.
And so, the conversation was, could we
somehow incentivize research into this space with
a specific purpose to quantify what is the price
we're paying now? What is the cost of ignoring
equity, and not eliminating disparities so that
we have that as a base case, primarily to
incentivize and motivate folks in a resource
strapped environment, to say, here is some loss
that can and should be captured with a quality

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improvement agenda?

2	But nobody's quantified it. So, most
3	folks just kind of say, the only reason to do
4	this is because it's the right thing to do.
5	There's some social, moral aspect. But it
6	doesn't impact finance at all. And I don't think
7	that's true.
8	There's some studies done many years
9	ago that tried to quantify it. And it was in the
10	billions, if not trillions of dollars. But
11	nothing has really been done on a substantial
12	research basis to try to quantify it. So, that's
13	where the idea came from.
14	So, wherever we want to put it, it's
15	fine with me. It was put in the research area
16	because it was trying to acknowledge that there's
17	research and data generation that needs to be
18	captured that doesn't exist today.
19	MEMBER COOPER: All right. Yeah, no,
20	I mean, I was there. And I agree it's really
21	important. I just wondered why if we were going
22	to be talking, getting specific about the types

of things we would be looking at, whether we would want to include other things that we want to have people assess, you know. That's all. But I agree 100 percent that it's important and needed.

6 CO-CHAIR CHIN: Well, maybe too, I can 7 see the point, like why it was a separate bullet, 8 because of its importance to, a driver of change. 9 But maybe under the fund demonstration projects 10 bullet we could have additional language, whether 11 in the bullet or text, that talks about how, just 12 a point about --

MEMBER COOPER: What we want to, and what we want to look at in those demonstration projects. What, you know, what --CO-CHAIR CHIN: Right. MEMBER COOPER: -- kinds of things are

18 we looking for, you know.

19 CO-CHAIR CHIN: So it can be a variety
20 of various clinical, economic outcomes,
21 implementation, science issues, that kind of
22 stuff. So, we can flesh that out in more detail,

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1	Lisa.
2	MEMBER COOPER: Okay.
3	CO-CHAIR CHIN: So, I think it was
4	David, Philip, and Emilio.
5	MEMBER NERENZ: Yes. I have some of
6	the same concerns about whether the bullets
7	actually follow the heading. And I think the
8	problem may be part of the heading is, the way
9	that's worded. And maybe we can tweak that a
10	little bit.
11	CO-CHAIR CHIN: Oh, yes. David, you
12	weren't here. But there's a, when you, the very
13	beginnings of the discussion that that's going to
14	be amended. So, it's going to be some
15	combination of, in the header, demonstration
16	projects, evaluation, and research. And the word
17	agenda being taken out.
18	MEMBER NERENZ: Okay. That's not the
19	part I was going to change.
20	CO-CHAIR CHIN: Oh. Okay.
21	MEMBER NERENZ: The part
22	CO-CHAIR CHIN: Go ahead. Go ahead.'

MEMBER NERENZ: Well, but the problem 1 2 is that the things that follow that suggest to me that they were talking about a very narrow 3 4 research agenda, where use of measures is the 5 independent variable of the intervention. And 6 health equity is the presumed result. 7 Bullet 3 is not really about that. 8 Bullet 4 is certainly not about that. So, I'd 9 say do what you just said. But also, just say, it's a research agenda about health equity. 10 11 Unless I'm misinterpreting what the rest of those 12 words mean. But, you know --13 CO-CHAIR CHIN: Here's, maybe Helen 14 And El can guide us with that. So, for the peer 15 audience, like a CMS or whatnot, as opposed to an 16 AHRQ, how should we address David's concern, 17 which is a good one? 18 CO-CHAIR PONCE: I think it's yes and, 19 I think it's about health equity and, as right? 20 well as measurement equity. I mean, research 21 around equity and measurement. So, I think it's both. 22

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1	MEMBER CARRILLO: To just amend some
2	of the wording to a socioeconomic impact of
3	disparities in the immediate impact and the long
4	term impact. I think that that gets at the core
5	of the question. And CDPR, should we say
6	anything about that?
7	CO-CHAIR CHIN: So again, we have the
8	immediate and the long term. And maybe under
9	Philip's point about the patient perspective, and
10	all, we can include some CDPR language also.
11	Ninez, Ignatius, and then we'll go to, at that
12	point we'll call it quits and go to the disparity
13	sensitive discussion.
14	CO-CHAIR PONCE: So, I saw this as a
15	way of creating new knowledge on the domains
16	where we don't have as much information on. And
17	one of those domains was community engagement in
18	partnerships. So, that was sort of the impetus
19	of some of the bullets here.
20	CO-CHAIR CHIN: You mean like, maybe
21	something about, like, I don't know if you want
22	to highlight this or not, but like the different

1	five equity domains. And some of the areas
2	basically we don't have great measures at this
3	point in time. So, the need for more development
4	of those areas.
5	CO-CHAIR PONCE: We need, this was
6	spurred by Romana's comment on Kara's comment
7	that she wants evidence. And so, if we're going
8	to promulgate the five domains, then we also want
9	to make sure we have the evidence base, to have
10	teeth behind it
11	CO-CHAIR CHIN: So, some type of
12	bullet about developing the evidence, better
13	measures basically, better equity measures. So,
14	Ignatius, and then we'll go to the, improving the
15	
16	MR. BAU: So, I wanted to look back to
17	Ron's comment about whether we actually want to
18	say something explicitly about the business case.
19	Because again, part of this, we're making these
20	recommendations in the context of this shift to
21	value.
22	And I think we want to be explicit to

say that both disparities reduction, and then the
 more aspirational achievement of equity is
 actually part of that value equation. And so,
 it's not an add on. It's not a, you know, post
 hoc rationalization. It's actually part of the
 formula.

7 And so, I think part of what this is 8 trying to get is, it's a little more abstract in 9 that way. But we want to make sure that this 10 conversation is part of every conversation about 11 value.

12 And then, especially in the context of 13 exploring alternative payments, and other kinds 14 of ways that healthcare is paid for, that again, 15 equity is part of that conversation, in every 16 alternative payment conversation, in every, where 17 again, we're going to have the flexibility to do 18 a lot of this additional funding I think. So, 19 some way that, to tie business and value into the 20 conversation.

21 CO-CHAIR CHIN: Thanks, Ignatius.
22 That's an important comment. So, it's great that

we have a little bit of time to revisit those 1 2 disparities sensitive condition criteria. Especially as it's come up that, and Bob and I 3 4 just made a point that, and Romana, that when it 5 comes down to it we're going to have to prioritize. 6 7 And there's going to be one of the 8 bullet recommendations about using high priority 9 disparity measures, which goes back to, what do we mean by a high priority disparity measure? 10 11 And so, I think Drew's going to give a 12 quick background for people on like the 13 disparities sensitive measure work of the past, 14 which is a great start, but which needs to be 15 updated because it has weaknesses. And so, 16 that's what we hope to do over the next ten 17 minutes or so. 18 DR. ANDERSON: Sorry, we're just 19 working on screen sharing. I'm trying to 20 remember, who here was on that particular 21 committee? Romana? So, Romana and I, Ignatius. (Off microphone comments) 22

I think Kevin was, yes. 1 DR. ANDERSON: 2 So, what we wanted to do was look at the protocol that we have for the disparities. And so, we're 3 4 going to screen share that. And I, yesterday I went over a little bit about what those 5 categories are. 6 7 But just to review. So, it's Page 7. 8 That's a table. So, you can -- Oh, right. There 9 So, the first one is prevalence. we qo. This 10 criteria was mapping it to the Medicare top 20 conditions, which included the conditions that we 11 12 were looking at originally on this project, like 13 cardiovascular disease, cancer, mental illness. 14 DR. BURSTIN: As well as the elimination of some conditions as well. 15 So, some 16 of this --17 DR. ANDERSON: Right. 18 DR. BURSTIN: -- is just getting at 19 which areas would be most important to focus on. 20 DR. ANDERSON: Right. So, prevalence 21 just has to do with what do we know about where 22 the disparities exist, where are the largest,

what's the prevalence of disparities in these 1 2 conditions? So, the second one is quality gap. 3 And the Committee chose a certain width of that 4 5 So, this is, how big is the disparity qap. between the comparison group and the group with 6 7 social risk? 8 The second one was impact. And then 9 this was, these are mapped to the National 10 Quality Strategy and the NPP goals. So, some of 11 these included that it had to affect, the 12 disparity had to affect large numbers, was a 13 leading cause of morbidity and mortality. There 14 was a high resource use, severity of illness, 15 those kinds of things. 16 And then, the next criteria is that 17 there's a high degree of discretion. So, does it 18 produce a lot of, is there less of a standard of 19 care? Does it produce more variation in 20 practice? And then the fifth one was the 21 communication sensitive services. So, care that 22

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is more sensitive to language barriers. And then 1 2 the last one here was social determinants. And so, this one was more tied from 3 4 the report to behavior. But it was, it is really 5 just a general bucket of care that is more sensitive to social risk factors. 6 7 And then there was a waiting schema 8 for how to assign whether or not the measure was 9 actually, like how to rank the measures in terms of how sensitive they were to disparities. 10 Yes, please, jump in.. 11 12 DR. BURSTIN: It's great. Thanks, 13 Drew. So, this is, I just want to be honest that 14 the scoring came after the Committee. We tried to operationalize this after the good work of the 15 16 Committee, that really gave us the initial 17 criteria. 18 And essentially, one of the hardest things when we tried to do this, we did this with 19 20 about 400, 300 or so measures within the NQF 21 portfolio, is how difficult it was to find information back to the research person on 22

whether there was a quality gap, and whether
 there were known interventions with which to
 address them.

Very difficult to use the ones like
communication sensitivity and social
determinants. So, really, in essence we wound up
focusing on the first three as being the ticket
ones.

9 Is this an area really of importance 10 to the populations at risk? What's the quality 11 gap? And that 13 percent was truly just where 12 the data seemed to be an empiric cut point, based 13 on what we saw, a split in the data. It has no 14 basis in anything, just to be honest.

15 And then lastly, impact was just the 16 idea that this could have a big impact. And at 17 the time we were using it, linking back to our 18 national priorities goals.

We could link that to the National
Quality Strategy, et cetera. Or could link it
back to the domains you just laid out, right.
So, there's that, there's a nice opportunity here

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to think about a refresh.

2	I'll also say at the time this was
3	very invested in the idea of which measures you
4	had identified that should always be stratified.
5	That you couldn't just look at the rate of low
6	birth weight, for example, in the U.S. It made
7	no sense. You had to look at low birth weight by
8	race and ethnicity. Because we knew those
9	differences were profound, and met every one of
10	those criteria.
11	But in this day and age, you know,
12	we're not necessarily talking about this being
13	always about stratification. And so this, the
14	idea was to call attention to areas where we knew
15	there were disparities. And simply looking at
16	the overall rate would not give us the
17	information we needed to act on reducing
18	disparities.
19	CO-CHAIR CHIN: Yes. Thanks, Helen
20	and Drew. So, in some ways this is a restart.
21	And I don't know what your impressions were,
22	Romana. But I remember being on the Committee.

I	L
1	And I wasn't very satisfied with sort of the end.
2	And so, that, it's, you can't say, Helen, in
3	practice then it devolved down to what you
4	actually used for the top three.
5	DR. BURSTIN: Absolutely.
6	CO-CHAIR CHIN: Okay.
7	DR. BURSTIN: Yes.
8	CO-CHAIR CHIN: Okay. So, I guess
9	let's get back to the question of how we're going
10	to operationalize that bullet recommendation
11	about use high priority disparity measures,
12	equity measures. How do you people think we
13	should then describe this in text of how we're
14	defining high priority?
15	MEMBER GARRETT: Well, I'm just
16	reacting to the social determinants criteria.
17	The scoring is interesting, because it was,
18	you're trying to look for measures that were not
19	socially determinant dependent, right? Am I
20	understanding that?
21	CO-CHAIR CHIN: That also was my
22	impression too. In some ways that is like one of

the big updates where your point's going to be 1 2 that, well, it's broader than what we think of, the healthcare system should be responsible for. 3 MEMBER GARRETT: So, I think, and I 4 5 think we talked about this on our first day. But one of the ideas in the National Academy of 6 7 Science's Report was that perhaps we should start to have a scale or a categorization of measures 8 9 to understand how sensitive they are to social 10 determinants, as a way of really helping understand better how they should be used. 11 12 So, if it something like diabetes 13 outcomes, where we know that if you live under a 14 bridge it's much harder to have blood sugar control, that that, maybe use that differently in 15 16 pay-for-performance programs, than a measure that's much more in the provider's control. 17 18 And so, I just wonder if that should 19 be pulled out as a new categorization system that 20 our Committee could recommend be put in place. So, the point being 21 CO-CHAIR CHIN: 22 that, just trying to think about what measures

may have, be on a range of susceptibility to
 social determinants. And then some consideration
 then of issues, like read that an organization
 should be accountable.

5 There's somewhat, you don't want to 6 give people a free pass of like, well, okay, anything having to do with the community is out 7 8 of our control. Because it pushes towards more 9 of that encompassing. Yet, you want to be fair, 10 So, some type of language that I quess. 11 discusses that conundrum, okay. Bob, then 12 Romana.

13 MEMBER RAUNER: Yes. I just kind of 14 sent an article I had mentioned last year about expressing in qualities what these preventive 15 16 strategies would hurt. Because I think that kind 17 of helps talks about the prevalence in quality of 18 that gap. Because that's how they came up with 19 the article. So, I just sent it back to the 20 group in this.

21 But that, yes, they expressed in 22 quality just in life's years. If you could go

from where we think we are right now to a certain
 level, what you could achieve in population
 health, in fact in life.

CO-CHAIR CHIN: Okay. So sort of like part of I guess impact. So, in terms of like, I guess what, about quality and impact, and the degree of which there were interventions that can improve. Yes. Romana.

9 MEMBER HASNAIN-WYNIA: So, in terms of 10 the social determinants, I think that we need to 11 be very explicit that in some ways, and I think, 12 Helen, you even said, you know, some of the work 13 that we did earlier, so those 2012, business in 14 2012 report, is a bit dated.

Part of it is because it was focusing 15 16 primarily on healthcare disparities, and the 17 dialogue, and also, you know, a little bit of the 18 science. And also value based purchasing, and 19 all that was not really part of the conversation. 20 So, the Committee really focused on 21 disparities in the context of the healthcare 22 system, in a sense. So, I think we should be

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pretty explicit in terms of the work that this 1 2 Committee has done, the NAM report. That we recognize the importance of 3 social determinants, and not be passive about it, 4 5 and pull this up, you know, to a high level. So, we include prevalence, quality gap, impact, and 6 7 social determinants explicitly, because of the evolution of the work in health disparities and 8 9 healthcare disparities. 10 CO-CHAIR CHIN: Yes. You got to 11 finish the change too, a point that Emilio 12 brought up a couple times about, like greater appreciation of the structural determinants of 13 14 disparities, and structural racism, and all. 15 Basically when I teach students, they 16 get that part about like implicit bias. And they 17 get the part about the communication sense of 18 The thing they have the hardest time things. 19 seeing are, the way we accept the system that 20 leads to the results we get. But it's just a 21 powerful driver, yes. Michelle. I'm just going to 22 MEMBER CABRERA:

keep going back to, I think this is really about
 how we're applying things, and the accountability
 applications, right.

So, you know, I can see how you could look at are you, we would give guidance or recommendations around, are you going to be withholding or penalizing on this basis? Caution. We don't think you should. Here's why, right.

Are you incentivizing, or providing 10 more funding to people? So, for that, you know, 11 12 diabetic who lives under the bridge, you shouldn't actually be dinging a provider who has 13 14 lots of those people. You should be providing them with additional resources. Because their 15 16 diabetic is qualitatively significantly different 17 than your diabetic, right.

18And then there's also the19accountability application of public reporting.20And again, this has significant applications for21health plans and providers, both of them.

22

In our state Medicaid health plans are

ranked on aggregate HEDIS and CAHPA scores. And then your aggregate score is the driver for default patient assignment, okay, which matters to people.

And if you're looking at an aggregate 5 score one of the things we've asked the state to 6 7 do, for example, is for those commercial plans 8 who do both Medicaid and non Medicaid, when 9 you're going to be using it for accountability, desegregate their Medicaid book of business. 10 And let's see how they perform on quality compared 11 12 with other health plans, not just --

So, there are all kinds of dimensions 13 14 of how this stuff is playing out. But I want us to be really firmly anchored in not just the 15 measure that sort of sits out there as its own 16 17 thing, but the application, and the 18 accountability pieces of all of this. 19 And, you know, I think that requires a bit more work. But I think it's worth it. 20

21 Because that is the real world scenario, and how 22 these things are playing out.

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1	CO-CHAIR CHIN: So, we'll turn to the
2	people on the phone now. And you don't have it
3	in front of you. But like the slide that, right
4	now it's a slide from this old disparities
5	criteria from five years ago.
6	And Helen had just mentioned that in
7	practice the criteria that the, you know, that
8	NQF has used, the first three prevalence of
9	condition, the quality gap, the impact.
10	We just had a little bit of discussion
11	by Romana about social determinants, Nancy also.
12	Their point being that this broadened in terms of
13	the conception of the past five years of what the
14	healthcare system's responsible for.
15	So, are there thoughts from people on
16	the phone about updating of the criteria?
17	MEMBER COOPER: This is Lisa. I like
18	the three, you know, the top three I think are,
19	you know, are great. For the quality gap piece,
20	is that going to be replaced with a disparity
21	gap? Or are we going to keep it at a quality
22	gap?

