Page 1

NATIONAL QUALITY FORUM

+ + + + +

NATIONAL VOLUNTARY CONSENSUS STANDARDS FOR ENDORSING PERFORMANCE MEASURES FOR RESOURCE USE: PHASE II STEERING COMMITTEE

+ + + + +

THURSDAY JUNE 30, 2011

+ + + + +

The Steering Committee met in the Capital Room of the Venable LLP Conference Center, 575 7th Street, N.W., Washington, D.C., at 8:30 a.m., Tom Rosenthal and Bruce Steinwald, Co-Chairs, presiding.

PRESENT:

TOM ROSENTHAL, MD, Co-Chair BRUCE STEINWALD, MBA, Co-Chair PAUL BARNETT, PhD, VA Palo Alto Health Care

System JACK BOWHAN, Wisconsin Collaborative JEPTHA CURTIS, MD, FACC, Yale University School

of Medicine LISA GRABERT, MPH, American Hospital Association

ETHAN HALM, MD, MPH, University of Texas Southwestern Medical Center (via phone) ANN HENDRICH, RN, MSN, FAAN, Ascension Health JACK NEEDLEMAN, PhD, FAAN, University of California, Los Angeles School of Public Health MARY KAY O'NEILL, MD, MBA, CIGNA HealthCare DAVID PENSON, MD, MPH, Vanderbilt University Medical Center

DORIS PETER, PhD, Consumers Union

```
Page 2
```

STEVE PHILLIPS, MPA, Ortho-McNeill-Janssen Pharmaceutical, Inc. DAVID REDFEARN, PhD, WellPoint JEFFREY RICH, MD, Mid-Atlantic Cardiothoracic Surgeons Ltd. WILLIAM RICH, MD, Northern Virginia Ophthalmology Associates BARBARA RUDOLPH, PhD, MSSW, The Leapfrog Group JOSEPH STEPHANSKY, PhD, Michigan Health and Hospital Association DOLORES YANAGIHARA, MPH, Integrated Healthcare Association NQF STAFF: TAROON AMIN HELEN BURSTIN, MD, MPH LAURALEI DORIAN SARAH FANTA CAMILLE PRESBURY SALLY TURBYVILLE, MA, MS ASHLIE WILBON, MPH, BSN ALSO PRESENT: DAN DUNN, Ingenix (via phone) BEN HAMLIN, NCQA CHAD HEIM, HealthPartners SUE KNUDSON, HealthPartners TODD LEE, ABMS (via phone) TOM LYNN, Ingenix (via phone) JEN PEARSE, Ingenix (via phone) JAIME ROSENZWEIG (via phone) ARJUN VENKATESH, Brigham and Women's Hospital KEVIN WEISS, ABMS (via phone) CHERI ZIELINSKI, Ingenix (via phone)

	Page 3	
TABLE OF CONTENTS		
Welcome, Recap of Day One, Mr. Steinwald,		
Mr. Rosenthal	4	
1604: Total Cost of Care PMPM Index		
(HealthPartners)	7	
1557: Relative Resource Use for People wit	h	
Diabetes (RDI) (NCQA)	40	
1576: Episode of care for patients with		
diabetes over a one-year period (ABMS-REF)	73	
5795: ETG based diabetes resource use		
(Ingenix)	135	
1572: Episode of care for management of		
chronic coronary artery disease (ABMS-REF)	199	
1599: ETG-based Non-Condition Specific		
Resource Use (Ingenix)[Usability &		
Feasibility Wrap up	202	
NQF Member/Public Comment	281	
Wrap Up/Next Steps, Ms. Turbyville, Ms.		
Wilson, Mr. Steinwald, Dr. Rosenthal	282	
Adjourn	293	

	Page 4
1	P-R-O-C-E-E-D-I-N-G-S
2	8:32 A.M.
3	CO-CHAIR STEINWALD: Now it says
4	we're supposed to recap yesterday and we'll do
5	that in the briefest way possible.
6	One thing that Tom and I would
7	like to do and if anyone protests this, please
8	speak up. We think it would be beneficial to
9	finish the discussion of the HealthPartners
10	measure. We got through scientific
11	acceptability at the end of the day yesterday
12	and we still have usability and feasibility.
13	We believe that the issues related
14	to those two criteria have been discussed at
15	some length already. And we're hopeful that
16	we could finish up those two criteria fairly
17	quickly and then get to the diabetes measures.
18	The chair of the Diabetes TAP will
19	be joining us by telephone and we understand
20	that he's available only through the morning
21	and so we want to make sure we are able to get
22	to the diabetes measures as quickly as we can.

	Page 5
1	And then once we're through the
2	diabetes measures we have the wrap-up of the
3	Ingenix measure to complete our agenda before
4	we're able to adjourn.
5	Sally, are there any
6	administrative or other issues, or Ashlie,
7	that we need to talk about?
8	MS. TURBYVILLE: Just thank you
9	for showing up for Day 2, rather than delay.
10	So I understand this morning there's been
11	confusion, somehow miscommunication on NQF's
12	side about the hotel. So please be sure to
13	clearly expense your hotel bill, if the hotel
14	didn't already have it already covered back to
15	NQF. If you have any questions, you can
16	contact Ashlie or Sarah or anyone at NQF and
17	we'd be glad to help you.
18	DR. BURSTIN: Brief item. When we
19	get to the measures that have associated costs
20	with them, we'll take a brief pause and I'll
21	go over some issues of how we're going to
22	handle some of that information.

	Page 6
1	CO-CHAIR STEINWALD: The
2	associated costs that enter into our
3	feasibility discussion?
4	DR. BURSTIN: Exactly. So for
5	proprietary measures for which there's an
6	associated fee, that becomes a subcriteria
7	under feasibility and as we get to some of the
8	follow up, it will be somewhat relevant under
9	the ACG's use and HealthPartners, but
10	especially for Ingenix.
11	CO-CHAIR STEINWALD: Okay. All
12	right
13	DR. ROSENZWEIG: Hello?
14	CO-CHAIR STEINWALD: Yes, hello?
15	DR. ROSENZWEIG: This is Jaime
16	Rosenzweig. I'm calling in.
17	CO-CHAIR STEINWALD: Thank you.
18	Dr. Rosenzweig, this is Bruce Steinwald. We
19	didn't quite complete a discussion of one of
20	the non-condition-specific measures yesterday
21	and we're hoping to complete that fairly
22	quickly this morning and then very quickly

	Page 7
1	after that go on to the diabetes measure. So
2	if you can bear with us for a few minutes,
3	that's what we'll do. Is that okay?
4	DR. ROSENZWEIG: No problem.
5	CO-CHAIR STEINWALD: All right,
б	thank you.
7	DR. ROSENZWEIG: Yes.
8	CO-CHAIR STEINWALD: So the
9	measure is 1604. The HealthPartners measure.
10	And we completed scientific acceptability.
11	Once again, the Steering Committee is acting
12	as its own TAP, which means that we have to
13	evaluate the subcriteria individually.
14	And the first one is usability. I
15	guess we need to have on the board the
16	first one.
17	MS. TURBYVILLE: Usability 3a is
18	the measure performance results are reported
19	to the public in national community programs
20	by the time of endorsement maintenance review
21	and so this is initial endorsement. So as
22	we give you the context is if there is an

Page 8 1 ability for them to be reported for public 2 reporting or accountability models. CO-CHAIR STEINWALD: Questions or 3 4 discussion? Hearing none can we proceed 5 directly to scoring. ? 6 MS. WILBON: Does everyone have a 7 remote from yesterday? 8 CO-CHAIR STEINWALD: All right, 9 let's take time out and make sure everyone has 10 their remote. All right. MS. WILBON: Okay, thanks. 11 12 MS. TURBYVILLE: So again this is high, moderate, low or insufficient. 13 So qo 14 ahead and vote. 15 CO-CHAIR STEINWALD: And Sarah, 16 we're ready to go? Oh, you've already got a 17 platform. Very good. 18 Tell us when you're ready. Go 19 now? Okay. 20 Paul suggested that the metallics 21 in the case might be interfering. Do what you 22 did yesterday.

	Page 9
1	(Laughter.)
2	MS. TURBYVILLE: If you vote high
3	on Usability 3a, please raise your hand.
4	Eight.
5	Moderates, please raise your hand.
6	Eight.
7	(Laughter.)
8	Clearly, since staff can't count
9	in a consistent way, so it's not reliable, I
10	think you're right.
11	(Laughter.)
12	CO-CHAIR STEINWALD: Okay, so
13	we're starting over electronically. We're
14	going to start over. One, two, three, go.
15	MS. TURBYVILLE: So we have nine
16	high and seven moderate.
17	Moving on to 3b, the measure
18	performance results are considered meaningful,
19	understandable and are useful to the intended
20	audience for both public reporting and
21	informing performance improvement.
22	An important outcome may have not

	Page 10
1	an identified improvement strategy, still can
2	be useful for informing quality improvement by
3	identifying the need for simulating new
4	approaches.
5	(Pause.)
6	Four high, eight moderate, and
7	four low.
8	Moving on to 3c which is that the
9	data and the result details are maintained in
10	such a way that the resources measure
11	including the clinical and construction logic
12	for defining of measurement can be decomposed
13	to facilitate transparency and understanding.
14	So if you're ready to vote, go
15	ahead and start, sir.
16	(Pause.)
17	So here we have seven high, six
18	moderate, and three low.
19	And then 3d is not applicable. We
20	actually it's a harmonization question,
21	given where we are, this being the first
22	resource use effort, at this time we didn't

	Page 11
1	ask developers to harmonize. Later on, if
2	similar measures are endorsed, we'll either
3	if there are opportunities for harmonization,
4	we'll discuss it at that time, but right now
5	we're not there.
б	And then for usability overall,
7	this is not a yes/no. It is high, moderate,
8	low overall and this is the Steering Committee
9	vote. Please go ahead and start.
10	(Pause.)
11	I think one of you may have pushed
12	your button before, sir. There we go. Two
13	more, I think. There we go.
14	For the overall usability of this
15	measure, we have six high, seven moderate, and
16	three low.
17	CO-CHAIR STEINWALD: Any objection
18	to moving right on to feasibility? Hearing
19	none, so Helen, do you want to wait until we
20	get to the subcriteria? Go ahead.
21	DR. BURSTIN: No, I'll just point
22	out that I believe Ashlie said it's in your

	Page 12
1	yes, part of NQF a couple of years ago
2	allowed proprietary measures to come through
3	the process, but part of that was to
4	incorporate the associated fees with using the
5	measure into the overall endorsement process,
6	into that consideration.
7	So we requested, since the
8	HealthPartners measure uses ACGs, that we
9	actually provide for you the actual costs of
10	using the ACGs. I know the submission
11	indicated other potential tools are available.
12	It had been tested with ACGs. So we thought
13	it was important that you see this. It is one
14	consideration as a subcriterion under
15	feasibility. We at least wanted to have the
16	chance to just point
17	DR. CURTIS: I thought I saw on
18	the application that the ACGs are now publicly
19	available. Is that not correct? Okay.
20	MS. TURBYVILLE: And we would want
21	to vote on it how it is now, even there
22	might be some future efforts, but right now

	Page 13
1	this is just in case you're having a hard
2	time reading it up on the screen, if you go to
3	the thumb drive folder that you were provided
4	by our team yesterday, there's a measure
5	developer response sub-folder. If you click
б	it open, you'll see each measure developer
7	listed there.
8	There is the HealthPartners'
9	folder, and if you open that, there is an
10	Excel document which you can open up and will
11	be this particular document right here.
12	CO-CHAIR STEINWALD: Let's move
13	ahead.
14	MS. TURBYVILLE: Is everyone able
15	to I just want to make sure people can read
16	this. Yes, please.
17	MS. WILBON: As everyone came in,
18	Sarah went around to everyone's computer and
19	downloaded. We didn't get it until a couple
20	days before the meeting, so we didn't send it
21	out. It's called HP Price Table Proprietary
22	Fees.

	Page 14
1	DR. BURSTIN: While everybody is
2	looking for it, we'll just read it.
3	So it's simpler so the ACG's
4	price that they provided to us were based on
5	the client size, based on the number of
б	covered lives. So under 50,000 covered lives
7	on the commercial side it was \$33,000. They
8	specifically indicated that for other
9	noncommercial entities there was no right,
10	Sally, no associated causes?
11	And then it rises from there. So
12	greater than less than 500,000 lives is
13	between 42,000 and 159,000, and over 500,000
14	it raises from there tp 2,000 to 299.
15	CO-CHAIR STEINWALD: We'll wait
16	until we get to the right criterion. We have
17	4a on the board.
18	MS. TURBYVILLE: Does everyone
19	when we get to the subcriteria we'll just make
20	sure everyone has had a chance to review the
21	fee. So 4a does not involve the fee
22	structure; 4a for feasibility is about the

	Page 15
1	clinical measure for the measure. The
2	required data elements are routinely
3	generated, and used during care delivery.
4	So thinking about this being based
5	on administrative claims data, we would then
6	request you to rate this particular
7	subcriteria. Is it high, moderate, low,
8	insufficient.
9	CO-CHAIR ROSENTHAL: Can I ask for
10	clarification?
11	MS. TURBYVILLE: Please.
12	CO-CHAIR ROSENTHAL: Do we consider
13	this talks about data elements routinely
14	generated during clinical care. We wouldn't
15	consider claims data or claims in this.
16	MS. TURBYVILLE: Yes, we would.
17	CO-CHAIR ROSENTHAL: Okay, all
18	right. Claims. Okay.
19	MS. TURBYVILLE: It's meant to be
20	broad, okay?
21	DR. BARNETT: And the
22	consideration of costs, which subcriteria will

Page 16 that apply to? 1 2 MS. TURBYVILLE: Four-D, and we'll 3 be sure to remind you that that's it. CO-CHAIR STEINWALD: I do notice 4 5 that Sarah is not there. Are you going to stand in? Okay. Are you ready? 6 7 Let's go. 8 MS. TURBYVILLE: So for 4a we have 9 11 high and 7 moderate. 10 Moving on to 4b, the required data elements are available in electronic health 11 12 record or other electronic sources. So are the required data elements available 13 14 electronically is the question for 4b. 15 CO-CHAIR STEINWALD: Ouestion. 16 Turn your mic on and go ahead. 17 DR. NEEDLEMAN: I've been a royal 18 pain in the ass asking about carve-outs. 19 (Laughter.) 20 But I think it is important if 21 we're talking about capturing total resources, 22 mental health services for a whole variety of

	Page 17
1	things that we're dealing with, including
2	dealing with depression associated with
3	chronic illnesses, and pharmacy costs are
4	major components of our resources.
5	Historically, when they've been
6	carved out, health plans have had a lot of
7	trouble getting those back, and we're looking
8	at a total cost of care measure here which
9	means all I need is the total pharmacy costs.
10	When we begin look at but when we also look
11	at condition-specific costing algorithms that
12	say we're going to get pharmacy costs from
13	claims data, this will be an even bigger
14	issue.
15	There are several ways this can be
16	done. The worst is to take the per member/per
17	month charges that are being paid to the
18	pharmacy benefit managers and just bringing
19	that back because that makes the charge or the
20	costs associated with the HIV positive person
21	and the kid who had an ear infection the same
22	in pharmacy for a given year.

	Page 18
1	The most precise way would be to
2	get all that claims data back and at least do
3	a standardized pricing even if you didn't get
4	the actual prices from the pharmacy benefit
5	manager. I don't know, and I keep asking, is
6	that what you're doing with these folks and
7	sometimes they said no and sometimes they
8	there are other options in between those two
9	including doing some kind of imputation based
10	upon the health condition of the patient,
11	historic costs, and the average amount you're
12	paying to the pharmacy benefit manager.
13	Every time you do an imputation
14	or there's an element that imprecision, if
15	not biased, introduced into these measures.
16	So in the long run, if we're really going to
17	have resource-based measures, the core plans
18	need to figure out how to get some usable data
19	back from the pharmacy benefit managers.
20	In the interim, we need to be sure
21	there's a reasonable imputation method for
22	approximating the pharmacy costs associated

1	
	Page 19
1	with each patient. And that's why I've been
2	a pain in the ass about this.
3	I had a conversation with the
4	HealthPartners people yesterday about how they
5	do this. And I think I got it. Unless you
6	want to amend what you said yesterday, which
7	involves doing some weighting of the average
8	cost they're paying to the pharmacy benefits
9	managers when they have a carve out around
10	case suggesting that, which is good enough
11	I'd say it's good enough for right now, but
12	the long term future of resource-based
13	measures has got to be to increase the
14	precision of that and our report to the Board
15	should reflect that concern.
16	MS. TURBYVILLE: Just a question
17	for you, Jack, and the rest of the Steering
18	Committee, because I do think this is an
19	important point. I wonder if this is in 4c
20	and 4d. My interpretation of 4b is that the
21	data are available electronically, so I wonder
22	if these sources aren't in electronic format,

	Page 20
1	but perhaps there are operational barriers, so
2	they're not being collected. They're being
3	carved out and it creates susceptibilities for
4	error.
5	DR. NEEDLEMAN: It could be a 4d
6	issue.
7	MS. TURBYVILLE: Just a question,
8	okay, so it's not so much that they might not
9	exist currently in electronic format, it's
10	that they're, due to contractual arrangements
11	in carving out, that they're not available for
12	a total resource-used calculation.
13	DR. NEEDLEMAN: Right.
14	MS. TURBYVILLE: Okay.
15	CO-CHAIR STEINWALD: Are we
16	content then to hold off this issue for 4d?
17	Is that okay?
18	CO-CHAIR ROSENTHAL: I don't know.
19	It looks to me like it's relevant. Available.
20	They're not available.
21	MS. TURBYVILLE: Well, the longer
22	read is that there are existing electronic

Page 21 1 sources. I mean I'm not trying to split hairs. I just want to make sure it's captured 3 I want to capture the conversation. 4 DR. NEEDLEMAN: Yes, so my 5 understanding is the pharmacy benefits 6 manager, the behavioral health managers, when 7 you've got a carve out, are being paid a flat 8 premium or payment per member/per month and 9 the risk is shifted from the health plan that 10 is the initial health plan for the beneficiary 11 to the subcontractor. 12 And the subcontractors clearly 13 have this because they're getting claims data, 14 but historically the health plans have not 15 been able to get detailed data back from them 16 and have not gotten it back. So somebody has 17 it, but if you're asking whether the 18 whether Mary Kay has it, then the answer is no 19 at the moment under most of those contracts. 20 So if somebody has it in 21 electronic form, the prime insurer or health 22 group does not		
2hairs. I just want to make sure it's captured3 I want to capture the conversation.4DR. NEEDLEMAN: Yes, so my5understanding is the pharmacy benefits6manager, the behavioral health managers, when7you've got a carve out, are being paid a flat8premium or payment per member/per month and9the risk is shifted from the health plan that10is the initial health plan for the beneficiary11to the subcontractor.12And the subcontractors clearly13have this because they're getting claims data,14but historically the health plans have not15been able to get detailed data back from them16and have not gotten it back. So somebody has17it, but if you're asking whether the18whether Mary Kay has it, then the answer is no19at the moment under most of those contracts.20So if somebody has it in21electronic form, the prime insurer or health		Page 21
 I want to capture the conversation. DR. NEEDLEMAN: Yes, so my understanding is the pharmacy benefits manager, the behavioral health managers, when you've got a carve out, are being paid a flat premium or payment per member/per month and the risk is shifted from the health plan that is the initial health plan for the beneficiary to the subcontractor. And the subcontractors clearly have this because they're getting claims data, but historically the health plans have not been able to get detailed data back from them and have not gotten it back. So somebody has it, but if you're asking whether the whether Mary Kay has it, then the answer is no at the moment under most of those contracts. So if somebody has it in electronic form, the prime insurer or health 	1	sources. I mean I'm not trying to split
4DR. NEEDLEMAN: Yes, so my5understanding is the pharmacy benefits6manager, the behavioral health managers, when7you've got a carve out, are being paid a flat8premium or payment per member/per month and9the risk is shifted from the health plan that10is the initial health plan for the beneficiary11to the subcontractor.12And the subcontractors clearly13have this because they're getting claims data,14but historically the health plans have not15been able to get detailed data back from them16and have not gotten it back. So somebody has17it, but if you're asking whether the18whether Mary Kay has it, then the answer is no19at the moment under most of those contracts.20So if somebody has it in21electronic form, the prime insurer or health	2	hairs. I just want to make sure it's captured
 understanding is the pharmacy benefits manager, the behavioral health managers, when you've got a carve out, are being paid a flat premium or payment per member/per month and the risk is shifted from the health plan that is the initial health plan for the beneficiary to the subcontractor. And the subcontractors clearly have this because they're getting claims data, but historically the health plans have not been able to get detailed data back from them and have not gotten it back. So somebody has it, but if you're asking whether the whether Mary Kay has it, then the answer is no at the moment under most of those contracts. So if somebody has it in electronic form, the prime insurer or health 	3	I want to capture the conversation.
6 manager, the behavioral health managers, when 7 you've got a carve out, are being paid a flat 8 premium or payment per member/per month and 9 the risk is shifted from the health plan that 10 is the initial health plan for the beneficiary 11 to the subcontractor. 12 And the subcontractors clearly 13 have this because they're getting claims data, 14 but historically the health plans have not 15 been able to get detailed data back from them 16 and have not gotten it back. So somebody has 17 it, but if you're asking whether the 18 whether Mary Kay has it, then the answer is no 19 at the moment under most of those contracts. 20 So if somebody has it in 21 electronic form, the prime insurer or health	4	DR. NEEDLEMAN: Yes, so my
you've got a carve out, are being paid a flat premium or payment per member/per month and the risk is shifted from the health plan that is the initial health plan for the beneficiary to the subcontractor. And the subcontractors clearly have this because they're getting claims data, but historically the health plans have not been able to get detailed data back from them and have not gotten it back. So somebody has it, but if you're asking whether the whether Mary Kay has it, then the answer is no at the moment under most of those contracts. So if somebody has it in electronic form, the prime insurer or health	5	understanding is the pharmacy benefits
8 premium or payment per member/per month and 9 the risk is shifted from the health plan that 10 is the initial health plan for the beneficiary 11 to the subcontractor. 12 And the subcontractors clearly 13 have this because they're getting claims data, 14 but historically the health plans have not 15 been able to get detailed data back from them 16 and have not gotten it back. So somebody has 17 it, but if you're asking whether the 18 whether Mary Kay has it, then the answer is no 19 at the moment under most of those contracts. 20 So if somebody has it in 21 electronic form, the prime insurer or health	6	manager, the behavioral health managers, when
9 the risk is shifted from the health plan that 10 is the initial health plan for the beneficiary 11 to the subcontractor. 12 And the subcontractors clearly 13 have this because they're getting claims data, 14 but historically the health plans have not 15 been able to get detailed data back from them 16 and have not gotten it back. So somebody has 17 it, but if you're asking whether the 18 whether Mary Kay has it, then the answer is no 19 at the moment under most of those contracts. 20 So if somebody has it in 21 electronic form, the prime insurer or health	7	you've got a carve out, are being paid a flat
 is the initial health plan for the beneficiary to the subcontractor. And the subcontractors clearly have this because they're getting claims data, but historically the health plans have not been able to get detailed data back from them and have not gotten it back. So somebody has it, but if you're asking whether the whether Mary Kay has it, then the answer is no at the moment under most of those contracts. So if somebody has it in electronic form, the prime insurer or health 	8	premium or payment per member/per month and
 to the subcontractor. And the subcontractors clearly have this because they're getting claims data, but historically the health plans have not been able to get detailed data back from them and have not gotten it back. So somebody has it, but if you're asking whether the whether Mary Kay has it, then the answer is no at the moment under most of those contracts. So if somebody has it in electronic form, the prime insurer or health 	9	the risk is shifted from the health plan that
12And the subcontractors clearly13have this because they're getting claims data,14but historically the health plans have not15been able to get detailed data back from them16and have not gotten it back. So somebody has17it, but if you're asking whether the18whether Mary Kay has it, then the answer is no19at the moment under most of those contracts.20So if somebody has it in21electronic form, the prime insurer or health	10	is the initial health plan for the beneficiary
 have this because they're getting claims data, but historically the health plans have not been able to get detailed data back from them and have not gotten it back. So somebody has it, but if you're asking whether the whether Mary Kay has it, then the answer is no at the moment under most of those contracts. So if somebody has it in electronic form, the prime insurer or health 	11	to the subcontractor.
14 but historically the health plans have not 15 been able to get detailed data back from them 16 and have not gotten it back. So somebody has 17 it, but if you're asking whether the 18 whether Mary Kay has it, then the answer is no 19 at the moment under most of those contracts. 20 So if somebody has it in 21 electronic form, the prime insurer or health	12	And the subcontractors clearly
15 been able to get detailed data back from them 16 and have not gotten it back. So somebody has 17 it, but if you're asking whether the 18 whether Mary Kay has it, then the answer is no 19 at the moment under most of those contracts. 20 So if somebody has it in 21 electronic form, the prime insurer or health	13	have this because they're getting claims data,
16 and have not gotten it back. So somebody has 17 it, but if you're asking whether the 18 whether Mary Kay has it, then the answer is no 19 at the moment under most of those contracts. 20 So if somebody has it in 21 electronic form, the prime insurer or health	14	but historically the health plans have not
<pre>17 it, but if you're asking whether the 18 whether Mary Kay has it, then the answer is no 19 at the moment under most of those contracts. 20 So if somebody has it in 21 electronic form, the prime insurer or health</pre>	15	been able to get detailed data back from them
18 whether Mary Kay has it, then the answer is no 19 at the moment under most of those contracts. 20 So if somebody has it in 21 electronic form, the prime insurer or health	16	and have not gotten it back. So somebody has
19 at the moment under most of those contracts. 20 So if somebody has it in 21 electronic form, the prime insurer or health	17	it, but if you're asking whether the
20 So if somebody has it in 21 electronic form, the prime insurer or health	18	whether Mary Kay has it, then the answer is no
21 electronic form, the prime insurer or health	19	at the moment under most of those contracts.
	20	So if somebody has it in
22 group does not have it if they've carved out,	21	electronic form, the prime insurer or health
	22	group does not have it if they've carved out,

	Page 22
1	is that a b or a d issue? I don't know.
2	DR. O'NEILL: I mean, I would
3	just from an industry perspective, this is
4	obviously an issue in evolution and so I think
5	historically when there is carve outs for PBMs
6	that they ran their business and like you say
7	it was a financial arrangement. However, the
8	whole world knows that this access to data is
9	increasingly important for everybody's
10	business in having a comprehensive view of
11	what utilization looks like is increasingly
12	important.
13	So basically from our industry's
14	perspective, we in our contractual dealings
15	with these organizations or through our self-
16	insured employers who are choosing to opt out
17	of our own benefit plan, increasingly those
18	contracts have data-sharing language in them.
19	It's usually the two legal teams that are
20	getting in the way.
21	And sometimes the IT guys who
22	don't have their databases talking, but I

	Page 23
1	think that this is the horizon for this
2	becoming less and less of an issue is fairly
3	close to us.
4	CO-CHAIR ROSENTHAL: I think the
5	only question is really not whether it's a
6	valid question, because I think Jack has made
7	a compelling case. The only question is do we
8	vote that issue in this one or in 4d. What
9	does 4d say, if you give us guidance, then I
10	think we can go ahead and vote.
11	MS. TURBYVILLE: So 4c, I'll talk
12	about both, is susceptibility to inaccuracies
13	or errors and then 4d is the data collection
14	and measurement strategy can be implemented as
15	demonstrated by operational use.
16	It's in here. So 4b really is
17	that they exist electronically. And then we
18	talk about barriers to getting these data that
19	might hurt feasibility. Okay?
20	CO-CHAIR STEINWALD: So on the
21	table is the notion that we'll address this
22	issue in 4d and go ahead and vote on 4b.

	Page 24
1	We're back to 4b.
2	(Pause.)
3	MS. TURBYVILLE: Can we have the
4	results? So the result is 11 high, 6 moderate
5	and 1 low. Interesting. Okay.
6	Moving on to 4c which is
7	susceptibility to inaccuracies, errors, or
8	intended consequences related to measurement
9	are judged to be inconsequential. So high
10	would be that it's inconsequential. Or can be
11	minimized through proper action or monitored
12	and detected.
13	CO-CHAIR STEINWALD: Yes, Paul.
14	DR. BARNETT: So I would just
15	remind that the two ideas, as a possible
16	subject to unintended consequences, one is
17	just by excluding anybody that doesn't have
18	any visits or not setting some higher
19	threshold for more than one visit to include
20	people. There is this unintended consequence
21	that the provider or plan that's being
22	evaluated would want to get everybody in for

1	
	Page 25
1	at least one visit a year so that they're in
2	the denominator.
3	The other issue is because of the
4	attribution rule that the visit with the
5	primary care provider doesn't have to happen
б	before the care is provided for that to be
7	attributed to that primary care provider.
8	There's going to be a disincentive for primary
9	care providers to take on people who have had
10	high healthcare costs who haven't had a
11	primary care provider, and maybe even those
12	that have.
13	And then the third is the fact
14	that people are that only people in primary
15	care specialties are counted as providers in
16	this, that some specialties that act as
17	primary care providers, and we gave the
18	examples of cardiologists or people with
19	serious cardiac problems or the infectious
20	disease specialists who's caring for patients
21	with HIV, the care that they provide will be,
22	could be attributed to a primary care

Page 26 provider. 1 2 An example might be someone that's receiving antiretrovials and being managed in 3 an infectious disease clinic, goes to a 4 5 primary care clinician for some Zyban to stop smoking and all those costs then get 6 7 attributed to that primary care provider and the infectious disease specialist is not 8 9 considered as a provider. 10 So that's going to provide some sort of disincentive for providers to get 11 12 involved with these patients who are generally being managed in special clinics. 13 14 CO-CHAIR STEINWALD: Thanks for 15 that. Yes, Mary Kay? DR. O'NEILL: I know we discussed 16 17 all of those yesterday and I mean the second 18 part of what Sally read was can these 19 otherwise be detected and managed. And so I 20 quess even though we had a robust discussion 21 amongst ourselves, I am not sure if there's 22 any information from you about how those

	Page 27
1	issues have historically been handled within
2	your organization?
3	I know that there are different
4	percentages of primary care sort of driving
5	the ship in different markets, but these
б	issues can't possibly be new.
7	CO-CHAIR STEINWALD: Do you want
8	to respond, HealthPartners?
9	MS. KNUDSON: Sure. I'll make a
10	couple of comments and ask Chad to comment as
11	well. I think on the non-user component, at
12	the plan level, if that's the unit of
13	measurement, that non-users could be brought
14	into play at the plan level, if that's the
15	unit of analysis. I think for the issue of
16	assignment with the clinic visit being done
17	after a hospitalization, a key element to
18	recall is that risk adjustment for the acuity
19	of that hospitalization will also come
20	through. So in terms of mitigating and making
21	that comparable, that's the whole design
22	there.

	Page 28
1	And in terms of attributing just
2	to the primary care for now, you know, so the
3	premise that we operate on is that primary
4	care is viewed as an opportunity to really
5	enhance care coordination, partner with
6	specialists to smooth transitions of care and
7	improve, really, Triple Aim outcomes for the
8	patients and members. And so we see a role in
9	that for primary care.
10	We understand that in other areas
11	of the country, perhaps that is not as strong
12	right now, but again, reflecting on the
13	discussions from yesterday as to whether or
14	not there's opportunity for use of this
15	measure in ACO development as it relates to
16	understanding those models and how the care
17	designs adapt in different areas of the
18	country is a potential opportunity. So that's
19	kind of where we've organized it.
20	I'll just see if Chad has
21	comments.
22	MR. HEIM: The only other thing

	Page 29
1	I'd probably add is in our experience actually
2	working closely with the providers, regarding
3	the inheriting a case, I guess I'll call it,
4	and actually what this measure does is kind of
5	promote that coordination outreach, working
6	with the specialists knowing that there's
7	handouts and also intakes. They know who the
8	referral partners are and so they want to
9	reach out to them before so there's a smooth
10	handoff from a specialist to a primary care
11	and then vice versa.
12	And then also in terms of if
13	there's, I guess, I'll call it opportunity to
14	maybe to game, if you're going to go out and
15	try to get everyone in to just get in for a
16	wellness visit or a preventive service might
17	come in and actually you find out they're
18	diabetic and you've just inherited someone
19	that you have to do some more care for them.
20	So you get the ACG with that.
21	CO-CHAIR STEINWALD: Okay, thank
22	you. Yes?

	Page 30
1	DR. J. RICH: So speaking of the
2	flip side of this unintended consequence would
3	be primary care provider who is now an
4	exaggerated gatekeeper because he does not
5	want to send his patient who needs a
6	hospitalization for something to the hospital
7	because those costs will fall to him.
8	Have you seen a reduction in
9	services to any of the patient population
10	that's not justified?
11	MS. KNUDSON: Actually, when we
12	measure Triple Aim results for our care
13	systems, in a lot of cases, and just use our
14	own care system as an example, we see improved
15	health outcomes in both process as well as
16	clinical outcome measures, improved patient
17	experience, and an improved total cost of care
18	performance and we've tracked that over time
19	for several years.
20	CO-CHAIR STEINWALD: Bill.
21	DR. W. RICH: One other issue I
22	think you didn't get a chance to address

Γ

	Page 3
1	yesterday, I think this is a great measure for
2	the region of Minnesota. You have lots of
3	groups and you have a large patient population
4	that you can assign to those groups, primary
5	care groups. But again, this is a national
6	metric.
7	How do you address the discussion
8	we had yesterday about the difference in
9	composition and the difference in patient
10	population of Minneapolis versus Memphis. I
11	hate to go back to that. One is about 60
12	percent African American with huge disparities
13	in diseases compared to Minneapolis. How do
14	you compare the measure doesn't say this is
15	just regional. It's national.
16	So how do you address that?
17	Because that fits right into the feasibility
18	here, but perhaps unintended consequences, a
19	change in a two-man primary care group that is
20	taking care of 80 percent African Americans in
21	Memphis versus a very large group in
22	Minneapolis.

1

	Page 32
1	MS. KNUDSON: Right, and you know,
2	actually that may be the traditional
3	understanding of Minnesota and Minneapolis,
4	but we have a very growing diverse population.
5	We have one of the largest Hmong populations
6	in the country as well as several other
7	diverse populations.
8	Several of our clinics serve a
9	large proportion of patients of color and we
10	track those measure results, as I had
11	discussed yesterday, on a quality and a
12	patient experience realm and stratify those
13	measurements in order to close disparities
14	gaps.
15	We covered yesterday that this
16	that we're not segmenting this measure in that
17	regard, but so just to somewhat update the
18	understanding of really the cultures in
19	Minnesota and how growingly diverse it is. So
20	that's one component.
21	And then I guess the other piece
22	that I would add is reflecting on that

	Page 33
1	discussion from yesterday and some of the
2	other discussions as well. Many of the
3	measures that are endorsed by the National
4	Quality Forum need community adaptation. So
5	there's several of the clinical measures, for
6	example from the Forum, that we can't
7	implement in Minnesota because they're not
8	endorsed locally by practice either by the
9	Institute for Clinical Systems Integration,
10	ICSI, and Minnesota Community Measurement,
11	which is similar to the Wisconsin
12	Collaborative for Community Measurement, uses
13	a slightly different definition.
14	So I just raise as an example of
15	community adaptation to making the measure
16	work. So it's not always a one size fits all,
17	but you know we work in sort of an imperfect
18	world, but really with the goal of improving
19	all those outcomes for patients and members.
20	CO-CHAIR STEINWALD: Thank you for
21	that. An interesting discussion. I think
22	some of it overlaps with yesterday's. My

1	
	Page 34
1	preference would be to I appreciate that,
2	but I think we should no, you're not
3	prepared to do that, move to the vote?
4	DR. O'NEILL: I just think that
5	some of the discussion here is based on a
6	premise that if we endorse this measure
7	somehow it will be nationally rolled out by
8	some national entity whereby people are in
9	every corner of the country are going to be
10	compared with each other on the same measure.
11	And I guess that's not my understanding of how
12	these measures are utilized.
13	And so what I'm afraid of, sitting
14	where I sit and based on the discussion
15	yesterday, is that we have a very powerful
16	measure here that measures something that the
17	other things that we have considered so far do
18	not measure which is what this stuff costs
19	people and what it costs businesses and what
20	it costs individuals out of pocket. And that
21	somehow this discussion on this measure which
22	is the same as the other measure we discussed,

	Page 35
1	but had standard pricing, suddenly all of
2	these concerns which are really the nature of
3	the measure in both points is a bigger deal.
4	But it seems to me it's a bigger deal because
5	there is not standardized pricing. That seems
6	to be the biggest thing.
7	So I think that this measure is
8	very powerful, very actionable and something
9	that people in a local community and setting
10	can get their heads around. And from a
11	feasibility standpoint, if they're in Memphis
12	and have primary care delivered by an
13	endocrinologist and cardiologist that there's
14	nothing in this data that would make that
15	difficult to understand, and that this has the
16	kind of power that the other measures don't.
17	And just because it has real pricing and not
18	standardized pricing, I'm just very worried
19	that this whole measure is going to be
20	jettisoned.
21	So I think if you take this
22	measure and put it on a system or on a

i	
	Page 36
1	community, there's a value in it. And even if
2	the community looks different than the Twin
3	Cities, you know, it still will have value
4	locally. I actually, I'm not sure I haven't
5	heard anything in the measure design that
6	would tell me that say if my community has
7	a particular medical community structure with
8	heavily weighted to specialists, I don't see
9	any reason why they couldn't be considered
10	primary care. Maybe not.
11	I just don't want to abandon this
12	opportunity. Thank you.
13	CO-CHAIR STEINWALD: We hear you.
14	My sense of the chair is that we've covered
15	the issue as well as we should feel that we
16	have not left anything out. Can we move to
17	the vote, please, on this sub-criterion.
18	MS. TURBYVILLE: Let's wait for
19	Mary Kay to get back to the table.
20	CO-CHAIR STEINWALD: She has a
21	whole minute.
22	(Laughter.)
	Page 37
----	---
1	MS. TURBYVILLE: So there are
2	susceptibilities to inaccuracies or errors,
3	high, moderate, or low, please vote.
4	(Pause.)
5	So we have four high, six
6	moderate, and eight low.
7	Moving on to 4d, we have the data
8	collection and measurement strategy can be
9	implemented as demonstrated by operational
10	use. And external reporting programs or
11	testing did not identify barriers for
12	operational use; barriers related to data
13	availability, for example, timing, frequency,
14	etcetera.
15	And 4d includes the consideration
16	of the proprietary fees which Ashlie has
17	kindly put back up on the screen so you'll
18	want to take that into account as to whether
19	or not that would constitute a barrier for
20	feasibility for implementation.
21	So again, it's a high, moderate,
22	low. And I'll leave it to you to decide.

	Page 38
1	CO-CHAIR STEINWALD: We also
2	decided that this was where we would consider
3	the carve out issue that Jack raised. Any
4	discussion? Yes.
5	MS. YANAGIHARA: This relates to
6	the carve outs and the availability of data.
7	I think ultimately we're all trying to move
8	toward having all types of data available, but
9	we're not there yet. And so I'm just
10	wondering in the interim if there's a way that
11	when that there's an option to say either
12	mental health is in or out, you know, pharmacy
13	is in or out. And as long as it's clearly
14	stated what is in or out and it's used
15	consistently within wherever it's being
16	measured, it can you can use it then
17	without it.
18	For example, our total cost of
19	care measure, we don't get mental health data.
20	So it's out. But it's out across the board
21	for all the groups in California that we're
22	measuring. And so as long as it's clearly

	Page 39
1	stated, it might be a way in the interim to
2	kind of allow us to keep moving forward
3	without letting this always be a barrier to
4	moving forward and a barrier for people using
5	the measure, but it's clearly stated what's in
6	and what's out, especially for those data sets
7	that are known to be problematic.
8	CO-CHAIR STEINWALD: Further
9	discussion? Okay, let's move to vote.
10	(Pause.)
11	MS. TURBYVILLE: So for 4d, we
12	have 13 moderate and 5 low. So we will now
13	vote for feasibility overall.
14	(Pause.)
15	So in thinking about those
16	subcriteria and how you would weight them in
17	an overall score, I don't know if there's any
18	discussion needed, but we can go ahead and
19	start the vote.
20	(Pause.)
21	(Vote: 3 high, 8 moderate, 7 low.)
22	CO-CHAIR STEINWALD: What the

Page 40 1 discussion up front here is do we need an 2 overall vote on the measure. DR. BURSTIN: And I'm saying there 3 was enough discussion that I think it deserves 4 5 a final vote and especially because I think 6 how partners would likely want to respond 7 following this to some of those concerns 8 raised about scientific acceptability. The other thing is it is very 9 10 common in these days, especially with controversial measures, that sometimes that 11 12 NQF puts out a measure indicating there was 13 lack of consensus and gets comments. So I don't want to lose the chance. 14 This is so 15 important. I think it deserves to go out for 16 comment, so I would move forward. 17 CO-CHAIR STEINWALD: The only consensus I see is that there's lack of 18 19 consensus. 20 DR. BURSTIN: There you go. 21 That's my point. 22 (Laughter.)

	Page 41
1	CO-CHAIR STEINWALD: So we have
2	MS. TURBYVILLE: So this is a vote
3	for a recommendation of endorsement and as
4	already noted, it's a yes/no and abstain.
5	(Pause.)
6	One more out there. Maybe
7	somebody voted before there we go.
8	(Laughter.)
9	So as was stated prior to the
10	vote, we have kind of a lack of consensus
11	here. Nine, yes; eight, no; and one is
12	abstaining.
13	DR. BURSTIN: Yes, all measures go
14	out for comment. We actually invite comments
15	on any measures that are not recommended, but
16	there will be a specific section in the
17	report, the draft report that will indicate
18	this one did not reach consensus, very close
19	votes. But in the interim though, you'll
20	still have a chance to have the measure
21	developers respond, so again that may sway you
22	ultimately, but I think this does happen

Page 42 1 fairly commonly. 2 CO-CHAIR STEINWALD: 3 HealthPartners, thank you very much for enduring this discussion over a two-day period 4 5 and we look forward for our issuance and your response to some of the concerns that have 6 7 been raised. Thank you. 8 MS. KNUDSON: Yes, thank you to 9 the NQF staff as well as the Steering 10 Committee. CO-CHAIR ROSENTHAL: So I think 11 12 we're going to move to item 1557, relative 13 resource use for people with diabetes and this measure is from NCQA. Welcome back. 14 15 DR. ROSENZWEIG: Hello, hello? 16 Can you hear me? 17 MS. TURBYVILLE: Jaime, this is 18 Sally and we should have thought of this 19 earlier as you weren't here yesterday. So the 20 order that we have found that works 21 successfully is we'll ask the measure 22 developer to provide an introduction to the

Page 43 1 Then we'll hand it over to you as measure. 2 the co-chair of the top four diabetes measures 3 and ask you to provide input as we go through the criteria on what the top discussions were, 4 5 as well as offer your expert opinion, but try 6 and help us understand when it's TAP and when 7 it's your input. 8 And then open it up to the 9 Steering Committee starting with the Steering 10 Committee folks who were assigned to leave particular components. So I will be sure to 11 12 signal you and make sure we're opening up the phone here and there throughout the discussion 13 14 for you to provide input. 15 DR. ROSENZWEIG: Okay, very good. 16 MS. TURBYVILLE: Jaime, also, I'm 17 not sure -- we just logged into the webinar. 18 I'm not sure if you were able to do that, if 19 you're at your computer, but we'll be 20 displaying slides of distribution of the task 21 ratings if that helps you kind of summarize 22 your feedback as well.

	Page 44
1	DR. ROSENZWEIG: Okay, I'm now on.
2	CO-CHAIR ROSENTHAL: So I think we
3	have the order of the morning here now set on
4	the three diabetes measures and the first one
5	will be from NCQA so if you give us a little
6	quick summary and then we'll have at it.
7	MR. HAMLIN: Thank you very much.
8	So our relative resource use measure for
9	diabetes is a very similar methodology to the
10	RCA measure you reviewed yesterday. So all of
11	our resource use measures are a standardized
12	price, use standardized prices to assign
13	effectively standardized utilization across a
14	number of service categories with a predefined
15	eligible population for people with diabetes,
16	using a multi-year denominator that's very
17	similar to our HEDIS quality measures.
18	Really, the only difference in
19	this from the approach the other day is that
20	the population is different in a sense. The
21	service categories are identical. There are
22	also service frequency categories that were

Page 45 1 reported alongside of these for in-patient 2 procedures, as service frequencies for this same population. So I'll just leave it at 3 that. We went through the other measure in 4 5 detail, yesterday, and again it's the same 6 methodology applied for this population as was 7 for the cardiovascular population. 8 CO-CHAIR ROSENTHAL: Jaime, would 9 you give the TAP review and again, one other 10 piece, we'll do this -- we'll vote on importance, then scientific acceptability, 11 12 usability and feasibility in that order and we'll take the same -- this is for Jaime's 13 14 benefit, that the importance -- we can't to 15 vote on importance, but I've got a feeling that this one is going to pass the importance 16 hurdle without a lot of discussion. 17 So Jaime, if you just give us kind 18 19 of the first piece of the TAP which is the 20 importance part, and then we'll get into the 21 meat of the thing with the scientific part. 22 DR. ROSENZWEIG: Sure, this

	Page 46
1	particular measure was developed by NCQA and
2	basically, their rationale for the importance
3	of the measure was very well done, talking
4	about the increase and prevalence of diabetes
5	in the general population and the economic
6	burden of diabetes which is very substantial
7	in the general population as well. And they
8	gave a number of good citations for the
9	importance of high impact. Is that how you
10	want me to do this?
11	CO-CHAIR ROSENTHAL: Yes, that's
12	perfect.
13	DR. ROSENZWEIG: So in the voting
14	in the Steering Committee nine voted, or all
15	nine people voted to support the high impact
16	part of this.
17	CO-CHAIR ROSENTHAL: Super, then
18	let's take a moment and vote at the Steering
19	Committee for the importance of the measure,
20	given that the TAP recommendation is strongly
21	positive and in this, one is yes, two is no.
22	(Pause.)

	Page 47
1	One vote is not getting tabulated
2	every time. Oh, even better. Okay, passes
3	the importance hurdle.
4	MS. TURBYVILLE: Seventeen high.
5	CO-CHAIR ROSENTHAL: Seventeen to
6	nothing. So Jaime, now I think is the time to
7	get into the discussion of the scientific
8	merits. And so if you would give us the TAP
9	view of that and then we'll open it up for
10	discussion.
11	DR. ROSENZWEIG: So we have
12	already covered 1b as well.
13	MS. TURBYVILLE: So for the
14	Steering Committee, they rate on the overall,
15	so they're not rerating the subcriteria that
16	the TAP did, Jaime.
17	DR. ROSENZWEIG: Okay, so we're
18	already moving on to Section 2.
19	MS. TURBYVILLE: Exactly, exactly.
20	DR. ROSENZWEIG: Okay, I
21	understand. All right. So basically, the
22	measure specifications really utilize the same

	Page 48
1	measure set that is being collected by the
2	HEDIS effectiveness of care measures from
3	NCQA. So it's been fairly consistent and they
4	rely on they report on the total use of the
5	diseases by service category and standardized
6	prices related to service units for each
7	measure.
8	And it has the advantage of being
9	able to look at their quality measures in
10	combination, their existing quality measures
11	in combination with the cost-of-care data that
12	they're collecting at the same time.
13	CO-CHAIR ROSENTHAL: Yes, and to
14	whom if I could summarize and see if I've
15	got it right, this is a total cost of care
16	measure for people with diabetes using a
17	standardized pricing methodology and a roll up
18	of total costs and then indexed. But I missed
19	to whom is the cost attributed? I missed
20	that.
21	DR. ROSENZWEIG: It's attributed
22	on various levels as far as I can understand,
l	

	Page 49
1	but primarily on the per capita primarily
2	the per capita, but it's population based for
3	the most part.
4	DR. CURTIS: It's the same as
5	yesterday, it's still specified by the payor
6	at the health plan
7	CO-CHAIR ROSENTHAL: At the health
8	plan level, right. Thank you. And higher,
9	yes. So it's the health plan.
10	DR. ROSENZWEIG: For the most
11	part, HEDIS measures are not reported per
12	physician.
13	CO-CHAIR ROSENTHAL: Right.
14	DR. ROSENZWEIG: They're reported
15	per plan for the most part.
16	MR. HAMLIN: So the same criteria
17	apply having multiple years of communities in
18	enrollment, minimum sample size at 400 members
19	in your population. Again, it's all the same.
20	We attribute the health plans for our health
21	plan support.
22	CO-CHAIR ROSENTHAL: I was just

	Page 50
1	trying to clarify so there was we had a
2	common starting point on the discussion. So
3	we've heard from the TAP. Now our technical
4	scientific reviewer, Sally, help me, who? Who
5	on the committee did scientific?
6	MS. TURBYVILLE: Carlos is not
7	here.
8	CO-CHAIR ROSENTHAL: Not here.
9	Well, I'm going to open it for a discussion
10	then. I think we have a pretty good idea from
11	yesterday's conversation what, if any, of the
12	scientific issues are. So I'll open this for
13	discussion.
14	Jack?
15	DR. NEEDLEMAN: I had a question
16	because I'm not sure to the developer
17	because I'm not sure I understood the answer
18	from yesterday. But before I ask the
19	question, with all these claims-based
20	measures, I don't think this is a deal
21	breaker. It is just inherent limitation of
22	moving forward on measuring resource use right

	Page 51
1	now. But it's important for us always to
2	remember and keep in mind that we're only
3	counting resources that are billed, that
4	health plans or groups which have unbilled
5	services they make available to their
б	patients, care coordination, nurse educators,
7	diabetes nutritionists that are not billed
8	services, those resources are real resources.
9	We think they make a difference in the
10	effectiveness of the care.
11	We have no way of measuring
12	whether how we may not have ways of
13	measuring what's there and how that's done.
14	To the extent that groups have negotiated
15	differential prices to pay for that because
16	they said look at the additional things we're
17	doing, we need a higher physician fee or
18	whatever, standardized pricing wipes out those
19	differences.
20	CO-CHAIR ROSENTHAL: Comment on
21	that?
22	MR. HAMLIN: Right, so our

	Page 52
1	approach is we're measuring utilization and we
2	feel that because we're attributing these to
3	the health plan, the health plan, through
4	their various programs, their DM programs,
5	their wellness programs, other incentives for
6	participation, if you will, all affect
7	utilization. And so by looking at the high
8	level utilization across specific service
9	categories, we're basically giving them a
10	snapshot of their utilization for a specific
11	period of time. And they can go back and look
12	and see how these specific programs may affect
13	the utilization results, if you will.
14	So all these programs, we feel,
15	affect the utilization of the plan members
16	when you're looking at it in the aggregate.
17	We do not have ways of measuring specific care
18	coordination components at this time, so
19	therefore, we're measuring what we can measure
20	at this current time and giving that back to
21	the plan as here's how your utilization
22	compares to other plans when you risk adjust

	Page 53
1	it and when you standardize it.
2	CO-CHAIR ROSENTHAL: I think Dr.
3	Needleman would probably agree. You're
4	agreeing.
5	DR. NEEDLEMAN: Yes.
6	CO-CHAIR ROSENTHAL: His point
7	that was still valid in the sense that costs
8	are being expended for certain things to get
9	that utilization and consequently if your
10	total cost of care will underestimate because
11	it's claims based will underestimate the
12	actual cost that was necessary to deliver
13	those volumes of services and it's just a
14	weakness of the extant methodology.
15	Somehow we have to figure out
16	MR. HAMLIN: The plan is not able
17	to capture that because they will be able to
18	plug in their actual prices for each
19	individual service categories based on this
20	methodology. They can also I'm assuming,
21	will be able to roll up as some sophisticated
22	plans like how partners can do, show their

	Page 54
1	total costs, be it total actual costs for all
2	services for these categories and they will be
3	able to then make those arguments to each of
4	their stakeholders, if you will, about the
5	differences between these and why they look
6	this way. But at NCQA's level, we only get
7	the utilization level data. So we can't, as
8	a measurement organization, measure that, but
9	I think there are ways to measure it using the
10	same template, if you will. It just requires
11	an additional drill down into the data by the
12	plan themselves.
13	DR. NEEDLEMAN: Just again, I
14	don't think it's a deal breaker on moving
15	forward with measures, claims-based measures
16	of resource use. We just need to understand
17	there are certain kinds of services and
18	certain kinds of clinicians that are simply
19	invisible in these measures and we just
20	that's a general issue that we ought to just
21	keep in mind and any reports that come out of
22	the Committee ought to acknowledge that.

Page 55
The question I had and I'm still -
- I'm confused. We heard I asked about how
in-patient pricing was done in terms of the
standardized pricing, and I thought I
understood your answer yesterday. And then
one of the other measure developers said they
were using your standardized in-patient
pricing method and it was different from the
way you described it.
So can you, once again just try to
help me understand how in-patient pricing is
done and therefore how and what kinds of
variances of in-patient use beyond admissions
we're actually capturing in our measures of
relative resources.
MR. HAMLIN: So we use a number of
different resources to generate standardized
pricing tables which are again, the Medicare
fee schedule, we have a large research
commercial database that Ingenix has
maintained for us over the years that that
feeds into this. Our pharmacy data comes from

	Page 56
1	First Bank. Primarily, we're capturing about
2	33,000 of the prescriptions that are written
3	frequently enough so that we can actually feel
4	like we can standardize, price these things.
5	We then annually publish the
б	standardized pricing table which is down to
7	the code level. So CPT, there's a
8	standardized price assigned. We make this
9	freely available on our web site. Anyone can
10	use it any way they wish to. We use it
11	specifically in the section that's detailed.
12	I believe it's 9.7 in your materials for our
13	measures of measuring health plans against
14	each other.
15	ABMS, I know, uses our
16	standardized pricing tables and they use them
17	in different ways, but again, but to use the
18	standardized prices as sort of a leveling
19	ground for removing the proprietary fee
20	schedules and contract specifics out of the
21	equation and we're fine with that. That's why
22	we published these. We make these freely

	Page 57
1	available because we have spent considerable
2	resources to generate these tables every year
3	and we feel like we want to get more out of it
4	than just five measures worth.
5	So we know that they do that.
6	That's why they make them freely available.
7	They're again, just a standardized,
8	effectively national price index for these
9	services that we can identify and we feel that
10	we can price effectively because there's
11	adequate utilization or there's adequate
12	information that allows us to assign a
13	standardized price to each of these individual
14	components. But again, different measures.
15	Stewards for different measures may use these
16	prices in a different manner.
17	CO-CHAIR ROSENTHAL: Are there
18	other questions either for the developer or
19	for our own TAP chair?
20	Yes, Paul?
21	DR. BARNETT: Yes, I just noticed
22	that looking at the TAP's scores that there

	Page 58
1	were a few concerns on the 2b and also 2b3
2	exclusions. I guess the exclusions had to do
3	with the exclusion of people over 75. That
4	was the concern. That was expressed by the
5	TAP and maybe our TAP chair can explain why
6	those votes happened.
7	CO-CHAIR ROSENTHAL: Jaime, did
8	you hear the question?
9	DR. ROSENZWEIG: If you're talking
10	about the voting for the 2b1, 2b2, and 2b3?
11	CO-CHAIR ROSENTHAL: Yes.
12	DR. ROSENZWEIG: They're still
13	basically mostly high with only some of the
14	people giving a medium rating. I'm not sure -
15	- it doesn't mean they were against the
16	CO-CHAIR ROSENTHAL: Jaime, no
17	doubt. He is just asking what was the basis
18	even for some people having only rated those
19	three moderately.
20	MR. HAMLIN: I actually do
21	remember the specific conversation because it
22	applied to our mandatory exclusions for ESRD

Page 59 1 transplantation primarily because in this 2 population, the TAP felt that those two actually were things that could really 3 contribute to the cost of care. And so what 4 5 we have done is then take that back now and we're reinvestigating that now as a measure 6 7 update. 8 So maybe our four mandatory 9 exclusions for active cancer, transplantation, 10 ESRD, and HIV may not be applicable across all five measures because they are particularly 11 12 relevant to the diabetes population. 13 CO-CHAIR ROSENTHAL: Thank you. 14 DR. ROSENZWEIG: Who is this 15 speaking? 16 MR. HAMLIN: This is Ben. 17 DR. ROSENZWEIG: Oh, Hi. 18 MR. HAMLIN: Dr. Rosenzweig, how 19 are you? 20 DR. ROSENZWEIG: Yes, he just 21 described that pretty accurately. I think the 22 main issue was the ESRD and the fact that a

	Page 60
1	lot of those people were excluded from this
2	population because they go to Medicare.
3	CO-CHAIR ROSENTHAL: And it's
4	clearly just a modest concern because none of
5	these were ranked low in the event.
6	Other questions? Yes, ma'am.
7	MS. HENDRICH: I have a comment.
8	I just wanted to build upon the point that's
9	already been made for just a moment. I think
10	one of the most difficult questions we have to
11	answer in the future is the issue of care
12	management, disease burden, and readmissions
13	back into acute care and from being on the
14	acute care side, as long as we continue to
15	bundle these care models within these large
16	process measures where there are intermediate
17	level providers, especially in the area.
18	And I was going to bring this up
19	around the congestive heart failure measure
20	where we have really some of the strongest
21	evidence around the cost effectiveness of
22	that. I think we're not going to be able to

	Page 61
1	answer the question. I think it's a yes and
2	I'm hearing that the developer is saying that
3	through the different groups, we're going to
4	be able to unbundle that and perhaps answer
5	it.
6	So my philosophical comment to
7	this group and challenge is at what point
8	though do we start to challenge developers and
9	say we have to be able to code in such a way
10	that we can start to identify the actual care
11	model that lies beneath the cost structures
12	we're looking at.
13	MR. HAMLIN: And our new measure
14	development in the EMR realm that actually
15	have and include measures of care coordination
16	because that data is available, I think will
17	strengthen our utilization approach because
18	we're reporting the quality of care with the
19	utilization by strengthening our quality side.
20	By understanding how these specific components
21	of care coordination and patient satisfaction
22	will affect the quality results, we can then

	Page 62
1	link those more directly to the utilization.
2	But in the absence of quality
3	measures around care coordination and
4	management of patients and patient
5	satisfaction, and the ability to access care,
6	I don't think we as NCQA don't want to dive
7	too deeply on the utilization side because we
8	don't have supporting evidence that those
9	indeed do make a difference. And again, we
10	have very high threshold for tolerance in that
11	arena as far as what we will use to report and
12	rank plans for our results.
13	CO-CHAIR ROSENTHAL: I'm not sure
14	either hers or Jack's comments really were
15	directed at this measure as they are kind of
16	the general feel. I think there would be
17	widespread agreement and in fact we had a
18	measure yesterday that excluded everybody that
19	was sent to a SNF. You know, when you think
20	about that, it's insane. And yet the SNF
21	costs are very hard to capture.
22	And we're on this crusade now to

i	
	Page 63
1	dump people at a "Uwe Reinhardt" of dumping
2	people out of acute care hospitals as if
3	that's the salvation of the healthcare cost
4	system without any notion that where they're
5	being dumped to is going to really and truly
6	and unequivocally be a lower cost proposition.
7	I think that's frankly still an untested
8	hypothesis. But anyway, I don't think any of
9	these comments are really directed at this
10	measure as much as they are kind of a general
11	
12	MR. HAMLIN: That was an FYI.
13	(Laughter.)
14	DR. BURSTIN: I do think it's an
15	important thing to consider into the final
16	report. That's again, the exact kind of thing
17	we want to make sure the Committee emphasizes
18	the fact that the broad scope of cost codes
19	are going to be really important to consider
20	across the board to really get a full handle
21	on who is doing what, what works, what doesn't
22	work as it relates to quality and cost.