1	Are we going to add something related
2	to the disparity gap, or equity gap? Are there
3	any thoughts around that? And, you know, and I
4	agreed with what Romana said about the social
5	determinants piece.
6	DR. BURSTIN: You know, it's just
7	mislabeled. I mean, we mislabeled it. I
8	mislabeled it. So, way back when. So, the idea
9	here was that there was actually a gap in quality
10	between populations. So, probably is more
11	MEMBER COOPER: Okay.
12	DR. BURSTIN: Agree at this point to
13	actually call it an equity disparity, whichever
14	word you think is better, gap. So, essentially
15	we're looking at, what's the performance for the
16	non-at-risk population, versus the at-risk
17	population, when we could find it. And again,
18	that was part of the issue was, so often
19	difficult to do, to map that out.
20	CO-CHAIR CHIN: Okay. Thanks, Helen.
21	And so, it sounds like so far we're basically
22	evolving for a simplified, actually a simplified

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version of what has actually been practical use. 1 2 DR. BURSTIN: Right. So, just one more question if I could. And I'm glad Romana 3 walked back in. So, the social determinants, if 4 we bump it up to the top, is the idea, meaning 5 you would preferentially want measures that 6 7 address social determinants? Or, how, I want to make sure I understand the, how we might 8 9 prioritize measures around social determinants. 10 I'm looking at you. So, in my mind 11 MEMBER HASNAIN-WYNIA: 12 what I was thinking as we were thinking about if 13 we were going to limit let's say two or three 14 measures, that we would limit the measures to those that had clear connections to what, that 15 16 have an impact related to social factors. 17 So, you know, so if we were to focus 18 on blood pressure measures, or measures related 19 to diabetes, we know that, you know, I think Dave 20 was making this point yesterday that, you know, 21 healthcare organizations can, you know, test for

22 cholesterol, and Alcs.

But actually, you know, controlling is 1 2 a completely different, you know, it's a completely different ballpark. Because it 3 impacts, it's, the impact is driven by what 4 happens where people live, neighborhoods, 5 communities, et cetera. 6 So, what I was, when I made the 7 8 comment a few minutes ago about bringing social 9 determinants, that we focus on those, at least those conditions, and then the measures related 10 11 to them where, you know, we know there's 12 prevalence, there's a quality gap, the potential 13 impact of the action related to that measure, and

play a big role. So, that was the intent.

where they're, where we know that social factors

16 CO-CHAIR CHIN: So, maybe related to 17 what you just said, Romana, bringing in the 18 Committee's recommendation from yesterday, that 19 outcome measures really should be prioritized for 20 this. 21 DR. BURSTIN: Yes. And I think one

21 DR. BORSTIN: Yes. And I think one
22 thing to mention. I think I've shared this with

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Marshall. We've also got a prioritization schema 1 2 that we put forward, discussed at our annual meeting have a setup for criteria overall, not 3 specific to this, for prioritization criteria. 4 One of, there are four. The first one 5 6 is that it's outcomes focused. So, an outcome or a measure very strongly linked to an outcome. 7 8 The second is that it's improvable and 9 actionable. The third is that it reflects care that crosses settings, clinicians, and providers, 10 to have more of that patient focused view. 11 And 12 the fourth, of course I'm, I always forget the fourth. What's the fourth? 13 14 (Off microphone comments) DR. BURSTIN: Poor Jean Luc, he's like 15 16 ohhh. Ahh, I'll bring it up in a second. But anyway, essentially outcomes orientation is part 17 18 of that already. And just so you know, part of what we 19 20 also did as part of this measurement framework is 21 identify that top outcomes, the top high impact areas for the nation that we want all measures to 22

drive toward. And equity is one of those. 1 2 So, we have already put that at the top of that pyramid as something we want to drive 3 So, this actually nicely fits in with 4 toward. 5 all the rest of this. So, we're going to ask 6 CO-CHAIR CHIN: 7 first, any public comments? Anyone on the phone, 8 or here in the audience would like to make a 9 public comment? If you would like to make a 10 **OPERATOR:** 11 public comment, please press *1 on your telephone 12 keypad. Again, that's *1 to make a public 13 comment. We have no one at this time. 14 CO-CHAIR CHIN: Okay. 15 (Off microphone comment) 16 CO-CHAIR CHIN: So, thanks very much 17 everyone. I think we got a lot done this 18 morning. (Off microphone comment) 19 20 CO-CHAIR CHIN: So --21 DR. BURSTIN: Sorry. This last, the very last, the fourth criteria, which I think is 22
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important in this context is that the results 1 2 would be meaningful to patients and caregivers. So again, I think logically it would, this would 3 4 fold in nicely, I think, which we've put forward 5 here. CO-CHAIR CHIN: If staff can email the 6 7 Committee then those criteria, that would be good 8 to see. And so, first, thanks, everyone. This 9 was a challenging conversation to get through, 10 and tough issues. And I think we ended up in a 11 good place. 12 And so, what we're going to do is we're going to break 15 minutes to get lunch. 13 14 Then we're going to have a working lunch where, before the 12:30 p.m. trial period discussion 15 16 we're going to talk a little bit about the final 17 portent of the heal affairs opportunity we have, that's based upon, partly upon the work that 18 19 we've done, as far as we want to brainstorm a 20 little bit about that as a Committee, about what 21 we might do with that. So, why don't we 22

reconvene at, well, 12:10 p.m.

1	MEMBER HASNAIN-WYNIA: Sounds good.
2	CO-CHAIR CHIN: Okay. Great.
3	(Whereupon, the above-entitled matter
4	went off the record at 11:52 a.m. and resumed at
5	12:11 p.m.)
6	CO-CHAIR CHIN: So, we're going to get
7	started because we have the 12:30 agenda item on
8	the trial period. And so we want to spend this
9	time talking a little bit about a Health Affairs
10	journal article opportunity.
11	And so Health Affairs, every so often
12	they have a theme issue. And equity has been one
13	of the recurring theme issues. So actually this
14	month's issue is an equity theme issue, and
15	September is also going to be well actually
16	not in September but in 2018 they're going to
17	have another equity issue.
18	And some of you have seen that there
19	was fairly recently a call for papers where they
20	want to have people submit an abstract of a paper
21	that they've proposed. Then there's this, like,
22	a limited number of those folks to then submit a

full paper. No guarantee on publication but 1 2 you're in the mix in terms of it being accepted. So we still have that opportunity. 3 4 And then right around the deadline, Susannah 5 actually encouraged us to apply also. And so Erin drafted an abstract which basically talked 6 7 about how we propose talking about the work of 8 this Committee and what NQF is doing in the 9 disparities, really focus upon the work of the committee and the framework and the 10 recommendations. 11 12 And so there was good news and bad 13 news with the response from Health Affairs. The good news was that we did make the cut in terms 14 of being asked to submit a full paper. 15 The bad 16 news is they didn't want us to focus solely on 17 sort of what we're doing, that they want it to 18 have data and all. 19 So maybe I turn to Erin just in terms 20 of, like, the exact wording from Don, that's the 21 editor. And what we're looking for from the 22 group is if you have suggestions on given, like,

the editor's response, what do you think then we 1 2 should do as a committee in terms of what would be a worthwhile paper that would be important, 3 4 impactful, and that would be in response to what 5 the editor wants? Yes? MEMBER HASNAIN-WYNIA: So this is for 6 7 Health Affairs? This is the, so you had one 8 paper that was published, and this is for the 9 second round of the equity journal? 10 CO-CHAIR CHIN: Yes, so the paper for 11 June, that was sort of separate from NQF. But 12 this is, like, they have another RFA out there for some time in 2018 it's going to be an issue. 13 14 MEMBER HASNAIN-WYNIA: Yes, I'm on the committee for Health Affairs. 15 CO-CHAIR CHIN: Excellent. 16 17 MEMBER HASNAIN-WYNIA: So, I mean, I 18 don't think there's any conflict here, I'm just 19 saying. Why don't we have Erin 20 CO-CHAIR CHIN: 21 first read Don's reply and then your input and why would be very helpful. 22

1	MS. O'ROURKE: Sure. So just to
2	highlight I think some of the guidance you
3	provided and that we would like the Committee's
4	input on was they seemed to like the premise of
5	our paper, that we could, incentive to reduce
6	disparities can be built into payment policy and
7	performance measurement.
8	But they would like to see the
9	argument developed a bit more than just expert
10	opinion and would like us to support it with some
11	examples and illustrations, arguments and
12	analysis, and empirical evidence rather than just
13	based on the Committee's deliberation.
14	So this language is more along the
15	lines of a standard paper. So we've been
16	brainstorming a little bit about what evidence we
17	can use to support this. I think throughout the
18	meeting the Committee's provided some great,
19	illustrative examples we can look into and build
20	out.
21	As far as empirical analysis, just
22	some quick brainstorms where if there's anything

in the trial period data that we've generated that you'll see this afternoon and was in the paper we shared.

Perhaps something along the lines of what Susannah talked about with an example from the re-admissions program. Maybe not that one since that's a bit of a flash point, but the idea of, Susannah put it nicely, of once you started measuring and incentivizing something, you reduce something people didn't think could be reduced.

So I wanted to open it up for some brainstorming on what might help us support these arguments to get the paper more broadly accepted. CO-CHAIR CHIN: And we'll start with Romana.

17 that was submitted was submitted as more of a, I 18 don't want to call it empirical because it's not 19 necessarily, it's not an empirical paper. It's 20 more of a commentary thought piece, but they 21 wanted, but it came back with more he wanted more 22 empirical evidence within the commentary.

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1	DR. BURSTIN: Evidence. I mean, I
2	think what he was really saying is something
3	along the lines of a standard paper. So don't
4	assume that you can put something forward purely
5	based on the expertise of your committee.
6	MEMBER HASNAIN-WYNIA: Right.
7	DR. BURSTIN: But that there should be
8	some, you know, the incentives to reduce
9	disparities for example. So the Committee's
10	works would better be viewed as a starting point
11	for the paper rather than an end in itself.
12	You can use insight from the
13	Committee's work, of course, but it can't be the
14	sole source of input, and it may only play a
15	minor role in the narrative.
16	MEMBER HASNAIN-WYNIA: Okay.
17	CO-CHAIR CHIN: Bob?
18	MEMBER RAUNER: Yes, I got thinking
19	about this after reading David's article last
20	time is that you could take a hypothetical for a
21	medium sized ACO essentially, and then take what
22	that percentage reduction in quality measures

based on what David saw in his article, how that 1 2 would financially impact an ACO. That you could run, you know, a base 3 4 case and then run a similar case that if you 5 brought in all safety net clinics and their colorectal cancer treating numbers were all that 6 amount lower using that case, what is the 7 8 financial impact. And I think that would make a 9 pretty concrete example of how this is 10 potentially messing with FQHCs or safety net 11 clinics. 12 CO-CHAIR CHIN: I guess, I don't know 13 if I mentioned, but we have a time limitation. 14 We're due in September, so there's not a lot of And frankly part of it too, I mean, it's 15 time. 16 because we're NQF that we've probably reached 17 this particular stage. 18 And so even though his email sort of 19 downplays NQF, I don't think we want to sort of, 20 like, throw, I mean, the core probably still has 21 to be like the work this Committee and the things that are going to be embedded in the conceptual 22

model, equity domains and the recommendations in the final report.

I mean, that's why we're invited probably. But you hear Erin's comments about, like, so it's a little tricky needle and thread in terms of what we can contribute as NQF and as a committee, and then fitting the material that he puts down. Michelle?

9 MEMBER CABRERA: I just want to promote, if it's relevant, the examples of 10 covered California as well as California's 1115 11 12 waiver, both of which incentivize both collection 13 of SDS data, or social risk factors, and then 14 pay-for-performance to close gaps or reduce 15 disparities. So is that kind of one of the 16 things you were thinking of as part of the 17 evidence base, or no?

18 CO-CHAIR CHIN: Well I guess part of 19 it can be, like Erin and staff as well have given 20 many examples as possible for the actual report 21 in terms of making things come alive. And then 22 maybe sort of one of the text also that take

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1	examples, like what you mentioned or like Bob
2	mentioned today some examples form the ACO world.
3	You can't out do a publication, but I
4	do think, like, some degree of overlap in terms
5	of the report that the staff's writing anyway. I
6	mean, that's what's probably realistic.
7	MEMBER CABRERA: And, well on that, so
8	I had a second question which is I think core to
9	a lot of the work that we're doing here is this
10	concept that if you're trying to improve quality
11	but you're not looking at disparities, you're
12	actually messing up or, you know, missing the
13	ball on something.
14	So I think if there are examples, and
15	I know there have been some but I'm not aware of,
16	like, the best of where a quality improvement
17	effort may have failed because it didn't look at
18	equity or disparities. Would that be an example
19	of the kind of thing that might help?
20	CO-CHAIR CHIN: Your guess is as good
21	as mine. I'm not sure.
22	MEMBER CABRERA: Okay. Well, one

suggestion.

2	CO-CHAIR CHIN: Yes. You could
3	consider it though, yes. Emilio and Romana?
4	MEMBER CARRILLO: I think that there
5	would be great interest across the board on the
6	issue of these disparity sensitive measures which
7	is something everybody's, you know, kind of
8	thinking about, and which is something that we're
9	working on and kind of touches a lot of the work
10	that we've done.
11	And going back to some of the
12	foundational stuff like the Weisman paper from
13	'12 or '13 that lays out the characteristics and
14	does a brief analysis of the portfolio of NQF
15	which is thousands of measures. Which of those
16	measures, what type of measures would fall into
17	the category of disparity sensitive?
18	So maybe some just looking at NQF
19	measures and how this particular approach would
20	point out those that are disparity sensitive.
21	CO-CHAIR CHIN: I guess really what
22	you're saying, Emilio, one approach is to really

still have it fairly NQF centric where if the 1 2 overall issue is well, how do you improve equity with a huge lever being equity, well performance 3 4 measurement and then the use of public reporting 5 and payment. Well, here's a brief history of what 6 7 NQF has done in the past with disparity sensitive 8 conditions, one of them. Here's the current 9 work, here's the evolving type of questions. Here's some data from the trial period with some 10 risk factors being, like, one important piece of 11 12 that. 13 So we have some data for that, so it's 14 not just expert opinion. And then the policy I mean, that keeps it in our wheelhouse of 15 regs. 16 what our strength is. I mean, I don't know how 17 much he's really asking for a review paper 18 because, I mean, others can do review papers as 19 well or better than us, so that's not really our 20 strength. 21 I mean, the strength is the work that 22 we're doing, and that's what makes it interesting

to, I would presume, the audience. Anyway,
 Romana?

MEMBER HASNAIN-WYNIA: So I'm on the editorial board and I was on both the committees for the special issues or the specific issues on equity. And I think if it's purely focused on the disparity sensitive measures, it won't get a lot of play at health affairs.

9 What I do think is that that could be 10 a component of it, but it has to tell an 11 overarching story, and that story has to be 12 bigger than NQF. But NQF's role in driving, in 13 this case measurement, is important.

So in some ways, you know, if we think about even the conversation today, where we were with disparity sensitive measures, where the role of social determinants kind of, you know, where it fell back in 2010, 2011, 2012, I would bring in some of the work with NAM because there's so much crossover, and reference that.

So showing some level of cohesionwhich I think the reports that staff have

written, you know, have already started to do showing kind of like this critical mass of work that connects the dots, but then honing in on what NQF is specifically doing around the measurement piece.

6 And you know, so bringing in the 7 disparity sensitive measures, but kind of maybe 8 really emphasizing where that intersection now, 9 the social risk factors and social determinates 10 plays out and how NQF and this Committee has been 11 thinking about that integration.

12 That would be a new contribution in 13 my, at least in my opinion based on the 14 conversations of the Committee that was trying to 15 focus on, you know, what is the ask of authors 16 who would be submitting to this issue.

17CO-CHAIR CHIN: That makes a lot of18sense. Emilio?

19 MEMBER CARRILLO: Just to continue on 20 that train of thought that you proposed, the fact 21 that cultural competence over the years has 22 evolved and now the social determinates coming

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together in a way that is measurable, I think 1 2 that that force, those forces that are evolving and how NQF is basically turning those into 3 measures would be, in terms of development of the 4 field, would be an important statement. 5 CO-CHAIR CHIN: Ninez? 6 7 CO-CHAIR PONCE: Yes, I think both 8 Romana and Emilio have helped us with an outline 9 for the paper. And, but just to get into specifics, in terms of moving the field, I think 10 11 what I've heard here a lot is the importance of 12 community level factors that have not really come 13 to play in the operationalization of measures. 14 And also, again I always call out Christie's work on emergence of new data sources 15 16 to get at more granular community level factors. 17 So, and that's all content that happened here. 18 And then Dave presented at NAM again 19 something on community level factors as well. So 20 where it's the place. So some of that I think 21 can help populate the outline that Romana said 22 with the overarching evolution and thinking that

Emilio noted. I think we have a paper. 1 2 CO-CHAIR CHIN: Anyone on the phone, any thoughts about this? 3 4 MEMBER BERNHEIM: Yes, I think 5 imbedded -- this is Susannah -- in what you all have already said is, or maybe supplementary, is 6 7 to the extent that we're getting to specific 8 strategies, you know, we don't have complete 9 evidence on what strategies are effective. But among this group we have built 10 11 some evidence for what strategies at least are 12 feasible. You know, there's lots of examples now 13 that have been sort of scattered through our 14 discussion. And I think it's going to make our 15 report stronger and the paper stronger if we can 16 lean on those. 17 CO-CHAIR CHIN: Thanks, Susannah. 18 Anyone else on the phone, any thoughts? So 19 moving ahead, like, in terms of process, so I 20 guess quickly timelines. So we can talk to the 21 journal about what's possible. 22 But one think we may be able to do is

if you have any particular interest in working on
 this, maybe let Erin know so that we may be able
 to do something, like, again if the journal
 allows.

5 But we may be able to do something 6 where there's both a group authorship in terms of 7 the disparity standing committee listed, and then 8 also if there's a subset of people that want to 9 work on it enough to be listed as individual 10 authors also. But we'll have to sort of talk to 11 the Health Affairs about that.

But if you have any particular But if you have any particular interest in working on it, knowing Susannah wants to work as one person. Any particular interest, maybe just let Erin know and we'll figure things out. Okay.

17 Anything else, Ninez or Helen? 18 DR. BURSTIN: It's great. 19 CO-CHAIR CHIN: Okay, great. Thank 20 We have maybe five minutes before the 12:30 you. 21 general item starts. Erin wanted to know, if we're starting to end the work of this contract 22

1	of CMS and we're talking about dissemination.
2	And so of course it's going to be the
3	final report, this is going to be well, we'll
4	see what happens in terms of the Health Affairs
5	paper.
6	Do people have other thoughts
7	regarding dissemination in terms of maximizing
8	the impact of the work of this Committee?
9	MEMBER COPELAND: Is there a planned
10	distribution map already? And you're looking for
11	additions? Or is this starting with a blank
12	sheet of paper?
13	CO-CHAIR CHIN: Great question. So
14	Erin and Helen, what is the default dissemination
15	plan?
16	MS. O'ROURKE: So generally we post it
17	on our website, deliver it to HHS, we notify
18	anyone who's expressed interest in the paper that
19	it's been published. We do put everything out
20	for comment, let all of the members of NQF as
21	well as people who have signed up who are not
22	members to follow the project to please weigh in

and share the results.

2	But I think that we're hoping to get
3	some more input from all of you on how we could
4	be more impactful and get more uptake of this
5	than necessarily just putting it on our channels,
6	and would love to know what you think might be
7	useful.
8	MEMBER FERGUSON: There might be an
9	opportunity if you have sort of a template for a
10	press release where we can link it to so that if
11	there's members that are really involved and
12	frequently do send out press releases, and if you
13	have some of the templates, information that can
14	go out then, you know, our organizations can
15	you might want to get a list and make sure that
16	it's in line. But you know, organizations will
17	be able to disseminate that. You know, I've been
18	giving dates so we'll just have a mass population
19	in terms of a press release, a news release.
20	CO-CHAIR CHIN: That's a great idea.
21	Romana?
22	MEMBER HASNAIN-WYNIA: So, because

there is a strategy that focuses on demonstrations, research, evaluation, et cetera. I would recommend that, and I'm going to actually ask Ron to help with this. So I would recommend trying to get a session at the annual meeting which is in DC.

And Ron sits on the addressing 7 8 disparities advisory panel. So this is something 9 Ron can recommend. I know advisory panel members have a lot of weight in terms of their 10 recommendations because it's a committee focused 11 12 on equity. If it's squarely into their priority 13 for addressing disparities, so that would be an 14 opportunity to present and say, you know, this is 15 NQF saying we need more evidence on X, Y, and Z. 16 So that's just a very specific recommendation. 17 CO-CHAIR CHIN: Great. So maybe Erin 18 and team can follow up with Ron there? 19 MEMBER SANCHEZ: Hey Marshall, this is 20 Eduardo. CO-CHAIR CHIN: Go ahead, Eduardo. 21 22 MEMBER SANCHEZ: With regards to

dissemination, a couple of thoughts. One is that we all, and I've heard mention of this already but I represent a -- I work in a large organization that's got its own communications channel.

6 And so it might be a way to amplify 7 the message. And if I were to know who to work 8 with in advance, we can do both our more 9 traditional communications, but then also we, 10 like many others, have a whole social media 11 presence that we're trying to grow even more. 12 And then I just wonder if there isn't

opportunities for blogging and commenting about
the importance of not just the notion of equity
and disparities, but the importance of
measurement and the value of measurement to move
us towards the elimination of health disparities
and the achievement of health equity.

19 CO-CHAIR CHIN: Thank you, Eduardo. So 20 quick comments from Nancy and Philip, then we'll 21 turn it over to Ninez for the afternoon 22 discussion.

1	MEMBER GARRETT: Well, I wonder if
2	there's some way to team up with the other two
3	efforts that are so related, the NAM report and
4	the ASPE report and show the similarities between
5	them and have some kind of common press release
6	across all three, that would be one idea because
7	it is a little confusing when these things come
8	out singly and then everyone has to try to
9	connect the dots themselves, so that would be one
10	idea.
11	And then I just, I really liked this
12	kind of four page thing that they did for the NAM
13	report. It makes it a lot easier than handing
14	somebody a 50 page report. So something like
15	this I think is helpful in dissemination as well.
16	CO-CHAIR CHIN: Thanks, Nancy. So
17	Philip, and then we'll turn it over to Ninez.
18	MEMBER ALBERTI: Just briefly, you
19	know, AAMC has dozens, many dozens of different
20	kinds of communication channels and venues,
21	meetings, annual meetings, quality focused
22	meetings, distribution lists with tens of

thousands of people. So I'm sure there's a way 1 2 that we can coordinate and amplify the word. CO-CHAIR CHIN: Same thing. 3 So Erin 4 and staff, be in contact with Philip in terms of 5 getting on a panel for AAMC shared by Philip Alberti. Okay, Ninez. 6 CO-CHAIR PONCE: 7 Okay, we're at the 8 point of our meeting where we will discuss the 9 report on the review and evaluation of the NQF on, it still says SDS trial period but I think 10 11 it's now renamed Social Risk Factors, risk 12 adjustment for social risk factors. 13 I just want to check on the folks on 14 the phone. I know we've gotten an email that Lisa Cooper has left the meeting for a nephew's 15 16 wedding, very important. Is anybody else on the 17 phone, just to make sure we get your comments. 18 MEMBER BERNHEIM: This is Susannah, 19 I'm still here. 20 CO-CHAIR PONCE: Okay, great. And 21 Sarah dropped off, she was in Alaska. 22 DR. BURSTIN: And Tom thought he would 1 be on by 1:00 p.m., but he'll join us in a little
2 bit.
3 CO-CHAIR PONCE: Okay, great. So I
4 give it to Helen and to Erin.

DR. BURSTIN: Perfect. Thank you, 5 everybody. So this has been a long time coming. 6 7 We're delighted to have the chance to talk with 8 you today about really what our experience has 9 been over the last couple of years, and a lot of 10 this work goes all the way back to the expert panel that Kevin and David chaired for us back in 11 12 2013, 2014.

13 And at that time, our expert panel 14 really, I think in many ways, started the ball rolling on this issue that has now become so 15 16 prominent across many different groups which is 17 exciting to see, and really was the idea that for 18 years, NQF had had a prohibition about including 19 race, ethnicity, any of those kinds of factors in 20 risk models, really because of fears that we 21 might be masking disparities.

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But ultimately, somewhat I think to

the surprise of some of us at the start of the 1 2 panel, ultimately the panel recommended including social risk factors with a pretty high bar as 3 4 we've now discovered over the last two years of 5 having both a conceptual and an empirical basis for doing so. 6 7 Given the concerns we were still 8 hearing out in the field, there was a decision 9 that we should move and do a two year trial period and see if we could share the learning 10 11 over this two year trial period. And during this 12 trial period, allow these social risk factors to be included. 13 14 And we very much set up this trial period to follow the guidance of the expert 15 16 panel, and I think probably five or six of you 17 were on that expert panel as well. And the 18 first, and I think much of this very much 19 resonates with I think what we heard just the 20 other day from the National Academy of Medicine 21 as well. 22 So first, we had recommended that each

measure really needed to be assessed 1 2 individually. This was not intended to be a blanket statement that all measures be adjusted. 3 And that in fact there really needed to be a 4 conceptual basis, a logic, a rationale, a theory 5 behind why you would do it as well as empirical 6 7 evidence that adjusting for it mattered. And I say those words easily. 8 9 Actually defining those was harder than I think any of us thought, and we'll certainly come back 10 to that. And we gave some examples in the report 11 12 of what wouldn't be adjusted, for example safety 13 events in hospitals are unlikely to require 14 adjustments for these factors, things that have 15 the longer time periods where patient engagement 16 and their environment were particularly important 17 are the ones that logically have that conceptual

We also didn't just limit it to hospitals, although that's where the heat was certainly at the time, and still around readmission measures. It would really be to any

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basis.

level of analysis, health plans facilities,
 individual clinicians.

And that during this trial period, if 3 4 adjustment was appropriate, we would endorse one 5 measure with specifications also to compute both the adjusted measure as well as the 6 7 stratification for whatever was significant. And 8 we thought this was important, we felt like it 9 gave us the ability to have our cake and eat it 10 too. 11 Yes, adjust for fairness, but at the 12 same time, provide the transparency that continued to be an issue many had raised concerns 13 14 about over the years. So what ultimately happened is we took 15 16 that great guidance from many of you in this 17 expert panel report and we packaged that for all 18 of our standing committees. So all of our standing committees now have the opportunity to 19 20 look at measures in this way. 21 And specifically had them consider these specific questions, each of them. 22 Is there

a conceptual relationship between any of these factors and the measure focus, and some of these just relate to really just good guidance around risk adjustment.

5 Was the factor present at the start of 6 care, is there enough variation in the prevalence 7 of some of these factors across measured 8 entities. Does the empirical evidence show that 9 the factor has a significant and unique effect on 10 the outcome in question. And I think we'll come 11 back to that one as well.

And finally, is the information 12 13 available and generally accessible for the 14 measured patient population, and that is the other one obviously we will come back to as well. 15 16 I think those were prescient questions when we 17 wrote them two years ago, and they're clearly at 18 the core I think of what we found over the last 19 couple of years.

20 So over the last two years, really 21 just ending April 15th, so pretty recently, any 22 measures submitted for endorsement, whether new,

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maintenance, any of those measures could be 1 2 included in the trial period. For the most part though, and I want 3 4 to emphasize this because the expert panel report 5 did not say focus only on risk adjusted outcome It could be really anything, 6 measures. intermediate outcomes, other issues were 7 8 certainly raised. I think for the sake of the trial 9 period we were talking about adding factors to an 10 11 existing model for the sake of simplicity, we 12 mainly focused in on those risk adjusted outcome 13 measures. 14 I will tell you at these tables, many 15 committees raise issues about other measures that 16 did not yet have risk adjustment as part of them at all and said what about social risk. 17 So I think it's something again we've teed up for you 18 19 to come back to at the end. 20 And you know, the measure developers 21 were required to provide this information on a conceptual relationship. And if they found a 22

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conceptual relationship, we then asked them to 1 2 conduct the empirical analyses between the risk factors and the outcome of interest. 3 And we had each of our standing 4 5 committees evaluate risk adjustment under the validity criterion where all of that is looked at 6 7 across all of our committees. 8 So at the start of this, we worked 9 internally with CSAC and actually this group as well to start thinking about what will we even 10 11 track over the course of these two years. And 12 this is a list of some of the questions that we 13 tracked and drove some of the analysis. You've 14 probably already seen the report, and I'll go over it today. 15 16 So first, which measures had a 17 conceptual relationship? Something you guys 18 added at your last in-person meeting was the 19 suggestion that we not just look at which 20 measures had it, but how did they come to that 21 point, how did they arrive at that conceptual 22 basis. So for example, was it largely

1	literature, or data driven, how did they come up
2	with that conceptual basis.
3	Which variables and social risk data
4	were available and analyzed? What was the final
5	dispensation for those measures that were
6	submitted with conceptual basis, were they
7	ignored, what was the concerns, what issues were
8	raised?
9	And then finally, if they were
10	included in the risk model, if these social risk
11	factors were endorsed in the model, were we
12	seeing developers following through on the
13	submitting the specifications for stratification.
14	We also went ahead and realized this
15	wouldn't be sufficient, and we also decided we
16	needed to go back and do some qualitative
17	assessments as well. So in fact Drew and Erin
18	and other staff sent a survey to every one of the
19	300-odd committee members who had been part of
20	this process over the last couple of years to get
21	their input as to what they thought about the
22	trial period, what they thought worked well, what

information would have been better to have where 1 2 they felt like they needed more clarity. And in addition, we also looked to see 3 what measure developers perspectives were about 4 5 being part of this trial period. How onerous was it, how difficult was it to get the data, for 6 7 example. One of the great limiting steps, as we've discovered. 8 9 And then we also did a qualitative assessment of all the public comments that came 10 in on those measures to see if there was some 11 12 similar themes that were emerging around this. 13 All right, so I think we're on to the 14 next one. No, we missed something. Okay, now it's up. Next slide. Oh, I have it. 15 It's been 16 a long few days. It's like three days of sitting 17 and talking about disparities. 18 So this is sort of, this is the slide 19 that really summarizes what we learned over the 20 last two years, just really with numbers more 21 than anything else. 22 So overall, over the last two years,

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303 measures came in to NQF that could have been considered for the trial period. 126 of those were outcome or intermediate outcome measures. And of those, 93 of those utilized some form of risk adjustment.

6 65 of those, and we included a long 7 table for you at the end that we'll do a little 8 cleanup for the final report, actually had a 9 conceptual basis for adjusting for social risk 10 factors. And then this continues to go down to 11 the narrower part of the cone here.

12 Measures that had the conceptual 13 relationship, 43 of them, so this is 43 out of 14 65, from the number above, were deemed to be, have a significant effect. There was a 15 16 statistical significance in the model. But the 17 differences were very, very small. Did not have 18 any effect on model performance and did not 19 appear to change the performance of the entities 20 as measured. We'll get into more depth on those. 21 were submitted and had social risk 21 factors included. Of those, 17 were actually 22

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endorsed. And the five, the four that didn't
make it through actually failed on criteria other
than validity. It wasn't the issue of social
risk that really came forward.
So that's kind of how we saw this play
out over the last couple of years. And I'll go
into each of these in a bit more detail.
So the first ones, which measures were
adjusted for social risk. So of the 21 of the 65
that were submitted with the review, I may have
already mentioned this, 17 were endorsed. The
CSAC, the group that oversees all of our
evaluations didn't overturn any standing
committee recommendations around inclusion of
these factors.
And concerns about the inclusion of
risk factors in the measures that were endorsed
with them was not a theme in any public comments.
I think there was in general some comfort there.
These tended to be, as you'll see if
you look at the list up there, a number of those
are things like patient self report, CAHPS,

coordination of care for kids with special 1 2 healthcare needs which are frequently adjusted for things like parental education or education 3 or language. Not as much about adjustment for 4 5 things like income or other social factors. We then had this fairly large bucket 6 7 of measures that had a conceptual relationship to 8 the social factor being examined, but no 9 adjustment was done. And this is, I think, where the heart of the discussion will logically lead 10 11 us. 12 So of those 93 risk adjusted measures, 13 about 70 percent had a conceptual basis, about 29 14 percent of those there was no conceptual relationship or it wasn't supported. 15 These are 16 the things like the classic safety events where 17 you wouldn't expect there to be a conceptual 18 basis. 19 So from a positive perspective, it was 20 good to see the conceptual bases in fact did not 21 support adjustment for the measures who would not 22 have -- the expert panel would likely not have

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recommended be adjusted.

2	Of the 43 of the 65 measures though
3	with a conceptual relationship, the developer did
4	note, there were multiple developers here, but
5	many of these, I know Susannah's talked about
6	them, many of these measures were submitted by
7	Yale CORE or other CMS contractors.
8	Was the effect of the social risk
9	variables was significant, but that the addition
10	of the social risk factors did not meaningfully
11	change results or improve the performance of the
12	risk model. Do you have a question, Bob, about
13	that?
14	Or do you want to wait until the end.
15	Okay. I'm sure lots of cards will go up as soon
16	as I stop talking. And this is definitely the
17	place where I think we need to have conversation.
18	There was a lot of comments that did come in
19	about these measures should still be adjusted,
20	there was a significant effect. And I'll go
21	through some of that as well.
22	A little bit about consistency with
what the expert panel had told us. So many of 1 2 you had said social risk factors, only include them if both the conceptual and empirical bar are 3 We should use the same guidelines for 4 met. selecting risk factors, whether they're clinical 5 or social, and we followed that. 6 7 Generally, measure developers did exactly what was recommended here. They did not 8 9 include factors that would not have met some of the key selection criteria on this slide. 10 11 The conceptual basis was interesting. 12 We did try to go back, and thank you to Erin who I think after I asked her to do this, I think 13 14 this consumed a good portion of her weekend last weekend, so apologies to Addy and her husband, to 15 16 actually dive back in and figure out exactly what 17 people were using for this conceptual basis 18 because this, even the conceptual bases of some 19 of these measures was quite contentious. 20 So about 65 percent of them used 21 literature to go back and say there was a relationship in the literature. About 19 used 22

prior data. Commenters frequently identified
 issues with the development of the conceptual
 model.

4 Some concerns that sometimes the 5 factors that were selected were the factors 6 available as opposed to truly thinking about at a 7 conceptual basis of the large universe of things 8 that could really relate to, for example costs, 9 which factors were you're looking at.

So again, I think this was a little 10 11 bit of a looking for your keys under the lamppost 12 But again, it's pretty hard to find any story. 13 keys in this world, so I think that was part of 14 what happened. And it is definitely we've identified, we would very much like your guidance 15 16 here as a potential area for greater specificity 17 potentially going forward.

18 The next one was the empirical 19 analyses, and this was the other biggest place 20 where we very much would love your further 21 thoughts. Analyses definitely followed the 22 guidelines for variable selection as we have

those risk factor selections we had mentioned. 1 2 But there was significant variance in the way the approach to inclusion of factors. 3 4 Some relied on statistical significance. If it was statistically significant and there was a 5 conceptual basis for it, it went into the -- it 6 7 was in the model and then endorsed by our committees like that. 8 9 Some made the point the effect size was so small that including it in the model did 10 11 not make sense. And we're talking of, you know, 12 odds ratios sometimes and the, you know, 1.08, 1.04 kinds of odds. 13 14 And then a third argument was that it didn't improve the performance of the model, the 15 calibration or the discrimination statistics. 16 17 These statistics didn't move at all, so this isn't truly improving the performance of the 18 19 model. 20 And then finally Yale in particular, 21 and Susannah could speak to this if there are any 22 questions, specifically looked at if you looked

at the social risk factors versus the clinical risk factors, the relative contribution of patient level versus hospital level was very different.

And for the social risk factors, they 5 were much more oriented toward hospital effect 6 7 rather than patient effect. And as you recall in 8 our last discussion when we asked you about some 9 of the unanswered questions we were encountering, there was a fair amount of discomfort about 10 11 inclusion of provider level factors. So that was 12 another issue that was raised when those measures 13 came forward.

But certainly as you'll see, none of these were done with great comfort. This was all a sense of we're learning, we're trying to understand, but this is where we are right now.

And the other big finding of this, no surprise given the discussions we've had for some of us the last three days, there was really limited data on social risk factors. We were not prescriptive about saying which data sources had

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to be used or explored.