1	Page 64
1	MS. HENDRICH: At the risk of
2	being redundant, since we know that comment is
3	going to be inserted, I would also stretch our
4	thinking beyond just intermediate level care
5	providers because this really goes into the
6	issue of home health care aides, right? Which
7	I think that need will probably outstrip
8	everything we've looked at thus far based on
9	what we're seeing in doing the deep dive into
10	readminissions around chronic disease. So
11	thanks for considering that.
12	CO-CHAIR ROSENTHAL: Mary Kay.
13	DR. O'NEILL: This is a comment
14	from the carrier industry. When you're
15	this measure is designed to compare our
16	industry, not really compare practices and
17	delivery systems. And so there's a lot of
18	variability. And in fact, one of the things
19	I think we compete on is our ability to
20	support our members to various different care
21	episodes. So we have huge infrastructure on
22	disease management, case management, health

	Page 65
1	advisor, integrated behavioral health data,
2	predictive modeling, preference-sensitive
3	care.
4	I mean the amount of money that
5	our company spends on this aspect of
6	management of our specific population is what
7	we sort of put our stake in the ground around
8	and why we are active in NCQA and have been
9	for a number of years. So this isn't really
10	even getting at the codes that will allow
11	practices to bill for care coordination.
12	There's other entities within the
13	larger healthcare world that are providing
14	this level of service. And so when you look
15	at some folks that are coming in from Medicare
16	or Medicaid, the robustness of their carrier
17	in these areas is not comparable.
18	So anyway, I mean the cost and the
19	benefit of this kind of activity resides
20	different places and we're not going to ever
21	get we don't have any claims data. That's
22	our business investment.

	Page 66
1	CO-CHAIR ROSENTHAL: That needs to
2	be done. Let me bring us back to this measure
3	and the scientific I have one last question
4	and then I think it's looking like we'll be
5	able to bring this to a vote, which is you do
6	have a truncation, as I recall and would you
7	share with us the logic behind the truncation
8	scheme?
9	MR. HAMLIN: Again, because in the
10	population we want to avoid a small proportion
11	of members driving the standardized costs up
12	beyond a comparable level so when members
13	reach that cap and there's a table of caps for
14	specific costs, they're basically just
15	truncated at a cap and they're not excluded
16	from the population, but it prevents small
17	spikes from skewing the results in one
18	direction.
19	CO-CHAIR ROSENTHAL: And the
20	number was 100,000 or something like that?
21	MR. HAMLIN: I don't remember the
22	actual current number. We adjust it slightly

Page 67 1 every year. 2 CO-CHAIR ROSENTHAL: It's not 3 important. 4 MR. HAMLIN: Yes. 5 CO-CHAIR ROSENTHAL: It's not so 6 important. Any other questions, comments, or 7 discussion on the scientific merits? If not, 8 then I think we're prepared to vote on the 9 scientific portion of this and if I recall, 10 this is yes or no. One is yes, two is no. 11 (Pause.) 12 MS. TURBYVILLE: So after a lot of 13 sending signal we have 18 yes, Jaime, so we'll 14 move on now to usability. 15 CO-CHAIR ROSENTHAL: So Jaime, if 16 you would, give us the TAP view of this, 17 please. 18 DR. ROSENZWEIG: Right. Can you 19 hear me well? 20 CO-CHAIR ROSENTHAL: Yes. 21 DR. ROSENZWEIG: Basically, the usability part of this was generally -- the 22

Page 68 1 analysis was pretty well received by the TAP. 2 I'm looking to the section here. Because of the fact that they're collecting all of their 3 data through HEDIS that this could be -- that 4 5 they could be able to understand it fairly 6 clearly and be able to use it for decision making because it was coordinated well with 7 8 measures that -- of quality of care. So it 9 can be use for quality improvement and public 10 reporting and quality improvement with external benchmarks. 11 12 So for those reasons I think we gave them high scores with the exception of 13 the issue of the harmonization part. 14 CO-CHAIR ROSENTHAL: But that's 15 16 not applicable. Right. 17 Doris, I think you were our internal reviewer. 18 19 DR. PETER: Yes, I don't think 20 there's too much to add. It's publicly 21 reported. The plan obviously uses -- the 22 aggregate results were reported for the public

Page 69 and annual reports that they put out and I 1 2 think we discussed it with the other measures. 3 CO-CHAIR ROSENTHAL: All right. 4 Is there any discussion of usability? Boy, 5 are we getting good. I think then that this is ready 6 7 for vote. 8 MS. TURBYVILLE: And this one is a 9 high, moderate, low, insufficient. 10 CO-CHAIR ROSENTHAL: So one, two, three, and four. 11 12 (Pause.) 13 CO-CHAIR ROSENTHAL: Okay. 14 MS. TURBYVILLE: So 12 high and 6 15 moderate. 16 CO-CHAIR ROSENTHAL: All right, and then finally, feasibility. So Jaime, if 17 18 you'll give us the TAP version of this. 19 DR. ROSENZWEIG: Yeah, here again, 20 the TAP felt that this was quite feasible to 21 be able to collect the data. There was a 22 really -- it was uniformly agreed that NCQA

	Page 70
1	was able to be able to collect the data that
2	they wanted to and be able to correlate it
3	well with the measures. The only issue where
4	there was disagreement was in the area of
5	susceptibility to inaccuracies and unintended
б	consequences. I guess there was some concern
7	that there might be some issues related to the
8	data audit process that might make it
9	occasionally a little more difficult to be
10	able to collect accurate data.
11	CO-CHAIR ROSENTHAL: Ben, do you
12	recall what that was in specifics or an answer
13	for that?
14	MR. HAMLIN: No, I mean, we do
15	all of it is submitted to NCQA. I'm sorry,
16	closer. All of the data submitted to NCQA has
17	to go through a certified auditor before it's
18	allowed to be reported. So we do reduce the
19	amount of errors in the data through this, and
20	each auditor must be certified through a very
21	extensive process and recertified every year,
22	like a licensing agreement kind of thing.

Page 71 Again, there's a lot of data 1 2 points. We're working to improve that process and automate much of it, so there will be 3 automatic validations, so next year there will 4 5 be a number of additional automatic 6 validations that will again reduce any kind of 7 misrepresentation of the data, but it's 50,000 8 data points. There's possibility for some 9 error somewhere along the line. 10 CO-CHAIR ROSENTHAL: Okay, and 11 Paul, you were our Committee reviewer, I 12 think? DR. BARNETT: Yes, I don't have 13 14 anything to add. 15 (Laughter.) 16 CO-CHAIR ROSENTHAL: Okay. This 17 is now open for discussion. Questions? 18 Hearing none, I think we are ready to vote on 19 this and -- I'm sorry, Jack. 20 DR. NEEDLEMAN: I'm going to vote 21 somewhere between high and moderate, but I 22 think NCQA is a well-established measure

	Page 72
1	developer and measure producer. A couple of
2	times during the conversation, we've basically
3	heard reliance upon the auditing function of
4	the individual health plans. I think there's
5	an issue of transparency there in terms of
6	exactly what's being done and so forth.
7	So I just want to note that,
8	without initially saying it indicts the
9	measure, I think it's very feasible, but we
10	ought to think about transparency here for
11	understanding exactly what data is coming
12	forward from the plans.
13	MR. HAMLIN: The audit is an
14	independent audit. It's not a health plan
15	audit. The auditors are certified as
16	independent auditors of the data, and the
17	health plan will contract with them to comply
18	with the audit. But they're not health plan
19	employees or have any other relationship other
20	than their
21	CO-CHAIR ROSENTHAL: Okay. Any
22	other Delores?
	Page 73
----	--
1	MS. YANAGIHARA: I just wanted to
2	comment that I think the data elements are
3	available. It can be collected. But once the
4	data are collected, there's still a lot of
5	analysis that needs to happen before the
6	measure can really be meaningful and you get
7	a result back.
8	So what the health plans actually
9	do is submit a whole bunch of data to NCQA.
10	NCQA has to crunch the numbers and come up
11	with all of the benchmarks and the results for
12	each plan. So it's not something that an
13	individual plan or individual organization
14	could do on their own. It's all about the
15	data are submitted and the data together
16	needed to be calculated. So it kind of lays
17	into feasibility here. It's a great measure,
18	but it does rely on that very sophisticated
19	analytic analysis after the fact, after the
20	data collection. It's not just like here's
21	the numerator. Here's the denominator.
22	Here's the rate, you're done. It's quite

Page 74 1 complicated. 2 CO-CHAIR ROSENTHAL: I see, so your 3 point was different than Jack was making. MS. YANAGIHARA: Different from 4 5 Jack's, yes. 6 CO-CHAIR ROSENTHAL: And it 7 relates to the fact that without NCQA --8 MS. YANAGIHARA: You need some 9 kind of data aggregate or body to collect the 10 data and do all the analysis and spit out the results. It's not just an individual 11 12 organization that can do that because it's all 13 about how you compare it to others. 14 CO-CHAIR ROSENTHAL: That was a 15 good question, but the algorithms are in the 16 public domain. 17 MR. HAMLIN: We post them on our website. 18 19 CO-CHAIR ROSENTHAL: Pardon me? 20 MR. HAMLIN: We post all our 21 methodology on our website. If another data 22 aggregator wanted to do this, they would be

	Page 75
1	able to do so.
2	CO-CHAIR ROSENTHAL: I think
3	that's a really it's not a black box, but
4	it's not trivial. I couldn't do it.
5	MS. YANAGIHARA: I think the other
6	comment related to the audit, the audit also
7	is not black box. The audit manual is posted
8	on the web. That's all transparent as well
9	and exactly what's done in the audit, and
10	their prophecies and what they're looking for
11	is all on the website as well.
12	CO-CHAIR ROSENTHAL: Other
13	comments or questions? Was there another hand
14	up over here?
15	All right, then I think we are
16	prepared to vote on feasibility. I'm breaking
17	my back checking to see how much time. This
18	is one, two, three, and four. So high,
19	moderate, low, and insufficient. Okay?
20	(Pause.)
21	MS. TURBYVILLE: Eleven high and
22	seven moderate. So I think we're ready to

Page 76 vote on the measure overall. 1 2 CO-CHAIR ROSENTHAL: That's next. So now it's time to vote on the measure 3 4 overall and this is yes/no and abstain, unless 5 there's any further discussion about the measure in toto. Hearing none, let us vote. 6 7 (Pause.) 8 MS. TURBYVILLE: So we have 17 yes 9 and 1 abstain. 10 CO-CHAIR ROSENTHAL: All right, that concludes the discussion on 1557. 11 12 MR. HAMLIN: Thank you very much 13 and thank you, Dr. Rosenthal. 14 CO-CHAIR ROSENTHAL: Thank you. 15 DR. ROSENZWEIG: That was -- I 16 hope all the others go half as smoothly. 17 CO-CHAIR ROSENTHAL: Well, when 18 they go smoothly, they go smoothly. I think 19 that's about all we can say. 20 DR. ROSENZWEIG: Yes, I shouldn't 21 editorialize. Okay. I'm sorry. 22 CO-CHAIR ROSENTHAL: We all share

	Page 77
1	that hope that the rest of them are as smooth
2	as that.
3	So next is 1576, which is episodes
4	of care for patients with diabetes over a one-
5	year period. This is an ABMS measure. And is
6	Kevin on the phone?
7	DR. WEISS: Yes.
8	CO-CHAIR ROSENTHAL: Kevin, good
9	morning. Did I hear a yes?
10	DR. LEE: I'm not sure if Kevin is
11	on, but Todd Lee is here I can
12	DR. WEISS: Kevin is on as well.
13	CO-CHAIR ROSENTHAL: Good morning,
14	gentlemen. If you would not mind giving us a
15	brief summary of the diabetes measure.
16	DR. WEISS: This is Kevin. I'll
17	give a short intro and then I'll ask Todd if
18	he'd like to add to it. But essentially, as
19	we have proceeded with the work group on this
20	measure, the question was what would be a look
21	at a person who has need for management of a
22	diabetes that was stable in the time period of

1what's recognized as a long disease process,2recognizing that it's at different times in3the disease process, particularly towards the4advanced stages, that it has a very different5set of complexity and thereby a whole set of6different expectations than it does for much7of the time of the person who has diabetes.8It shows a one time period to9measure this and we're very reflective on the10fact of how it would eventually match up to11quality measures since there are quality12measures in this area, so we're so well13advanced, recognizing that in the one-year14period what resources really could be15attributed to the provider, recognizing in16that context that there are a number of17activities that may be associated with18resources that may alleviate the long-term19supply, then really what could be looked at in20one year.21So rather than look at total22costs, we look for anything adverse to that in		Page 78
3the disease process, particularly towards the4advanced stages, that it has a very different5set of complexity and thereby a whole set of6different expectations than it does for much7of the time of the person who has diabetes.8It shows a one time period to9measure this and we're very reflective on the10fact of how it would eventually match up to11quality measures since there are quality12measures in this area, so we're so well13advanced, recognizing that in the one-year14period what resources really could be15attributed to the provider, recognizing in16that context that there are a number of17activities that may be associated with18resources that may alleviate the long-term19supply, then really what could be looked at in20one year.21So rather than look at total	1	what's recognized as a long disease process,
4advanced stages, that it has a very different5set of complexity and thereby a whole set of6different expectations than it does for much7of the time of the person who has diabetes.8It shows a one time period to9measure this and we're very reflective on the10fact of how it would eventually match up to11quality measures since there are quality12measures in this area, so we're so well13advanced, recognizing that in the one-year14period what resources really could be15attributed to the provider, recognizing in16that context that there are a number of17activities that may be associated with18resources that may alleviate the long-term19supply, then really what could be looked at in20one year.21So rather than look at total	2	recognizing that it's at different times in
5set of complexity and thereby a whole set of6different expectations than it does for much7of the time of the person who has diabetes.8It shows a one time period to9measure this and we're very reflective on the10fact of how it would eventually match up to11quality measures since there are quality12measures in this area, so we're so well13advanced, recognizing that in the one-year14period what resources really could be15attributed to the provider, recognizing in16that context that there are a number of17activities that may be associated with18resources that may alleviate the long-term19supply, then really what could be looked at in20one year.21So rather than look at total	3	the disease process, particularly towards the
6different expectations than it does for much of the time of the person who has diabetes.8It shows a one time period to9measure this and we're very reflective on the fact of how it would eventually match up to10fact of how it would eventually match up to11quality measures since there are quality12measures in this area, so we're so well13advanced, recognizing that in the one-year14period what resources really could be15attributed to the provider, recognizing in16that context that there are a number of17activities that may be associated with18resources that may alleviate the long-term19supply, then really what could be looked at in20one year.21So rather than look at total	4	advanced stages, that it has a very different
7of the time of the person who has diabetes.8It shows a one time period to9measure this and we're very reflective on the10fact of how it would eventually match up to11quality measures since there are quality12measures in this area, so we're so well13advanced, recognizing that in the one-year14period what resources really could be15attributed to the provider, recognizing in16that context that there are a number of17activities that may be associated with18resources that may alleviate the long-term19supply, then really what could be looked at in20one year.21So rather than look at total	5	set of complexity and thereby a whole set of
8It shows a one time period to9measure this and we're very reflective on the10fact of how it would eventually match up to11quality measures since there are quality12measures in this area, so we're so well13advanced, recognizing that in the one-year14period what resources really could be15attributed to the provider, recognizing in16that context that there are a number of17activities that may be associated with18resources that may alleviate the long-term19supply, then really what could be looked at in20one year.21So rather than look at total	6	different expectations than it does for much
 measure this and we're very reflective on the fact of how it would eventually match up to quality measures since there are quality measures in this area, so we're so well advanced, recognizing that in the one-year period what resources really could be attributed to the provider, recognizing in that context that there are a number of activities that may be associated with resources that may alleviate the long-term supply, then really what could be looked at in one year. 	7	of the time of the person who has diabetes.
10fact of how it would eventually match up to11quality measures since there are quality12measures in this area, so we're so well13advanced, recognizing that in the one-year14period what resources really could be15attributed to the provider, recognizing in16that context that there are a number of17activities that may be associated with18resources that may alleviate the long-term19supply, then really what could be looked at in20one year.21So rather than look at total	8	It shows a one time period to
11quality measures since there are quality12measures in this area, so we're so well13advanced, recognizing that in the one-year14period what resources really could be15attributed to the provider, recognizing in16that context that there are a number of17activities that may be associated with18resources that may alleviate the long-term19supply, then really what could be looked at in20one year.21So rather than look at total	9	measure this and we're very reflective on the
 measures in this area, so we're so well advanced, recognizing that in the one-year period what resources really could be attributed to the provider, recognizing in that context that there are a number of activities that may be associated with resources that may alleviate the long-term supply, then really what could be looked at in one year. 	10	fact of how it would eventually match up to
 advanced, recognizing that in the one-year period what resources really could be attributed to the provider, recognizing in that context that there are a number of activities that may be associated with resources that may alleviate the long-term supply, then really what could be looked at in one year. So rather than look at total 	11	quality measures since there are quality
14 period what resources really could be 15 attributed to the provider, recognizing in 16 that context that there are a number of 17 activities that may be associated with 18 resources that may alleviate the long-term 19 supply, then really what could be looked at in 20 one year. 21 So rather than look at total	12	measures in this area, so we're so well
15attributed to the provider, recognizing in16that context that there are a number of17activities that may be associated with18resources that may alleviate the long-term19supply, then really what could be looked at in20one year.21So rather than look at total	13	advanced, recognizing that in the one-year
16 that context that there are a number of activities that may be associated with 18 resources that may alleviate the long-term 19 supply, then really what could be looked at in 20 one year. 21 So rather than look at total	14	period what resources really could be
 17 activities that may be associated with 18 resources that may alleviate the long-term 19 supply, then really what could be looked at in 20 one year. 21 So rather than look at total 	15	attributed to the provider, recognizing in
18 resources that may alleviate the long-term 19 supply, then really what could be looked at in 20 one year. 21 So rather than look at total	16	that context that there are a number of
<pre>19 supply, then really what could be looked at in 20 one year. 21 So rather than look at total</pre>	17	activities that may be associated with
20 one year. 21 So rather than look at total	18	resources that may alleviate the long-term
21 So rather than look at total	19	supply, then really what could be looked at in
	20	one year.
22 costs, we look for anything adverse to that in	21	So rather than look at total
	22	costs, we look for anything adverse to that in

	Page 79
1	the context of this, but rather looking at
2	diabetes-specific costs as it relate to the
3	type of activities one would expect in a one-
4	year aspect of care.
5	We had the work group ask the
6	question as to what primarily would one want
7	to look towards attribution, and they thought
8	that this could be attributed to an individual
9	provider or based upon a provider group that
10	you had.
11	Those are the basic elements of
12	this diabetes measure.
13	Todd, would you like to add
14	anything to that?
15	DR. LEE: I'll just add how this
16	is similar or different than the other
17	measures that you all have reviewed from us.
18	Unlike this is probably more similar to the
19	CAD measure in that individuals are identified
20	during a 12-month period. And then we look at
21	the resource use in the following 12-month
22	period, so we have an identification and a

	Page 80
1	measurement year, unlike our AMI measures
2	which are triggered by an index event. So
3	we're taking an approach from a chronic
4	disease standpoint and looking at resource use
5	over the 12-month measurement period of
6	individuals who had identified in a previous
7	year.
8	CO-CHAIR ROSENTHAL: All right.
9	Great. Thank you very much.
10	Jaime, will you discuss the TAP
11	discussion?
12	DR. ROSENZWEIG: Sure. This was
13	the 1576 on the ABMS measure and hold on a
14	second. Let me just get my notes. Yes, as
15	was just discussed, this measure discussed
16	resource use and costs associated with
17	management of diabetes over a one-year period.
18	It identified patients in a management phase
19	of diabetes by including people in the year
20	prior to the measurement year and resources
21	use and cost during the measurement year and
22	patients with new diagnosis of diabetes and

	Page 81
1	those with end-stage disease, which was not
2	exactly clearly defined, were excluded from
3	the measure and resource use was attributed at
4	the level of the individual provider as
5	opposed to the last measure set.
6	So the measure type was per
7	episode, but really it is over a year period
8	and the level analysis was at the clinician or
9	individual level. So with respect to 1a,
10	everyone clearly agreed that the measure had
11	a very high impact and high importance. Eight
12	thought that it was high and one thought that
13	it was medium.
14	However, there was a sense that
15	there might be some resource use or cost
16	problems. The TAP discussed that the
17	submission provided evidence of gender and
18	only racial disparities and did not address
19	the other areas of disparities, including
20	socio-economic issues, and the TAP discussed
21	that this may be due to a lack of literature
22	in the area. But I think there is some

Page 82 1 literature in the area, and there was some 2 suggestion that if in the future that the Steering Committee would have to give guidance 3 with respect to how this resource measure 4 5 should be used. 6 And then with respect to the 7 purpose clearly described there again, there 8 were six highs and three mediums, and the 9 concern among some of the people was that they needed more detail about whether the measure 10 is paired to other quality measures. 11 It's 12 discussed later on in the section, and then there was also some concern about the resource 13 14 use service and categories being consistent 15 and representative. And here again, there was 16 disagreement over this issue. 17 CO-CHAIR ROSENTHAL: All right. 18 Thank you very much. I think it sounds as if 19 the TAP on this one looked at this importance 20 question in the dimensions like we talked 21 about yesterday. Does the importance apply 22 specifically to the measure? Just to clarify,

	Page 83
1	we've been considering the importance question
2	more broadly, and so I would suggest that we
3	go ahead and vote on that and then we can get
4	to the scientific questions on this thing.
5	And this is one, yes; two, no.
6	(Pause.)
7	MS. TURBYVILLE: So we have 18 yes
8	on importance, so we can move on to scientific
9	acceptability.
10	CO-CHAIR ROSENTHAL: So Jaime, if
11	you all would discuss the if you discuss
12	the TAP discussions
13	DR. ROSENZWEIG: Okay, going to
14	2al, which is whether or not the measures are
15	well defined and the specifications were
16	precise, there was actually a sense that this
17	was not fulfilled. And some of the issues
18	that came up included as to it was unclear
19	as to why renal failure codes 585.3 and 585.2
20	and 585.4 were excluded from the measure. The
21	codes apparently that they listed were not
22	updated.

	Page 84
1	Bariatric surgery was not
2	included. The TAP required rationalization
3	for the specific drug selections, in
4	particular, why the uses of only oral
5	hypoglycemic or injectable medications are in
6	the inclusion criteria and others should be
7	considered.
8	They requested a clarification for
9	the lower age band of 30 years for Type 2
10	diabetes that was being specified. The
11	developer responded that the measure was
12	supposed to be focused on Type 2 diabetes.
13	However, Type 2 diabetes is being seen at
14	earlier and earlier ages, as most of you
15	probably are aware.
16	And there was some issues, if
17	that's the case, then the TAP said that the
18	title and measure description in 10 should
19	clearly state the focus on Type 2 diabetes
20	rather than just on diabetes as a whole.
21	I don't know if that's been
22	changed since we reviewed it or if the actual

	Page 85
1	text has been changed. And then the TAP
2	required clarification on Type 1 exclusion and
3	how you would exclude it, considering it's
4	very difficult based upon data from the chart
5	or data from administrative data. The
6	distinctions between Type 1 and Type 2 are
7	listed in coding, but they're often not used
8	correctly by physicians.
9	And there was also a sense that
10	the inclusion and exclusion criteria needed to
11	be tightened up, at least as written in this
12	protocol to be sure to exclude patients with
13	Type 1.
14	And also, there was a question as
15	to how new diabetes would be excluded. New
16	diabetes diagnosis would be excluded since
17	there's a fairly high proportion of patients
18	who are diagnosed, who are under-diagnosed and
19	may be diagnosed in one place and they're not
20	listed elsewhere. So those are a lot of the
21	issues related to definition, which caused a
22	lot of debate.

	Page 86
1	With respect to reliability
2	testing, people felt that that was, indeed,
3	very sound and has been tested in large
4	database by ABMS.
5	With respect to the issue of
6	specifications consistent with resource use
7	and the cost problem, and here again, there
8	was a lot of people who had concerns about
9	this particular part of the protocol because
10	the specifications were not always clear.
11	Issues related to the time of entry into the
12	target population, how that would be
13	determined, and how that would be counted with
14	respect to resource use. There was some
15	concerns that they were not listed precisely
16	enough and that they should also the
17	costing method it was felt that the costing
18	method should require more clear
19	clarification.
20	And there were also concerns about
21	the issue of exclusion and exclusion criteria,
22	which it was felt at least within the respect

	Page 87
1	of this particular protocol that they required
2	more clarity and specific rationale. And in
3	addition, the target population
4	identification, as listed earlier, needed to
5	be more precise.
б	In general, there was also some
7	issues that were raised about the validity
8	testing. The general sense was there was
9	insufficient information provided on the
10	validity testing, testing analytic methods,
11	and results.
12	With respect to exclusions, also,
13	there again, almost all the people voted
14	medium, with one low and here this was
15	largely the rationale for this was that they
16	were we didn't know whether they were going
17	to be consistent inclusion and exclusion
18	criteria across the measures that were
19	relevant. And the measure as was written
20	didn't provide clear rationale for measure
21	exclusions.
22	Also, there was some disagreement

1	
	Page 88
1	as to the score for the risk adjustment. The
2	TAP wanted confirmation upon which risk
3	adjustment approach would be selected and the
4	methodology that they listed there appeared to
5	be based upon the widely-used CMS HCC
6	approach, which TAP liked, but the TAP
7	couldn't assess risk adjustment because some
8	things were missing, including fit testing and
9	the RSQ value and the rationale and list of
10	selected covariates.
11	So we felt that they needed to be
12	more clear on how to instruct the users how to
13	apply risk adjustment to this measure. And
14	then it was felt, however, that in general
15	that most people felt that the identification
16	of statistically significant and meaningful
17	differences could be done with this measure
18	set. The minimum sample size for reporting
19	implementation was not provided, and that's
20	important because this measure is being
21	selected on the is actually looking on the
22	physician level, and many physicians don't

	Page 89
1	take care of that many patients with diabetes
2	in their population, and there may be a large
3	percentage of them that would have a small
4	number of patients that could not be
5	sufficiently compared with other physicians.
6	CO-CHAIR ROSENTHAL: All right,
7	thank you very much.
8	DR. ROSENZWEIG: Am I missing
9	anything? Yes, the multiple data sources
10	thing was not applicable, and stratification
11	for disparities, there was no real
12	stratification listed there.
13	DR. CURTIS: The only other thing
14	I thought was the issues of attribution that
15	we discussed, the difficulties of assigning
16	particular physician. I think you raised the
17	concern about
18	DR. ROSENZWEIG: Oh, yes. I'm
19	glad
20	who is that, is that Jeptha?
21	DR. CURTIS: Yes, that's me.
22	DR. ROSENZWEIG: Yes, yes. That

Page 90 was an important issue was that typically the 1 2 care of these patients is very shared, okay, among various providers and how you would 3 attribute the overall care to which provider 4 5 with respect to the costs, how the costs would be, would be sort of clarified, becomes very 6 7 complicated in the diabetes population. 8 DR. HELM: This is Ethan. You 9 know, the attribution part, the complexity was 10 one of the things that caught my eye in reviewing this as well. There's sort of a 11 12 tiered algorithm of costs of attributed to sort of the primary diabetes provider, based 13 14 on three criteria. One is that that provider did 70 percent of those visits in a year. 15 Ιf that's not met, then it's the person who did 16 30 percent of the visits, and then there's a 17 third tier which is kind of like we don't know 18 19 who attribute it to, and one of the things 20 empirically which was kind of striking but 21 probably not surprising was that 55 percent of 22 the patients that they identified, they could