2	We specifically expected data was
3	going to be used as a proxy for individual risk
4	factors, but that many of our committees like
5	readmissions and others really made the point
6	that if you're going to use these individual risk
7	factors, they had to be as granular as possible.
8	So initial submissions of income by
9	six digit, income by six digit ZIP code became
10	income by nine digit ZIP code. And you know,
11	efforts to, I mean, we pushed pretty hard.
12	I have some of the developers didn't
13	appreciate it but again, I think we felt like we
14	had an obligation to try to go as far as we could
15	here, get more and more granular data. But even
16	the more granular data, unlike some of the things
17	we saw, you know, from Christie and others over
18	the last couple days, did not show large effects.
19	The focus to date has been patient
20	level factors, that was actually what was in the
21	expert panel report was a focus on patient level
22	factors primarily. Very limited exploration of

1	these more community level factors we spent a lot
2	of time talking about in the last couple days.
3	And overall, the variables that got
4	the most analysis were race, ethnicity, and
5	payer, including Medicaid, uninsurance, and used
6	specifically as part of our discussion. This
7	last time we talked about this this morning we
8	then recommended to the developers not to include
9	race as a proxy for social risk.
10	Some developers included it as a
11	comparator because at times it was more
12	significant than some of the other social risk
13	factors that were examined.
14	Relationship between conceptual basis
15	and empirical bases. This is again I think, I
16	have raised this, this has been I think the most
17	prominent feature of what we found, significant
18	number of measures with a strong conceptual basis
19	that then did not find an empirical relationship,
20	or at least a stronger one.
21	Generally, the conceptual basis was
22	broader than what could be tested empirically.

The literature would suggest you could look at all these different factors and there was a relationship, but when they were faced with the actual data in front of them, the data used to do the analysis which was available generally did not show that effect.

7 And again, I think as I've said on the 8 prior slide, developers sometimes differed in 9 their interpretation of the empirical relationship. And I think there was some 10 11 disagreement on endorsing measures when a measure 12 was analyzed for social risk and ultimately significant but not included. 13 That was 14 definitely a pretty significant point of concern. So a little bit about the qualitative 15 16 feedback we heard, and we've got, I think Sarah 17 dropped off, we've got Susannah who participated 18 pretty fully in this. Some of the challenges, it 19 was pretty hard to develop the conceptual model 20 if you hadn't already done it. 21 It was difficult to appropriately

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identify variables that could affect the outcomes

without potentially masking disparities. 1 I think 2 that issue was raised a lot by the developers in particular as we were going through this process. 3 And developers had mixed opinions 4 5 about how hard it was to get data on social risk Some worked really hard, some took a 6 factors. long time to keep trying and trying. But they 7 8 did all highlight the need for better data on 9 social risk factors to support future analyses. And finally, the majority of 10 11 developers agreed that examining this question 12 was important. So I think that was an important 13 factor for us. 14 Committee members, again we surveyed, we got about how many of these back, like 70 or 15 16 so? 17 PARTICIPANT: 69. 18 DR. BURSTIN: 69, I was close. 70 of 19 our committee members, actually 69 came back and 20 actually filled out this pretty extensive survey 21 to give their feedback which was great. 22 And many of them said we needed more

consistency across developers in the way this was 1 2 done. They wanted more, potentially more standardization of the kind of variables tested, 3 the data source to help with their review. 4 They noted significant challenges in 5 evaluating measures, it was just really hard to 6 7 know what to do with it. I mean, the struggles for example of some of the most high profile 8 9 committees who sit in this room like readmissions and costs in particular where lots of discomfort. 10 11 And the information tended to focus on 12 statistical significance as opposed to what would 13 be the real world impact of these measures as 14 used in a particular payment program. And some of this is the schizophrenia 15 16 of NQF of endorsement being about the measure 17 properties, the measure's application 18 partnership, the MAP being more about the 19 financial impact and understanding the broader 20 implications of programs, of measures selected 21 for programs. But I think, you know, there was a lot 22

of discussion back and forth. Okay, it may be statistical significance, there may be a small affect size, but what affect does this have out there in the world, particularly since we've been 4 talking a fair amount about the safety net for the past couple days on even if it's a small subsample of safety net institutions.

And there was a lot of concern there. 8 9 And suggestions were made. Should we have, for example for this particular area, external 10 methodology reviews rather than relying on our 11 12 usual standing committees. Definitely better 13 data on social risk factors was what they wanted, 14 and we all do.

And a closer tie between understanding 15 16 the conceptual model presented and the empirical 17 analyses then presented to the committee. That 18 disconnect was hard for many of them, and they 19 raised that.

20 And just as an aside, and we put this 21 in the report, Elisa has just led a large kaizen improvement effort we just did across all of our 22

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consensus development work. And one of the 1 2 recommendations you put out for public comment was the idea that we would actually have measure 3 testing reviewed by a separate methods panel just 4 because I think there's a level of expertise 5 there and a look of deer in the headlights when 6 7 people start talking about split samples and things that, you know, maybe it's time to just 8 9 move that to a panel more comfortable with that data, with that information. 10 11 When we did an analysis qualitatively

of all the public comment feedback we had gotten, it was a recurring theme in some projects, particularly readmissions and cost and resource use. Public comments highlighted concerns that the measures didn't, you know, generally did not include adjustment, that they thought was adequate for social risk.

Public commenters raised concerns that
social risk factors were frequently statistically
significant, but the developers did not include
them. And then finally, commenters expressed

concern that the social risk factors empirically tested didn't align as I mentioned earlier with the conceptual models presented.

And so then it felt like yes, it's conceptually logically related by the literature and everything else, their prior research, but what you're presenting doesn't meet that because you're giving us a different set of data on social risk factors mainly just due to the availability of social risk factor data.

So a couple key challenges and I'll wrap up and I'm sure there will be lots to talk about. Data availability is certainly the biggest one I think we encountered. There is really limited availability of patient level data here.

Variables that were examined
empirically didn't always align, as I mentioned.
And an issue that has come up repeatedly is
should we move to this consideration of community
level factors and what does that exactly mean.
I mean, for example, if Yale used the

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AHRQ deprivation index which is linked to the 1 2 American Community Survey at the nine digit ZIP, isn't that essentially a community factor, or are 3 4 there others that we want to expand beyond that might get a richer set of data. 5 Consideration of race we talked about 6 7 already so I won't spend much time on this. But, 8 you know, at times there was for example one ESRD 9 measure that was adjusted with race. And some of this does get back to the fact that sometimes 10 11 there are reasons where race may be appropriate. 12 But it wasn't used as a proxy for social risk. 13 And I took a picture of this, so 14 apologies for the weird placement of the slide, but I really liked this slide at the NAM the 15 16 other day. And I had Patrick Romano in front of 17 me whose head is right in the middle of my 18 picture. 19 I love him. I've known him forever, 20 but he was right in the middle of my photos. But 21 I thought this was a great, in many ways, summary of I think at least on the data side the 22

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struggles we are obviously collectively having 1 2 between ASPE, NAM, and us of, you know, if you think about worst outcomes for beneficiaries with 3 social risk factors in the center. 4 5 Quality of care drives that certainly, we know that. That's why we're doing this. 6 But social support and environment matter. 7 And then 8 I like the way they laid it at the top that there 9 is oftentimes higher medical risks that leads to worse outcomes that's measured, but there's also 10 11 higher medical risk that's unmeasured and this 12 issue of complexity keeps coming up. I always talk about the NAM meeting, 13

14 and we've talked about it as well. Patient 15 frailty, poor functional status, is that really 16 what we're potentially trying to capture with 17 some of these social risk data, or is it 18 different? 19 And then also -- a picture of my bad

20 picture. And then this question of also that 21 there is higher social risk that could 22 potentially lead to these worse outcomes that's

But then that, you know, that light 1 measured. 2 blue-gray box there I think summarizes a lot of the concerns at the end of this two year trial 3 4 period which is potentially higher social risk 5 that's unmeasured. And I think this is, I thought, just a 6 7 very nice summative piece, at least for us, 8 around some of our learnings over the last couple 9 years. Couple of other challenges. 10 I think 11 this role on stratification was complex. We did 12 ask developers to provide these instructions for 13 calculating it. We got some inconsistency in the 14 way that instructions would be laid out, and again there weren't that many adjusted variables. 15 16 But something we would need to be more consistent 17 potentially for in the future. 18 Pretty limited implementation, right? 19

19 None of the measures that we've now endorsed over 20 the last couple of years that have social risk 21 factors included are out in the field. So we 22 can't really assess the impact of adjustment

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without implementation.

2	You know, all the concerns raised
3	about what would happen if you put this, you
4	know, mass disparities. We have no way in a two
5	year trial period to really answer that question,
6	and we just want to be honest about the fact that
7	we can't.
8	Now the flip side of that is we do
9	have a fair amount of information from many
10	stakeholders that there may be some negative
11	concerns about measures implemented and its
12	effect on the safety net that don't have
13	adjustment.
14	And so this is really where we are.
15	We would love to discuss with you which issues
16	you feel like we've somewhat resolved, or at
17	least come close to resolving through the last
18	two years. And you'll notice I didn't put any
19	examples under there, although I think there are
20	some.
21	I think we've, you know, in many ways
22	shown this can be done. We could logistically

make this work and would certainly love your 1 2 guidance there. But really I think the main issues we would love to explore with you today, 3 which issues need further consideration. 4 I've 5 highlighted a couple of ones I mention in the slides as well as the report we sent you. 6 7 And do we need a more consistent 8 approach to conceptual model. How will we 9 consider adjustment versus stratification, statistical significance versus effect size for 10 11 inclusion is some of them. 12 And what data sources or factors 13 should be potentially used or explored further 14 like community factors or these unmeasured 15 clinical and social complexity. 16 So we're not asking you to make a 17 recommendation to us today around whether we 18 should continue the trial period, stop the trial 19 period, or weave it into our criteria, you know, 20 weave it into our process. That's really a board 21 level decision. 22 We very much want to get input from

1	you, we will also seek input from the CSAC early
2	next month, and then we'll produce an options
3	paper for the board taking all this consideration
4	into hand for the board meeting on July 23rd.
5	You should know that NQF funded this
6	trial period out of its internal dollars which
7	was not funded by CMS. So you know, there are
8	considerations of us moving forward, we just want
9	to be honest about that we need to consider. And
10	I think with that I will see if Erin, Drew, or
11	Alicia have anything else to oh, the board
12	meeting is on July 20th. And I think that's all
13	I got. Thank you.
14	CO-CHAIR PONCE: Thank you, Helen.
15	Rob was out first and then Romana, Nancy, David,
16	Emilio, and Christie. And also on the phone,
17	Susannah also if you would like to be in the
18	queue.
19	MEMBER RAUNER: I would like to
20	propose that we move to a phase two that studies
21	not new measures but the currently in use
22	measures for Medicare Shared Savings Program and

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2	David's article already has three of
3	those measures, colorectal cancer screening, A1c
4	poor control, and blood pressures control that
5	showed significant differences on income and
6	unemployment and race in his study.
7	So we know those are in use and
8	already potentially affecting, and so I think we
9	need to confirm from other sources how much those
10	measures are affected by these measures because
11	they are going to affect all these incentive
12	programs.
13	And so I think that's the next phase,
14	not new measures which I think are often very
15	minute little tweaky measures, blood pressure
16	control, those are big ones. And we should move
17	to those.
18	DR. BURSTIN: Those are great points,
19	Bob. And I should point out we did look at both
20	new and maintenance, new and old measures were
21	included. What we didn't do though is we didn't
22	look at some of these measures that are more

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process measures.

2 And so I guess another question would be if we did continue this, how do we handle 3 4 looking at measures that don't even have an 5 existing risk model at all to add social risk. So we would very much --6 (Simultaneous speaking.) 7 Although most of his 8 MEMBER RAUNER: 9 were the outcome measures actually that the process were less affected was the outcome 10 11 measures, those three. 12 The A1C, the blood DR. BURSTIN: 13 pressure, and the --14 MEMBER RAUNER: Colorectal acted like an outcome measure and you might want to comment 15 16 on that. 17 MEMBER NERENZ: Yes, I mean, and we 18 don't want to belabor this but we had a kind of a 19 blend of let's say distal outcome measures most 20 affected by SES, either intermediate outcomes or 21 process things that involved a fair amount of 22 personal investment, time commitment, support

like getting a colorectal screening more 1 2 moderately affected, and then the directly under control provider measures less affected. 3 So it's -- there's a little bit of a 4 5 spectrum there that I think just reflects the underlying dimension that we talk about all the 6 7 time of provider scope of control. 8 CO-CHAIR PONCE: Thanks. Romana? 9 MEMBER HASNAIN-WYNIA: Helen, I had a question about you talked briefly about the 10 11 patient level factors and kind of decomposing the 12 hospital level and the patient level. I was just curious about what the hospital level factors 13 14 And could you just again state what was were. the issue around the hospital versus patient 15 16 level decomposition analysis? 17 DR. BURSTIN: Yes, let me take the 18 first part if it and then maybe let us even ask 19 Susannah since it's her analysis to give you a bit more of a flavor of the decomposition 20 21 analysis. So the first one, hospital factors 22

1	were things like do you look at percent
2	uninsured, do you look at percent minority
3	patients within your institutions. And I think
4	the concerns that have been raised there is does
5	that necessarily then say those hospitals have a
6	different standard potentially?
7	MEMBER HASNAIN-WYNIA: Were there
8	other measures like nurse staffing ratios and
9	things like that?
10	DR. BURSTIN: No. No.
11	MEMBER HASNAIN-WYNIA: Kind of the
12	no, okay.
13	DR. BURSTIN: No, this was really
14	around, I should have been more clear, you're
15	right. This is really about hospital factors as
16	they relate to social risk. Right, so very
17	specific there. Susannah, do you want to give a
18	thumbnail on decomposition so I don't butcher it?
19	MEMBER BERNHEIM: Yes, I will try to
20	give a thumbnail and hope that none of my
21	statisticians are listening. I may butcher it
22	but I want to be brief. The concept is that we

know that social risk factors also travel, 1 2 cluster in certain hospitals. And so if you just put a patient level 3 4 social risk factor into a model and you don't 5 account for that cluster, and this came up in our original report as well, you could be essentially 6 7 adjusting away part of the hospital quality 8 system. 9 So we use a statistical technique 10 called decomposition that essentially separates out the portion of that seemingly patient level 11 12 variable that is really about the kind of -- not 13 the kind but the hospitals that have a lot of 14 these patients compared to the patient 15 themselves. 16 And this, and as Helen said, when we 17 do that, we show with some of our measures that 18 the hospital portion of that seemingly patient 19 level signal is much stronger than the patient 20 level so that the risk of putting a patient level 21 variable in is that you essentially lose 22 information about quality which this measure is

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intended to illuminate.

2	So what we did was we then looked at
3	whether that plays out similarly with clinical
4	variables and show that the SES variables behave
5	very differently, that the clinical variables are
6	primarily, although not entirely, you know,
7	something about the individual whereas often what
8	looks like a patient level variable is carrying
9	more information about the hospital.
10	And so really, and that sort of
11	quality measurement science mind set, it
12	shouldn't be put in without that decomposition.
13	And the one last thing I'll say, I was really
14	glad that Helen mentioned it, is a lot of times
15	our teams' results got framed as there was a
16	conceptual approach.
17	But because the factor didn't make a
18	big difference, we didn't put it in. But it was
19	really more that this decomposition speaks to our
20	conceptual framework which is that SES plays out
21	in two ways.
22	One is things that individuals carry,

and the other is the kinds of hospitals that they 1 2 are at. And that we needed to use an empiric method to try to separate those, and that those 3 4 empiric results really suggested that it was more 5 problematic to include them than not. I know that is controversial, but it 6 7 is important to know for this committee that we 8 didn't rest just on it doesn't make a big 9 difference. So that's the concept behind the 10 decomposition. I'm happy to share more if people 11 want. 12 CO-CHAIR PONCE: I think some of us 13 would want to look at that more closely, 14 Susannah. Nancy? 15 MEMBER GARRETT: So I really 16 appreciate the evaluation. Thank you, Helen, for 17 the nice summary. It's a really good report and 18 helpful to kind of understand what's been 19 happening. 20 So as a member of the original risk 21 adjustment committee, one thing for you to be aware of is that we didn't recommend the two year 22

trial period. So that came about I think at the
 board level.

We recommended that the door will be open to risk adjustment, and then when it got to the board, that's when the two year trial period got introduced. So that wasn't in the original recommendation of the committee.

8 And I think that happened because of 9 this fear of masking disparities, et cetera. I 10 think now two years later we have even more of an 11 understanding of the importance of social 12 determinates of health on overall health and 13 also, you know, we're grappling.

14 It's really messy, but I think opening 15 the door is the right thing to do, I think. So I 16 would really strongly recommend that the trial 17 period be ended and that this just become part of 18 what we do is trying to do the best we can with 19 measurements. So that would be my 20 recommendation.

In terms of the conceptual basis, one
thing I've been thinking about is whether that's

really an appropriate task to ask the measure developers to do to figure out the conceptual model.

So are there other options? For example, should the endorsing body for that particular measure grapple with that question and whether there's a conceptual relationship that should be investigated further.

9 And it doesn't necessarily have to be 10 a literature review. It doesn't have to be, you 11 know, something that's published to understand. 12 It could be qualitative information based on 13 going and observing a patient population and 14 seeing what factors are important in that kind of 15 care.

So that conceptual basis, I think we need to be careful about that it's not just a quick literature review. There's nothing published so there must not be something there because we're so early in the science on this. So I think we should be careful with how we do that, and maybe reframe or redo the process of

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how that happens.

2	And then the question of what happens
3	if there's a conceptual relationship but there's
4	no empirical evidence? That is a tough one. And
5	so one thing that we talked about in the cost and
6	resource use committee is should we consider
7	having a category.
8	So if, you know, there's either
9	endorsed or not endorsed right now. But is there
10	something like endorsed but social risk plays a
11	role but we can't measure it, and so be careful
12	how you use this measure.
13	Maybe you should just be cautious
14	because you might be inadvertently creating some
15	incentives that you don't want to create because
16	of this. So that's an option as well to have
17	another kind of category of endorsement.
18	CO-CHAIR PONCE: So Nancy, so your
19	recommendation is end but implement, that was
20	your first end the trial period but just do
21	it, but with a lot of cautionary notes. Yes.
22	MEMBER GARRETT: And again, you guys

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don't even need to worry about, I mean, 1 2 specifically those kind of recommendations are things we're going to have to figure out. 3 Ι 4 would much rather have you help us with this 5 tougher, muddy, difficult disparity science 6 issues. CO-CHAIR PONCE: 7 David? 8 MEMBER NERENZ: I do have a few 9 points, and a couple things just for background context. You know, I was one of the co-chairs of 10 11 the panel. And during the course of that work 12 and in the time after I came to take on a very 13 personal strong interest in this work and really felt like I owned it. 14 So as I look at this now, I sort of 15 16 have a paternalistic feel. It's sort of like 17 when your child goes to school, you want to know 18 how he or she is doing, or is your kid's soccer team winning the soccer game. So whatever I say 19 20 is kind of filtered through that. 21 But I would have to say first of all the broad thing, I think this is all really good 22

in the sense that now there's an opportunity to learn about the conceptual models, to learn about the data relationships, to learn about what happens with the measures when you try to adjust them.