Page 1 not attribute to a provider, so it's slightly 2 over half could not be attributed to a 3 provider. So it brings up some 4 generalizability concerns. 5 CO-CHAIR ROSENTHAL: All right, 6 thank you very much. A lot of work went into 7 doing that analysis, and this Committee much 8 appreciates the effort that you guys put into 9 thinking that through and doing such a careful 10 and thorough evaluation.	91
over half could not be attributed to a provider. So it brings up some generalizability concerns. CO-CHAIR ROSENTHAL: All right, thank you very much. A lot of work went into doing that analysis, and this Committee much appreciates the effort that you guys put into thinking that through and doing such a careful	
3 provider. So it brings up some 4 generalizability concerns. 5 CO-CHAIR ROSENTHAL: All right, 6 thank you very much. A lot of work went into 7 doing that analysis, and this Committee much 8 appreciates the effort that you guys put into 9 thinking that through and doing such a careful	
4 generalizability concerns. 5 CO-CHAIR ROSENTHAL: All right, 6 thank you very much. A lot of work went into 7 doing that analysis, and this Committee much 8 appreciates the effort that you guys put into 9 thinking that through and doing such a careful	
5 CO-CHAIR ROSENTHAL: All right, 6 thank you very much. A lot of work went into 7 doing that analysis, and this Committee much 8 appreciates the effort that you guys put into 9 thinking that through and doing such a careful	
6 thank you very much. A lot of work went into 7 doing that analysis, and this Committee much 8 appreciates the effort that you guys put into 9 thinking that through and doing such a careful	
7 doing that analysis, and this Committee much 8 appreciates the effort that you guys put into 9 thinking that through and doing such a careful	
8 appreciates the effort that you guys put into 9 thinking that through and doing such a careful	
9 thinking that through and doing such a careful	
10 and thorough evaluation.	
11 Our internal primary reviewer for	
12 scientific acceptability is not with us. I	
13 wonder if, out of order, but Steve, feel free	
14 to say no, but you did look at the usability.	
15 And I imagine that perhaps you might have read	
16 this a little more closely than some of us	
17 based on having to look at it from a usability	
18 point of view. Do you want to make any	
19 comments with regard to the science?	
20 MR. PHILLIPS: Well, just a couple	
21 and they were actually touched on in the TAP	
22 review. Looking coming at it from the	

	Page 92
1	usability review, I guess the biggest question
2	is just as was touched on linking this with
3	some sort of quality measures because just
4	with the resource use, I'm not sure what I
5	would make of it, given the outputs, this
6	higher resource expenditures, good or bad.
7	But you know, we've already talked about the
8	need, eventually, that these will have to be
9	meshed with quality measures.
10	I guess the biggest issue that I
11	saw, again, was just touched on as far as
12	attribution. I can think of situations where,
13	basically, you're not able to attribute a
14	patient because they're really not being very
15	well managed and so then they end up getting
16	spread across or attributed to someone else or
17	multiple providers. To me, that's a
18	significant problem because that's exactly
19	what I think we're trying to get at here is
20	identifying you may not have much resource
21	use because you're not really managing the
22	patient very well, and then you lead to these

1	
	Page 93
1	downstream expenses in the overall health
2	system. I think those were my main comments.
3	CO-CHAIR ROSENTHAL: Okay, open
4	for discussion. I thought I saw a hand up
5	over here earlier, maybe out of sequence.
6	Jack?
7	DR. NEEDLEMAN: Yes, a question
8	for the TAP. When you looked at the services
9	and procedure codes that were being included
10	in this measure because it's diabetes-specific
11	care rather than a total cost of care for
12	patients with diabetes, were there any
13	important exclusions with things you felt
14	should have been on the list that weren't?
15	DR. ROSENZWEIG: Well, there were
16	a number of things that were excluded that we
17	felt shouldn't have been. I mentioned that
18	earlier. The renal failure codes which are
19	closely related to diabetes, bariatric
20	surgery, things of that sort.
21	I cannot recall whether there were
22	very many specific codes that were missing

Page 94 1 that were just missing by accident. Thev 2 looked like they were including most of the diabetes-related codes that -- that was my 3 recollection. I don't have the actual list up 4 5 in front of me right at the moment, but I 6 don't think that there were many problems that 7 were raised related to that. 8 DR. ROSENZWEIG: I can imagine 9 with patients with a chronic disease like 10 diabetes, some codes that are not specific to diabetes -- you would expect to be part of the 11 12 diabetes management would be included in something else. So that's the kind of things 13 14 that aren't are on the list that I'd be a little bit concerned about. 15 16 DR. NEEDLEMAN: Yes, there are a 17 lot of things that are hard to sort out. 18 Patients get admitted for an acute infection, 19 but it's also maybe associated with 20 uncontrolled diabetes, and sometimes -- that 21 would probably be listed as something that's 22 not diabetes-related in most settings, but in

	Page 95
1	fact, it is diabetes-related.
2	I think we had some discussion
3	about the issue about how in many cases length
4	of stay, hospital length of stay may be
5	increased fairly significantly in some of
6	these situations, but they're not really
7	dealing with most of those issues. They're
8	dealing with in this particular measure set
9	with the diabetes-related admissions, which
10	mostly includes either a hyperglycemia or a
11	hypoglycemia, those kinds of things.
12	CO-CHAIR ROSENTHAL: This is a
13	question out of ignorance, but they exclude
14	polycystic ovary disease explicitly. Why
15	that? I'm sure there must be some reason, but
16	it's not specifically apparent to me.
17	DR. ROSENZWEIG: Well
18	CO-CHAIR ROSENTHAL: Kevin, could
19	you answer that?
20	DR. WEISS: I think it's because
21	in order to define the patients with in
22	this data set with diabetes, they use

	Page 96
1	medications that are normally associated with
2	treatment of diabetes. And what's happening
3	nowadays is that some of these medications are
4	being used in situations other than diabetes.
5	So metformin is being used quite commonly to
6	treat polycystic ovarian disease.
7	So if you're using some of these
8	medications to identify patients with diabetes
9	by the use of medications, then you have to
10	exclude I mean, some patients with
11	polycystic ovarian disease have a
12	significant number of them have concurrent
13	diabetes, but the issue is that you can't
14	if they're being identified by the use of
15	metformin or thiazolidinedione, which are
16	drugs which are usually used to identify
17	patients with diabetes, some of them are being
18	used to treat PCOS.
19	CO-CHAIR ROSENTHAL: I think we
20	got it. Thank you. I didn't get that.
21	That's an interesting confounder.
22	DR. WEISS: It's going to occur

Page 97 more and more in the future because some of 1 2 these drugs may be used actually to prevent There are varying studies that have 3 diabetes. 4 shown that some of these drugs actually can 5 decrease the risk of getting diabetes by a 6 certain amount. Whether or not they're cost 7 effective is a great concern and there's 8 certainly no uniformity in terms of clinical 9 guideline. 10 CO-CHAIR ROSENTHAL: But the 11 trigger in almost every one of the diabetes 12 measures that's extant is the pharmacy identification of drugs being prescribed, 13 14 right? 15 It's a combination of DR. WEISS: that and then the diabetes-related codes. 16 17 CO-CHAIR ROSENTHAL: Right, right. 18 Okay, are there questions? Mary Kay. 19 DR. O'NEILL: I just would like to 20 say I think it's great that DME is in here on 21 this and that I actually didn't notice if it 22 was missing on the other ones, but it's

Page 98 1 significant for chronic management. 2 CO-CHAIR ROSENTHAL: I had one 3 question. In the culling out of eligible cases, one of the slides has the Market Scan 4 5 enrollees started off with about 1.4 enrollees 6 with a diabetic indication. By the time the 7 various exclusions are applied, the cohort is 8 down to 212,000. Does that cause the TAP any 9 concern or am I missing something about that? 10 DR. WEISS: I can't answer this I missed it. This is in the actual 11 question. 12 protocol? No, it's in 13 CO-CHAIR ROSENTHAL: 14 the slide set that accompanied the measure, Slide 4. 15 MS. WILBON: Jaime, we'll try to 16 17 pull it up on the webinar for you. 18 CO-CHAIR ROSENTHAL: Half of them 19 were because of coverage issues, and I think 20 this came up yesterday in some of the 21 discussions about we're missing a whole chunk 22 of people because of the rule set. And again,

	Page 99
1	this is not a critique of the developers.
2	You've got to have some rule set and that's
3	not a ridiculous one. But the net effect is
4	if you apparently start with 1.4 million
5	potentials and you get it down to 200,000.
6	So Kevin, the question I would ask
7	is, and it's the question we asked several
8	times yesterday, which is if you've got 200,
9	approximately 212,000 episodes, how many
10	episodes per physician then did this end up
11	being attributed? Do you know that number for
12	the diabetes one?
13	DR. WEISS: I'll ask Todd that,
14	but I just also remind the Committee that this
15	is to some degree a feature of this data set
16	as well. We need to be mindful that in a data
17	set that may have more information or more
18	pharmacy coverage, those numbers will
19	dramatically change and so I want to be
20	careful that we're not looking at data sets
21	specific concerns or that we have random or
22	nonspecific biases introduced by trying to

	Page 100
1	look at this now.
2	Now Todd, I don't know, do you
3	have the average numbers close at hand?
4	DR. LEE: I don't. The
5	attributable issue is exactly the same as we
б	have for other measures where about half of
7	our final episodes indicates that it's
8	actually a little under half, end up being
9	attributed at the physician level because of
10	the missingness with provider ID that you all
11	heard about yesterday and talked about.
12	DR. ROSENZWEIG: Now, looking at
13	this slide, I remember when we reviewed this.
14	I don't have any real big problems with them
15	picking a well-defined cohort and eliminating
16	patients that they may have problems with,
17	even though it is a relatively small
18	percentage of the initial but they're
19	talking about people with any diabetes
20	indication in 2006, and they're eliminating
21	people with discontinuous coverage and with
22	and a variety of other issues, patients who

1	
	Page 101
1	hadn't had any visits during the previous
2	year. So I guess this was not of great
3	concern, at least it didn't come up as an
4	issue of great concern as far as I could tell
5	during our discussion, as far as I can recall.
6	CO-CHAIR ROSENTHAL: All right,
7	thank you. Doris?
8	DR. PETER: I just had a question
9	about why is it just the first half of 2006.
10	It excludes a huge number of people between
11	the eligible enrollees and the cohort one.
12	Why not the whole year?
13	DR. WEISS: Is that for us, the
14	developer?
15	CO-CHAIR ROSENTHAL: Yes. Thanks,
16	Kevin.
17	DR. WEISS: Because we are trying
18	to focus on a group of people that are not
19	newly diagnosed. If they had a diagnosis in
20	December of the identification year, we didn't
21	want to bring in a cohort of patients that had
22	a new diagnosis. So the definition, was let's

	Page 102
1	make them have a diagnosis in the first six
2	months of the identification year to ensure
3	that the resource is not going to be a
4	function of trying to manage a patient with a
5	new diagnosis.
6	CO-CHAIR ROSENTHAL: So you were
7	trying to make it established diabetes, as
8	opposed to new diagnosis diabetes in the index
9	year.
10	DR. WEISS: That's exactly right.
11	DR. PETER: Could you look at the
12	prior visit though? Maybe you still can't
13	tell because it's the second half. The first
14	half to me, it doesn't make sense. You'd
15	have to look at the prior visits still and see
16	if you can see diabetes even before.
17	DR. WEISS: Well, there could be a
18	new diagnosis in this first half, but then
19	they're going to have six plus months of
20	experience of management of their initial
21	diabetes care that won't be counted as part of
22	the episode because we don't set the clock

	Page 103
1	until at least six months later or start
2	counting resources until at least six months
3	later. And they have to have a diabetes visit
4	in the follow-up year, so we know that they're
5	continuing to be managed for their diabetes.
6	CO-CHAIR ROSENTHAL: Thank you for
7	that explanation. Just to clarify though, of
8	the cohort that was very precisely defined,
9	you're not sure, though, then how many per
10	physician that ends up being. Again, I think
11	for the group that's a somewhat relevant
12	concept because if this ends up being five
13	cases per physician attributed, it's hard for
14	me then to know how would that be validly
15	distinguishing one from another, but you don't
16	have that number.
17	DR. WEISS: I don't have that
18	answer for you.
19	CO-CHAIR ROSENTHAL: Okay, thank
20	you. Jack?
21	DR. NEEDLEMAN: Yes, Kevin, quick
22	question on these no prescription drug

Page 104 1 coverage, which is the way you've 2 characterized it in the slide set. Is that 3 people with no coverage or people with PBM coverage that was not -- where the claims 4 5 were not submitted to Thomson Reuters by the primary insurer. Do you know what proportion 6 7 falls into that category? 8 DR. WEISS: We don't know what 9 proportion falls into those two buckets, but 10 it's likely that the larger of the two is the latter, where the PBM is not part of what's 11 12 submitted to Thomson Reuters and contained in the MarketScan data. 13 14 CO-CHAIR ROSENTHAL: Thank you. Just again, this illustrates this issue of 15 16 carve-outs and its impact to identify disease 17 specific and general. 18 CO-CHAIR STEINWALD: An issue 19 that's come up several times is the issue of 20 exclusions of certain procedures and diagnoses 21 from the assessment of resource use. 22 Recall yesterday, there was one

Page 105 1 measure where they adopted a very inclusive 2 strategy. Once they identified the population, they basically let everything in, 3 knowing that there would be a lot of noise 4 5 coming in with certain events that occurred 6 that were unrelated to the underlying 7 condition. 8 But I'm personally more 9 comfortable with that. I'm thinking back to 10 a previous conversation I had with a clinician who said, told me, that if you exclude 11 12 fractures, for example, you may, because they don't look like they're relevant to the 13 14 underlying chronic condition, you may actually be missing some important information about 15 the management of the chronic illness because 16 17 the likelihood of a fall and a fracture may be related to how well that chronic disease is 18 19 managed. 20 So I quess when I hear this 21 discussion of why did you exclude this certain 22 diagnosis, it makes me think of this issue all

	Page 106
1	over again, and my preference would be
2	personally to be much more inclusive than
3	exclusive.
4	CO-CHAIR ROSENTHAL: Kevin, would
5	you guys want to comment on that in
б	relationship to diabetes of sort of lumping,
7	rolling in, basically, all things that happen
8	to the diabetics and how you guys thought
9	about the question that Bruce just posed?
10	DR. WEISS: It's a great question
11	and it's one of those that can get easily
12	debated. There's no right answer. I think
13	the issues parse off into the signal to noise.
14	We threw in all these other things, including
15	bumps and lumps and skin tags and twisted
16	ankles and stuff. You just threw in a lot of
17	information that may or may not be relevant,
18	and that creates noise which makes it very
19	hard to detect signal. That's just a
20	technical concern explained very non-
21	technically.
22	The other is what is a reasonable

ſ

	Page 107
1	expectation for in one year's care of a person
2	with diabetes and in that section of care
3	where they don't have advanced sequelae and
4	they're not newly diagnosed, what can you
5	really attribute to a physician to say what
б	you should be spending money on. And for
7	that, you know, and what should the patient's
8	adverse complications where money is being
9	spent be attributed to that one year of care?
10	And we heard in the work group a
11	clear recognition. These are great diabetes
12	experts and they were clearly cognizant of all
13	of the relationships that exist over time, and
14	if this was a five or seven year cost-of-care
15	measure, they would probably have looked at it
16	very differently, adding cardiovascular and
17	adding in a huge amount of issues related to
18	end-stage end-organ damage that starts to
19	develop. And it's even the five-year cost-of-
20	care measure that would have been difficult
21	for them, but they would have been more
22	comfortable. But over one year, both on the

	Page 108
1	issue of the technical signal to noise and the
2	second issue related what really in terms of
3	cost can you hold a provider accountable for.
4	It didn't make sense to that work group to go
5	for total cost at this degree of granularity
6	of measurement.
7	I hope that's helpful in terms of
8	a response.
9	CO-CHAIR ROSENTHAL: No, I think
10	that was a perfect response. And I think the
11	discussion demonstrates how difficult this
12	whole field is when you capture all of the
13	complexity and trying to get it right in all
14	of the dimensions that we're asking these
15	measures to perform against.
16	Yes, Jeffrey.
17	DR. J. RICH: A point of
18	clarification. This slide says cohort 1.
19	There's a cohort 2 on the next slide which
20	even has a much lower number, 4 percent at the
21	final. I think I went back to look at the
22	inclusion, and cohort 2, I think, are the
	Page 109
----	--
1	people who are on insulin and not on oral
2	hypoglycemics. So it begs the question, I
3	thought this was a measure for Type 2 diabetes
4	in the introductory remarks. So why is there
5	a cohort that involves insulin only?
6	DR. ROSENZWEIG: Just to answer
7	that, this is Jaime Rosenzweig. Just a very
8	large percentage of patients with Type 2
9	diabetes are on insulin. It's 20 or 30
10	percent.
11	DR. J. RICH: Without being on
12	oral hypoglycemics?
13	DR. ROSENZWEIG: No, some of them
14	are on oral hypoglycemics.
15	DR. J. RICH: Well, if you go to
16	the inclusion criteria in this document, the
17	including criteria says no oral hypoglycemics,
18	but insulin, way back, on some earlier page.
19	DR. ROSENZWEIG: Yes, but some of
20	them are on insulin alone, so there are a
21	group of patients within that population that
22	are on insulin.

Page 110
DR. J. RICH: Okay, thanks. And
then the second question
DR. ROSENZWEIG: One thing that
did come up is there was a question as to why
people who have Type 2 diabetes and are on no
either oral or insulin medications, why
they were not included in this population.
DR. J. RICH: So that comment
comes from page 11, top of page 11.
The second question I had related
to the risk adjustment model. And this looks
very complicated and robust and I don't think
I heard anybody from the TAP discuss it. I
was wondering if there was some discussion
from the TAP or reflection on it. It seems
very complicated.
CO-CHAIR ROSENTHAL: Jaime, I
think you did mention that briefly in your
presentation, but would you mind
DR. ROSENZWEIG: Yes, I think we
did think it was complicated. I thought I had
mentioned that.

	Page 111
1	CO-CHAIR ROSENTHAL: Just
2	reiterate just briefly again, if you would.
3	DR. ROSENZWEIG: Yes, the
4	enrollment criteria was kind of confusing and
5	they used in one case, as I said, some who
б	were on insulin and some were on oral
7	medications. And there are people exactly as
8	you're mentioning who are on both and there
9	are also people who have neither. And then in
10	addition, there are patients who are on
11	medications that are neither insulin nor oral
12	hypoglycemic medication.
13	CO-CHAIR ROSENTHAL: Thank you.
14	DR. ROSENZWEIG: Like the GLP-1
15	agonists, which are injectable, non-insulin
16	medication. It becomes kind of complicated,
17	and the definitions were not very well
18	clarified.
19	CO-CHAIR ROSENTHAL: Thank you.
20	Lisa, are you following the rules from the
21	last time where we said if you wanted to speak
22	you turn your thing up? That's amazing. From

	Page 112
1	one year, she remembered and she's the only
2	person who did that.
3	(Laughter.)
4	MS. GRABERT: It's just easier
5	than holding your hand up.
б	CO-CHAIR ROSENTHAL: I'm trying to
7	be respectful of that. So you're next, and
8	then Bill, and then David.
9	MS. GRABERT: Are we supposed to
10	comment on price standardization and
11	scientific acceptability? Is that the right
12	category for that?
13	CO-CHAIR ROSENTHAL: It is. It
14	has not come up yet in the discussion, but if
15	you'd like to.
16	MS. GRABERT: I just have a
17	question for the developer, since this is
18	specified for both commercial and Medicare
19	data. How did you price standardize,
20	specifically, the Medicare data?
21	DR. WEISS: We didn't. We only
22	tested this specific measure in a commercial

	Page 113
1	population and created a standardized price
2	file from that commercial population.
3	CO-CHAIR ROSENTHAL: Does it say
4	Medicare in there somewhere?
5	Well, the clarification is, it's
б	not Medicare, so Bill is next, and then David.
7	DR. W. RICH: I'd like to go back
8	to Jeff's point. I had this same concern and
9	actually I queried the staff to see if the TAP
10	had Carlos' scientific acceptability and had
11	some comments that I'll read. And
12	specifically the risk adjustment methodology,
13	is it described completely inaccurately? No.
14	Six models were tested and the most
15	parsimonious chosen.
16	Carlos is the technical
17	statistician's evaluation of the was it
18	adequately described? The answer is no. In
19	general, the only descriptive process is the
20	threshold of a P value of less than .1 was
21	used for variable selection. And general
22	selection process based only on significant

	Page 114
1	testing is not reliable, blah, blah, blah. So
2	there were some significant comments, and I
3	had the same concerns that Jeff did about the
4	lack of clarify of the risk-adjustment model.
5	CO-CHAIR ROSENTHAL: David?
б	DR. PENSON: So I wanted to add to
7	that and ask the instrument developer a
8	question, and then I wanted to ask the TAP
9	chair a question.
10	With regard to the risk
11	adjustment, I mean, this is the same thing
12	we've seen with all the ABMS foundation
13	measures, and in the end, the same basic
14	methodology is used, but we run into problems
15	with how extensively it's tested. So I wanted
16	to ask the instrument developer if it's been -
17	- if this has been tested the same as the
18	other ones, if not at all, if it was just the
19	Delphi process and preliminary testing because
20	you know, Bill Rich's comment reading the
21	statistician's comment is important. It seems
22	like there's a problem with the risk

Page 115 adjustment. So that's the first thing. 1 2 The other thing I wanted to ask the TAP was about the accountability piece and 3 I think we've sort of touched on it a little 4 5 bit, but I'm just -- when I looked at the accountability piece, ascribing it to a 6 7 provider who had more than 70 percent of the 8 E&Ms associated with diabetes, it just made me 9 a little nervous because you could have a patient that has an acute event one year vis-10 a-vis has a below-knee amputation or some sort 11 12 of heart event which is coded with the 13 diabetes. 14 And suddenly, the cardiac surgeon or the vascular surgeon is now held 15 accountable for the E&M care of the diabetes 16 17 which he or she had nothing to do with. So it's a two-parter. Sorry, Tom. 18 19 CO-CHAIR ROSENTHAL: I would elect 20 to do them separately. Okay, so the first one 21 was? 22 DR. PENSON: The first one was the

	Page 116
1	instrument developer with regard to risk
2	adjustment. Is this basically the same as the
3	other measures we've seen? The same very
4	basic testing but still a lot of questions
5	left to be answered?
6	CO-CHAIR ROSENTHAL: Kevin, that
7	one is for you.
8	DR. WEISS: If I could Todd
9	will take that partly, but I just wanted to
10	note, we did submit a substantial additional
11	information with regards to testing after the
12	TAP meeting. I don't know if you had the
13	chance to receive that and review it. It
14	sounds like that may not have happened.
15	But with that in mind, I just want
16	to ask Todd if he wanted to say anything
17	additionally?
18	DR. LEE: Yes, sure. We went
19	through a process, as is described in the
20	submission forms and maybe not extensively
21	enough, a process of asking our work groups
22	what conditions from the HCC list they felt

	Page 11
1	were important in terms of adjusting diabetes-
2	related costs. We then compared those models
3	to models that were derived via standardized
4	statistical fit, you know, looking at T
5	values.
6	And I understand the
7	statistician's comments. It's an issue.
8	However, when we compare the performance of
9	those two models, we're stuck in a spot where
10	if we pick the model that's derived wholly
11	from the Delphi process where our clinical
12	work groups selected it, we're going to say
13	your model doesn't fit very well because it
14	doesn't predict the tail.
15	So we tried to predict or select a
16	model that fit our distribution, wrote the
17	best, and was the most parsimonious. That was
18	our strategy. And as Kevin noted, we've
19	submitted additional documentation about the
20	performance of our models for I think all,
21	maybe not all of the conditions, but the
22	majority of the conditions that you've

7

Page 118 reviewed in the last two days. CO-CHAIR ROSENTHAL: So Ashlie, let's clarify, was the additional information factored in to Carlos' review when he wrote it? MS. WILBON: Yes, he did the information that ABMS sent we did package and send out to the TAP and to the Steering Committee. We also sent it back to Carlos for him to update his original analysis, and I believe, I have to double check. We sent a couple of versions of the analysis out, but I'm 99 percent sure. CO-CHAIR ROSENTHAL: Can we be sure that the thing that Bill Rich quoted is - CO-CHAIR ROSENTHAL: Okay, I would because I'd have to check emails and stuff. CO-CHAIR ROSENTHAL: Okay, I would say for the purposes of discussion, let's I don't know quite what the right idea is, but let's put the reading of Carlos' report		
2CO-CHAIR ROSENTHAL: So Ashlie,3let's clarify, was the additional information4factored in to Carlos' review when he wrote5it?6MS. WILEON: Yes, he did the7information that AEMS sent we did package and8send out to the TAP and to the Steering9Committee. We also sent it back to Carlos for10him to update his original analysis, and I11believe, I have to double check. We sent a12couple of versions of the analysis out, but13I'm 99 percent sure.14CO-CHAIR ROSENTHAL: Can we be15sure that the thing that Bill Rich quoted is -16-17MS. WILBON: I can't right now18because I'd have to check emails and stuff.19CO-CHAIR ROSENTHAL: Okay, I would20say for the purposes of discussion, let's21I don't know quite what the right idea is, but		Page 118
let's clarify, was the additional information factored in to Carlos' review when he wrote it? MS. WILBON: Yes, he did the information that ABMS sent we did package and send out to the TAP and to the Steering Committee. We also sent it back to Carlos for him to update his original analysis, and I believe, I have to double check. We sent a couple of versions of the analysis out, but I'm 99 percent sure. CO-CHAIR ROSENTHAL: Can we be sure that the thing that Bill Rich quoted is - MS. WILBON: I can't right now because I'd have to check emails and stuff. CO-CHAIR ROSENTHAL: Okay, I would say for the purposes of discussion, let's I don't know quite what the right idea is, but	1	reviewed in the last two days.
factored in to Carlos' review when he wrote it? MS. WILBON: Yes, he did the information that ABMS sent we did package and send out to the TAP and to the Steering Committee. We also sent it back to Carlos for him to update his original analysis, and I believe, I have to double check. We sent a couple of versions of the analysis out, but I'm 99 percent sure. CO-CHAIR ROSENTHAL: Can we be sure that the thing that Bill Rich quoted is - MS. WILBON: I can't right now because I'd have to check emails and stuff. CO-CHAIR ROSENTHAL: Okay, I would say for the purposes of discussion, let's I don't know quite what the right idea is, but	2	CO-CHAIR ROSENTHAL: So Ashlie,
5it?6MS. WILBON: Yes, he did the7information that ABMS sent we did package and8send out to the TAP and to the Steering9Committee. We also sent it back to Carlos for10him to update his original analysis, and I11believe, I have to double check. We sent a12couple of versions of the analysis out, but13I'm 99 percent sure.14CO-CHAIR ROSENTHAL: Can we be15sure that the thing that Bill Rich quoted is -16-17MS. WILBON: I can't right now18because I'd have to check emails and stuff.19CO-CHAIR ROSENTHAL: Okay, I would20say for the purposes of discussion, let's21I don't know quite what the right idea is, but	3	let's clarify, was the additional information
6MS. WILBON: Yes, he did the7information that ABMS sent we did package and8send out to the TAP and to the Steering9Committee. We also sent it back to Carlos for10him to update his original analysis, and I11believe, I have to double check. We sent a12couple of versions of the analysis out, but13I'm 99 percent sure.14CO-CHAIR ROSENTHAL: Can we be15sure that the thing that Bill Rich quoted is -16-17MS. WILBON: I can't right now18because I'd have to check emails and stuff.19CO-CHAIR ROSENTHAL: Okay, I would20say for the purposes of discussion, let's21I don't know quite what the right idea is, but	4	factored in to Carlos' review when he wrote
information that ABMS sent we did package and send out to the TAP and to the Steering Committee. We also sent it back to Carlos for him to update his original analysis, and I believe, I have to double check. We sent a couple of versions of the analysis out, but I'm 99 percent sure. CO-CHAIR ROSENTHAL: Can we be sure that the thing that Bill Rich quoted is - - MS. WILBON: I can't right now because I'd have to check emails and stuff. CO-CHAIR ROSENTHAL: Okay, I would say for the purposes of discussion, let's I don't know quite what the right idea is, but	5	it?
8 send out to the TAP and to the Steering 9 Committee. We also sent it back to Carlos for 10 him to update his original analysis, and I 11 believe, I have to double check. We sent a 12 couple of versions of the analysis out, but 13 I'm 99 percent sure. 14 CO-CHAIR ROSENTHAL: Can we be 15 sure that the thing that Bill Rich quoted is - 16 - 17 MS. WILBON: I can't right now 18 because I'd have to check emails and stuff. 19 CO-CHAIR ROSENTHAL: Okay, I would 20 say for the purposes of discussion, let's 21 I don't know quite what the right idea is, but	6	MS. WILBON: Yes, he did the
 9 Committee. We also sent it back to Carlos for 10 him to update his original analysis, and I 11 believe, I have to double check. We sent a 12 couple of versions of the analysis out, but 13 I'm 99 percent sure. 14 CO-CHAIR ROSENTHAL: Can we be 15 sure that the thing that Bill Rich quoted is - 16 - 17 MS. WILBON: I can't right now 18 because I'd have to check emails and stuff. 19 CO-CHAIR ROSENTHAL: Okay, I would 20 say for the purposes of discussion, let's 21 I don't know quite what the right idea is, but 	7	information that ABMS sent we did package and
10 him to update his original analysis, and I believe, I have to double check. We sent a couple of versions of the analysis out, but I'm 99 percent sure. 14 CO-CHAIR ROSENTHAL: Can we be sure that the thing that Bill Rich quoted is - co-CHAIR ROSENTHAL: Can we be sure that the thing that Bill Rich quoted is - MS. WILBON: I can't right now because I'd have to check emails and stuff. 19 CO-CHAIR ROSENTHAL: Okay, I would say for the purposes of discussion, let's I don't know quite what the right idea is, but	8	send out to the TAP and to the Steering
11 believe, I have to double check. We sent a 12 couple of versions of the analysis out, but 13 I'm 99 percent sure. 14 CO-CHAIR ROSENTHAL: Can we be 15 sure that the thing that Bill Rich quoted is - 16 - 17 MS. WILBON: I can't right now 18 because I'd have to check emails and stuff. 19 CO-CHAIR ROSENTHAL: Okay, I would 20 say for the purposes of discussion, let's 21 I don't know quite what the right idea is, but	9	Committee. We also sent it back to Carlos for
<pre>12 couple of versions of the analysis out, but 13 I'm 99 percent sure. 14 CO-CHAIR ROSENTHAL: Can we be 15 sure that the thing that Bill Rich quoted is - 16 - 17 MS. WILBON: I can't right now 18 because I'd have to check emails and stuff. 19 CO-CHAIR ROSENTHAL: Okay, I would 20 say for the purposes of discussion, let's 21 I don't know quite what the right idea is, but</pre>	10	him to update his original analysis, and I
13 I'm 99 percent sure. 14 CO-CHAIR ROSENTHAL: Can we be 15 sure that the thing that Bill Rich quoted is - 16 - 17 MS. WILBON: I can't right now 18 because I'd have to check emails and stuff. 19 CO-CHAIR ROSENTHAL: Okay, I would 20 say for the purposes of discussion, let's 21 I don't know quite what the right idea is, but	11	believe, I have to double check. We sent a
14 CO-CHAIR ROSENTHAL: Can we be 15 sure that the thing that Bill Rich quoted is - 16 - 17 MS. WILBON: I can't right now 18 because I'd have to check emails and stuff. 19 CO-CHAIR ROSENTHAL: Okay, I would 20 say for the purposes of discussion, let's 21 I don't know quite what the right idea is, but	12	couple of versions of the analysis out, but
<pre>15 sure that the thing that Bill Rich quoted is - 16 - 17 MS. WILBON: I can't right now 18 because I'd have to check emails and stuff. 19 CO-CHAIR ROSENTHAL: Okay, I would 20 say for the purposes of discussion, let's 21 I don't know quite what the right idea is, but</pre>	13	I'm 99 percent sure.
16 - 17 MS. WILBON: I can't right now 18 because I'd have to check emails and stuff. 19 CO-CHAIR ROSENTHAL: Okay, I would 20 say for the purposes of discussion, let's 21 I don't know quite what the right idea is, but	14	CO-CHAIR ROSENTHAL: Can we be
MS. WILBON: I can't right now because I'd have to check emails and stuff. CO-CHAIR ROSENTHAL: Okay, I would say for the purposes of discussion, let's I don't know quite what the right idea is, but	15	sure that the thing that Bill Rich quoted is -
18 because I'd have to check emails and stuff. 19 CO-CHAIR ROSENTHAL: Okay, I would 20 say for the purposes of discussion, let's 21 I don't know quite what the right idea is, but	16	_
19 CO-CHAIR ROSENTHAL: Okay, I would 20 say for the purposes of discussion, let's 21 I don't know quite what the right idea is, but	17	MS. WILBON: I can't right now
<pre>20 say for the purposes of discussion, let's 21 I don't know quite what the right idea is, but</pre>	18	because I'd have to check emails and stuff.
21 I don't know quite what the right idea is, but	19	CO-CHAIR ROSENTHAL: Okay, I would
	20	say for the purposes of discussion, let's
22 let's put the reading of Carlos' report	21	I don't know quite what the right idea is, but
	22	let's put the reading of Carlos' report

1	
	Page 119
1	into
2	on hold because I don't think we can be
3	sure that it factored in all of the elements.
4	DR. LEE: Again, we have Carlos
5	writing that it was inadequate. They respond,
6	here's why it's really okay. Unless Carlos
7	looked at it and said it's okay or not okay,
8	I'm not sure what to do with his analysis.
9	That's all I'm saying.
10	DR. BARNETT: It says 616 in the
11	file name.
12	CO-CHAIR ROSENTHAL: Okay, so it
13	appears that it was all factored in. Okay,
14	all right. After, after, after. Okay, thank
15	you. Unfortunately, Carlos not being here, we
16	can't easily clarify.
17	Now David, your other part and
18	then we have a couple of questions.
19	DR. PENSON: So my question was to
20	the TAP members because again, it's hard for
21	me, not doing research in this particular
22	condition, whether or not the accountability

	Page 120
1	technique described is appropriate and,
2	frankly, the word I would use is fair.
3	CO-CHAIR ROSENTHAL: You're
4	thinking about attribution.
5	DR. PENSON: Attribution.
6	DR. ROSENZWEIG: I would say that
7	your concerns these were concerns that were
8	raised during the TAP, that there was a sense
9	that maybe this method of attribution might be
10	somewhat arbitrary and then might also
11	actually interact with a question related to
12	risk adjustment because typically in a
13	particular year, you might find a patient
14	would let's say develop a retinal hemorrhage
15	or a vitreous hemorrhage or something like
16	that. And during that particular year, over
17	70 percent of their visits might be
18	attributable to the ophthalmologist who would
19	see the patient. It would be a high-cost year
20	and a lot of issues related to that.
21	On another year, in addition,
22	patients who are more severely affected with

Page 121 diabetes might be on insulin would more likely 1 2 be seen by an endocrinologist, as opposed to a primary care doc, and therefore might be 3 seen at more frequent intervals and therefore 4 5 could very well be higher, much higher resource use and also would require a lot more 6 7 diabetes education. 8 CO-CHAIR ROSENTHAL: This is why 9 we need multi-specialty group practices 10 because then you could attribute this to the multi-specialty group and who cares which one 11 12 of them didn't do their job. They all need to do their jobs. But unfortunately, that's not 13 the world we live in. 14 DR. ROSENZWEIG: And the other 15 16 issue was that certainly the endocrinologist might be seeing a larger proportion of their 17 18 patients having diabetes, so they would have 19 much larger ns than a lot of the individual 20 primary care docs who might only see 20 or 30 21 or 40, maybe 50 patients with diabetes that 22 would be part of this particular group. So

Page 1221there were a lot of concerns that were raised2about this particular system.3The other issue was that the4identification they used their5stratification model, the hierarchical the6HCC model, hierarchical condition categories7model and we there was a lot of concern8about that, the way they were using it with9respect to individual physicians that might10not be as successful. And if it was used in11much larger groups like the plans which was12used in the case of NCQA.13CO-CHAIR ROSENTHAL: Okay, I think14we have a few more people who want to pose15questions or make comments and maybe we want16to start trying to make sure that it's on,17perhaps, a new topic because I think we've18been round and round on several of these, so19hopefully, we won't need to go back. But Paul20and then Jack and then Bill.21DR. BARNETT: So I'm also thinking22that we have three other measures to get to		
2about this particular system.3The other issue was that the4identification they used their5stratification model, the hierarchical the6HCC model, hierarchical condition categories7model and we there was a lot of concern8about that, the way they were using it with9respect to individual physicians that might10not be as successful. And if it was used in11much larger groups like the plans which was12used in the case of NCQA.13CO-CHAIR ROSENTHAL: Okay, I think14we have a few more people who want to pose15questions or make comments and maybe we want16to start trying to make sure that it's on,17perhaps, a new topic because I think we've18been round and round on several of these, so19hopefully, we won't need to go back. But Paul20and then Jack and then Bill.21DR. BARNETT: So I'm also thinking		Page 122
3The other issue was that the4identification they used their5stratification model, the hierarchical the6HCC model, hierarchical condition categories7model and we there was a lot of concern8about that, the way they were using it with9respect to individual physicians that might10not be as successful. And if it was used in11much larger groups like the plans which was12used in the case of NCQA.13CO-CHAIR ROSENTHAL: Okay, I think14we have a few more people who want to pose15questions or make comments and maybe we want16to start trying to make sure that it's on,17perhaps, a new topic because I think we've18been round and round on several of these, so19hopefully, we won't need to go back. But Paul20and then Jack and then Bill.21DR. BARNETT: So I'm also thinking	1	there were a lot of concerns that were raised
4identification they used their5stratification model, the hierarchical the6HCC model, hierarchical condition categories7model and we there was a lot of concern8about that, the way they were using it with9respect to individual physicians that might10not be as successful. And if it was used in11much larger groups like the plans which was12used in the case of NCQA.13CO-CHAIR ROSENTHAL: Okay, I think14we have a few more people who want to pose15questions or make comments and maybe we want16to start trying to make sure that it's on,17perhaps, a new topic because I think we've18been round and round on several of these, so19hopefully, we won't need to go back. But Paul20and then Jack and then Bill.21DR. BARNETT: So I'm also thinking	2	about this particular system.
5 stratification model, the hierarchical the 6 HCC model, hierarchical condition categories 7 model and we there was a lot of concern 8 about that, the way they were using it with 9 respect to individual physicians that might 10 not be as successful. And if it was used in 11 much larger groups like the plans which was 12 used in the case of NCQA. 13 CO-CHAIR ROSENTHAL: Okay, I think 14 we have a few more people who want to pose 15 questions or make comments and maybe we want 16 to start trying to make sure that it's on, 17 perhaps, a new topic because I think we've 18 been round and round on several of these, so 19 hopefully, we won't need to go back. But Paul 20 and then Jack and then Bill. 21 DR. BARNETT: So I'm also thinking	3	The other issue was that the
 HCC model, hierarchical condition categories model and we there was a lot of concern about that, the way they were using it with respect to individual physicians that might not be as successful. And if it was used in much larger groups like the plans which was used in the case of NCQA. CO-CHAIR ROSENTHAL: Okay, I think we have a few more people who want to pose questions or make comments and maybe we want to start trying to make sure that it's on, perhaps, a new topic because I think we've been round and round on several of these, so hopefully, we won't need to go back. But Paul and then Jack and then Bill. DR. BARNETT: So I'm also thinking 	4	identification they used their
7 model and we there was a lot of concern about that, the way they were using it with 9 respect to individual physicians that might 10 not be as successful. And if it was used in 11 much larger groups like the plans which was 12 used in the case of NCQA. 13 CO-CHAIR ROSENTHAL: Okay, I think 14 we have a few more people who want to pose 15 questions or make comments and maybe we want 16 to start trying to make sure that it's on, 17 perhaps, a new topic because I think we've 18 been round and round on several of these, so 19 hopefully, we won't need to go back. But Paul 20 and then Jack and then Bill. 21 DR. BARNETT: So I'm also thinking	5	stratification model, the hierarchical the
 about that, the way they were using it with respect to individual physicians that might not be as successful. And if it was used in much larger groups like the plans which was used in the case of NCQA. CO-CHAIR ROSENTHAL: Okay, I think we have a few more people who want to pose questions or make comments and maybe we want to start trying to make sure that it's on, perhaps, a new topic because I think we've been round and round on several of these, so hopefully, we won't need to go back. But Paul and then Jack and then Bill. DR. BARNETT: So I'm also thinking 	6	HCC model, hierarchical condition categories
 9 respect to individual physicians that might 10 not be as successful. And if it was used in 11 much larger groups like the plans which was 12 used in the case of NCQA. 13 CO-CHAIR ROSENTHAL: Okay, I think 14 we have a few more people who want to pose 15 questions or make comments and maybe we want 16 to start trying to make sure that it's on, 17 perhaps, a new topic because I think we've 18 been round and round on several of these, so 19 hopefully, we won't need to go back. But Paul 20 and then Jack and then Bill. 21 DR. BARNETT: So I'm also thinking 	7	model and we there was a lot of concern
 not be as successful. And if it was used in much larger groups like the plans which was used in the case of NCQA. CO-CHAIR ROSENTHAL: Okay, I think we have a few more people who want to pose questions or make comments and maybe we want to start trying to make sure that it's on, perhaps, a new topic because I think we've been round and round on several of these, so hopefully, we won't need to go back. But Paul and then Jack and then Bill. DR. BARNETT: So I'm also thinking 	8	about that, the way they were using it with
 11 much larger groups like the plans which was 12 used in the case of NCQA. 13 CO-CHAIR ROSENTHAL: Okay, I think 14 we have a few more people who want to pose 15 questions or make comments and maybe we want 16 to start trying to make sure that it's on, 17 perhaps, a new topic because I think we've 18 been round and round on several of these, so 19 hopefully, we won't need to go back. But Paul 20 and then Jack and then Bill. 21 DR. BARNETT: So I'm also thinking 	9	respect to individual physicians that might
 used in the case of NCQA. CO-CHAIR ROSENTHAL: Okay, I think we have a few more people who want to pose questions or make comments and maybe we want to start trying to make sure that it's on, perhaps, a new topic because I think we've been round and round on several of these, so hopefully, we won't need to go back. But Paul and then Jack and then Bill. DR. BARNETT: So I'm also thinking 	10	not be as successful. And if it was used in
CO-CHAIR ROSENTHAL: Okay, I think we have a few more people who want to pose questions or make comments and maybe we want to start trying to make sure that it's on, perhaps, a new topic because I think we've been round and round on several of these, so hopefully, we won't need to go back. But Paul and then Jack and then Bill. DR. BARNETT: So I'm also thinking	11	much larger groups like the plans which was
14 we have a few more people who want to pose 15 questions or make comments and maybe we want 16 to start trying to make sure that it's on, 17 perhaps, a new topic because I think we've 18 been round and round on several of these, so 19 hopefully, we won't need to go back. But Paul 20 and then Jack and then Bill. 21 DR. BARNETT: So I'm also thinking	12	used in the case of NCQA.
15questions or make comments and maybe we want16to start trying to make sure that it's on,17perhaps, a new topic because I think we've18been round and round on several of these, so19hopefully, we won't need to go back. But Paul20and then Jack and then Bill.21DR. BARNETT: So I'm also thinking	13	CO-CHAIR ROSENTHAL: Okay, I think
 to start trying to make sure that it's on, perhaps, a new topic because I think we've been round and round on several of these, so hopefully, we won't need to go back. But Paul and then Jack and then Bill. DR. BARNETT: So I'm also thinking 	14	we have a few more people who want to pose
 perhaps, a new topic because I think we've been round and round on several of these, so hopefully, we won't need to go back. But Paul and then Jack and then Bill. DR. BARNETT: So I'm also thinking 	15	questions or make comments and maybe we want
18 been round and round on several of these, so 19 hopefully, we won't need to go back. But Paul 20 and then Jack and then Bill. 21 DR. BARNETT: So I'm also thinking	16	to start trying to make sure that it's on,
 19 hopefully, we won't need to go back. But Paul 20 and then Jack and then Bill. 21 DR. BARNETT: So I'm also thinking 	17	perhaps, a new topic because I think we've
20 and then Jack and then Bill. 21 DR. BARNETT: So I'm also thinking	18	been round and round on several of these, so
21 DR. BARNETT: So I'm also thinking	19	hopefully, we won't need to go back. But Paul
	20	and then Jack and then Bill.
22 that we have three other measures to get to	21	DR. BARNETT: So I'm also thinking
	22	that we have three other measures to get to

Page 123 1 before we finish. And if you look, I think 2 there are nine criteria for scientific acceptability and for five of them, this 3 measure didn't get a single high rating. 4 So 5 I think in reality, this is not going to fly and I think we ought to vote on the scientific 6 7 acceptability. I think that the measure 8 developers have a lot of skill. They've got 9 some great ideas here. It's just not far enough along yet. So you and I were beginning 10 to think alike on this, that we probably heard 11 12 most of the issues. So if there's something 13 new or --14 DR. NEEDLEMAN: In the spirit, I 15 agree with Paul. In the spirit of thinking about next directions, I'm a little concerned 16 17 about the risk-adjustment model, but not 18 because of it being regression-based. 19 I'm concerned about your concern 20 about parsimony in your model. That you've 21 got tens of thousands of cases that you're 22 using to project your -- to try to project the

Page 124 1 expected costs of care from. You've got lots 2 of degrees of freedom here. I would much prefer to see you do a standardized, get all 3 of the HCC categories into your regression 4 5 model so we're not picking and choosing which ones we're doing. And the only reason for 6 7 dropping one would be you have such a small 8 cell in your data that you're going to have 9 trouble fitting that one or there's a clear risk of overfitting. 10 But treat as your default not 11 12 going for parsimony, but going for inclusion 13 of these measures as a way of standardizing 14 what you're doing across all your measures and doing it in a way that minimizes the work. 15 Parsimony is not a high value here in terms of 16 17 getting your risk adjustment right. 18 CO-CHAIR ROSENTHAL: A free 19 consultation. 20 DR. WEISS: Can I respond to that? 21 Because that's exactly what we did. I mean 22 that was the second set of six models that we

	Page 125
1	fit. I mean, we fit the first several based
2	on input from our work groups. The others
3	were data driven. It was all the HCCs. And
4	where we had very, very small sample sizes, we
5	dropped those. So we then selected the model.
6	If they fit similarly, we opted for one that
7	was more parsimonious. If they didn't, that's
8	why you see in our diabetes submission this
9	long list of coexisting conditions that are
10	used in our risk adjustment. It was not the
11	list that the work group told us. It was the
12	methodology that was just described.
13	CO-CHAIR ROSENTHAL: Okay, well,
14	thank you for that clarification.
15	Bill, maybe the last comment and
16	then we'll
17	DR. W. RICH: Last thing. One of
18	the intents of this type of measure is to
19	identify outliers, and again, as a result of
20	the risk adjustment and the exclusions and the
21	data where you have that tremendous
22	compression issue, it overestimates the

	Page 126
1	observed by 100 percent at the low end. And
2	underestimates the observed by 60 percent, so
3	the implication of this is that you're not
4	going to be able to differentiate anybody who
5	is not right in the middle, so it doesn't
6	work.
7	CO-CHAIR ROSENTHAL: Okay, well, I
8	think we've pretty thoroughly covered the
9	various issues. Let's look at the TAP
10	scoring. So again, for me to remember how we
11	did this. We separately will vote we're
12	going to vote scientific acceptability, but
13	along the dimensions of the grid of
14	reliability and validity and as the drivers of
15	scientific acceptability, and if you recall
16	the grid, if either one in your mind is ranked
17	low, then it fails. If validity is ranked
18	low, it fails automatically. If reliability -
19	- you've got the grid.
20	(Laughter.)
21	I'm sorry. I thought I could do
22	that

	Page 127
1	MS. TURBYVILLE: These are high or
2	moderate
3	CO-CHAIR ROSENTHAL: I thought I
4	could do that out of my head. I really
5	thought I had that in my head.
б	You can have moderate to high on
7	reliability and still get it passed. The grid
8	is the same one we used yesterday. But
9	fundamentally, if either one is ranked low,
10	then it doesn't pass scientific acceptability,
11	but here is the top vote on reliability, which
12	was nine, high; seven, medium; and two, low.
13	Wait
14	MS. TURBYVILLE: These are the
15	number of ratings because there are numerous
16	subcriteria. So when you look at the
17	subcriteria, there were nine high ratings on
18	subcriteria for reliability; seven moderate on
19	the subcriteria ratings.
20	CO-CHAIR ROSENTHAL: Oh, summed up.
21	MS. TURBYVILLE: Summed up.
22	CO-CHAIR ROSENTHAL: I couldn't

1 make it work. On the validity 2 MS. TURBYVILLE: I know. 3 DR. BURSTIN: It's supposed to 4 give you a visual detection of how they all 5 fit together. You can see the size of the 6 bars of high to moderate versus low. 7 CO-CHAIR ROSENTHAL: I do think 8 though for the sake, and maybe this is worth 9 spending one minute on, because this 10 discussion was, I would say, just trying to 11 broadly weigh it, was, I would say, 12 substantially more negative than the TAP vote.	
 3 DR. BURSTIN: It's supposed to 4 give you a visual detection of how they all 5 fit together. You can see the size of the 6 bars of high to moderate versus low. 7 CO-CHAIR ROSENTHAL: I do think 8 though for the sake, and maybe this is worth 9 spending one minute on, because this 10 discussion was, I would say, just trying to 11 broadly weigh it, was, I would say, 	
4 give you a visual detection of how they all 5 fit together. You can see the size of the 6 bars of high to moderate versus low. 7 CO-CHAIR ROSENTHAL: I do think 8 though for the sake, and maybe this is worth 9 spending one minute on, because this 10 discussion was, I would say, just trying to 11 broadly weigh it, was, I would say,	
5 fit together. You can see the size of the 6 bars of high to moderate versus low. 7 CO-CHAIR ROSENTHAL: I do think 8 though for the sake, and maybe this is worth 9 spending one minute on, because this 10 discussion was, I would say, just trying to 11 broadly weigh it, was, I would say,	
 6 bars of high to moderate versus low. 7 CO-CHAIR ROSENTHAL: I do think 8 though for the sake, and maybe this is worth 9 spending one minute on, because this 10 discussion was, I would say, just trying to 11 broadly weigh it, was, I would say, 	
7 CO-CHAIR ROSENTHAL: I do think 8 though for the sake, and maybe this is worth 9 spending one minute on, because this 10 discussion was, I would say, just trying to 11 broadly weigh it, was, I would say,	
8 though for the sake, and maybe this is worth 9 spending one minute on, because this 10 discussion was, I would say, just trying to 11 broadly weigh it, was, I would say,	
9 spending one minute on, because this 10 discussion was, I would say, just trying to 11 broadly weigh it, was, I would say,	
<pre>10 discussion was, I would say, just trying to 11 broadly weigh it, was, I would say,</pre>	
11 broadly weigh it, was, I would say,	
12 substantially more negative than the TAP vote.	
13 So maybe Jaime, you've listened to	
14 this whole discussion, hopefully, and	
15 hopefully have been able to follow it. I know	
16 it's difficult at times when you're on the	
17 phone. But do you want to make a comment	
18 about the discussion you heard here versus	
19 your TAP discussion and make, maybe, a final	
20 comment or recommendation to the group?	
21 DR. ROSENZWEIG: Are we still on	
22 scientific acceptability or have we moved on?	

	Page 129
1	CO-CHAIR ROSENTHAL: Pardon me?
2	DR. ROSENZWEIG: Are we still on
3	the scientific acceptability section?
4	CO-CHAIR ROSENTHAL: Yes, yes,
5	yes.
6	DR. ROSENZWEIG: Our votes weren't
7	all that high. Reliability testing was high,
8	but most of the others were not so good.
9	There were a lot of lows in the specifications
10	consistent with resource use section.
11	Validity testing was all in the medium range.
12	So I don't know.
13	And then in addition, there was
14	the measure set didn't really wasn't able
15	to stratify for disparities.
16	CO-CHAIR ROSENTHAL: I don't think
17	this has to do with inter-related
18	reliabilities.
19	DR. ROSENZWEIG: I think there's a
20	big disagreement between what I'm hearing here
21	and what we were discussing.
22	DR. CURTIS: Jaime, I think it has

i	
	Page 130
1	more to do with how the group discussion in
2	the TAP got rolled up. I don't think the
3	rolling up necessarily is effective for this
4	because our concerns about this individual
5	measure were mainly expressed in 2b1, which is
6	the specification consistent with research use
7	and cost. I mean that was, I think, kind of
8	where we got into a lot of the issues that
9	have been raised.
10	And so when you roll all those up
11	into one mega vote, I think you lose that.
12	But I don't think anything that's been said
13	here was substantively different than the
14	tenor of the TAP's recommendation.
15	DR. ROSENZWEIG: Yes, I agree.
16	DR. W. RICH: The other thing was
17	that Carlos was there verbally. They did not
18	have the advantage of looking at his final
19	statistical analysis that we sought today. So
20	that's why I think some of the other ones
21	I was struck also by the
22	CO-CHAIR ROSENTHAL: When you look

ĺ	
	Page 131
1	at that roll out and there is a kind of
2	interrelated reliability question in the sense
3	of what was a medium score in the TAP on this
4	one versus a medium or low score on the other
5	one. So I think it's just
6	DR. BURSTIN: Just one comment,
7	again, for initial endorsement, we are only
8	requiring that they demonstrate pilot testing
9	on the data source they have. So it's a
10	little difficult to compare a measure that's
11	been out in use for four and five years and
12	extensive testing to this. I think you have
13	to keep that in context.
14	The overall ratings of the testing
15	they had done were still moderate or high. I
16	just want to point that out.
17	CO-CHAIR ROSENTHAL: All right, so
18	I think we've heard plenty on this. Again, I
19	think the time was well spent in really trying
20	to understand this thoroughly, and it's very
21	complex and it would have been a mistake to
22	sort of just gloss over the details because

	Page 132
1	the details matter. But I think with that and
2	we have the TAP and we've had this very
3	thorough discussion, I think it's time to
4	vote, and on this one, this will be yes and no
5	on scientific acceptability. Right, Ashlie?
6	(Pause.)
7	DR. ROSENZWEIG: Hello?
8	CO-CHAIR ROSENTHAL: We're just
9	tabulating the vote.
10	DR. ROSENZWEIG: Okay.
11	CO-CHAIR ROSENTHAL: Five, yes;
12	13, no. Can we take her word for it that
13	that's what it was?
14	(Laughter.)
15	Or is it only valid if it's
16	projected on the wall? Now we all feel
17	comfortable. It is 5, yes; 13 no.
18	So I think that concludes the
19	discussion on this issue. We won't consider
20	usability, feasibility.
21	Yes, Paul?
22	DR. BARNETT: Doesn't this mean

	Page 133
1	that we no longer consider item 3 or 4 either,
2	right?
3	CO-CHAIR ROSENTHAL: That's what -
4	- this concludes the discussion on this.
5	Again, I would say a huge vote of thanks to
6	ABMS on their careful consideration of this
7	issue. And hopefully, some of the
8	conversation will provide some ability to make
9	some adjustments to this because again,
10	there's no doubt that trying to be able to
11	figure out how to attribute diabetes at the
12	physician level and the cost issues is an
13	enormously important task and this was an
14	unbelievably good first run at it. And so I
15	wouldn't let the rather intense criticism be
16	a barrier for going forward.
17	Sally, did you have something you
18	wanted to add on that? Okay, so we have an
19	operational announcement, and then I think
20	it's we're going to have a break and then
21	we'll do the Ingenix measure or are we moving
22	forward? We have the diabetes and Ingenix.

	Page 134
1	Are we scheduled for a break?
2	(Laughter.)
3	I'm ready to keep going? How many
4	people want to keep going? No, that's not
5	open for discussion.
6	Sally, you've got a housekeeping
7	tooling and then we'll take a break.
8	MS. TURBYVILLE: So for those of
9	you who were charged for the room at the
10	hotel, our meetings folks have contacted the
11	hotel and is requesting that they refund your
12	credit cards, so your statement should show
13	the credit back for the rooms and that the
14	bill should come directly to NQF. So let us
15	know if that does not happen. The hotel
16	should be crediting to whichever credit card
17	you gave them today. Thanks.
18	CO-CHAIR ROSENTHAL: All right, so
19	a 15-minute break. Thank you.
20	(Whereupon the meeting recessed
21	from 10:51 a.m. to 11:07 a.m.)
22	CO-CHAIR ROSENTHAL: All right.

	Page 135
1	We are ready to deal with Number 5795, ETG-
2	based diabetes resource use measure from
3	Ingenix. And do we have somebody from Ingenix
4	on the phone?
5	DR. LYNN: Yes. Tom Lynn is here,
6	as well as Jen Pearse and Cheri Zielinski.
7	CO-CHAIR ROSENTHAL: All right.
8	Thank you very much.
9	And, Jaime, you're still on the
10	phone for the TAP?
11	DR. ROSENZWEIG: Yes, I am.
12	CO-CHAIR ROSENTHAL: All right.
13	Well, terrific. Then, we will go ahead and do
14	this, and we will start with a brief overview
15	from Ingenix, and then we will vote on
16	importance, and then we will get to scientific
17	acceptability in that sequence.
18	So Ingenix?
19	DR. LYNN: Thank you. My name is
20	Tom Lynn. I'm a Medical Director working with
21	Ingenix. This rule is based on our ETG
22	methodology. That's their treatment group's

1	
	Page 13
1	methodology. And it starts with creating an
2	episode of diabetes that's a year long by
3	examining administrative claims and putting
4	claims in diabetes episodes back that sit
5	in the episodes.
6	And then, once the episodes are
7	created, identifying severity of the diabetes
8	using clinical diagnostic-based markers and
9	then evaluating expected costs and observed
10	costs for diabetes based on those the
11	different severity level and looking at the
12	observed cost of a physician or a physician
13	group or a health plan compared to the
14	expected cost based on the severity level.
15	We were asked to respond to a
16	number of issues from the TAP. I'm just going
17	to hit the highlights. One of the concerns
18	was that some of our labels were confusing in
19	that they used "other" but didn't really
20	explain what was underneath that. And we
21	tried to update those labels to make it clear
22	what was included in those categories.