6 And you know, when we first released 7 the report, we started using, at least I started 8 using the metaphor of opening the door. And I 9 keep coming back to that, that I think the really 10 important thing that the NQF Board did and CSAC 11 in changing the policy was to open the door to 12 this kind of exploration.

Before that people, you know, who was going to look because if somebody wanted to go in and really dig in on social factors and the measures, where was it ever going to go? You know, policy said you're not going to do it anyway.

So I think this change I'm so happy
with, and then it's been reinforced now by the
NAM report, it's been reinforced by the ASPE
report. So it's good.

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1	Now I've been asked occasionally, you
2	know, am I disappointed in some way with the
3	results of what we're seeing here meaning fewer
4	measures with profound changes in risk adjustment
5	or the fact that all of the measures are now not
6	coming through with robust social risk models to
7	them.
8	And my answer is no, I'm not
9	disappointed because that, you know, if we go
10	back to our committee recommendations we said you
11	do adjustment when the conceptual model says yes
12	and the data say yes.
13	And then there's sort of the third
14	thing, as a practical matter can you actually
15	make it happen with the data available. So I
16	think we're learning.
17	Last couple things, I think it's early
18	days in this. So on terms of the first question,
19	issues being resolved, it may take a whole before
20	any issues are really resolved other than in
21	general. I think the current, the new/current
22	NQF policy is a good one.

I'm thinking for example, at least 1 2 according to the history I read, how many times did it take Edison to get a light bulb that 3 4 worked? What, 98 fails before one ever. So, you 5 know, people have to try things. And the first tries aren't necessarily fully successful, so we 6 7 do it more. 8 Also, for those of you who like video, 9 there are these wonderful examples of late '40s and early '50s tests of rockets where, you know, 10 11 the rocket would be sitting on the launch pad and 12 they would press the button and the thing would get about ten feet in the air and then it would 13 14 go down on its side and blow up. And you know, eventually we -- well, 15 16 yes. But still recently. But you know, 17 eventually we figure out how to put things to 18 wherever we want them to go. So I'm not discouraged by the fact that not everything just 19 20 clicked and happened. I think we learn this. 21 If there's any, last thing I'll say 22 about, say the consistent approach to conceptual

model, you know, I haven't been in and looking at 1 2 every single one of these that has come through, so I don't have the rich sense that some of you 3 4 have about how the different approaches have 5 come. But I personally have always liked the 6 7 idea of the boxes and arrows diagrams that we've You know, we had an example up here a few 8 seen. 9 minutes ago. Alan had one at the meeting 10 yesterday. 11 You know, to my visual taste they run 12 from left to right with it but, you know, you can 13 do it different ways. But it's conceivable to me 14 that we could offer that to measure developers at 15 least as a suggested template and say do 16 something like this. 17 They don't have to. Maybe it doesn't 18 lend itself. But I always find it easy to 19 understand. And if we go all the way back to our 20 panel work, and one of the things where I think 21 we found common ground among us early on in our 22 process was this idea if you take, you know, and

I'll sort of draw it up here in the air. 1 2 If you've got a measure or an outcome over on the right hand side and you say okay, 3 4 quality of care is one box that feeds that. And 5 then you talk about socioeconomic factors, you can either draw an arrow from socioeconomic to 6 7 quality and then to the outcome. And you know, everybody said that's 8 9 the pathway you do not want to adjust away in our adjustment. That's where the socioeconomic 10 11 factor is influencing quality. You don't want to 12 adjust that away. 13 But then it's the other arrow going 14 straight from socioeconomic to the outcome that 15 does not go through quality. That's what you do 16 want to adjust. So somehow it just seems to 17 create a clarity about, you know, what matters. 18 Now that's just as simple as simple 19 can be. And in the real context of measures you 20 would have more factors and you would have a 21 breakdown of which socioeconomic factors. But as 22 a prototype for how to think about this

1	conceptual model, I think we could do worse.
2	CO-CHAIR PONCE: Thanks, David. And
3	I'm going to turn it to the other dad. I know
4	Kevin is on the phone for that committee. Kevin,
5	are you on mute?
6	MEMBER FISCELLA: Oh yes, I was on
7	mute. I was. Yes, I agree with the comments,
8	with the previous comments from David and Nancy.
9	I think this is a work in progress. Obviously it
10	would be premature to say at this point to
11	abandon the effort.
12	I think this is much too complex an
13	issue with lots of work to be done. So I would
14	agree with the others, with continuing. I mean,
15	I think the results so far suggest I think that
16	likely, a lot of the social factors are being
17	included in many of the hospital risk adjustment
18	measures.
19	So in essence, we are in fact
20	adjusting for social risk via that added
21	morbidity and the ICD-10 codes and the procedures
22	that are included in these risk models.

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1	And at the end of the day, that given
2	the crude levels and the crude measures we have
3	for SES, that there isn't that much change when
4	you add that one measure to this fully adjusted
5	model.
6	So it very well could change if we
7	have better measures. But I think it also is
8	important to keep in mind that in fact we are
9	doing probably most of those effects already
10	being adjusted. So the incremental effect in
11	terms of actually changing things is not going to
12	be great.
13	The one thing I do think that needs to
14	be added perhaps during the continuation is the
15	impact on safety net providers and the change in
16	ranking that that has.
17	I think that's an additional point
18	beyond the additional criteria that we have
19	because even if it's only a handful of hospitals
20	or other entities who are affected, they're going
21	to be very, very upset and feel like it's very
22	unfair.
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1	And certainly they're caring for large
2	numbers of patients. So I think that should be
3	part of the data that's being collected, and ask
4	developers to look at that.
5	CO-CHAIR PONCE: Thanks, Kevin.
6	Emilio?
7	MEMBER CARRILLO: Thinking outside the
8	hospital environment, again this is not in direct
9	response to the immediate. When we think about
10	the neighborhood, the community, you have a lot
11	of these social risk factors which appear to many
12	of us that are synergistic and you get an
13	enhanced outcome, adverse outcome.
14	So that's just something to put in the
15	parking lot as we, you know, go forward thinking
16	about this, we might want to consider.
17	CO-CHAIR PONCE: Thanks, Emilio.
18	Nancy? Oh, you already did. Okay, sorry.
19	Christie?
20	MEMBER TEIGLAND: Yes, I want to talk
21	a little bit about the data, number one, and the
22	fact that, you know, it really isn't very

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1	precise. So it shouldn't be surprising to us
2	that we're not finding some of these effects.
3	Even if you talk about the ACS data at
4	the nine digit ZIP code level, remember what the
5	ACS data is. It is a sample of about two and a
6	half percent of the United States population. So
7	in an area like Washington, DC, you might get one
8	person in a nine digit ZIP code, you might get no
9	people, right.
10	And even if you aggregate that over
11	three years, which then the populations change.
12	There's just so many issues with using that data.
13	Ideally we would have this data at the person
14	level but we don't.
15	So we have found some very different
16	results using some much more precise but more
17	comprehensive covers a lot of the population.
18	You know, 95 percent of the population in the
19	country or something like that.
20	The other thing I want to talk about
21	is these effect sizes and what these models mean
22	because we tend to look at these coefficients

1	separately and we say oh, the odds ratio's only
2	1.04, the odds ratio is what you forget is
3	that you add up those effects for people who have
4	a lot of these, you know, risk factors.
5	So if I have five of those risk
6	factors, you got to look at all five of those
7	combined effects to see the effect on my risk for
8	having that outcome. You can't just look at
9	those individually.
10	What those individual odds ratios are
11	telling you is if everything else is equal,
12	right. So if I have cancer and you have cancer,
13	you know, the overriding thing is cancer. That's
14	going to make me more likely to be admitted to
15	the hospital or have some bad outcomes or die or
16	whatever.
17	But if I'm poor and have cancer, and
18	you're rich and have cancer, my risk is higher,
19	right? But what happens is cancer, you know,
20	these clinical chronic conditions are much more
21	prevalent in the disadvantaged population. And
22	so the decomposition analysis that Susannah's

talking about, you know, what you see is that a 1 2 lot of the disparity is actually attributed to the chronic conditions because they're far more 3 4 prevalent. They're absorbing some of that social risk factor stuff, right? 5 And so if you took those chronic 6 7 conditions out, those social risk factors would be much more significant. 8 9 And the other thing I wanted to 10 comment on was just, you know, in terms of the affect size, was looking at the differences in 11 12 quality, the outcomes, the actual quality gaps 13 that you see. 14 And what people also forget is, you 15 know, what are you comparing, what populations 16 are you comparing. Are you comparing the 17 unadjusted rates to the adjusted rates and 18 there's not a very big difference? 19 The reason for that is because some 20 plans are doing a worse job so they actually come 21 down, right? And some of the plans that serve a 22 lot of disadvantaged people are coming up. So

the overall effect, the differences in actual
 outcome rates for that measure might be zero or
 very, very small.

You need to look at the impacts on the individual plans, some of whom are going to do a hell of a lot worse, some of them who are going to do a heck of a lot better. Those rankings in between are the ones that really count, not those aggregate outcomes.

You can't just look and say well there's no difference so we didn't. No, no, no. It's all about those individuals. You know, what CMS and RAND actually did was control for the contracts, the actual MA plans, right?

And so what all they were looking at were disparities between duals and non-duals within the same contract. We already talked about the fact that number one, they're skewed really differently. These plans are either lots of duals or very few duals.

21 And so if you were looking at a plan 22 that has only a very few duals, lots of non-

duals, you're not going to see a lot of differences in their outcomes. Why? Because that plan has the resources to put to those duals.

5 They're probably going to, they may do They may also look a lot more like those 6 better. Right? And also if you look at, you 7 non-duals. 8 know, those high dual plans and they have a 9 handful of non-duals, you're probably not going to see a lot of difference in their outcomes 10 11 because the handful of non-duals might be a dual 12 if they were in a Medicaid managed, you know, 13 Medicaid expansion state.

14 They probably look more like those So again, I'm not surprised you don't see 15 duals. 16 a lot of difference within plans. You know, and 17 the statement that the between plan differences represent true differences in quality, I 18 19 completely disagree with. So those are my 20 comments. 21 CO-CHAIR PONCE: Thanks, Christie. Ι

think you would be a good candidate for this

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methods subcommittee.

2	DR. BURSTIN: She's on our list.
3	CO-CHAIR PONCE: Okay, good. I also
4	just wanted to clarify one of your points about
5	the decomposition analysis since Susannah's on
6	the phone. So the distribution of the effect,
7	which is what the decomposition does, which
8	attributes the effect to the patient versus the
9	hospital level and then showing that in terms of
10	the social risk factors, the distribution was
11	greater in the hospital, in this particular case,
12	hospital factors versus the patient.
13	Susannah, so my understanding is that
14	includes where you include these clinical
15	factors. And I think Christie's proposition is
16	what would happen if you took away the conditions
17	that are in the clinical, the traditional
18	clinical risk adjustment.
19	And I think that also resonates with
20	ASPE's approach where they started out with the
21	social risk factor adjustment and then they
22	incrementally added clinical factors. So I

wondered if you could comment on that, Susannah. 1 2 MEMBER BERNHEIM: Yes, I've never quite understood, in all honesty, how people --3 4 there's some amount of getting concerned about 5 these bordering. I mean, I don't think anybody is proposing that we would risk adjust these 6 7 models only for SES and ignore the effective 8 clinical factors. 9 So ultimately you're going to have a model that has both and it is true that in 10 11 general the patients with social risk factors 12 have more clinical comorbidities, particularly by 13 the time they're 65 and in Medicare and they've had sort of a lifetime accumulation often of 14 social risk factors. 15 16 So if you have one in there and you 17 don't have the other, they may soak up some of 18 the, you know, they may capture some of the signal. So I mean, I don't quite ever know how 19 20 to respond to that. 21 Yes, it is true that we examine the 22 impact of social risk after the clinical factors

are already there. But given that we would never 1 2 have a model that didn't have the clinical factors, I don't really know why that matters. 3 You could do it the other way and you 4 5 would see exactly what ASPE saw which is social risk factors look stronger. And when you add the 6 7 clinical risk factors, they account for a large 8 proportion of what's attributed to the social 9 risk factor when it's just in there alone. So I don't know if that's helpful. 10 11 Yes, I think it's CO-CHAIR PONCE: 12 just something -- no, that is helpful, thank you. 13 That's something to consider. And also my recollection of the committee that Dave and Kevin 14 chaired is that I thought we suggested that you 15 16 would show unadjusted, then clinical adjustment, and then adding the social adjustment. 17 18 MEMBER BERNHEIM: And that is what our 19 team does. But can I make one other quick comment on this which is I think it has been a 20 21 challenge to be somebody who is more cautious about the fact -- I think the trial has been a 22

I think David said it really well, 1 good thing. 2 that there's been a lot of learning. I think it has generated a lot of 3 4 exploration in important areas and a call for 5 better data which we all agree upon. So I'm a fan of having the policy of NQF changed to be 6 7 more open. 8 So, but I've definitely been a voice 9 of being more cautious. And it hasn't been fun because many people see things differently than I 10 11 But there's two things that I've noticed do. 12 that I want to question with you. 13 One is people who are scientists who I 14 know well seem to be very strongly driven by an underlying belief about this, that sort of no 15 matter what evidence comes forward, the response 16 17 is there must be something wrong with that 18 evidence. 19 And so I want us as a committee to be 20 careful. I mean, I think that we are learning 21 and we should pay attention both to what our 22 ongoing beliefs are and what the data ends up

showing us.

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2	And part of the reason I think it is
3	so different than what people anticipate is that
4	we tend to think about for an individual, the
5	risk of social risk factors. But in these
6	measures, patients are aggregated.
7	And David Nerenz has actually said
8	this really well often. And once you account for
9	clinical risk factors and you have an aggregation
10	of patients with relative degrees of these social
11	risk factors, in the end they often don't have as
12	big an impact as we anticipate ahead of time.
13	And we then may think we have the
14	wrong data and other things. And sometimes we
15	probably do have the wrong data, we certainly
16	don't have good enough data. But I think we get
17	confused between the sort of quality signal issue
18	of an aggregated group being seen by a provider
19	and what we believe about individual patient
20	prediction. So that's my one other just piece of
21	caution.
22	CO-CHAIR PONCE: Yes, we really

appreciate your cautiousness and also your work 1 2 on this. I also want to acknowledge that the way David drew out the conceptual framework where you 3 4 don't want to control for the pathway where it 5 goes through the healthcare provider is in line with the way you conceptualize the decomposition 6 7 analysis where you're trying to sort that out. 8 I just ran out of gas MEMBER NERENZ: 9 in talking. But Susannah, what I was going to say, what I was describing visually with my hands 10 11 in the air, I thought it was just a graphic 12 version of what you had said perfectly well about 13 the decomposition. It's the same idea. 14 Sorry, Susannah, did CO-CHAIR PONCE: 15 you have -- go ahead. 16 MEMBER BERNHEIM: No, please. I want 17 to make room for other people. I was just 18 agreeing with David. 19 CO-CHAIR PONCE: She was agreeing with 20 you, David. Philip? 21 MEMBER ALBERTI: I'm trying to 22 organize my thoughts on the fly and not repeat

many of the great points that have been made. 1 So 2 in terms of what issues have been resolved, I think it seems like we're all in agreement that 3 we need to continue to explore this. 4 I think the fact that the vast 5 majority of developers were able to develop 6 7 conceptual models, and that committees during the review said what about these measures that you 8 9 haven't -- I mean, there's a sense I believe that the resolution is we need to move forward in some 10 11 way. 12 In terms of conceptual further 13 considerations, when it comes to conceptual model 14 guidance, I think it would be really important for the NQF to kind of delineate explicitly the 15 16 potential patient, hospital, and community 17 factors that could be incorporated. 18 And I think that if we don't include 19 community factors, we have missed the boat 20 entirely. There are many, many validated, well 21 validated models that show the vast majority of health outcomes are actually due to those 22

variables.

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2	And I think that any conceptual model
3	that doesn't include neighborhood level factors
4	as I'll just say potentially incorrect. And I
5	think our last meeting, we had some debate and
6	discussion about when we talked about community
7	or neighborhood.
8	I just want to make it clear that I
9	think we're all talking about the neighborhoods
10	to which we are discharging patients, and not the
11	neighborhoods in which the hospitals are located.
12	I think there was some confusion before at our
13	last meeting, and I think that's a really crucial
14	point that if we're going to include hospital
15	level factors, it's not necessarily the
16	characteristics of the neighborhood the hospital
17	is in.
18	I also want to talk a little bit about
19	the disconnect between the conceptual and the
20	empirical models. You know, there is this huge
21	lack of data. Right? So you specify these
22	beautiful conceptual models that have variables

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at patient and maybe hospital, but certainly
 community levels. And then you don't have any of
 them.

4 So it actually turns up the empirical 5 test, we're using everything in there as a proxy. 6 Right? We're using dual eligibility as a proxy, 7 we're using race as a proxy, we're using 8 everything becomes a proxy because you don't 9 actually have the precision of the variables that 10 we need.

And so I think we just need to be aware of that. And so I, like Christie, am just not surprised that we don't see these movements once we adjust because we're not adjusting in the right way for the right things.

I also think I really, I read Sarah's email, kind of her plea for flexibility and continued flexibility in terms of how measures are adjusted and what developers propose. And I think in this learning mode, that's really crucial.

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But I also do think that there needs

to be some guidance at kind of high levels on how 1 2 we input some of these adjuster variables. So you know, we'll see models, empirical tests that 3 4 adjust for white, not white. It's not great, 5 we're lumping a whole lot of groups together in the not white group, but sometimes that's all the 6 data will allow us to do. 7 8 I've also seen tests that adjust for 9 black, not black. And I think that's unbelievably problematic because that not black 10 11 has all kinds of different groups of varying 12 degrees of privilege in. 13 And so I would not be surprised we 14 would not see differences when it comes to black, not black. So I think that we could actually 15 16 provide some guidance on model development at a very high level. 17 18 And then the last point has to do with 19 this issue of statistical versus clinical 20 significance. My question is who's the arbiter. 21 Who gets to decide how you translate an odds ratio of 1.04 into the lived experience of a 22

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1 provider on the ground.

2	You know, so if only three percent of
3	payments would shift as a result of doing this
4	SES adjustment, what three percent of hospitals,
5	where are they located, who are they serving, and
6	how much cash does that translate to?
7	I mean, it might not be in the omnibus
8	a hugely meaningful shift, but for those three
9	percent of hospitals, it very well could be. And
10	unless we have some transparency and someone in
11	charge of deciding what a threshold is for a
12	clinically or an on the ground significant, I
13	don't want to leave that up to measure
14	developers. Those are some of my points.
15	CO-CHAIR PONCE: Thanks, Philip. I
16	think you gave some specifics on stronger
17	language on measurement, empirical model
18	inference, and subgroup analysis. Yolanda?
19	MEMBER OGBOLU: I would just like to
20	add that I agree with much of what Philip just
21	said. When I hear the results that you just
22	described of the evaluation, it sounds like

although we're talking in the language of social 1 2 risk factors now, when this trial period started, we were talking social demographic status, and 3 4 they're not the same thing. And so when you think about social 5 risk factors, we're missing a bunch in this 6 7 common definition that's going forth now in terms of social risk factors, in terms of cultural 8 9 contacts, social relationships, community 10 contacts. 11 None of that has been measured by this 12 trial period. So I think switching the language 13 around that is problematic because this really 14 wasn't a trial period of social risk factors. It 15 was a social demographic status. 16 And then it only focused on very 17 limited data points which was race, ethnicity, 18 and payer. And so it really doesn't capture what

19 we need to measure. Some things as a group I
20 think we've already identified that there are
21 some measures about that could be looked at long
22 term, and then some things that we don't have

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measures for.

2	And then I wanted to piggyback a
3	little bit on what Christie mentioned about the
4	cumulative of those odds ratios. And so thinking
5	about things again, we've talked about this is
6	behind what intersectionality accounted for, and
7	some of the methods that are used in terms of
8	doing these studies.
9	And I hear people talking about why
10	there's something mediates or moderates or if we
11	need to do some kind of path analysis type
12	research as well. And I just don't have enough
13	information.
14	Maybe there's more information
15	available in terms of the methods that were used
16	to do some of, to evaluate whether these risk
17	factors should be accounted for. So those were
18	the additions I had.
19	CO-CHAIR PONCE: Thanks, Yolanda. So
20	you note again that this is, the thinking has
21	evolved. So it's not just a label change to
22	social risk factors, but that thinking is

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1	involved and what that means. Bob and then
2	Michelle, I haven't forgotten you.
3	MEMBER RAUNER: I just going to add to
4	what both Phil and Christie were saying that we
5	might add a third category. There's
6	statistically significant, there's clinically
7	significant, and then there's financially
8	significant.
9	And the way the Medicare shared
10	savings program works is that you can achieve
11	savings, but then the Medicare calls back a
12	certain percentage based on your quality score.
13	And most score between 80 and 99 percent, so
14	you're losing between 1 and 20 percent of
15	multiple millions of dollars.
16	And so if you added one or two points
17	down because of colorectal cancer screening, one
18	or two points down for blood pressure control and
19	that starts adding up, that could be the
20	difference between an ACO getting 93 percent of
21	that or 97 percent of it, and that becomes a
22	significant amount because the mean savings was

\$5.4 million. That ends up being hundreds of 1 2 thousands of dollars of potential loss. And then a couple of programs like 3 4 our, unfortunately our commercial plan, it's all 5 or nothing. So the difference between 49 and 51 percent is the entire \$4.7 million. 6 And so those small effect 1.08s, if 7 you add them up, can be a big deal for an ACO. 8 9 And so I think we need to consider that financial significance too. 10 11 CO-CHAIR PONCE: Thank you. Michelle? 12 MEMBER CABRERA: So I have a 13 combination of questions and comments. First one 14 is on the, sorry. I had them and now I lost 15 them. Oh, okay. 16 CO-CHAIR PONCE: You were waiting so 17 long. 18 MEMBER CABRERA: That's okay. So on 19 the issue of the sequencing of the adjustment, 20 SDS first versus clinical, I actually do think it 21 matters to do SDS first because a lot of the 22 heated conversations are around things that are

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1 happening in Medicare.

2	And you assume that by the time
3	someone is in Medicare, they're likely to be
4	sicker either because they're older or because
5	they have a disability, right?
6	And so that's where, yes, those things
7	come. They kind of converge and they compound.
8	But they're both present. I think if you're
9	looking more broadly across different pairs, then
10	the up-front, you know, social factors followed
11	by the clinical makes a little bit more sense of
12	it.
13	I don't know, just a thought on sort
14	of the Medicare as our kind of anchor on that
15	part of the conversation. I do think that a lot
16	more guidance would be useful, and I think we
17	just have to have an open mind that this is going
18	to be an iterative process and that it's not sort
19	of set in stone forever.
20	But, you know, we should, NQF should
21	give people guidance on a whole number of things.
22	I have a ton of questions which I'm happy to take

offline about, you know, what kind of training, 1 2 what kind of information was rolled out. And one basic question, do we, does 3 4 NQF require conceptual bases and empirical analyses on non-SDS? No. So there's all kinds 5 of -- maybe? Okay. 6 So yes, okay. So I mean, I guess what I'm trying to 7 8 figure out is I think that there's a culture 9 shift too within the measure developer community around what it means to do this, and that's 10 11 really playing out in the readmissions space. 12 And I actually found it helpful to go 13 to, like, some of the comments in that discussion 14 because I don't know this stuff very well. But 15 you know, AHA was commenting on the decomposition 16 issue. 17 And they said, you know, there, it's a 18 mixed effects model which means that they combine 19 hospital level and patient level factors for, 20 they roll that up into a single performance 21 score. 22 So for clinical they mix, but for SDS,

we're doing that separating out by pure patient 1 2 versus hospital. And they've called the question, why. And I call the question about I 3 4 thought our intent was to inoculate to some 5 degree that hospital which by virtue of their serving, you know, large numbers of uninsured 6 7 people, was facing low reimbursement rates, or 8 not uninsured but, I'm sorry, uninsured, under 9 insured, you know, again, understanding social risk factors. 10 11 The people who serve a lot of them might also be facing similar challenges, and that 12 13 we were trying to mitigate for some of that

14 effect. I think that's why there's sort of 15 concern about how this is playing out. This 16 isn't how it was supposed to go. This isn't what 17 it was supposed to be.

18 And I think there are some legitimate
19 questions in that mix model thing which, you
20 know, makes sense to me at least.
21 But I also want to ask, I mean, I'm
22 not sure it's not appropriate to adjust even if,

you know, we're looking at hospital level factors 1 2 for something because of the impact on the broader community and the fact that again, my 3 4 understanding was that we were supposed to 5 stratify in order to have the conversation about disparities, not massive disparities, and keep 6 7 the door open to that ongoing conversation. 8 And it's almost as though when folks 9 are talking about the adjustment piece, they're forgetting that we required the stratification 10 piece and that it was about finances. 11 But all of 12 a sudden now it's about assigning poor quality 13 when again I don't know. 14 You know what I mean? So I just think I would like to register those concerns. 15 I can't 16 remember if I had others. 17 CO-CHAIR PONCE: Ignatius. Thank you, 18 Michelle. 19 MR. BAU: So two very practical 20 suggestions. Again, since the list got narrowed 21 down to 17, there were ultimately endorsed with 22 adjustment at least to do a little more analysis

of what the conceptual models were and sort of tease them out more in the lines of technical assistance to say that these were the kinds of literature reviews that were done and here's the kind of evidence that created that conceptual relationship.

7 And then the same thing with the 8 empirical evidence. Given all the challenges and 9 data that again, if respondent education came up 10 as, you know, what was the data source for that 11 and how easy is that so that again, for future 12 measure developers, they at least have something 13 to point to.

14So I'm sure all that's available if15people did their research. But again, since it's16only 17, it just might be nice to have a handy17little chart just to show either as an appendix18or something else for people to see that.19CO-CHAIR PONCE: And before I call on20you, Michelle, so on the 17 I actually thought

wow, 17, that's actually really good. And so

this first part seems to be a feasibility test,

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like can it be done.

2	But what about what happened with
3	these 17? Like, how sort of the impact of
4	changing the, you know, the way that we're risk
5	adjusting, how does it compare? Kind of like one
6	of Christie's charts when she shows when you
7	change it, like, what happens to hospital A and
8	B, where do they fit.
9	So I think that could, that requires
10	more time. You need more of a runway of time to
11	see what happens. But then that would be kind of
12	a, you know, we did, I mean, this first part
13	seems like more of a feasibility. You know, can
14	it be done?
15	Although, of course, it was a mixed
16	bag on how it was done and that's where we're
17	going to give guidance. But then of those that
18	were endorsed. Michelle.
19	MEMBER BERNHEIM: Can I ask for one
20	request?
21	CO-CHAIR PONCE: Sure, sure.
22	MEMBER BERNHEIM: Which is that we are

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1	Susannah again, sorry. That we're careful
2	again in our language about assuming good and
3	bad. I just heard you say oh 17, that's pretty
4	good. Well maybe 17 is the perfect number.
5	I mean, obviously I don't think it is
6	perfect, but I don't think that this committee
7	should be on record as assuming that a measure
8	being risk adjusted is a better thing.
9	I think the science has to drive that.
10	And it may be that we disagree about the science,
11	but we should be more equal in our assumptions
12	about what is good and bad as the outcome of
13	these measures.
14	CO-CHAIR PONCE: So what I mean by
15	good is it's empirically good. It's good that we
16	have a sample to look at.
17	MEMBER BERNHEIM: And that makes a lot
18	of sense.
19	CO-CHAIR PONCE: Yes. Michelle?
20	MEMBER CABRERA: Yes, I remembered one
21	other point which was I again have this weird
22	question about whether given that we have such

1 limited consistent patient level data sources,
2 should we push out here's what we do have and ask
3 people to look at it in the interest of being
4 data driven for the, you know, anything where
5 we've figured out, like, okay this is now a data
6 set we can play with, asking people to play with
7 it in terms of stratification.

8 And then having that be a component or 9 a driver of a conversation about whether there 10 might be a need or a desire to adjust for that. 11 So again, not knowing as well as folks like 12 Christie and others whether that even exists.

But I think that should be one goal or aspiration to compile that and then just say across the board do it so that more people are doing it.

17 CO-CHAIR PONCE: Thanks, Michelle.18 Christie?

19 MEMBER TEIGLAND: Yes, I just want to 20 draw a parallel between this hospital effect that 21 we're seeing and, you know, maybe it's not 22 appropriate to adjust for the hospital because

the hospital is really a reflection of the people
 it's serving.

3	And in this case we have better data
4	about the hospital because that's an entity and
5	we know exactly what that population, we know a
6	lot more about what that population looks like.
7	Whereas the patient level data is
8	still poor, right, related to the social risk
9	factors. So it's not surprising that the
10	hospital effect
11	But again, it's just absorbing, just
12	like those clinical chronic conditions are
13	absorbing a lot of the risk factor, you know,
14	income and education factors in some of the risk
15	adjustments estimates we did because it's more
16	powerful because it's way more prevalent in
17	people who have low income, low education. They
18	have more diabetes, they have more heart
19	conditions, they have
20	So it's pulling away from the effect
21	of the social risk factor, and I think we're
22	seeing that same thing with this hospital effect.

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1	So it's really muddying the waters. And so we
2	just have to be really careful about that.
3	CO-CHAIR PONCE: Thanks, Christine.
4	Also I think it speaks to and calls out the
5	unmeasured, its effects of community context.
6	Emilio?
7	MEMBER CARRILLO: Yes, it makes sense.
8	However, recall the VA system had a big study,
9	and the disparities really reduced in the
10	hospital. Again, that might reflect on the VA as
11	opposed to say you know, Harlem hospital.
12	But the hospital does, because of all
13	the standardized guidelines and the way that the
14	care is delivered, they tend to shave down
15	somewhat. Again, the condition is still moved,
16	but it's really reduced, I think.
17	CO-CHAIR PONCE: Mic please, Christie.
18	MEMBER TEIGLAND: That's what we want
19	these models to do is to really which
20	organizations are doing it better. So when we
21	adjust for the organization, we muddy that,
22	right, we mess that up. So that's all I'm

1 saying. 2 CO-CHAIR PONCE: Those on the phone, would you care to comment? If you're talking 3 4 right now, you're on mute. Okay, go ahead. 5 that Susannah? No, this was Kevin. 6 MEMBER FISCELLA: 7 CO-CHAIR PONCE: Oh Kevin, sorry. 8 Yes, I just wanted MEMBER FISCELLA: 9 to respond to an earlier comment that the same standards are applied to clinical risk factors as 10 they are to social risk factors. 11 12 I mean, I think if you were to take

out any single clinical risk factor and then add 13 14 it back into the model, you would see that it really didn't, you know, probably 95 percent of 15 16 the cases have any more affect than a single 17 poorly measured social risk factors.

18 So I don't think it's equivalent in 19 that sense. You're taking a well-developed clinical model and adding one risk factor to it. 20 21 And if you were to do the opposite, I think in 22 most cases you would have a very similar minimal

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effect.

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2	CO-CHAIR PONCE: Okay, thank you. So
3	I think we've given a lot of guidance on the
4	statistical inferences that also include clinical
5	and financial significance. We had a lot of
6	guidance on the conceptual framework, do's and
7	don'ts too on some strong language and what
8	should be a proxy and not a proxy.
9	We offer a template. I think I heard
10	that. We didn't really touch on the specifics of
11	data, but I think we can continue that with
12	recommendations offline.
13	One appeal that Helen had was the
14	measures that were not currently risk adjusted,
15	but the feeling that there should still be under
16	an equity lens of social risk factors. Philip?
17	MEMBER ALBERTI: I actually want to
18	take the data conversation online for a minute.
19	CO-CHAIR PONCE: Okay, take it online.
20	MEMBER ALBERTI: If that's okay.
21	CO-CHAIR PONCE: No, take it online,
22	yes.

You know, I think 1 MEMBER ALBERTI: 2 there's just been a general agreement, at least in this room over the last two days and three 3 4 meetings of the importance of these neighborhood 5 community level factors. And I think that this group with this 6 7 opportunity that we've pointed out so often these two days, to propose a path forward to collect 8 9 the data that we need to collect to do this 10 right. 11 And whether that's through 12 demonstration projects in areas like California 13 or New York City where it might be possible in a 14 limited way to do some of those tests, or have, you know, four or five different options. 15 Aqain, 16 I'm not going to suggest new data collection 17 requirements for hospitals, I would lose my job. 18 But you know, so if, but that's one 19 option right there. Is CMS going to collect 20 these data, is it CDC that's going to collect 21 these data at a more granular level. Are we 22 really going to incentivize the collection of

1 these at the provider level.

2	What are the paths forward. What are
3	the ten most central variables we think based on
4	our expertise would be the most crucial adjusters
5	at the community or neighborhood level. And can
6	we come up with some ideas on how to gather those
7	prospectively.
8	CO-CHAIR PONCE: Thank you. Christie?
9	DR. BURSTIN: The last item that's
10	listed there, this issue just keeps coming up of
11	how much we're calling social risk may in fact be
12	unmeasured complexity. I just wanted this group
13	to just give us a little bit of thoughts on that.
14	And most of it just as a safety net
15	doc for years and years and years, they're so
16	intertwined, frailty, poor functional status,
17	many of those issues with some of those social
18	risk factors, this has been an area I would like
19	NQF to focus more attention on as well.
20	For example, can we get a claims based
21	indicator of frailty to put into some of these
22	risk factors. You know, what is the adequacy of

even being able to use claims data on a, you 1 2 know, a continuous bases for doing even some of the clinical risk adjustment. 3 We would just love your perspectives 4 on that as well. 5 CO-CHAIR PONCE: 6 Ron? 7 MEMBER COPELAND: Well, I think to 8 pursue that, we're going to have to have partners 9 out in the field who are already in many cases 10 starting to ask patients directly for those type 11 of data so that we have patient level data that's 12 been put into the system. 13 So whether whoever, you know, the 14 payer systems are regarding risk adjustment and so on as we've heard today, that there's a lot of 15 16 complexity there. But we should all be aware that a lot of organizations aren't waiting for 17 18 the Government payers to figure this out. 19 They're just starting to collect the 20 data from their members directly, putting it into 21 their systems, and creating risk factors based on 22 that to not to adjust payment, but obviously to
adjust interventions, upstream interventions as
well as direct patient care in the right
environment and so on.

4 So I think identifying as I think 5 about some type of collaboration or demonstration 6 project, in that space to understand these so-7 called unmeasured clinical areas because I think 8 structure racism in another one of these areas 9 that fits into that category.

None of this stuff is going to touch that in terms of impact, but it is definitely operating because it informs peoples day to day decisions and it's not going to show up in data based on some measurable social factors.

So there's that stuff and how does 15 16 that contribute and impact into this whole 17 agenda. So that would be an area to explore. 18 Don't know how many organizations are already 19 doing a lot in this space in terms of collecting 20 data directly from patients and putting it into 21 their systems or not, but that's worth exploring 22 and maybe get some collaboration that can occur

in that space.

2	DR. BURSTIN: And Sarah presented some
3	data at the meeting you convened, Ignatius,
4	around health plans at least in terms of what
5	they're actually collecting. And it was still
6	pretty darn small for most.
7	CO-CHAIR PONCE: I do work with
8	AAPCHO, Association of Asian Pacific Community
9	Health Organizations where they're represented
10	there. So they are very interested. I've been
11	talking about social complexity for a long time.
12	I mean, the data's a limitation.
13	But it might be since you just, you
14	know, you triggered it in my brain when you said
15	since you were a safety net provider, that maybe
16	we should look at these safety net providers to
17	get guidance because they're front liners on
18	dealing with socially complex patients.
19	Their data may not be as mature as
20	their sensitivity and their thinking about this.
21	But I think they have a sense on the real world
22	problems.