36

	Page 137
1	We also included data from our
2	large data set, benchmark data set, that
3	examined the grouping of diabetes and the
4	severity assigned to diabetes in a case where
5	we dropped the fourth diagnosis curve off of
6	the claim, so we compared grouping using all
7	of the four diagnosis codes that we had versus
8	grouping only using the first three diagnosis
9	codes.
10	We've done smaller sets of that in
11	the past and noted relatively small
12	differences, because there was a question
13	about whether the grouper should set some
14	diagnosis codes or not. And that was
15	concluded in the in the work since the TAP
16	met.
17	In addition, there is a more
18	detailed description of how we take into
19	account members that don't have a pharmacy
20	benefit during a diabetes episode, and
21	basically we stratify those cases, those
22	without pharmacy benefit and those with

Page 138 1 pharmacy benefit. 2 And, finally, we were asked to look at some statistics around how well our 3 severity level works inside of diabetes. 4 We 5 did show some data for total costs as well as the different categories of metrics showing 6 7 progression across the different severity 8 levels and calculating R squareds for the 9 different measurements, the total cost R squared being 0.22. 10 That's all I have. 11 12 CO-CHAIR ROSENTHAL: All right. 13 Jaime, a quick summary on importance from the 14 TAP. 15 DR. ROSENZWEIG: Sure. I'd just 16 like to say that, you know, we looked at this measure very carefully, and we recognized the 17 great effort and extent to which the measure 18 19 developers put into this -- into this effort. 20 With respect to the importance, 21 obviously, here again, they were able to make a very good case for sufficient support for 22

	Page 139
1	the high impact of diabetes in the population
2	and the importance of looking at resource use
3	in this population. So everyone agreed on
4	that.
5	There was the question was
6	whether or not there were some issues related
7	to resource use and problems with cost, and
8	there was a very large discussion, at least in
9	the text that I have.
10	I don't know if it has been
11	changed by the time that you have had a chance
12	to look at it, but there was a lot of
13	discussion about how in their database there
14	was a lot of variation in resource use and
15	cost between various geographical regions, but
16	there wasn't much discussion of other types of
17	variation, such as socioeconomic differences
18	or the severity of illness and those kinds of
19	things, in this particular group.
20	And there was it was also felt
21	that the that the that they could have
22	tried to more clearly describe the purpose of

	Page 140
1	the use of the measures than they did in this
2	particular summary.
3	They did think they did have a
4	very large and extensive resource use list,
5	and that was the looked like it was very
6	adequate.
7	CO-CHAIR ROSENTHAL: All right.
8	Any discussion on importance from the
9	Committee?
10	(No response.)
11	Hearing none, I think we should
12	vote. And we have the TAP scores on the
13	screen, and this is one yes, two no.
14	DR. ROSENZWEIG: I'm not sure I
15	understand that.
16	CO-CHAIR ROSENTHAL: It's okay.
17	(Laughter.)
18	The vote is 18 to 18 yes, that
19	this is important, zero no.
20	So with that, we will move to the
21	scientific acceptability portion of the
22	discussion, and, Jaime, if you would share

	Page 141
1	with us the TAP review of scientific
2	acceptability.
3	DR. ROSENZWEIG: Yes. There was
4	with respect to the specifications and the
5	precise specifications of the measured
6	properties, there was some disagreement about
7	this.
8	Five thought they were highly
9	specified, and the rest were either medium or
10	low, and it was basically felt that the
11	specifications of the various comorbidities
12	were not totally clear, and it was especially
13	unclear if the severity of ratings were
14	weighted based upon services of comparable
15	cost. And only costs that are mapped back to
16	the diabetes code were accounted in the
17	episode, so they weren't considering a lot of
18	the other kinds of costs that occur with
19	patients with diabetes.
20	And then, with respect to
21	reliability testing, it was felt that there
22	was internal consistency and reliability in

Page 142

1 this patient population.

2	With respect to whether or not
3	those specifications were consistent with
4	resource use, and if there was a problem
5	related to the cost, it was unclear in the
6	text as to whether or not diabetes education
7	was included as part of the specifications and
8	whether or not any of the education codes were
9	included, and that obviously would add a
10	certain amount of resource use that is very
11	important.
12	DR. LYNN: Just to interrupt I
13	apologize this is Ingenix. There is one
14	thing that they asked us to address that I
15	didn't mention. Between the TAP and the
16	steering committee alert, there is a list of
17	diabetic education procedure codes, and they
18	are eligible to group the diabetes.
19	DR. ROSENZWEIG: Okay. I just
20	should mention to the Steering Committee that
21	I am looking I am basically looking at the
22	document that we were looking at when we had

Page 1431the TAP meeting. I don't think I have the2updated version, as far as I can tell.3So, and validity testing it4appeared to be that there was some a little5bit of disagreement on this, but in most cases6people felt that validity testing was adequate7with the information that was provided. And8it was unclear as to at least to us in the9TAP as to how the exclusions were identified,10at least in this protocol.11And then, one of the big issues12that did come up was the issue of risk13adjustment. And I believe they use Ingenix14uses a proprietary model of risk adjustment,15and it was, at least it was felt by some, that16it was kind of a black box, that it may be17valid, it has certainly been used by in a18large patient population already.19But to the individual providers20who might be graded on how well how, you21know, effective, you know, they are in22controlling costs, the black box aspect of it		
2updated version, as far as I can tell.3So, and validity testing it4appeared to be that there was some a little5bit of disagreement on this, but in most cases6people felt that validity testing was adequate7with the information that was provided. And8it was unclear as to at least to us in the9TAP as to how the exclusions were identified,10at least in this protocol.11And then, one of the big issues12that did come up was the issue of risk13adjustment. And I believe they use Ingenix14uses a proprietary model of risk adjustment,15and it was, at least it was felt by some, that16it was kind of a black box, that it may be17valid, it has certainly been used by in a18large patient population already.19But to the individual providers20who might be graded on how well how, you21know, effective, you know, they are in		Page 143
3So, and validity testing it4appeared to be that there was some a little5bit of disagreement on this, but in most cases6people felt that validity testing was adequate7with the information that was provided. And8it was unclear as to at least to us in the9TAP as to how the exclusions were identified,10at least in this protocol.11And then, one of the big issues12that did come up was the issue of risk13adjustment. And I believe they use Ingenix14uses a proprietary model of risk adjustment,15and it was, at least it was felt by some, that16it was kind of a black box, that it may be17valid, it has certainly been used by in a18large patient population already.19But to the individual providers20who might be graded on how well how, you21know, effective, you know, they are in	1	the TAP meeting. I don't think I have the
 appeared to be that there was some a little bit of disagreement on this, but in most cases people felt that validity testing was adequate with the information that was provided. And it was unclear as to at least to us in the TAP as to how the exclusions were identified, at least in this protocol. And then, one of the big issues that did come up was the issue of risk adjustment. And I believe they use Ingenix uses a proprietary model of risk adjustment, and it was, at least it was felt by some, that it was kind of a black box, that it may be valid, it has certainly been used by in a large patient population already. But to the individual providers who might be graded on how well how, you know, effective, you know, they are in 	2	updated version, as far as I can tell.
 bit of disagreement on this, but in most cases people felt that validity testing was adequate with the information that was provided. And it was unclear as to at least to us in the TAP as to how the exclusions were identified, at least in this protocol. And then, one of the big issues that did come up was the issue of risk adjustment. And I believe they use Ingenix uses a proprietary model of risk adjustment, and it was, at least it was felt by some, that it was kind of a black box, that it may be valid, it has certainly been used by in a large patient population already. But to the individual providers who might be graded on how well how, you know, effective, you know, they are in 	3	So, and validity testing it
 people felt that validity testing was adequate with the information that was provided. And it was unclear as to at least to us in the TAP as to how the exclusions were identified, at least in this protocol. And then, one of the big issues that did come up was the issue of risk adjustment. And I believe they use Ingenix uses a proprietary model of risk adjustment, and it was, at least it was felt by some, that it was kind of a black box, that it may be valid, it has certainly been used by in a large patient population already. But to the individual providers who might be graded on how well how, you know, effective, you know, they are in 	4	appeared to be that there was some a little
with the information that was provided. And it was unclear as to at least to us in the TAP as to how the exclusions were identified, at least in this protocol. And then, one of the big issues that did come up was the issue of risk adjustment. And I believe they use Ingenix uses a proprietary model of risk adjustment, and it was, at least it was felt by some, that it was kind of a black box, that it may be valid, it has certainly been used by in a large patient population already. But to the individual providers who might be graded on how well how, you know, effective, you know, they are in	5	bit of disagreement on this, but in most cases
 8 it was unclear as to at least to us in the 9 TAP as to how the exclusions were identified, 10 at least in this protocol. 11 And then, one of the big issues 12 that did come up was the issue of risk 13 adjustment. And I believe they use Ingenix 14 uses a proprietary model of risk adjustment, 15 and it was, at least it was felt by some, that 16 it was kind of a black box, that it may be 17 valid, it has certainly been used by in a 18 large patient population already. 19 But to the individual providers 20 who might be graded on how well how, you 21 know, effective, you know, they are in 	6	people felt that validity testing was adequate
 9 TAP as to how the exclusions were identified, 10 at least in this protocol. 11 And then, one of the big issues 12 that did come up was the issue of risk 13 adjustment. And I believe they use Ingenix 14 uses a proprietary model of risk adjustment, 15 and it was, at least it was felt by some, that 16 it was kind of a black box, that it may be 17 valid, it has certainly been used by in a 18 large patient population already. 19 But to the individual providers 20 who might be graded on how well how, you 21 know, effective, you know, they are in 	7	with the information that was provided. And
10at least in this protocol.11And then, one of the big issues12that did come up was the issue of risk13adjustment. And I believe they use Ingenix14uses a proprietary model of risk adjustment,15and it was, at least it was felt by some, that16it was kind of a black box, that it may be17valid, it has certainly been used by in a18large patient population already.19But to the individual providers20who might be graded on how well how, you21know, effective, you know, they are in	8	it was unclear as to at least to us in the
11And then, one of the big issues12that did come up was the issue of risk13adjustment. And I believe they use Ingenix14uses a proprietary model of risk adjustment,15and it was, at least it was felt by some, that16it was kind of a black box, that it may be17valid, it has certainly been used by in a18large patient population already.19But to the individual providers20who might be graded on how well how, you21know, effective, you know, they are in	9	TAP as to how the exclusions were identified,
12 that did come up was the issue of risk 13 adjustment. And I believe they use Ingenix 14 uses a proprietary model of risk adjustment, 15 and it was, at least it was felt by some, that 16 it was kind of a black box, that it may be 17 valid, it has certainly been used by in a 18 large patient population already. 19 But to the individual providers 20 who might be graded on how well how, you 21 know, effective, you know, they are in	10	at least in this protocol.
13adjustment. And I believe they use Ingenix14uses a proprietary model of risk adjustment,15and it was, at least it was felt by some, that16it was kind of a black box, that it may be17valid, it has certainly been used by in a18large patient population already.19But to the individual providers20who might be graded on how well how, you21know, effective, you know, they are in	11	And then, one of the big issues
14 uses a proprietary model of risk adjustment, 15 and it was, at least it was felt by some, that 16 it was kind of a black box, that it may be 17 valid, it has certainly been used by in a 18 large patient population already. 19 But to the individual providers 20 who might be graded on how well how, you 21 know, effective, you know, they are in	12	that did come up was the issue of risk
15 and it was, at least it was felt by some, that 16 it was kind of a black box, that it may be 17 valid, it has certainly been used by in a 18 large patient population already. 19 But to the individual providers 20 who might be graded on how well how, you 21 know, effective, you know, they are in	13	adjustment. And I believe they use Ingenix
<pre>16 it was kind of a black box, that it may be 17 valid, it has certainly been used by in a 18 large patient population already. 19 But to the individual providers 20 who might be graded on how well how, you 21 know, effective, you know, they are in</pre>	14	uses a proprietary model of risk adjustment,
<pre>17 valid, it has certainly been used by in a 18 large patient population already. 19 But to the individual providers 20 who might be graded on how well how, you 21 know, effective, you know, they are in</pre>	15	and it was, at least it was felt by some, that
18 large patient population already. 19 But to the individual providers 20 who might be graded on how well how, you 21 know, effective, you know, they are in	16	it was kind of a black box, that it may be
But to the individual providers who might be graded on how well how, you know, effective, you know, they are in	17	valid, it has certainly been used by in a
20 who might be graded on how well how, you 21 know, effective, you know, they are in	18	large patient population already.
21 know, effective, you know, they are in	19	But to the individual providers
	20	who might be graded on how well how, you
22 controlling costs, the black box aspect of it	21	know, effective, you know, they are in
	22	controlling costs, the black box aspect of it

1	
	Page 144
1	was of concern to a number of people, so that
2	there were a lot of lower scores with respect
3	to the whole issue of risk adjustment, largely
4	because it was not transparent.
5	And then, identification of
6	statistically meaningful or significant
7	differences. Here again, there was
8	insufficient evidence, at least that was
9	presented to us, that the sample size
10	threshold and analysis at the physician level
11	was meaningful.
12	They were talking about a 30-
13	sample size as being important to distinguish
14	between different physicians, 30 patients I
15	assume, and it was unclear how they came up
16	with that number or how that would necessarily
17	be adequate to compare individual physicians.
18	And then, they didn't use multiple
19	data sources. They were using their own data
20	source, so it was felt that issue was felt
21	to be non-applicable, and there was also not
22	evidence about whether or not they actually
1	
----	--
	Page 145
1	stratified for disparities.
2	So I think that pretty much
3	summarizes what we discussed with relationship
4	to this particular section.
5	CO-CHAIR ROSENTHAL: All right.
6	Thank you very much.
7	David, your comments on scientific
8	acceptability.
9	DR. REDFEARN: Yes. The first
10	thing I will say is this definition of
11	diabetes is the standard episode treatment
12	group definition of diabetes that has been in
13	the ETG model out there for years, used pretty
14	widely. So it has a lot of experience in use
15	and practical experience with whether it makes
16	any sense and holds together.
17	The definition of the episode, I'm
18	not a clinician, and I can't comment on that,
19	but you have to look at it and there is reason
20	people vary in terms of what goes into an
21	episode, and particularly what should be a
22	comorbidity complication and add it into that

	Page 146
1	episode, or what might be something different.
2	I know the CMS, when they looked
3	at ETGs the Medstat MEG Program a while ago
4	they differed in terms of what the two
5	methods captured into diabetes. So you have
б	to look at that clinically, I think, and make
7	some sense about whether you think it does
8	make sense. It is a definition.
9	The only other comment I'll make
10	is about the risk adjustment methodology.
11	This is a little different from what all of
12	the other measures have been doing. This is
13	a risk adjustment specific to that episode of
14	diabetes. It is not a global patient risk
15	characteristic.
16	So they build it if you look at
17	the methodology, they build it they build
18	levels four levels inside the diabetes
19	episode based on the specifics of the risk
20	associated with that definition of diabetes,
21	which is a little different. And you can
22	argue that you might want to use global

	Page 147
1	because that captures global risk, but this
2	has some this is designed specifically to
3	be used in that measure, in that way.
4	DR. ROSENZWEIG: One aspect of the
5	issue of the diabetes-related episode of care
6	was that, at least the way it was explained to
7	us at the time of the TAP meeting was that
8	this diabetes is a chronic disease and really
9	reflects overall care during the course of
10	this particular period.
11	It is hard often to define
12	specific episodes of care within a 12-month
13	period, so that for the vast majority of these
14	patients the actual episode is the full 12
15	months.
16	Perhaps a measure developer would
17	want to comment on that, but it appeared to
18	at least it appeared to that was the way it
19	was explained to us, that it was a even
20	though it these costs are concentrated
21	around what is called an episode of care, it
22	just seems like it was reflecting a full 12-

Page 148 month period. 1 2 And I think some questions were 3 raised as to what happens if the patient, you know, enters the plan in the middle of the 12-4 5 month period or if -- you know, if it hasn't been seen for a while and then starts being 6 7 seen later. Am I explaining this correctly? 8 CO-CHAIR ROSENTHAL: Yes, I think 9 so. 10 If I can comment on DR. LYNN: that, we do divide -- diabetes is chronic. 11 We 12 do divide it up into year-long episodes. However, if the member is not eligible during 13 14 that entire year, then the episode is marked as incomplete, and the method that we used is 15 16 not the method everybody uses. 17 But the method that we presented 18 excludes those episodes where the member 19 wasn't eligible for the entire year. There 20 are some methods where you make an adjustment 21 for the partial year, but that's not the 22 method we presented.

	Page 149
1	In addition, I wanted to make one
2	comment about the minimum 30. We do set a
3	minimum of 30, but we try to make the point,
4	especially in response to the TAP that was
5	provided since the TAP meeting, that what
6	really matters is that you only that you
7	only show the statistically significant
8	differences and that you measure that.
9	And the method we presented does
10	measure that, which is a requirement of
11	PHQ 2008 when you are measuring for resource
12	use. The minimum number was once used as a
13	proxy for statistical significance, and in
14	that case it is really important that you get
15	that right, and it may be sort of impossible
16	to get it right.
17	But in the case where you are
18	actually measuring statistical significance,
19	that minimum number is not as critical. Our
20	opinion.
21	CO-CHAIR ROSENTHAL: Bill.
22	DR. WILLIAM RICH: A couple of

Page 1 questions for the developer. Is this risk- adjusted methodology that you outline different than the one that was up on your website about two years ago? And, secondly, what was the total to get to 30 per provider, what we have seen in others other groupers that have come before us is that problems with the physician ID dramatically decreased the eligible number of assignments to a physician. What was the total what percentage if you take 30 by your number of total physicians, what percentage of that is the total number of claims and physicians that you	
 adjusted methodology that you outline different than the one that was up on your website about two years ago? And, secondly, what was the total to get to 30 per provider, what we have seen in others other groupers that have come before us is that problems with the physician ID dramatically decreased the eligible number of assignments to a physician. What was the total what percentage if you take 30 by your number of total physicians, what percentage of that is the total number of claims and physicians that you 	.50
 different than the one that was up on your website about two years ago? And, secondly, what was the total to get to 30 per provider, what we have seen in others other groupers that have come before us is that problems with the physician ID dramatically decreased the eligible number of assignments to a physician. What was the total what percentage if you take 30 by your number of total physicians, what percentage of that is the total number of claims and physicians that you 	
 website about two years ago? And, secondly, what was the total to get to 30 per provider, what we have seen in others other groupers that have come before us is that problems with the physician ID dramatically decreased the eligible number of assignments to a physician. What was the total what percentage if you take 30 by your number of total physicians, what percentage of that is the total number of claims and physicians that you 	
And, secondly, what was the total to get to 30 per provider, what we have seen in others other groupers that have come before us is that problems with the physician ID dramatically decreased the eligible number of assignments to a physician. What was the total what percentage if you take 30 by your number of total physicians, what percentage of that is the total number of claims and physicians that you	
 6 to get to 30 per provider, what we have 7 seen in others other groupers that have 8 come before us is that problems with the 9 physician ID dramatically decreased the 10 eligible number of assignments to a physician. 11 What was the total what percentage if 12 you take 30 by your number of total 13 physicians, what percentage of that is the 14 total number of claims and physicians that you 	
7 seen in others other groupers that have 8 come before us is that problems with the 9 physician ID dramatically decreased the eligible number of assignments to a physician. 11 What was the total what percentage if 12 you take 30 by your number of total 13 physicians, what percentage of that is the 14 total number of claims and physicians that you	
8 come before us is that problems with the 9 physician ID dramatically decreased the 10 eligible number of assignments to a physician. 11 What was the total what percentage if 12 you take 30 by your number of total 13 physicians, what percentage of that is the 14 total number of claims and physicians that you	
 9 physician ID dramatically decreased the 10 eligible number of assignments to a physician. 11 What was the total what percentage if 12 you take 30 by your number of total 13 physicians, what percentage of that is the 14 total number of claims and physicians that you 	
<pre>10 eligible number of assignments to a physician. 11 What was the total what percentage if 12 you take 30 by your number of total 13 physicians, what percentage of that is the 14 total number of claims and physicians that you</pre>	
What was the total what percentage if you take 30 by your number of total physicians, what percentage of that is the total number of claims and physicians that you	
12 you take 30 by your number of total 13 physicians, what percentage of that is the 14 total number of claims and physicians that you	
13 physicians, what percentage of that is the 14 total number of claims and physicians that you	
14 total number of claims and physicians that you	
15 evaluated? Does that make sense? Probably	
16 didn't verbalize	
17 CO-CHAIR ROSENTHAL: Tom, I think	
18 that was addressed to you guys.	
19 DR. LYNN: I'm sorry. I was on	
20 mute. I think it makes sense. I'm not sure	
21 I know. Were you are you asking if we	
22 looked at diabetes and measured a physician	

	Page 151
1	and found that that physician had more than 30
2	cases, what percentage of the dollars for that
3	physician would we have captured on average?
4	DR. WILLIAM RICH: What percentage
5	of the claims were you able to identify at the
6	physician level?
7	DR. LYNN: Well, okay, so the
8	question is
9	DR. WILLIAM RICH: And the first
10	part I'm sorry you were on mute was is
11	this risk adjustment methodology different
12	than the risk adjusted methodology that you
13	had up on the on your web page about 18, 24
14	months ago?
15	DR. LYNN: No, it's the same. The
16	second question is: are we since the data
17	that we use maybe I'm being dense, I'm
18	sorry, but the data that we're using, are we
19	able to successfully identify which physician
20	was which physician was responsible for the
21	claim?
22	DR. WILLIAM RICH: Yes. And the

	Page 152
1	third part is, where did you get the number
2	30? I mean, 30 is a statistically significant
3	sample for surveys and things like that, and
4	then people that have published in this area,
5	like Dr. Thomas, Bill Thomas, says 100. How
6	did you get to the number of 30 and decide
7	that that was statistically significant?
8	DR. LYNN: The first question, you
9	know, we we certainly have challenges with
10	matching physicians, but, you know, we are
11	we only sort of bring in use data where
12	those challenges have been sufficiently
13	resolved amongst identifying physicians
14	across.
15	Our data doesn't, in fact, include
16	data for multiple health plans, but we do the
17	best we can to make sure that we have valid
18	physician IDs that work across the health
19	plans. If we don't, then we don't include
20	that in the data that we use. That's I
21	think that answers the first question.
22	The second question is about the

	Page 153
1	number of cases, and, you know, honestly, the
2	number of cases 30 comes from one of the
3	original NCQA documents about doing resource
4	utilization required a minimum of 30 cases.
5	But, again, you know, I think the
б	important thing is that you when you're
7	doing measurement that you identify
8	statistically significant differences from an
9	expected benchmark, which is usually the
10	average across the peer group, and only report
11	statistically significant differences. And if
12	the differences are not statistically
13	significant, basically, say that you can't
14	tell a difference.
15	And we think that it's more
16	important to use a valid statistical method,
17	which is a method that's we use a method
18	that has been published and used by RAND in
19	some of the work they do. And then, the
20	number of cases is not as important, because
21	if the number of cases is too small, then you
22	won't have cases that are statistically

Page 154 1 significant. 2 CO-CHAIR ROSENTHAL: So to that point, Tom, with the attribution model and the 3 4 30 cases, what percentage were either higher 5 than expected or lower than expected? DR. LYNN: Oh, that's a good 6 7 question. I don't have that off the top of my 8 head. I would -- we would have to go back 9 into the data and look at that. 10 MS. TURBYVILLE: This is Sally. If you looked at the 11 DR. LYNN: 12 number of doctors that had some range of cases, what percentage of them would be 13 statistically significant or different? 14 I -we would have to go back and do that work. 15 MS. TURBYVILLE: Just for point of 16 clarification -- it may or may not change the 17 request for that information -- similar to 18 19 what the HealthPartners measure, remember that 20 for sample size, because we knew this might 21 vary, we allowed it be a guideline. 22 And in their submission, they do

-	Page 155
1	state that a valid statistical test is
2	preferable, and then and we can we
3	pulled it up for you and then they talk
4	about 30, but that actually, as Tom said,
5	what's more important is that you can
6	demonstrate to statistical differences.
7	CO-CHAIR ROSENTHAL: Right. I
8	think I'm saying the same thing.
9	MS. TURBYVILLE: Okay.
10	CO-CHAIR ROSENTHAL: And,
11	therefore, it would be really interesting to
12	know in this cohort what is statistically
13	significant and what fell out above or below
14	based on the 30. So, okay, but they don't
15	they don't have
16	DR. LYNN: Again, we could say
17	that we'd provide that to you. We just I
18	don't have it. I'd have to go back and
19	calculate it.
20	CO-CHAIR ROSENTHAL: Okay.
21	DR. REDFEARN: I can comment about
22	we use the same methodology, using episode

	Page 156
1	data, across all types of episodes when we do
2	provider profiling. And we do confidence
3	intervals around the observed-to-expected
4	ratio, and you get about 50 percent of the
5	docs that fall into the middle "don't know"
6	category. That is, there is no statistically
7	significant difference, but about somewhere
8	around 25 percent efficient, 25 percent
9	inefficient. That's rough, and it varies
10	across a lot of episodes.
11	But if you do confidence
12	intervals, you get a huge "don't know"
13	category. You get a lot of cases in which you
14	can't make a determination that the doctor is
15	efficient or inefficient, costs are higher
16	than expected or lower than expected.
17	And that to reinforce what Tom
18	was saying about sample size, you see that for
19	doctors in which we have assigned 300 episodes
20	to the doctor. Even in that case, there is so
21	much variability, we say we can't say it, but
22	we do assign efficiency to doctors that have

Page 157 1 had 10 or 15 episodes, way below the 30, 2 because they are absolutely rock consistent in 3 terms of how they perform, either high cost or 4 low cost. 5 So you always have that big 6 category, but you can make this determination 7 with this data. 8 CO-CHAIR ROSENTHAL: But it 9 clearly does sample size matters, and there 10 is no doubt that with a small number, if 11 somebody has a gigantic Six Sigma outlier, 12 that it will be statistically significant. 13 But generally, the smaller number of 14 attributable cases, virtually everybody falls 15 into an indistinguishable one. That's 16 certainly true of the transplant data, where 17 we have that for years. 18 The one that 19 DR. LYNN: Yes, I think that's 20 absolutely right. I think, you know, what 21 Dave just said, that the percentage the 22 detail depends upon what you said is your		
because they are absolutely rock consistent in terms of how they perform, either high cost or low cost. So you always have that big category, but you can make this determination with this data. CO-CHAIR ROSENTHAL: But it clearly does sample size matters, and there is no doubt that with a small number, if somebody has a gigantic Six Sigma outlier, that it will be statistically significant. But generally, the smaller number of attributable cases, virtually everybody falls into an indistinguishable one. That's certainly true of the transplant data, where we have that for years. The one that DR. LYNN: Yes, I think that's absolutely right. I think, you know, what Dave just said, that the percentage the		Page 157
3 terms of how they perform, either high cost or low cost. 5 So you always have that big 6 category, but you can make this determination 7 with this data. 8 CO-CHAIR ROSENTHAL: But it 9 clearly does sample size matters, and there 10 is no doubt that with a small number, if 11 somebody has a gigantic Six Sigma outlier, 12 that it will be statistically significant. 13 But generally, the smaller number of 14 attributable cases, virtually everybody falls 15 into an indistinguishable one. That's 16 certainly true of the transplant data, where 17 we have that for years. 18 The one that 19 DR. LYNN: Yes, I think that's 20 absolutely right. I think, you know, what 21 Dave just said, that the percentage the	1	had 10 or 15 episodes, way below the 30,
4low cost.5So you always have that big6category, but you can make this determination7with this data.8CO-CHAIR ROSENTHAL: But it9clearly does sample size matters, and there10is no doubt that with a small number, if11somebody has a gigantic Six Sigma outlier,12that it will be statistically significant.13But generally, the smaller number of14attributable cases, virtually everybody falls15into an indistinguishable one. That's16certainly true of the transplant data, where17we have that for years.18The one that19DR. LYNN: Yes, I think that's20absolutely right. I think, you know, what21Dave just said, that the percentage the	2	because they are absolutely rock consistent in
5So you always have that big6category, but you can make this determination7with this data.8CO-CHAIR ROSENTHAL: But it9clearly does sample size matters, and there10is no doubt that with a small number, if11somebody has a gigantic Six Sigma outlier,12that it will be statistically significant.13But generally, the smaller number of14attributable cases, virtually everybody falls15into an indistinguishable one. That's16certainly true of the transplant data, where17we have that for years.18The one that19DR. LYNN: Yes, I think that's20absolutely right. I think, you know, what21Dave just said, that the percentage the	3	terms of how they perform, either high cost or
 category, but you can make this determination with this data. CO-CHAIR ROSENTHAL: But it clearly does sample size matters, and there is no doubt that with a small number, if somebody has a gigantic Six Sigma outlier, that it will be statistically significant. But generally, the smaller number of attributable cases, virtually everybody falls into an indistinguishable one. That's certainly true of the transplant data, where we have that for years. The one that DR. LYNN: Yes, I think that's absolutely right. I think, you know, what Dave just said, that the percentage the 	4	low cost.
<pre>vith this data. vith this data. CO-CHAIR ROSENTHAL: But it clearly does sample size matters, and there is no doubt that with a small number, if somebody has a gigantic Six Sigma outlier, that it will be statistically significant. But generally, the smaller number of attributable cases, virtually everybody falls into an indistinguishable one. That's certainly true of the transplant data, where we have that for years. The one that DR. LYNN: Yes, I think that's absolutely right. I think, you know, what Dave just said, that the percentage the</pre>	5	So you always have that big
 8 CO-CHAIR ROSENTHAL: But it 9 clearly does sample size matters, and there 10 is no doubt that with a small number, if 11 somebody has a gigantic Six Sigma outlier, 12 that it will be statistically significant. 13 But generally, the smaller number of 14 attributable cases, virtually everybody falls 15 into an indistinguishable one. That's 16 certainly true of the transplant data, where 17 we have that for years. 18 The one that 19 DR. LYNN: Yes, I think that's 20 absolutely right. I think, you know, what 21 Dave just said, that the percentage the 	6	category, but you can make this determination
9 clearly does sample size matters, and there is no doubt that with a small number, if somebody has a gigantic Six Sigma outlier, that it will be statistically significant. 12 that it will be statistically significant. 13 But generally, the smaller number of attributable cases, virtually everybody falls into an indistinguishable one. That's certainly true of the transplant data, where we have that for years. 18 The one that DR. LYNN: Yes, I think that's absolutely right. I think, you know, what Dave just said, that the percentage the	7	with this data.
10 is no doubt that with a small number, if 11 somebody has a gigantic Six Sigma outlier, 12 that it will be statistically significant. 13 But generally, the smaller number of 14 attributable cases, virtually everybody falls 15 into an indistinguishable one. That's 16 certainly true of the transplant data, where 17 we have that for years. 18 The one that 19 DR. LYNN: Yes, I think that's 20 absolutely right. I think, you know, what 21 Dave just said, that the percentage the	8	CO-CHAIR ROSENTHAL: But it
11 somebody has a gigantic Six Sigma outlier, 12 that it will be statistically significant. 13 But generally, the smaller number of 14 attributable cases, virtually everybody falls 15 into an indistinguishable one. That's 16 certainly true of the transplant data, where 17 we have that for years. 18 The one that 19 DR. LYNN: Yes, I think that's 20 absolutely right. I think, you know, what 21 Dave just said, that the percentage the	9	clearly does sample size matters, and there
12 that it will be statistically significant. 13 But generally, the smaller number of 14 attributable cases, virtually everybody falls 15 into an indistinguishable one. That's 16 certainly true of the transplant data, where 17 we have that for years. 18 The one that 19 DR. LYNN: Yes, I think that's 20 absolutely right. I think, you know, what 21 Dave just said, that the percentage the	10	is no doubt that with a small number, if
But generally, the smaller number of attributable cases, virtually everybody falls into an indistinguishable one. That's certainly true of the transplant data, where we have that for years. The one that DR. LYNN: Yes, I think that's absolutely right. I think, you know, what Dave just said, that the percentage the	11	somebody has a gigantic Six Sigma outlier,
14attributable cases, virtually everybody falls15into an indistinguishable one. That's16certainly true of the transplant data, where17we have that for years.18The one that19DR. LYNN: Yes, I think that's20absolutely right. I think, you know, what21Dave just said, that the percentage the	12	that it will be statistically significant.
<pre>15 into an indistinguishable one. That's 16 certainly true of the transplant data, where 17 we have that for years. 18 The one that 19 DR. LYNN: Yes, I think that's 20 absolutely right. I think, you know, what 21 Dave just said, that the percentage the</pre>	13	But generally, the smaller number of
<pre>16 certainly true of the transplant data, where 17 we have that for years. 18 The one that 19 DR. LYNN: Yes, I think that's 20 absolutely right. I think, you know, what 21 Dave just said, that the percentage the</pre>	14	attributable cases, virtually everybody falls
<pre>17 we have that for years. 18 The one that 19 DR. LYNN: Yes, I think that's 20 absolutely right. I think, you know, what 21 Dave just said, that the percentage the</pre>	15	into an indistinguishable one. That's
18 The one that 19 DR. LYNN: Yes, I think that's 20 absolutely right. I think, you know, what 21 Dave just said, that the percentage the	16	certainly true of the transplant data, where
19DR. LYNN: Yes, I think that's20absolutely right. I think, you know, what21Dave just said, that the percentage the	17	we have that for years.
 absolutely right. I think, you know, what Dave just said, that the percentage the 	18	The one that
21 Dave just said, that the percentage the	19	DR. LYNN: Yes, I think that's
	20	absolutely right. I think, you know, what
22 detail depends upon what you said is your	21	Dave just said, that the percentage the
	22	detail depends upon what you said is your