1	2
1	CO-CHAIR PONCE: Marshall?
2	CO-CHAIR CHIN: I'm trying to think
3	of, like, how to sort of synthesize what we've
4	heard so far. The report is pretty to the point
5	of, like, there was a trial period, here's what
6	we found where 17, the measures were admitted
7	were incorporated.
8	There's a lot of heterogeneity in what
9	was done, and not a lot of consensus on sort of
10	the ways to move forward given the thorny issues.
11	And so I'm wondering if maybe, well thinking a
12	little bit like, so what are the take homes that
13	we've come to so far.
14	So for example, it's almost to me, I
15	may have heard, it's like there probably does
16	need to be more standardization, or at a minimum
17	convening of the various different parties with
18	different perspectives, approaches to hammer out
19	some of these, like, advantages that consist of
20	different approaches ranging from what's in the
21	conceptual model, the issue of patient level,
22	community level, availability of data,

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statistical approaches.

2	So we sort of just touched up on this.
3	Maybe it needs to have a subcommittee, but it
4	seems like that there are significant differences
5	between some of the different groups in how I've
6	approached it. Which lead to important
7	differences.
8	And so that needs to be sort of hashed
9	out also. Let alone then things which are more
10	suited, judgement calls regarding things like
11	what type of significance in a month of change is
12	relevant, whether it's fiscal significance,
13	whether it's the impact.
14	Or like Bob and Philip are saying,
15	maybe one to three percent of some outcome. But
16	you know, maybe that's enough to, because they
17	use different types of payment, or if you had a 3
18	percent of groups effective that's important.
19	Sort of a policy judgement, value
20	judgement type of thing. So I guess my concern
21	is that, like, we're raising a lot of great
22	issues, but we haven't really talked about well,

and so how and presumably would be like a next 1 2 stage of this work that we don't have two years from now basically the same result of, like, left 3 4 clarity I guess regarding some of the advancement. 5 In other words, give us some of these 6 7 unresolved issues or conflicting approaches sometimes. How do we sort of gain further 8 9 insight into preferred approaches. I mean, Sarah's point that she made in 10 somebody, but very important of like there needs 11 12 to be some flexibility in it all. So it's this balance between 13 14 flexibility and learning versus if there are better ways of doing things, then we should know 15 16 about them and then we should be guiding towards 17 that. 18 So I'm wondering then, like, on one 19 hand we have basically live it as is and leave it 20 to the wisdom of the higher powers of NQF to make 21 sure that moving ahead this is addressed versus 22 potentially we can probably get a little more

guidance about how do we enhance the likelihood 1 2 that this continued advancement in this area towards whatever result is going to be the 3 4 fairest and based upon reality and improving 5 things in terms of, like, the data availability and the statistical approaches and all. 6 7 DR. BURSTIN: Just a quick response on 8 I think in many ways the issues you've that. 9 raised are not the ones that we could have simply 10 said do X. There just is not an agreement on 11 doing X. 12 I do think though it's a way to 13 elucidate with those key questions and go to, you 14 know, subgroups of you guys or something to try to get that specificity. I can't imagine moving 15 16 forward in the current heterogeneous environment 17 and kind of, you know, what was the Einstein 18 thing, doing the same thing over and over again 19 expecting different results. 20 No desire to do that again. So I 21 think there is a desire regardless of sort of how he moved forward in whatever way that we need 22

that clarity. 1 2 CO-CHAIR PONCE: Thanks, Helen. Christie? 3 4 MEMBER TEIGLAND: Yes, Helen, I just 5 wanted to respond to your question about these additional variables and how important they are. 6 7 And I have a recent example. And it's public so 8 I can say who it is. 9 We built some, and I remember that the 10 Impact Act was about post-acute care, right? So 11 we built, Kindred came to us and said can you 12 build us models to show the optimal placement for 13 someone who's leaving the hospital so that we 14 minimize readmissions to the hospital. And so the model's based on all kinds 15 16 of chronic conditions that the individual has, 17 you know, what kind of tests and procedures they 18 had in the hospital, why they were in the 19 hospital, you know, how long were they in the 20 hospital, were they in the ICU. 21 And so ultimately what the model did 22 was shift a lot of people from going to a nursing

1	home, right, a skilled nursing home to home
2	health, to home health which could save the
3	system, you know, billions of dollars.
4	But what it came down to was we had to
5	add some additional questions at the end for the
6	person making the placement because can this
7	person go home, you know, can they do activities
8	of daily living, do they have a support, a care
9	giver at home.
10	And if they don't, guess what, they're
11	going to go be in the nursing home. And so even
12	though I have the same, you know, clinical
13	conditions, and if I went home I would be better
14	off and I would be less likely to go back to the
15	hospital. I'm going to go to a nursing home
16	because I don't have the resources.
17	So they have really important factors.
18	So when we're thinking about this in the bigger
19	context of saving the health system money and
20	actually having an impact on readmission rates
21	for people with, you know, some and certainly not
22	having social supports at home is a social risk

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2	You know, ADLs is something else, but
3	these other variables are no less important to
4	get this stuff right. So I absolutely vote for,
5	you know, figuring out how to get that
6	information.
7	Now once you get to the nursing home,
8	you have all that data, right, on ADLs scores, on
9	ten different activities of daily living. They
10	collect all that data once you're there. But
11	once you're there, it's too late. So yes.
12	CO-CHAIR PONCE: Thanks, Christie.
13	Emilio?
14	MEMBER CARRILLO: Yes, on a different
15	topic going back to some of the things that Phil
16	said and also Marshall, the neighborhood based,
17	you don't know if mesh or analysis can help us
18	begin to look at institutional racism.
19	And how is that? But by retracing the
20	pathway, you have policies and procedures that
21	are driven by government and are driven by
22	certain industries.

1	Those policies, procedures,
2	regulations impact social determinants which show
3	up in the neighborhood. Now for example housing.
4	You know, there is just so much evidence of how
5	red lining by banks and how certain, you know,
6	even government housing policies result in
7	gettoizing sectors of the population.
8	And that becomes the seed of a
9	neighborhood so that the policies and regulations
10	that the banks use, the redlining, the government
11	in terms of who gets the loans, in terms of
12	basically dispensations, that can all be traced
13	backwards if you look at the neighborhood and you
14	begin to look at the impact of the housing versus
15	the impact of the transportation, et cetera.
16	CO-CHAIR PONCE: Thanks. I was also
17	thinking that a lot of the social factors
18	measures are level measures and not, you know,
19	the social stratification measures of residential
20	segregation and income and equality which then
21	aren't amenably to when we start stratifying.
22	Then you sort of lose that overall

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structural factors that create the segregation of 1 2 services. So thanks. Phil? MEMBER ALBERTI: Yes, so kind of an 3 4 existential question maybe for, sorry to do that. 5 For the board to consider on July 20th. And I think it really comes back to this mismatch of a 6 really well specified, evidence based, literature 7 8 based conceptual model where there's kind of 9 universal scientific agreement that those doctors play a role paired with the complete inability to 10 11 test it with a national data set. 12 So I think the question is what does 13 the NQF do in that instance? Do you endorse a 14 measure that you know is invalid because you cannot, I'm just going to be provocative to be 15 16 provocative, that you know is, or that you think 17 might very well be invalid because you can't do 18 the adjustments and prove via an empirical test 19 how it should be used, or do you scrap the 20 measure. 21 I mean, those are two really extreme,

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and I'm doing that on purpose. But you know,

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what's the answer when you know that there's a
great conceptual basis to do these multi-level
adjustments, you can't test it.

Well, we'll either endorse it without it, we know it's not right, or we don't use it and that's a real, now that leaves a hole in the quality measurement. And I don't know what the answer is, I just wanted to put that out there. DR. BURSTIN: That's basically the

10 scenario. I mean, that's true. I mean, that's 11 exactly the arguments we heard of how do you put 12 it forward if you don't think it's valid versus 13 how do we remove it when we don't have that 14 empiric evidence that it has an effect.

I mean, it's truly the ultimate 15 16 existential crisis I think we face. I will say 17 that part of what we did do over the past couple 18 of years is for example when measures came 19 forward with a conceptual basis without a clear 20 empiric basis, as part of the annual review of 21 measures that we require all developers to go 22 through, there is now going to be a clear

question for each of them on an annual basis
saying so, what's the state of the art lately in
terms of data.

Can you look to re-do this. So I think part of our thinking was could we continue to sort of push this rock up the hill a bit. But it's still I think at the end of the day unsatisfying to all, to be very existential.

CO-CHAIR PONCE: Nancy, then David.

10 MEMBER GARRETT: So to that point, 11 that's what I was suggesting earlier that perhaps 12 there's another category in between those. And 13 so maybe there's an endorse but this is social 14 risk factor sensitive and we're not adequately 15 accounting for that.

16And therefore, here's a category where17we want to be careful how we use these measures18and give some guidance about how they're used.19So that would be one option to consider.20And then I just wanted to make the

21 point that in the NAM reports, they identify four 22 categories of how CMS could account for social

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risk factors. And risk adjustment's only one of
the four.

So there's also direct adjustment of 3 4 payment which we have in our recommendations 5 restructuring payment incentive design, stratification. So it's all stuff that we're 6 7 talking about, but I think part of the challenge 8 is that the risk adjustment is not going to 9 address health equity in the way, you know, we're 10 going to have to do other things. 11 And so addressing this one at a time 12 through the risk adjustment process, it's too 13 much to expect out of that process. And so I think that's a little bit of the challenge that 14 we're facing and maybe something that we can make 15 16 clear in our recommendations as well is that this 17 is just one thing that we think we need to do, 18 but it's not going to solve the problem. 19 CO-CHAIR PONCE: It's a good point, 20 Nancy. 21 MEMBER BERNHEIM: Ninez? 22 CO-CHAIR PONCE: Yes, Susannah, go

ahead.

2	MEMBER BERNHEIM: Well, is somebody
3	else in front of me in queue waiting.
4	CO-CHAIR PONCE: Oh, is that
5	MEMBER BERNHEIM: Susannah, yes.
6	CO-CHAIR PONCE: Yes, okay, go ahead.
7	MEMBER BERNHEIM: Okay. So Nancy, I
8	appreciated what you just said. And I think
9	responding a little bit to Philip's purposely
10	provocative statement, I think that I would like
11	for a second, race has come up a couple of times
12	now and I would like to talk about race for a
13	second.
14	One is a clarification because we
15	tested race in our models partly because we
16	thought that that was the guidance and partly
17	because we thought it was important not as a
18	proxy for SES, completely agree that we should
19	not use race as a proxy for SES.
20	But that the conceptual model for how
21	race affects something like readmission is
22	perhaps in my mind importantly similar to the

ways in which SES can affect readmission and 1 2 different from the ways clinical factors can. In general, although it's not this 3 4 simple, we think about clinical factors as having 5 a pretty direct affect. If you have in addition to the heart attack that you were admitted for 6 7 you also have end stage renal disease you are at 8 a higher risk because of that renal disease and 9 end up back in the hospital. If you are a low SES patient like 10 11 minority patients, the reasons that you have a 12 higher risk of returning to the hospital may be 13 things that are outside of that hospital's 14 control, and that's the argument that people make for risk adjusting. 15 16 But they may also have to do with, for 17 both minority patients and low SES patients, the 18 kinds of hospitals that you have access to, and 19 the kinds of treatment that you get within that 20 hospital. 21 And so when Philip says provocatively when we have sort of a perfectly good conceptual 22

model for why you would risk adjust, I would 1 2 argue again that the problem with SES is that the conceptual model suggests reasons to adjust and 3 4 reasons not to adjust. 5 And I will go back to what David 6 pointed out about the NAM piece, right? It depends, the different pathways that SES affects 7 8 the outcome and which of those predominate. 9 When we did our analyses, we found 10 that the predominant pathways were as much about 11 where you go as who you are. And that's, you 12 know, and when we see that with race we say no 13 way we're going to touch this. 14 But we don't really like to talk about the ways, though it's low SES patients on the 15 16 basis of their SES end up with institutional 17 classism if you will. 18 Right, part of what happens to these 19 patients is that they, not that there aren't many 20 outstanding safety net providers, but they 21 sometimes end up with limited access to high 22 quality care, or with less high quality care

1	within those institutions. And if we risk adjust
2	for that, we lose important information.
3	CO-CHAIR PONCE: People are thinking
4	here, Susannah. David?
5	MEMBER NERENZ: Sure. I was actually
6	going to make the point that Nancy made, her
7	first point. So I'm essentially just agreeing
8	with that, which I think was in response to Phil,
9	so I'm still trying to catch up with the
10	sequence.
11	But just to put a little smiley face
12	on it, I'm wondering if the NQF endorsement
13	message can come with something like a package
14	insert for prescription medications that, you
15	know, this measure is endorsed but don't use it
16	if this situation occurs or this situation
17	occurs.
18	And, you know, now back to serious, it
19	basically says we know conceptually, we know on
20	the basis of studies with limited, more regional,
21	or even single institution data sets that there
22	are certain factors that affect this that we

cannot adjust for in the way that we built the 1 2 model and we're applying it nationally. So, caution. 3 And so I'm asking a question. 4 Since I 5 don't actually look at the NQF endorsement letter or endorsement document, does it come with 6 7 caveats or cautions, or is that a reach? 8 DR. BURSTIN: You know, we don't. Ι 9 mean, we've done things like that in the past, this is time limited, it's not been tested, this 10 11 is, you know, things along those lines. 12 I will tell you one of the biggest 13 challenges here is these measures are the ones 14 most in use in federal payment programs. Let's be honest. So it's kind of the opposite effect, 15 16 right? 17 These measures are coming forward in 18 are so controversial because in some ways they 19 are out there being used. So to say use with 20 caution, I'm just not sure it's --21 MEMBER NERENZ: And I do understand 22 that. Again, I realize.

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1	DR. BURSTIN: Yes.
2	MEMBER NERENZ: But even then, I think
3	an example, and I'm not coming up with a good,
4	concrete example, but there was a CMS document
5	that came out a few months ago about proposed
6	measures for use in future programs, I forget
7	exactly what the title was. But at least to my
8	taste it involves some measures that were say
9	developed and validated in one setting, but now
10	were going to be pulled over.
11	So it was coming from the hospital
12	arena, but now we're going to put it in MIPS and
13	we're going to apply it to individual physicians
14	or something like that.
15	And in that case I think there is
16	still some avenue, and certainly in our public
17	comment, to that document. We made this point
18	that a measure that's good over here is not
19	necessarily good over there. And this, what I'm
20	now saying is just be kind of a special case of
21	that.
22	DR. BURSTIN: Right. And actually
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interesting, we do put that guidance, and actually the specific example here is the, which Erin did as well, the Medicare Spending for 4 Beneficiary measure which is a hospital level measure is being proposed for a level at the physician level. 6

7 And so our committee, and Nancy knows 8 this, explicitly said hey, this measure is 9 endorsed only at the provider level. You know, if you want to use this measure at a different 10 11 level, additional analyses would be required. 12 But that's always been guidance. It doesn't have 13 quite the same hammer I think of the you're in, 14 you're out kind of endorsement decision. 15 MEMBER NERENZ: Right. And I 16 certainly, I understand. If we're talking about 17 measures that are already widely in use, than

18 this caution about, you know, they could perhaps 19 be more informative or more fair if adjusted, it 20 doesn't affect much.

21 DR. BURSTIN: Yes.

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But maybe still that MEMBER NERENZ:

message could be put out there just so it's out there.

CO-CHAIR PONCE: So before I call on you, Bob, I just thought about this. Susannah, you know, when you said that there are different mechanisms that lead to what's an observed difference or penalty, not just by race but by socioeconomic status.

9 So in some ways, doesn't the approach 10 that you and your colleagues took, the 11 decomposition approach, address some of that 12 because again, that approach was, like, 13 classically done on our, the wage gender gap. Is 14 it because of the human capital characteristics of women or is it that employers might be 15 16 discriminating against women.

So wouldn't that be one way of decomposing it? MEMBER BERNHEIM: Yes, that's exactly why we did it. And you could, I mean, so you

21 could argue then once you decompose it to include 22 in the model that tiny portion that stays patient

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1	level. It seemed de minimis at that point.
2	But you certainly could do that, and
3	that might make stakeholders happy. And I know
4	ASSI, I think they ultimately didn't put any of
5	it in the report, but I think that is something
6	that they thought about as well is if you tried
7	to do the decomposition, it creates complicated
8	statistical models.
9	But you know, one thing this committee
10	could recommend is, you know, developers try to
11	separate the provider level effects from the
12	patient level effects so that if they're
13	adjusting they're primarily looking at the
14	patient level effect.
15	And of course you could do that for
16	clinical variables. But because the clinical
17	variables are mostly patient level, there's
18	typically less of a need to do that.
19	CO-CHAIR PONCE: And again, a friendly
20	amendment that I represent I think some of the
21	thinking across the table here is that we make
22	sure that we account for these unmeasured social

complexity and clinical complexity and measured 1 2 community factors right now. MEMBER BERNHEIM: 3 Yes. CO-CHAIR PONCE: Oh, I'm sorry. 4 Go ahead. 5 I just, I agree with 6 MEMBER BERNHEIM: both of the unmeasured clinical complexity issues 7 8 and the community factors. We thought a lot 9 about community factors. And it's an important area for continued exploration of these measures. 10 11 CO-CHAIR PONCE: I heard a definitely 12 from the NQF voice here. So, Bob? Oh Ron, did 13 you have? Okay, so Bob. 14 Yes, I was just kind MEMBER RAUNER: of running more with David's analogy about the 15 16 package inserts, that NQF measures are being used 17 off-label for things they weren't initially 18 intended for. They were for quality improvement, 19 but now they're being used for payment. 20 And so just like with drugs, we have 21 some post release monitoring for unintended side effects and adverse reactions. We need something 22

1	like that for these commonly used NQF measures
2	that are getting put into payment systems because
3	they were studied for this but they're using now
4	for something else.
5	Probably good, but likely with some
6	unintended consequences just like drugs. So I
7	kind of like that model, actually.
8	DR. BURSTIN: And actually, you're
9	playing right into our other big strategic area
10	which is getting feedback on measures. So right
11	now if you go to the NQF website and pull up
12	NQF's work, there is now a new button that allows
13	you to click feedback on any measure at any time,
14	24/7 because that's exactly we can't look
15	right now.
16	(Simultaneous speaking)
17	DR. BURSTIN: You know, but on the
18	plane, you know what, this measure, and part of
19	it is what we don't actually know is, I mean, we
20	hear a lot about the concerns about the negative
21	unintended consequences. We actually know very
22	little about which measures are actually really

	I
1	good, which ones in practice move the needle.
2	I want to use this measure, it really
3	helps me. So I think some of it is we feel like
4	to do our work effectively, we've just got to
5	know that. So much more of that to come.
6	PARTICIPANT: Thank you for being the
7	plant. All right, I think maybe we've exhausted
8	that.
9	CO-CHAIR PONCE: No, is there
10	something we haven't touched? Like, I was
11	skirting the data, but we actually have a lot
12	more time to discuss the data.
13	CO-CHAIR CHIN: It's Marshall. I
14	would just like to hear Susannah's response to
15	Christie's point earlier about this unmeasured
16	community factors and to the degree that your
17	hospital variable could be capturing that.
18	So in other words, so the community
19	social risk, because we don't have great
20	measures, some of what your models are capturing
21	as a hospital effect are really sort of the
22	unmeasured social complexity of the community.