Page 158 1 minimum number of cases. 2 But what -- to me, the important 3 thing is making sure that you are doing some sort of test to make sure even someone with 4 5 100 cases, the difference is statistically significant, or even, as Dave pointed out, 6 7 300. 8 CO-CHAIR ROSENTHAL: Absolutely. 9 No doubt. 10 The one other area that I don't think we have touched on at all is the 11 12 attribution model here went on for a page and a half and was rather complex. Perhaps could 13 14 we -- could you discuss your thinking about that? And, well, let's just leave it that 15 16 open ended for the moment. Tom, could you 17 quys sort of talk about your attribution 18 methodology? 19 DR. LYNN: Yes. I think in the 20 case of diabetes, the attribution methodology 21 -- and if I said something wrong, it may have 22 been because I believe we presented

	Page 159
1	alternatives that the attribution methodology
2	is to identify counts of contacts between
3	physicians and members for diabetes that were
4	grouped in this diabetes episode.
5	And then we assigned that episode
6	to the physician that has the most number of
7	contacts the highest number of contacts as
8	long as the number of contacts is greater than
9	30 percent of the total number of contacts.
10	So even if you have a provider who
11	has let's say if you had a member with 10
12	contacts for the episode of diabetes, and they
13	were all assigned to different doctors except
14	for two of them, then that doctor would not be
15	assigned the diabetes. Nobody would be
16	assigned to diabetes because no doctor met the
17	30 percent threshold for attribution.
18	Then, I think a lot of the
19	complexity may come from, you know, what
20	happens when you when there is a tie. When
21	there is a tie, then you use the cost as a
22	tiebreaker. And there may be a third

	Page 160
1	tiebreaker, but I'm not I don't have it
2	right in front of me. I could pull it up
3	here, if someone would remind me what section
4	it was in. Is it in S8?
5	CO-CHAIR ROSENTHAL: It's in
б	Section 11. And just to clarify, though, you
7	are proposing options for attribution. Did I
8	get that correct? So an entity that would
9	want to use this measure could pick one of the
10	attribution methodologies and apply it?
11	DR. LYNN: Right. But the one I
12	describe is the one that was used in this
13	analysis.
14	DR. REDFEARN: Yes. The my
15	notes indicate that they sort of leave it up
16	to the user. There is a lot of different ways
17	you can do this. They have a suggested one,
18	but there's lots of different ways of doing
19	it.
20	CO-CHAIR ROSENTHAL: Well,
21	assuming a different I mean, we have
22	struggled with the attribution on these

	Page 161
1	specific measures, you know, diagnosis-
2	specific measures. And we have been critical
3	of the people who sort of narrowly picked one.
4	It might be internally
5	inconsistent to be, then, critical of somebody
6	who says, "Pick whatever one you want," but to
7	pick one "whatever one you want" appears to
8	have been the alternative strategy here to the
9	really challenging difficulties in,
10	particularly, diabetes that we talked about in
11	the last one of does the primary care doc
12	get it? Does the endocrinologist get it?
13	Does the surgeon get it who happens to do the
14	amputation, or the ophthalmologist who ends up
15	with the eyes?
16	And, I don't know, does anybody
17	have a comment on sort of the fact that they
18	have taken the opposite approach to this and
19	whether that's a better way to do it, or not
20	a better way to do it?
21	DR. STEPHANSKY: I much prefer the
22	flexibility. In practice in Michigan, we have

Page 162
been dealing with a lot of different health
payers and a lot of different attribution
models, and I guess the best way to describe
it is in the meetings it gets very
contentious. And while there has never been
an actual murder in one of the meetings
(Laughter.)
the homicidal ideation is so
high that the
(Laughter.)
so I think we are much better
off being as flexible as we can with
reasonable attribution models, leaving it up
to how it's going to get used for a local
community or a region.
DR. LYNN: There is an attribution
method. That varies depending on what you're
using it for.
DR. STEPHANSKY: Right.
DR. LYNN: Absolutely.
DR. NEEDLEMAN: Got a question
because one of the bases for attribution

	Page 163
1	you've got are, you know, who is the assigned
2	PCP under the plan? You know, who somebody
3	picked. And I'm just wondering, when you look
4	at that, have you seen have you looked how
5	consistent the PCP that is formally assigned
6	is how close how often that matches who
7	you wind up attributing the diabetes care to?
8	So have you done any cross-checking of what
9	the different attribution models
10	DR. LYNN: No, that that
11	particular attribution method, you know, would
12	be used in a case where that primary care
13	provider was acting as a gatekeeper, unless
14	I'm not sure it would be the best one.
15	DR. NEEDLEMAN: But your data
16	should be able would answer the question
17	posed.
18	DR. LYNN: Yes, we could go back
19	and say, "Of the physicians that were
20	identified as primary care, and the members
21	that had diabetes for those physicians, what
22	percentage of the time did the primary care

Page 164 1 physician get attributed to a diabetes 2 episode?" We could answer that question. 3 CO-CHAIR ROSENTHAL: All right. But you didn't --4 5 DR. LYNN: I don't have the answer to that question, but we --6 7 CO-CHAIR ROSENTHAL: -- you didn't 8 -- don't have it, okay. So the answer is 9 don't know. 10 DR. LYNN: Right. 11 CO-CHAIR ROSENTHAL: Paul? 12 DR. BARNETT: I have a question 13 about a different part of it. Is that all right -- okay? 14 15 CO-CHAIR ROSENTHAL: Absolutely. 16 DR. BARNETT: So trying to think 17 about how this differs from the NCQA diabetes 18 measure, which takes all costs, so the costs 19 here, as I understand it, are attributable to 20 the episode which, in the case of a chronic 21 disease, is the entire year. But it's things 22 pertaining to diabetes visits.

Page 1651And so what I was wondering about2is, so if somebody has diabetes and they get,3you know, ischemic heart disease and they4become a CHF patient, or they become you5know, they get eye problems and become an6ophthalmology that's an ophthalmology7episode, and then that cost is not8attributable to diabetes anymore, or is it9it's end stage renal disease, and that cost is10no longer attributable to diabetes anymore, is11that right?12DR. LYNN: Yes, that's a good13question, and that's a good description. You14know, this episode is part of, obviously, an15application that groups claims to all sorts of16diseases, not just diabetes, and this17particular thing that we hold out looks at the18cost of the direct treatment of diabetes and19not the cost of the sequelae of diabetes.20We know that's important, but21inside of our applications it's easier to pull22things it's easier to put things together		
 is, so if somebody has diabetes and they get, you know, ischemic heart disease and they become a CHF patient, or they become you know, they get eye problems and become an ophthalmology that's an ophthalmology episode, and then that cost is not attributable to diabetes anymore, or is it it's end stage renal disease, and that cost is no longer attributable to diabetes anymore, is that right? DR. LYNN: Yes, that's a good question, and that's a good description. You know, this episode is part of, obviously, an application that groups claims to all sorts of diseases, not just diabetes, and this particular thing that we hold out looks at the cost of the direct treatment of diabetes and not the cost of the sequelae of diabetes. We know that's important, but inside of our applications it's easier to pull 		Page 165
you know, ischemic heart disease and they become a CHF patient, or they become you know, they get eye problems and become an ophthalmology that's an ophthalmology episode, and then that cost is not attributable to diabetes anymore, or is it jit's end stage renal disease, and that cost is no longer attributable to diabetes anymore, is that right? DR. LYNN: Yes, that's a good question, and that's a good description. You know, this episode is part of, obviously, an application that groups claims to all sorts of diseases, not just diabetes, and this particular thing that we hold out looks at the cost of the direct treatment of diabetes and not the cost of the sequelae of diabetes. We know that's important, but inside of our applications it's easier to pull	1	And so what I was wondering about
 become a CHF patient, or they become you know, they get eye problems and become an ophthalmology that's an ophthalmology episode, and then that cost is not attributable to diabetes anymore, or is it it's end stage renal disease, and that cost is no longer attributable to diabetes anymore, is that right? DR. LYNN: Yes, that's a good question, and that's a good description. You know, this episode is part of, obviously, an application that groups claims to all sorts of diseases, not just diabetes, and this particular thing that we hold out looks at the cost of the direct treatment of diabetes. We know that's important, but inside of our applications it's easier to pull 	2	is, so if somebody has diabetes and they get,
 know, they get eye problems and become an ophthalmology that's an ophthalmology episode, and then that cost is not attributable to diabetes anymore, or is it it's end stage renal disease, and that cost is no longer attributable to diabetes anymore, is that right? DR. LYNN: Yes, that's a good question, and that's a good description. You know, this episode is part of, obviously, an application that groups claims to all sorts of diseases, not just diabetes, and this particular thing that we hold out looks at the cost of the direct treatment of diabetes. We know that's important, but inside of our applications it's easier to pull 	3	you know, ischemic heart disease and they
 ophthalmology that's an ophthalmology episode, and then that cost is not attributable to diabetes anymore, or is it it's end stage renal disease, and that cost is no longer attributable to diabetes anymore, is that right? DR. LYNN: Yes, that's a good question, and that's a good description. You know, this episode is part of, obviously, an application that groups claims to all sorts of diseases, not just diabetes, and this particular thing that we hold out looks at the cost of the direct treatment of diabetes. We know that's important, but inside of our applications it's easier to pull 	4	become a CHF patient, or they become you
<pre>episode, and then that cost is not attributable to diabetes anymore, or is it it's end stage renal disease, and that cost is no longer attributable to diabetes anymore, is that right? DR. LYNN: Yes, that's a good question, and that's a good description. You know, this episode is part of, obviously, an application that groups claims to all sorts of diseases, not just diabetes, and this particular thing that we hold out looks at the cost of the direct treatment of diabetes and not the cost of the sequelae of diabetes. We know that's important, but inside of our applications it's easier to pull</pre>	5	know, they get eye problems and become an
 attributable to diabetes anymore, or is it it's end stage renal disease, and that cost is no longer attributable to diabetes anymore, is that right? DR. LYNN: Yes, that's a good question, and that's a good description. You know, this episode is part of, obviously, an application that groups claims to all sorts of diseases, not just diabetes, and this particular thing that we hold out looks at the cost of the direct treatment of diabetes and not the cost of the sequelae of diabetes. We know that's important, but inside of our applications it's easier to pull 	6	ophthalmology that's an ophthalmology
 9 it's end stage renal disease, and that cost is 10 no longer attributable to diabetes anymore, is 11 that right? 12 DR. LYNN: Yes, that's a good 13 question, and that's a good description. You 14 know, this episode is part of, obviously, an 15 application that groups claims to all sorts of 16 diseases, not just diabetes, and this 17 particular thing that we hold out looks at the 18 cost of the direct treatment of diabetes and 19 not the cost of the sequelae of diabetes. 20 We know that's important, but 21 inside of our applications it's easier to pull 	7	episode, and then that cost is not
no longer attributable to diabetes anymore, is that right? DR. LYNN: Yes, that's a good question, and that's a good description. You know, this episode is part of, obviously, an application that groups claims to all sorts of diseases, not just diabetes, and this particular thing that we hold out looks at the cost of the direct treatment of diabetes and not the cost of the sequelae of diabetes. We know that's important, but inside of our applications it's easier to pull	8	attributable to diabetes anymore, or is it
11 that right? 12 DR. LYNN: Yes, that's a good 13 question, and that's a good description. You 14 know, this episode is part of, obviously, an 15 application that groups claims to all sorts of 16 diseases, not just diabetes, and this 17 particular thing that we hold out looks at the 18 cost of the direct treatment of diabetes and 19 not the cost of the sequelae of diabetes. 20 We know that's important, but 21 inside of our applications it's easier to pull	9	it's end stage renal disease, and that cost is
DR. LYNN: Yes, that's a good question, and that's a good description. You know, this episode is part of, obviously, an application that groups claims to all sorts of diseases, not just diabetes, and this particular thing that we hold out looks at the cost of the direct treatment of diabetes and not the cost of the sequelae of diabetes. We know that's important, but inside of our applications it's easier to pull	10	no longer attributable to diabetes anymore, is
13question, and that's a good description. You14know, this episode is part of, obviously, an15application that groups claims to all sorts of16diseases, not just diabetes, and this17particular thing that we hold out looks at the18cost of the direct treatment of diabetes and19not the cost of the sequelae of diabetes.20We know that's important, but21inside of our applications it's easier to pull	11	that right?
14 know, this episode is part of, obviously, an 15 application that groups claims to all sorts of 16 diseases, not just diabetes, and this 17 particular thing that we hold out looks at the 18 cost of the direct treatment of diabetes and 19 not the cost of the sequelae of diabetes. 20 We know that's important, but 21 inside of our applications it's easier to pull	12	DR. LYNN: Yes, that's a good
15 application that groups claims to all sorts of 16 diseases, not just diabetes, and this 17 particular thing that we hold out looks at the 18 cost of the direct treatment of diabetes and 19 not the cost of the sequelae of diabetes. 20 We know that's important, but 21 inside of our applications it's easier to pull	13	question, and that's a good description. You
16 diseases, not just diabetes, and this 17 particular thing that we hold out looks at the 18 cost of the direct treatment of diabetes and 19 not the cost of the sequelae of diabetes. 20 We know that's important, but 21 inside of our applications it's easier to pull	14	know, this episode is part of, obviously, an
17 particular thing that we hold out looks at the 18 cost of the direct treatment of diabetes and 19 not the cost of the sequelae of diabetes. 20 We know that's important, but 21 inside of our applications it's easier to pull	15	application that groups claims to all sorts of
<pre>18 cost of the direct treatment of diabetes and 19 not the cost of the sequelae of diabetes. 20 We know that's important, but 21 inside of our applications it's easier to pull</pre>	16	diseases, not just diabetes, and this
19 not the cost of the sequelae of diabetes. 20 We know that's important, but 21 inside of our applications it's easier to pull	17	particular thing that we hold out looks at the
20 We know that's important, but 21 inside of our applications it's easier to pull	18	cost of the direct treatment of diabetes and
21 inside of our applications it's easier to pull	19	not the cost of the sequelae of diabetes.
	20	We know that's important, but
22 things it's easier to put things together	21	inside of our applications it's easier to pull
	22	things it's easier to put things together

	Page 166
1	than it is to pull things apart.
2	I mean, another approach, which we
3	did not present here, would be to say let's
4	look at especially when you're measuring,
5	say, a system for a primary care doctor that
6	maybe has the responsibility, let's look at
7	the entire let's look at all of the
8	episodes for diabetes and its sequelae
9	together.
10	We call that an ETG family. And
11	we have a method for doing that and an opinion
12	about what if these should be grouped
13	together to do that sort of thing. But if
14	you're measuring the ophthalmologist who is
15	taking care of the diabetic retinopathy, most
16	of our customers would want that to be pulled
17	out separate.
18	So the application pulls them out
19	separately, and, you know, basically the
20	philosophy there is it's easier to put things
21	together than to take them apart.
22	DR. BARNETT: So the retinopathy

	Page 167
1	screening, would that be a different episode,
2	or is that part of diabetes care?
3	DR. LYNN: The retinopathy
4	screening would be part of it would be part
5	of diabetes care if the diagnosis was
6	diabetes. If they had some diabetic
7	retinopathy, then it would go into a diabetic
8	retinopathy episode.
9	DR. BARNETT: That makes sense,
10	and so then the I guess the big concern is
11	is that the how do you tease out diabetes
12	from, say, coronary artery disease? Because
13	those are really, you know, linked together.
14	It's kind of a chicken and egg thing, I think,
15	isn't it? So I'm just
16	DR. LYNN: I think the diabetes
17	probably comes first, but that doesn't really
18	matter. Yes, I mean, it is challenging to
19	tease it out, and, you know, we try to we
20	look at the diagnosis code, we look at the
21	procedure code and how and the clinical
22	information contained in the procedure code to

Page 168 1 help us make the determination, and we have 2 extensive tiebreaker logic, which, you know, honestly is a little bit hard to read to try 3 to figure out what is the best place for a 4 5 claim to go that could be eligible for different episodes. But I -- you know, I 6 7 think we do as good a job as you can do given the limitations of the claims data. 8 9 You know, the point being made, which I think is a valid one, is that, you 10 know, in some situations don't even try --11 12 just look at how much it costs to take care of the patient or limit some of that choice of 13 14 which episode it goes to by using a more expensive ETG family. And, you know, we 15 16 certainly agree that there are times when that 17 may be the better approach. 18 CO-CHAIR ROSENTHAL: Let me ask 19 one last quick question about the risk 20 adjusting. I hate to go back to that, but it 21 wasn't completely clear to me. If somebody 22 has a four-vessel CABG and diabetes in that

	Page 169
1	year, do they get risk adjusted differently
2	than a normal person who only has a little bit
3	of hyperglycemia? Is that accounted for in
4	the risk adjustment?
5	DR. LYNN: Right. So there's two
6	things there's two parts to that answer.
7	The first part is the coronary bypass graft
8	surgery and the coronary artery disease that
9	was directly responsible for that surgery,
10	would be captured in a separate episode. It
11	would not be part of this episode.
12	After that occurs, then the fact
13	that the person did have coronary artery
14	disease at the same time as diabetes is taken
15	into account in building the severity model
16	for diabetes, recognizing and the models do
17	recognize because it's mathematics, that the
18	cost that is increasing cost for diabetes is
19	indirect. It's a direct cost of coronary
20	artery disease, and the CABG is captured by a
21	separate episode.
22	CO-CHAIR ROSENTHAL: Okay. I've

Page 170 1 qot it now. 2 DR. LYNN: It did not --3 CO-CHAIR ROSENTHAL: I've got it. It did not look at 4 DR. LYNN: 5 whether there was a CABG or not. 6 CO-CHAIR ROSENTHAL: Okay. I qot 7 it, I got it. I got it. The answer was yes. 8 The answer was yes. 9 DR. LYNN: All right. I'll try to limit my answers. Sorry about that. 10 11 (Laughter.) 12 CO-CHAIR ROSENTHAL: No, I appreciate it. You have the unfortunate thing 13 14 of not being able to read the body language, 15 and so -- Jeptha. DR. CURTIS: I understand that 16 17 approach, and it makes sense on one hand. I 18 just want to raise the issue that down the 19 road, if we're trying to match these resource 20 use measures with quality measures to get to 21 value, this is leading to a potential paradox 22 where you will have quality measures that are

	Page 171
1	specifically set up that you risk adjust on
2	things that are present before the estimation
3	of quality, and you have resource use measures
4	that are adjusting for things that could
5	potentially be complications or consequences
6	of care.
7	And so I'm not sure how we should
8	involve that at this stage, but I can
9	definitely see that becoming a major issue
10	down the road.
11	CO-CHAIR ROSENTHAL: Okay. Thank
12	you. Jack, I think you had your hand up.
13	DR. NEEDLEMAN: Yes.
14	CO-CHAIR ROSENTHAL: And then,
15	we'll perhaps try to sort of maybe bring the
16	scientific part of this to a vote.
17	DR. NEEDLEMAN: I've got two
18	questions for the developer. One is, you
19	know, you talked about a family of diabetes
20	ETGs, and I'm just wondering, can you explain
21	what you see as the scope of what this ETG is
22	trying to measure and where it fits into the

	Page 172
1	family of other diabetes-related ETGs that you
2	also have that we're not looking at as
3	specific measures? So that's question one.
4	DR. LYNN: This is this episode
5	captures the direct cost of diabetes. If
6	there is a complication of diabetes, that
7	you know, that is basically a disease in and
8	of itself, it is captured in a separate
9	episode.
10	Our concept of the diabetes family
11	is not a separate episode, but a way to
12	combine multiple episodes to come up with one
13	cost you know, the cost of the cost of
14	the diabetes, coronary artery disease, the
15	congestive heart failure, the renal failure,
16	are some examples of what we included in the
17	diabetes family.
18	So it would be calculated by
19	basically summing up costs in the separate
20	episodes for diabetes as well as complications
21	of diabetes.
22	CO-CHAIR ROSENTHAL: And your

Page 173 1 other question, Jack? 2 DR. NEEDLEMAN: And my second question -- you talked about dealing with the 3 4 pharmacy carve-outs that exist in much of your 5 data by basically stratifying your cost 6 analysis for patients where you have that data 7 and where you don't. 8 There are also carve-outs in 9 behavioral health. And if you were looking at 10 the direct cost of diabetes, obviously, depression as a diabetes-related comorbidity 11 12 is not in the cost -- the cost of this. But I'm wondering if it's part of your risk 13 14 adjuster and -- because somewhere you talk about psychosis as part of your risk adjuster. 15 16 And how are you dealing with 17 behavioral health carve-outs for your risk 18 adjusters, to the extent that they include 19 mental health services or mental health 20 conditions? 21 DR. LYNN: Yes, we do have --22 you're right, we do have severity markers that

Page 1741are comorbid that are based on mental health2issues. And we do not stratify based on3mental health whether mental health is a4carve-out. So we don't deal with that5probably the way you want it, you know, dealt6with.7You know, hopefully that is8mitigated by the possibility that some of9these diagnoses may be included in medical10claims, because they are relevant to the11treatment.12CO-CHAIR ROSENTHAL: All right.13DR. LYNN: So that's the answer to14the question.15CO-CHAIR ROSENTHAL: Okay. Thank16you. I think we have pretty well run the17gamut of the issues around this. Jaime, maybe18I'd like to give you, on behalf of the TAP,19kind of the last word.20And in turn, for having21participated in this conversation and we've22got your the TAP scores up in terms of		
issues. And we do not stratify based on mental health whether mental health is a carve-out. So we don't deal with that probably the way you want it, you know, dealt with. You know, hopefully that is mitigated by the possibility that some of these diagnoses may be included in medical claims, because they are relevant to the treatment. CO-CHAIR ROSENTHAL: All right. DR. LYNN: So that's the answer to the question. CO-CHAIR ROSENTHAL: Okay. Thank you. I think we have pretty well run the gamut of the issues around this. Jaime, maybe I'd like to give you, on behalf of the TAP, kind of the last word. And in turn, for having participated in this conversation and we've		Page 174
 mental health whether mental health is a carve-out. So we don't deal with that probably the way you want it, you know, dealt with. You know, hopefully that is mitigated by the possibility that some of these diagnoses may be included in medical claims, because they are relevant to the treatment. CO-CHAIR ROSENTHAL: All right. DR. LYNN: So that's the answer to the question. CO-CHAIR ROSENTHAL: Okay. Thank you. I think we have pretty well run the gamut of the issues around this. Jaime, maybe I'd like to give you, on behalf of the TAP, kind of the last word. And in turn, for having participated in this conversation and we've 	1	are comorbid that are based on mental health
4carve-out. So we don't deal with that5probably the way you want it, you know, dealt6with.7You know, hopefully that is8mitigated by the possibility that some of9these diagnoses may be included in medical10claims, because they are relevant to the11treatment.12CO-CHAIR ROSENTHAL: All right.13DR. LYNN: So that's the answer to14the question.15CO-CHAIR ROSENTHAL: Okay. Thank16you. I think we have pretty well run the17gamut of the issues around this. Jaime, maybe18I'd like to give you, on behalf of the TAP,19kind of the last word.20And in turn, for having21participated in this conversation and we've	2	issues. And we do not stratify based on
probably the way you want it, you know, dealt with. You know, hopefully that is mitigated by the possibility that some of these diagnoses may be included in medical claims, because they are relevant to the treatment. CO-CHAIR ROSENTHAL: All right. DR. LYNN: So that's the answer to the question. CO-CHAIR ROSENTHAL: Okay. Thank you. I think we have pretty well run the gamut of the issues around this. Jaime, maybe I'd like to give you, on behalf of the TAP, kind of the last word. And in turn, for having participated in this conversation and we've	3	mental health whether mental health is a
 with. You know, hopefully that is mitigated by the possibility that some of these diagnoses may be included in medical claims, because they are relevant to the treatment. CO-CHAIR ROSENTHAL: All right. DR. LYNN: So that's the answer to the question. CO-CHAIR ROSENTHAL: Okay. Thank you. I think we have pretty well run the gamut of the issues around this. Jaime, maybe I'd like to give you, on behalf of the TAP, kind of the last word. And in turn, for having participated in this conversation and we've 	4	carve-out. So we don't deal with that
7You know, hopefully that is8mitigated by the possibility that some of9these diagnoses may be included in medical10claims, because they are relevant to the11treatment.12CO-CHAIR ROSENTHAL: All right.13DR. LYNN: So that's the answer to14the question.15CO-CHAIR ROSENTHAL: Okay. Thank16you. I think we have pretty well run the17gamut of the issues around this. Jaime, maybe18I'd like to give you, on behalf of the TAP,19And in turn, for having21participated in this conversation and we've	5	probably the way you want it, you know, dealt
8 mitigated by the possibility that some of 9 these diagnoses may be included in medical 10 claims, because they are relevant to the 11 treatment. 12 CO-CHAIR ROSENTHAL: All right. 13 DR. LYNN: So that's the answer to 14 the question. 15 CO-CHAIR ROSENTHAL: Okay. Thank 16 you. I think we have pretty well run the 17 gamut of the issues around this. Jaime, maybe 18 I'd like to give you, on behalf of the TAP, 19 kind of the last word. 20 And in turn, for having 21 participated in this conversation and we've	6	with.
9 these diagnoses may be included in medical claims, because they are relevant to the treatment. 12 CO-CHAIR ROSENTHAL: All right. 13 DR. LYNN: So that's the answer to 14 the question. 15 CO-CHAIR ROSENTHAL: Okay. Thank 16 you. I think we have pretty well run the 17 gamut of the issues around this. Jaime, maybe 18 I'd like to give you, on behalf of the TAP, 19 kind of the last word. 20 And in turn, for having 21 participated in this conversation and we've	7	You know, hopefully that is
<pre>10 claims, because they are relevant to the 11 treatment. 12 CO-CHAIR ROSENTHAL: All right. 13 DR. LYNN: So that's the answer to 14 the question. 15 CO-CHAIR ROSENTHAL: Okay. Thank 16 you. I think we have pretty well run the 17 gamut of the issues around this. Jaime, maybe 18 I'd like to give you, on behalf of the TAP, 19 kind of the last word. 20 And in turn, for having 21 participated in this conversation and we've</pre>	8	mitigated by the possibility that some of
<pre>11 treatment. 12 CO-CHAIR ROSENTHAL: All right. 13 DR. LYNN: So that's the answer to 14 the question. 15 CO-CHAIR ROSENTHAL: Okay. Thank 16 you. I think we have pretty well run the 17 gamut of the issues around this. Jaime, maybe 18 I'd like to give you, on behalf of the TAP, 19 kind of the last word. 20 And in turn, for having 21 participated in this conversation and we've</pre>	9	these diagnoses may be included in medical
12CO-CHAIR ROSENTHAL: All right.13DR. LYNN: So that's the answer to14the question.15CO-CHAIR ROSENTHAL: Okay. Thank16you. I think we have pretty well run the17gamut of the issues around this. Jaime, maybe18I'd like to give you, on behalf of the TAP,19kind of the last word.20And in turn, for having21participated in this conversation and we've	10	claims, because they are relevant to the
13DR. LYNN: So that's the answer to14the question.15CO-CHAIR ROSENTHAL: Okay. Thank16you. I think we have pretty well run the17gamut of the issues around this. Jaime, maybe18I'd like to give you, on behalf of the TAP,19kind of the last word.20And in turn, for having21participated in this conversation and we've	11	treatment.
14 the question. 15 CO-CHAIR ROSENTHAL: Okay. Thank 16 you. I think we have pretty well run the 17 gamut of the issues around this. Jaime, maybe 18 I'd like to give you, on behalf of the TAP, 19 kind of the last word. 20 And in turn, for having 21 participated in this conversation and we've	12	CO-CHAIR ROSENTHAL: All right.
15 CO-CHAIR ROSENTHAL: Okay. Thank 16 you. I think we have pretty well run the 17 gamut of the issues around this. Jaime, maybe 18 I'd like to give you, on behalf of the TAP, 19 kind of the last word. 20 And in turn, for having 21 participated in this conversation and we've	13	DR. LYNN: So that's the answer to
 16 you. I think we have pretty well run the 17 gamut of the issues around this. Jaime, maybe 18 I'd like to give you, on behalf of the TAP, 19 kind of the last word. 20 And in turn, for having 21 participated in this conversation and we've 	14	the question.
<pre>17 gamut of the issues around this. Jaime, maybe 18 I'd like to give you, on behalf of the TAP, 19 kind of the last word. 20 And in turn, for having 21 participated in this conversation and we've</pre>	15	CO-CHAIR ROSENTHAL: Okay. Thank
18 I'd like to give you, on behalf of the TAP, 19 kind of the last word. 20 And in turn, for having 21 participated in this conversation and we've	16	you. I think we have pretty well run the
<pre>19 kind of the last word. 20 And in turn, for having 21 participated in this conversation and we've</pre>	17	gamut of the issues around this. Jaime, maybe
20 And in turn, for having 21 participated in this conversation and we've	18	I'd like to give you, on behalf of the TAP,
21 participated in this conversation and we've	19	kind of the last word.
	20	And in turn, for having
22 got your the TAP scores up in terms of	21	participated in this conversation and we've
	22	got your the TAP scores up in terms of