So how would you respond to Christie's point there?

3	MEMBER BERNHEIM: Well, it's a little
4	complicated. I think the way the model is set up
5	is pretty specific to the hospital. However, in
6	general, you know, everything, this is going to
7	sound ridiculous but I think it's an important
8	concept. Everything is ultimately nested in
9	other things, right?
10	So there's probably an effect of, you
11	know, state level policies and there's probably,
12	you know, so we account for the sort of
13	clustering of patients within hospitals as a
14	modeling approach we use, hierarchical modeling
15	which accounts for that.
16	But in truth, hospitals are in fact if
17	you will kind of clustered within communities.
18	We've talked about some of this in this
19	committee. The things that I think we need to
20	start to sort out to try to think about community
21	factors are what are factors that are community
22	factors that you feel like hospitals don't

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influence but that might influence their quality and outcomes.

3 So first you have to sort of separate 4 factors into ones that are sort of at least 5 partially under the influence of the hospital and 6 those that aren't.

7 And then you have to think about 8 whether you're thinking about the community that 9 the patients are in or are we more interested in 10 this idea that if patients come from communities 11 with high crime rates, their risk is different, 12 or the community that the hospital is in.

So are we more interested in sort of 13 14 say social services or policies in that hospital, 15 and then how would you account for that, right, 16 because you often have a cluster of hospitals 17 that looks to be exposed to the same set of community factors if you look at, you know, 18 19 county level vacancy rates which some people have 20 done, there might be four hospitals in that 21 county who all sort of have that same vacancy rate assigned. 22

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But of course, the way that it 1 2 influences those four hospitals is going to be different, and that's hard to parse that across. 3 4 So I didn't completely answer your question 5 except to say there may be a little bit of that, but I think the modeling is mostly hospital 6 7 focused. 8 But to some extent, those community 9 factors are affecting not just SES, everything about these models. And the problem with trying 10 to incorporate them in is that there's these 11 12 layers of questions about which factors you would 13 use and at what level and how you would determine 14 how they differentially affected different hospitals. 15 16 We're doing some work on, but it is 17 not simple. 18 CO-CHAIR PONCE: Thanks, Susannah. Ι 19 think you're inspiring creative thought here. Ι 20 think there's, the cards went up and down and up 21 and down. So, I'm going to stick with the order 22 where Ignatius, no? Who? Who goes?

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1	PARTICIPANT: I think Philip was next.
2	CO-CHAIR PONCE: Philip. Philip then
3	David then Michelle.
4	MEMBER ALBERTI: I was definitely
5	going up and down, I apologize. You know, so I
6	think we all agree that these variables across
7	the various levels that we're talking about are
8	co-linear, right? They're correlated. It's hard
9	to, really different to tease apart.
10	So I think that's, I think, I'm
11	looking around, everyone's nodding. So I think
12	that's true.
13	Getting back to some of the, you know,
14	I would be interested, I don't have your analyses
15	in front of me, Susannah, so I would be really
16	interested in the specific hospital level
17	variables that you used.
18	You know, I would think that things
19	like connections to social services or an inter-
20	professional care team that's incorporating
21	social work, I would not want to account for
22	those things, that's part of the care process

that is quality care. I would want to be able to
kind of isolate those things and not adjust those
away.

4 In terms of community level factors 5 that do not go through and kind of David's mediated model, don't go through, or go directly 6 7 to outcomes, not through the quality process or 8 quality of care, I mean, I think we could all 9 probably go around for the next hour and just start rattling them off whether it's segregation 10 11 indices or depravation indices, transportation, 12 food access.

13I mean, there's just many, many, many14things that I think we would all agree are15"beyond the control" of the care process itself16that we think would impact things like17readmission or the cost of caring for patients.18So those are just some of the thoughts19that I had. But I really would like to, I would

20 be interested to just see what kind of hospital 21 factors you were assessing and some of the 22 decomposition analyses.

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1	CO-CHAIR PONCE: Susannah, do you have
2	a quick answer for that?
3	MEMBER BERNHEIM: Yes, so we don't put
4	fixed factors in. We don't sort of adjust for
5	whether the hospital has CABG capacity. We
6	literally take the patient level SES variable and
7	it gets, and it sort of is separated into the
8	portion that's attributable to the patient and
9	the portion that's attributable to a hospital.
10	So it's just that same variable
11	decomposed. Again, at this point you've got to
12	get my statisticians on the call. But can I ask
13	a follow up question? So for something like
14	transportation, and maybe this is too in the
15	weeds.
16	So Helen, I would love to hear from
17	this committee, and maybe we should do it another
18	time. You know, when I think about
19	transportation I go back to all of those
20	questions.
21	Do I look at the transportation, if I
22	had the variable, acceptable to individual

patients that come to that hospital, or do I look 1 2 at it regionally and then how do I understand how it affects different hospitals differently within 3 4 that region? So there's some interesting questions 5 about what you do with these community factors 6 when you're trying to model hospital quality. 7 8 It's probably too detailed for this committee, 9 but it would be great for this committee to tackle because I don't think anybody's got good 10 11 answers and there are a lot of smart people in 12 this room. 13 MEMBER ALBERTI: You know, this is 14 Philip, I'm just going to jump in real quick. You know, I think we've talked about this before. 15 16 For something like transportation, I would want 17 to know A, do you have a car. I'm just going to 18 be real. 19 And B, if not, do you live in a 20 community where there's robust public 21 transportation? I think both of those things 22 would impact something like keeping follow up

appointments and readmission.

2	So I think that's the importance of
3	really, you know, identifying variables like
4	individual income is important, but so is the
5	immediate income of the community where you're
6	coming from. So I would say both.
7	DR. BURSTIN: And just quickly to
8	build on I think what Philip said, I think
9	there's been pretty strong agreement in this
10	committee that what we're talking about is
11	community factors for where the patient lives,
12	not where the hospital is.
13	I think that's been pretty consistent,
14	every head is nodding. So I think that does
15	change that a bit because we're not saying it's
16	about the hospital. It's about where the patient
17	lives and the community affects the kind of
18	things Philip just rattled off for the community,
19	for the patient, sorry.
20	MEMBER BERNHEIM: But so when we then
21	put things in from the ACS which is something
22	about where the patient lives, nobody thinks

that's a useful thing to look at. So that 1 2 confuses me. 3 I mean, I have that. I mean, I can 4 tell you a lot from the ACS about the communities 5 these patients are coming from. But everybody is 6 angry of that approach. 7 CO-CHAIR PONCE: I hear that no one's But so we can work with you, Susannah. 8 angry. 9 And thank you so much for clarifying for us. I'm 10 going to go to Dave. 11 Well, I think I'm just MEMBER NERENZ: 12 going to speak in general support of this is a 13 very exciting, encouraging area to look at. I 14 agree absolutely with Susannah, it just becomes 15 more complicated because as you add degrees of 16 nesting, the hierarchical models get more 17 complicated yet. 18 And at some point nobody can 19 understand them, but that's okay. If they end up 20 good in the end, I'm happy if I don't understand 21 it. I may even try to understand it. But I have 22 thought pretty strongly for a while that we

should, that there are valid and legitimate city 1 2 level or community level factors that we should explore and see if we can work with them somehow. 3 At the NAM meeting a couple days ago I 4 5 was asked, you know, what are some examples. And I had started with the observation that when the 6 7 readmission penalty started, every single hospital in Detroit get the max penalty. 8 9 I said well how, what? They're not There's some for profit, not for 10 owned the same. 11 profit, how can they get the max penalty as a 12 common factor being they're in Detroit. And so 13 what does that mean? 14 Well then I was challenged. So okay, 15 what are some examples. And I said okay, 16 transportation would be one, that if you live, if 17 you are a low income person or if you live in a 18 low income neighborhood in Detroit, that's not 19 necessarily the same experience as being the same 20 person living in the same income level say in 21 Denver or Seattle, or Boston because there are 22 different services at the city level.
1	
1	And I know it's hard to deal with
2	that, but I think it would be worth exploring.
3	So I agree with Susannah. A, it's complex, B,
4	there are some ways to do it.
5	And just maybe as another for thought
6	experiment, I hope I'm corrected if I'm wrong
7	here, but when the hospital global star ratings
8	came out last summer, you know, a lot of people
9	took a look and I did a little, cute little
10	analysis that we published about that.
11	But imbedded in that was the
12	observation I made, and again tell me if I'm
13	wrong, every single hospital in Brooklyn, New
14	York is a one star, every single one. Now, what
15	does that mean?
16	Well, but it's kind of interesting to
17	speculate. The first conclusion, and then the
18	discussion ends, is that they're all just bad
19	hospitals. Okay, fine.
20	But I don't know, is there something
21	then characteristic of Brooklyn, and if so, what
22	might it be? And is it transportation, is it

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1	(Laughter)
2	(Off microphone comments)
3	MEMBER CARRILLO: It's not that
4	simple, it's not that simple. You have, like,
5	Maimonides Hospital, you have New York Methodist
6	Hospital. You have a number of strong hospitals
7	that are three stars, four stars.
8	MEMBER NERENZ: Okay, so I'm wrong in
9	the observation, I apologize. I just thought as
10	I went through the long list I saw
11	MEMBER CARRILLO: I mean, Brooklyn is
12	huge, it's like a city. You know, and so there's
13	a lot of different ZIP codes and nine digit codes
14	that are really very distinct socioeconomically.
15	CO-CHAIR PONCE: Let's go to Ignatius
16	and then Michelle.
17	MR. BAU: So back to two additional
18	practical suggestions. I think the risk
19	adjustment trial was a separate thing from the
20	project that CMS did. But I do think there are
21	some congruencies.
22	So some of the evidence that we

highlight in the first two reports may actually give some conceptual models for folks to think about. And then I think when, so I was actually then looking at the measures that were not recommended for adjustment.

6 And again, is there similarly a 7 crosswalk back to some of the conditions that 8 were highlighted, the five conditions that we're 9 focused on in terms of the CMS specific task 10 order.

11 And then I think more importantly, not 12 just the conceptual models but in terms of the 13 data sources, to the extent that we're going to 14 really begin to flesh out what social risk actually means and how it's measured, I think 15 16 that also will give, you may not need to do it in 17 the committee's reports, but somewhere as you 18 wind up the trial, it may also be good to 19 reference the fact that the committee's actually 20 looking at how to better define social risk and 21 what the data sources might be for social risk to 22 again point people to potential data sources.

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1	CO-CHAIR PONCE: Thanks, Ignatius.
2	Michelle?
3	MEMBER CABRERA: I think, you know,
4	again just sort of on the editorial kick, we
5	have, and Emilio, you talked about redlining for
6	banks. We have redlining for hospitals, right?
7	I mean, so I think that's an important factor to
8	just remember that what a safety net hospital
9	represents for the community it's serving is last
10	man standing often time.
11	And so yes, the response that you're
12	getting around the anxiety about the impacts of
13	these things, it's akin to No Child Left Behind
14	policies, right? It's this notion that you can
15	create a test, grade everybody equally, let the
16	science lead the way, and if you don't perform,
17	you get whacked.
18	And the consequences are the same, you
19	start to divest from institutions that have
20	remained and have persisted despite a lot of
21	challenging care delivery factors. Right?
22	And so the question is yes, we don't

1	know, I don't think anybody, I think the one
2	thing we can all agree on is we don't want to
3	give a pass to lower quality. You know, there
4	were some studies of the various CMS Medicare
5	related policies around value based purchasing.
6	There was one in particular that was
7	published in Health Affairs that found that for
8	California safety net hospitals, they were more
9	likely to be penalized under VBP but their 30 day
10	risk adjusted mortality outcomes were better than
11	their competitors, and cost was virtually the
12	same.
13	So the conclusion based on VBP alone
14	that they are poor quality hospitals because they
15	didn't perform well on that test does not line up
16	with the outcomes relative to people who were not
17	penalized.
18	Stuff like this is the kind of stuff
19	that I think we need to keep in the conversation.
20	And again, I'm cautious about drawing the
21	assumption based on whatever measures we have,
22	whatever tests we have so far that because you

didn't perform well, you are a low quality
 hospital and poor are the folks who have to
 suffer with that care.

You know, I think the flip side of
that is they are the folks there trying every
day. And so what can we do to support them? You
know, I don't think labeling them poor quality
hospitals and giving them the Scarlet Letter is
helpful in the end.

So you know, one, I don't know enough 10 11 about how accurate the scores are, how at the end of the day the data, you know, if the data's so 12 13 crappy all around, like, are we really accurately 14 lining people up next to each other? Is everything we're measuring all the time the right 15 16 stuff to figure out if it's actually in service 17 in the populations?

So without knowing that the tests and the measures are great and doing their job great, then I would be hesitant from a purely scientific and data driven standpoint to label folks poor quality.

I	
1	CO-CHAIR PONCE: Thanks, Michelle.
2	And that could be part of our recommendation,
3	right, for this particular, not just for the
4	trial but that also certainly resonates with our
5	road map and our strategy. So Helen and Erin and
6	Drew, and Tara and Mauricio, have we, and
7	Madison, how are we doing with advising you? Are
8	there any gaps?
9	DR. BURSTIN: This has been a
10	phenomenally rich discussion that we have to kind
11	of digest it a bit. We'll definitely be back to
12	you because I think you are the group that's
13	going to, you know, depending on how this moves
14	forward, if we are going to continue to do this,
15	and I suspect we will, you know, the degree of
16	specificity you can offer to us that we can then
17	offer and reduce the heterogeneity is our goal
18	collectively.
19	This has been incredibly useful
20	discussion.
21	CO-CHAIR PONCE: So I'm going to go
22	ask if we have members on the phone, make some

final comments, and then we'll go to public 1 2 comment. So Kevin, Susannah, Sarah, if you're still back with us. 3 The only thing I'll 4 MEMBER BERNHEIM: 5 say is it's been a great discussion. And I apologize for when I get a little animated, but I 6 7 think this has actually been a very interesting, 8 useful --9 (Simultaneous speaking) I really value your 10 CO-CHAIR PONCE: 11 animation, Susannah. I was trying to impart 12 animation here too to you. 13 MEMBER BERNHEIM: Excellent. But 14 great discussion. 15 CO-CHAIR PONCE: Thank you. 16 MEMBER BERNHEIM: Thank you. 17 MEMBER FISCELLA: Yes, I agree with 18 Susannah. I really have nothing else to add. 19 Thanks, Kevin. CO-CHAIR PONCE: Okay, 20 let's, shall we open it up for public comment? 21 MS. MURPHY: Operator, can you please 22 open the phone lines for public comment?

	3
1	OPERATOR: Thank you. At this time,
2	if you would like to make a comment, please press
3	star and then the number one on your telephone
4	keypad. We'll pause for just a moment. And
5	there are no public comments at this time.
6	MS. MURPHY: Thank you. Are there any
7	public comments in the room?
8	MS. BOSSLEY: Okay, thank you. It
9	would seem a shame not to have someone say
10	something after this conversation. So this is
11	Heidi Bossley on behalf of the Federation of
12	America's Hospitals. Just wanted to say thank
13	you for this conversation.
14	It's been two years of watching these
15	measures go through the trial period. And as one
16	of the groups commenting, it's nice to see it all
17	come together and have this type of robust
18	discussion. So thank you very much, and we look
19	forward to see where it goes with the CSAC and
20	then the Board.
21	CO-CHAIR PONCE: All right, thanks,
22	everybody. I think it's time for all to have

safe travels to start, you know, the line of 1 2 labor and leisure. So leisure is going to start now, and we are adjourning. Thank you so much. 3 Marshall and I thank you for, can I 4 5 use robust again, robust discussion, animated, passionate, but also very grounded in advancing 6 7 the field and moving forward with a clear road 8 map for NQF. So thank you. 9 CO-CHAIR CHIN: Yes, what Ninez said. It's now the time for, have the image of, like, 10 in the Sound of Music when you have all the kids 11 12 up on the staircase. PARTICIPANT: 13 That's a long fair well. 14 CO-CHAIR CHIN: Yes. I think though that this challenge that Ninez and I and Helen 15 16 sort of posted at the very beginning about, like, 17 to think boldly and to not be constrained and to 18 think about how can we take advantage of this 19 opportunity to try to advance the field in 20 equity, I think we did it. 21 I'm very pleased with the discussion and the degree of engagement and the going 22

1 through, like, some very tough issues. And so I 2 think again, we're in a good position. There's still a lot of work to do between now and 3 4 September, but I think we're in good shape in 5 terms of being able to come up with a final report and recommendations that will be 6 7 impactful. Thank you very much. 8 DR. BURSTIN: And special thanks to 9 Marshall and Ninez. It was quite the effort to moderate this over the last couple days and the 10 11 last couple years actually. So thank you, and 12 thanks to the staff as well. We put them through 13 their paces of getting all this work done the last couple of months and --14 15 (Applause) 16 DR. BURSTIN: Thank you. 17 CO-CHAIR CHIN: And the staff really 18 is the magic potion here. Okay, so we'll be in 19 Thanks very much. contact. 20 (Whereupon, the above-entitled matter 21 went off the record at 2:38 p.m.) 22

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CERTIFICATE

This is to certify that the foregoing transcript

In the matter of: Disparities Standing Committee

Before: NQF

Date: 06-15-17

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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