	Page 175
1	reliability and validity and apropos of
2	sort of the last observation the last
3	review of this where give us your summary
4	of what you think these numbers mean on the
5	screen. Can you see them?
б	DR. ROSENZWEIG: Well, you know, I
7	think there was there is certainly internal
8	consistency that was demonstrated, but the
9	other validity measures were highly debated,
10	and there was a lot of variability in the
11	scores between the various members of the TAP.
12	In general, I think the one of
13	the bigger issues was this proprietary nature
14	of their risk adjustment score, and I think
15	there was sort of a difference between the
16	clinicians on our Committee and the people who
17	were more in tuned with health plans with
18	respect to their ability to trust the data
19	with respect to that particular aspect, and
20	that's why there was kind of a mixed review.
21	CO-CHAIR ROSENTHAL: All right.
22	Thank you. I was

	Page 176
1	DR. CURTIS: Can I follow up on
2	that?
3	CO-CHAIR ROSENTHAL: Please.
4	DR. CURTIS: These ratings broken
5	down into the individual elements show that
6	the lows in this case are different than for
7	the last measure, which was more on
8	specifications. This is more about the risk
9	adjustment than the identification, and that,
10	as I recall, was directly our concern, that
11	you were adjusting for things that were
12	happening during the measurement year, as well
13	as the difficulty of attributions.
14	DR. ROSENZWEIG: Correct.
15	CO-CHAIR ROSENTHAL: I think with
16	that clarification, does the group feel
17	prepared to make a judgment on scientific
18	acceptability? It appears so. This is one
19	yes, two no.
20	MS. TURBYVILLE: We have 10 yes
21	and eight no.
22	CO-CHAIR ROSENTHAL: All right.

Г

	Page 177
1	So we will move now into that at least
2	gives us the opportunity to discuss usability
3	and feasibility, and so, Jaime, would you give
4	us a TAP rendition of usability?
5	DR. ROSENZWEIG: Yes. With
6	respect to the usability issue, the measured
7	performance results are already publicly
8	reported, but the usability information that
9	was submitted was the same was really not
10	specific to diabetes, but really for all of
11	the Ingenix measures.
12	And there was some concern in the
13	TAP that about the with the availability
14	of this data to the public and requested
15	and we requested clarification from NQF as to
16	what would be required for public reporting.
17	So I think this is an issue that
18	came up, and, as a result, with respect to 3A,
19	most of the people felt that the data was
20	insufficient.
21	And there was also some here
22	again, on 3B, the usability information

Page 178 submitted was not specific to diabetes and for 1 2 Ingenix measures. It was for all Ingenix 3 measures. The usability -- and it was felt 4 that diabetes presented specific problems that 5 6 had to be addressed. So we had some concerns 7 about this here, and that applied to 3C as well. 8 9 There was also some -- felt that there was -- that it was difficult to assess 10 the extent to which this particular -- the 11 individual measures could be evaluated. 12 And then, I think basically the major issue was 13 14 that the whole section here that was put in place with respect to usability was fairly 15 generic and could apply to a whole variety of 16 17 different measures other than diabetes. I'm 18 repeating myself. 19 CO-CHAIR ROSENTHAL: All right. 20 Thank you. That's very thorough. Jack, 21 you're our rep on this. 22 I mean, it's in MR. BOWHAN: Yes.

	Page 179
1	the notes and the description, and I wouldn't
2	have anything to add. But these are all
3	complex measures, and I don't know that
4	with any of the groups that it's any easier to
5	figure these out than this one. But it is
6	complex.
7	CO-CHAIR ROSENTHAL: Do you want
8	to comment on the 3C?
9	MR. BOWHAN: Other than knowing
10	that you know, trying to decipher down to
11	the level of figuring out where you fit in and
12	how you got to your rating, you know, it's
13	complex.
14	CO-CHAIR ROSENTHAL: But I think
15	the issue what I'm hearing from the TAP is
16	more than complex. Is this or maybe I'm
17	misunderstanding it, but is this not the place
18	where the fact that the methodology is not at
19	all transparent is the issue? This is the
20	black box issue. I mean, or am I missing it?
21	I'm hearing some yeses so, but if somebody
22	wants to

Page 180 DR. BARNETT: 1 Yes. So one 2 important -- another important way that this differs from the NCOA diabetes measures, I 3 looked at the NCQA thing, and I was thinking 4 5 as -- I could have one of the programmers in my center do this. I could read it, and I 6 7 could have them do it. 8 And so it's partly the complexity 9 issue, yes, that it's simpler. But, you know, we don't -- so I was just looking at the 10 submission. I don't see any further 11 12 documentation that I can go to, unless I have overlooked something in there, that explains, 13 14 you know, all the codes. So I think that their -- what they 15 have done is great. The issue is, if we are 16 17 going to start judging plans and providers on 18 it, we really have to understand exactly how 19 it is constructed. And it's a dilemma because 20 they can't give this -- build it and then have 21 something so complicated, and then give it So I'm -- it is a dilemma. 22 away.
Page 181 1 MS. ZIELINSKI: This is Cheri 2 Zielinski. I have a couple of salient points 3 I think would help this discussion. 4 Number one, due to the fact that 5 the diabetes measures for usability are cited 6 for all of the other measures that we have 7 due to the fact that, you know, we way we 8 package our software ETG those measures 9 are grouped together, you know, and can be 10 recorded publicly. You know, so several 11 chronic conditions can be reported on publicly 12 and are reported on publicly by our clients 13 and users. 14 And so we envision that to be 15 widespread usability using all of our 16 measures, which we feel is an advantage. 17 And then, secondly, in terms of 18 the black box technology, we do have a website 19 it's ingenix.com/transparency that 10 people who people who have questions about 10 how the episodes are constructed who want to 12 know how the coding how the coding m		
Zielinski. I have a couple of salient points I think would help this discussion. Mumber one, due to the fact that the diabetes measures for usability are cited for all of the other measures that we have due to the fact that, you know, we way we package our software ETG those measures are grouped together, you know, and can be recorded publicly. You know, so several chronic conditions can be reported on publicly and are reported on publicly by our clients and users. Mand so we envision that to be widespread usability using all of our measures, which we feel is an advantage. And then, secondly, in terms of the black box technology, we do have a website it's ingenix.com/transparency that people who people who have questions about how the episodes are constructed who want to		Page 181
3 I think would help this discussion. 4 Number one, due to the fact that 5 the diabetes measures for usability are cited 6 for all of the other measures that we have 7 due to the fact that, you know, we way we 8 package our software ETG those measures 9 are grouped together, you know, and can be 10 recorded publicly. You know, so several 11 chronic conditions can be reported on publicly 12 and are reported on publicly by our clients 13 and users. 14 And so we envision that to be 15 widespread usability using all of our 16 measures, which we feel is an advantage. 17 And then, secondly, in terms of 18 the black box technology, we do have a website 19 it's ingenix.com/transparency that 20 people who people who have questions about 21 how the episodes are constructed who want to	1	MS. ZIELINSKI: This is Cheri
4Number one, due to the fact that5the diabetes measures for usability are cited6for all of the other measures that we have7due to the fact that, you know, we way we8package our software ETG those measures9are grouped together, you know, and can be10recorded publicly. You know, so several11chronic conditions can be reported on publicly12 and are reported on publicly by our clients13and users.14And so we envision that to be15widespread usability using all of our16measures, which we feel is an advantage.17And then, secondly, in terms of18the black box technology, we do have a website19 it's ingenix.com/transparency that20people who people who have questions about21how the episodes are constructed who want to	2	Zielinski. I have a couple of salient points
the diabetes measures for usability are cited for all of the other measures that we have due to the fact that, you know, we way we package our software ETG those measures are grouped together, you know, and can be recorded publicly. You know, so several chronic conditions can be reported on publicly and are reported on publicly by our clients and users. And so we envision that to be widespread usability using all of our measures, which we feel is an advantage. And then, secondly, in terms of the black box technology, we do have a website it's ingenix.com/transparency that people who people who have questions about how the episodes are constructed who want to	3	I think would help this discussion.
 for all of the other measures that we have due to the fact that, you know, we way we package our software ETG those measures are grouped together, you know, and can be recorded publicly. You know, so several chronic conditions can be reported on publicly and are reported on publicly by our clients and users. And so we envision that to be widespread usability using all of our measures, which we feel is an advantage. And then, secondly, in terms of the black box technology, we do have a website it's ingenix.com/transparency that people who people who have questions about how the episodes are constructed who want to 	4	Number one, due to the fact that
7due to the fact that, you know, we way we8package our software ETG those measures9are grouped together, you know, and can be10recorded publicly. You know, so several11chronic conditions can be reported on publicly12 and are reported on publicly by our clients13and users.14And so we envision that to be15widespread usability using all of our16measures, which we feel is an advantage.17And then, secondly, in terms of18the black box technology, we do have a website19 it's ingenix.com/transparency that20people who people who have questions about21how the episodes are constructed who want to	5	the diabetes measures for usability are cited
8 package our software ETG those measures 9 are grouped together, you know, and can be 10 recorded publicly. You know, so several 11 chronic conditions can be reported on publicly 12 and are reported on publicly by our clients 13 and users. 14 And so we envision that to be 15 widespread usability using all of our 16 measures, which we feel is an advantage. 17 And then, secondly, in terms of 18 the black box technology, we do have a website 19 it's ingenix.com/transparency that 20 people who people who have questions about 21 how the episodes are constructed who want to	6	for all of the other measures that we have
9 are grouped together, you know, and can be recorded publicly. You know, so several chronic conditions can be reported on publicly 12 and are reported on publicly by our clients 13 and users. 14 And so we envision that to be widespread usability using all of our 16 measures, which we feel is an advantage. 17 And then, secondly, in terms of 18 the black box technology, we do have a website 19 it's ingenix.com/transparency that 20 people who people who have questions about 21 how the episodes are constructed who want to	7	due to the fact that, you know, we way we
10 recorded publicly. You know, so several 11 chronic conditions can be reported on publicly 12 and are reported on publicly by our clients 13 and users. 14 And so we envision that to be 15 widespread usability using all of our 16 measures, which we feel is an advantage. 17 And then, secondly, in terms of 18 the black box technology, we do have a website 19 it's ingenix.com/transparency that 20 people who people who have questions about 21 how the episodes are constructed who want to	8	package our software ETG those measures
<pre>11 chronic conditions can be reported on publicly 12 and are reported on publicly by our clients 13 and users. 14 And so we envision that to be 15 widespread usability using all of our 16 measures, which we feel is an advantage. 17 And then, secondly, in terms of 18 the black box technology, we do have a website 19 it's ingenix.com/transparency that 20 people who people who have questions about 21 how the episodes are constructed who want to</pre>	9	are grouped together, you know, and can be
12 and are reported on publicly by our clients 13 and users. 14 And so we envision that to be 15 widespread usability using all of our 16 measures, which we feel is an advantage. 17 And then, secondly, in terms of 18 the black box technology, we do have a website 19 it's ingenix.com/transparency that 20 people who people who have questions about 21 how the episodes are constructed who want to	10	recorded publicly. You know, so several
13 and users. 14 And so we envision that to be 15 widespread usability using all of our 16 measures, which we feel is an advantage. 17 And then, secondly, in terms of 18 the black box technology, we do have a website 19 it's ingenix.com/transparency that 20 people who people who have questions about 21 how the episodes are constructed who want to	11	chronic conditions can be reported on publicly
14And so we envision that to be15widespread usability using all of our16measures, which we feel is an advantage.17And then, secondly, in terms of18the black box technology, we do have a website19 it's ingenix.com/transparency that20people who people who have questions about21how the episodes are constructed who want to	12	and are reported on publicly by our clients
15 widespread usability using all of our 16 measures, which we feel is an advantage. 17 And then, secondly, in terms of 18 the black box technology, we do have a website 19 it's ingenix.com/transparency that 20 people who people who have questions about 21 how the episodes are constructed who want to	13	and users.
16 measures, which we feel is an advantage. 17 And then, secondly, in terms of 18 the black box technology, we do have a website 19 it's ingenix.com/transparency that 20 people who people who have questions about 21 how the episodes are constructed who want to	14	And so we envision that to be
And then, secondly, in terms of the black box technology, we do have a website it's ingenix.com/transparency that people who people who have questions about how the episodes are constructed who want to	15	widespread usability using all of our
18 the black box technology, we do have a website 19 it's ingenix.com/transparency that 20 people who people who have questions about 21 how the episodes are constructed who want to	16	measures, which we feel is an advantage.
19 it's ingenix.com/transparency that 20 people who people who have questions about 21 how the episodes are constructed who want to	17	And then, secondly, in terms of
20 people who people who have questions about 21 how the episodes are constructed who want to	18	the black box technology, we do have a website
21 how the episodes are constructed who want to	19	it's ingenix.com/transparency that
	20	people who people who have questions about
22 know how the coding how the coding maps	21	how the episodes are constructed who want to
	22	know how the coding how the coding maps

	Page 182
1	and, you know, what codes are included in
2	diabetes, ETGs, and so on.
3	Anybody that is open to the public
4	do not need proprietary measures. You don't
5	have to have a license in order to see our
6	how our codes are constructed and how our
7	episodes are constructed, so that's something
8	that can be accessible to the public as well.
9	CO-CHAIR ROSENTHAL: Okay. Other
10	discussion, then, on the usability criteria?
11	(No response.)
12	Hearing none, I am assuming that
13	that means the group is ready to vote.
14	MR. PHILLIPS: Just to I mean,
15	I guess a follow up
16	CO-CHAIR ROSENTHAL: I thought so.
17	MR. PHILLIPS: a follow up on
18	the point about the transparency website. And
19	so, I mean, is the point, then, that a
20	provider could work back using this
21	information to decipher its score?
22	MS. ZIELINSKI: That was exactly

	Page 183
1	why we constructed that website, because
2	people who are being measured with these tools
3	need to understand the measurement being used.
4	And so it's primarily well, it's for
5	anybody who is interested in the construct of
6	the episodes, but, yes, it's especially for
7	providers who are being measured.
8	CO-CHAIR ROSENTHAL: Bill?
9	DR. WILLIAM RICH: Yes. In
10	reality, a physician first has to get their
11	report from the whoever put the report
12	together using the Ingenix. They have to get
13	the data. Then, they can go to the website.
14	To look at one measure, if you will, takes
15	about six to eight hours, but it is there, and
16	you can go through and see how, as an
17	ophthalmologist, I was assigned urograms and
18	things like that, but you can go through
19	everything and actually map it out.
20	CO-CHAIR ROSENTHAL: Is it an
21	issue of usability that, in point of fact, the
22	only people who could use this would be ones

	Page 184
1	who would hire Ingenix? Is that a usability
2	issue? You don't think so?
3	DR. WILLIAM RICH: More
4	feasibility.
5	CO-CHAIR ROSENTHAL: Well, no, I'm
б	not talking about the money, that it is not
7	feasible. I mean, the only people that are
8	going to have be able to use this tool are
9	going to be health plans that would engage
10	them. Is that an issue about usability? If
11	
12	DR. RUDOLPH: Well, it could be
13	others in the health plans, right? I mean,
14	I'm thinking, you know, say a large employer
15	with all of their own claims or it could be,
16	you know, some other group a state, many of
17	the states
18	CO-CHAIR ROSENTHAL: Could also
19	engage them on
20	DR. RUDOLPH: who have health
21	data, which is
22	CO-CHAIR ROSENTHAL: Okay. All

	Page 185
1	right.
2	DR. RUDOLPH: just like all
3	payer claims data, states could use this
4	measure. So
5	MS. YANAGIHARA: Big medical
б	groups in California license the product.
7	MS. ZIELINSKI: Well, we have
8	several provider organizations, NCOs, large
9	employer groups, state Medicaid programs, all
10	using it.
11	CO-CHAIR ROSENTHAL: Mary Kay?
12	DR. O'NEILL: Without playing an
13	economist for a second, though, if it does
14	take as many hours as Bill described to figure
15	this out, that is actually a cost.
16	CO-CHAIR ROSENTHAL: If there is
17	no other point Jack, last point.
18	DR. NEEDLEMAN: A number of the
19	folks that we have been were using some
20	variation of the HCC weighting system, that's
21	documented, and the sources of it are
22	documented. You've got your own comorbidities

	Page 186
1	that you are including, your own other
2	weighting factors that you are including, and
3	your weights.
4	Can you just briefly tell us a
5	little bit about how those were developed, and
6	what kinds of analysis went into them? I'm
7	sure it's documented on your website, but I'd
8	just like the slightly a long elevator ride
9	explanation of where that is and how it
10	contrasts to the HCC kind of development,
11	which looks very similar in terms of the
12	weighting up of each individual.
13	DR. LYNN: Yes, I think I'll
14	try to keep it to the long elevator ride
15	explanation. I think there are two components
16	to it. One is the what is going on outside
17	the episode that has an indirect cost that we
18	capture, and that is similar to the HCC model,
19	you know, which tells you what comorbidities
20	the member has.
21	We felt like it was important, and
22	I think some of our colleagues that have

Page 187 1 presented felt like it was important, that you 2 see what the specific comorbidity rate was for diabetes as opposed to taking some overall 3 disease burden quote from an HCC system, using 4 5 the individual markers. I think our colleagues have used the individual markers. 6 7 We use markers that are similar, 8 and I think the HCC models that are used, and 9 our models that are used, are similar. But that's looking at what's outside. 10 We also looked at what is inside the episode for --11 12 you know, that might explain costs, the clinical diagnosis, as opposed to procedures 13 14 and use those markers as well. So I think we felt like it was 15 16 important to have a specific diabetes model that the comorbidity had specific effect on 17 18 the severity of diabetes that you don't use on 19 some sort of measure of overall disease 20 burden, because maybe migraine doesn't has 21 much of an effect on diabetes, and they -- you 22 know, COPD, for example. But they might have

	Page 188
1	similar increases in the disease burden.
2	So I think it was the specificity
3	built in a specific model for diabetes and
4	looking outside for the indirect effects of
5	cost and inside for the more direct effect of
6	cost, and making sure it was all diagnosed.
7	The way they were developed you
8	know, a lot of our comorbidities jive with our
9	definitions of other diseases that we looked
10	at. That worked well with what is happening
11	outside of the episode.
12	And then, we modeled it. We used
13	that large database that we have been working
14	with, although it's a version a couple years
15	old older, but and we modeled those
16	markers, looked at sort of a cast a wide
17	net clinically about what would be a marker
18	and what wouldn't be a marker, looked at what
19	effect those markers had, ran the model,
20	looked at what is statistically significant,
21	what wasn't, you know, and adjusted the model
22	until we felt like we had the best marker for

Page 189 1 diabetes. 2 And, of course, all of this is, you know, done as much mathematically as it is 3 4 clinically. We tried to use the two together. 5 And that's sort of the long elevator ride explanation about how the models 6 7 were developed. 8 DR. NEEDLEMAN: Thank you. 9 DR. LYNN: Diabetes models. 10 DR. NEEDLEMAN: We got to the 100th floor. 11 12 (Laughter.) 13 DR. LYNN: Yes. I'll stop. 14 DR. NEEDLEMAN: Thank you. 15 CO-CHAIR ROSENTHAL: All right. Okay. I've lost all train of thought now 16 about usability. Hold on. Now, focus, focus. 17 18 I think we are ready. I think we 19 have dealt with the various issues around 20 usability, and I get the sense the group is 21 ready to weigh in on this. 22 And if we recall, let's -- can we

	Page 190
1	look at the TAP scores on this? And then,
2	this one will be high, moderate, low, and
3	insufficient. All right. So we've got 3A, B,
4	and C. Here D is N/A.
5	And, Jaime, do you want to just
б	very quickly review just get the last word
7	in on this?
8	DR. ROSENZWEIG: Yes. Here again,
9	I think with respect to usability, the issue
10	was that it wasn't specific to diabetes, that
11	the data that was presented it might be
12	usable for overall costs and other disease
13	states, but there wasn't any data of their
14	diabetes people of their subgroup within
15	that they have already looked at with respect
16	to diabetes.
17	CO-CHAIR ROSENTHAL: In terms of
18	what has been publicly reported.
19	DR. ROSENZWEIG: And we are
20	with respect to what has been publicly
21	reported, yes.
22	CO-CHAIR ROSENTHAL: Yes.

	Page 191
1	DR. ROSENZWEIG: And there was a
2	certain amount of concern about the fact that
3	it was because of the lack of attribution
4	if you go back to where we discussed the
5	attribution, there were so many different
6	options for attribution that physicians who
7	would be judged by this might be judged
8	compared to other physicians with respect to
9	their resource use, whereas the with
10	respect to the overall picture they may be
11	saving money, keeping people out of a
12	hospital, even though they were using more
13	resources.
14	CO-CHAIR ROSENTHAL: Okay. And
15	then
16	DR. ROSENZWEIG: Does that make
17	that sense?
18	CO-CHAIR ROSENTHAL: Yes,
19	absolutely. And then
20	DR. ROSENZWEIG: It's a big issue
21	in diabetes, you know, obviously, because the
22	proportion of actual resources that are

	Page 192
1	actually related to outpatient provider use is
2	actually relatively small compared to the
3	entire resource use picture.
4	CO-CHAIR ROSENTHAL: And then, 3C
5	is the decomposition, the ability to decompose
б	the data had some negative votes.
7	DR. ROSENZWEIG: Yes, yes. The
8	TAP thought it was difficult to assess the
9	extent to which the measure could be
10	decomposed
11	CO-CHAIR ROSENTHAL: Okay.
12	DR. ROSENZWEIG: as currently
13	specified.
14	CO-CHAIR ROSENTHAL: I think this
15	is very helpful, and the discussion on this
16	point has been good. And I think we are ready
17	to vote. It's 1 through 4, then, on this one
18	with high, moderate, low, and insufficient.
19	MS. TURBYVILLE: So we have nine
20	moderate, six low, and three insufficient.
21	CO-CHAIR ROSENTHAL: All right.
22	So we will move on to feasibility. So, Jaime,

	Page 193
1	the TAP. Oh, yes, I'm sorry. Helen goes
2	first on this one.
3	DR. BURSTIN: Yes. So I just want
4	to have a couple of minutes to talk to the
5	Steering Committee about this particular issue
6	for feasibility. So as you saw earlier, when
7	we considered the HealthPartners measure, we
8	you have the ability to look at the fee
9	schedule for the ACGs as part of that data.
10	To date, we still have incomplete
11	information from Ingenix. We have not yet
12	received the fee schedule. So at this point,
13	you actually can't assess feasibility, so I
14	think at this point we're going to we are
15	having some continued ongoing discussions with
16	Ingenix, but I think at this point we are
17	going to table feasibility. You also can't
18	make an overall assessment of the measure,
19	because you won't have feasibility, won't have
20	the benefit of looking at that.
21	It is important to note this is
22	clearly, as part of the policy the Board

Page 194 1 approved a couple of years ago of proprietary 2 measures, the fact that they thought it was important that the Committee and the end users 3 have a chance to see the fees involved and 4 5 have that incorporated into feasibility. Clearly, we can't -- you know, the 6 7 measures may score well, as they have sort of 8 done moderately on many of these other 9 criteria, but if they are not feasible they can't move forward. 10 So at this point, we really just 11 12 need to -- we will work with Ingenix to continue to get that information to share with 13 14 you, and then we will continue at a later date on feasibility. 15 16 CO-CHAIR ROSENTHAL: Do we have 17 some way of capturing the key points of this, 18 so that we don't have to repeat the entire 19 exercise when we are finally able to have 20 feasibility, and then have the overall vote? 21 Because otherwise we will have wasted an hour. 22 MS. TURBYVILLE: We're taking

Page 195 1 meeting notes right now and summarizing the 2 discussions and key points. And you voted on the first three, so hopefully that will be 3 sufficient for all of you. You know --4 5 DR. WILLIAM RICH: I would venture to say, Tom, we can't, because there's other 6 7 issues in feasibility about adverse 8 consequences of the reporting that we haven't 9 addressed. So we are going to table this. 10 I would be unable to vote until 11 we -12 CO-CHAIR ROSENTHAL: I was not 13 suggesting a vote today. I was suggesting a 14 methodology by which we could have some of the discussion crisply summarized, so that we 15 16 don't have to repeat it all --17 DR. WILLIAM RICH: I'm sorry. 18 CO-CHAIR ROSENTHAL: -- when we do 19 that thing. I --20 DR. WILLIAM RICH: I thought you 21 were talking of calling for a consensus. 22 No, no, no, CO-CHAIR ROSENTHAL:

	Page 196
1	no, no, no. I understand the absolute
2	constraint on our freedom on this one.
3	MS. WILBON: Tom, when we are
4	ready to bring it back to the Committee, we
5	will provide you guys with a summary of what
6	your votes were, what the key points were for
7	the previous three prior criteria, so that you
8	have an idea of where the discussion was
9	CO-CHAIR ROSENTHAL: Okay.
10	MS. WILBON: before that.
11	CO-CHAIR ROSENTHAL: And then, as
12	a point of order, the same will apply then to
13	the other Ingenix thing, which we were
14	supposed to do usability and feasibility wrap
15	up, and which in fact we are going to have to
16	rediscuss a little bit of the scientific
17	thing, because we didn't really complete all
18	the votes on that, and so we'll need a short
19	conversation. But it's clear we will not
20	reach a final decision on it either.
21	I assume people are beginning,
22	though, to direct themselves in their heads.

	Page 197
1	And to the extent that you can do that so that
2	you remember how you were at least leading up
3	to this, so I'm just trying to, again, create
4	some efficiencies for our group, so that we
5	just don't because this is complex stuff,
6	and the details are important.
7	And if we come back two weeks
8	later or three weeks later on a phone call,
9	and we have to reiterate every single point,
10	that will be unpleasant for all involved, I
11	think.
12	DR. WILLIAM RICH: Do we need a
13	motion to table?
14	CO-CHAIR ROSENTHAL: Yes.
15	DR. WILLIAM RICH: So moved.
16	CO-CHAIR ROSENTHAL: Okay.
17	Second?
18	DR. STEPHANSKY: Second.
19	CO-CHAIR ROSENTHAL: Any
20	discussion? Not discussable. Motion to table
21	as not discussable. Thank you, Robert's Rules
22	of Order.

	Page 198
1	(Laughter.)
2	No, you can't speak. It's not
3	discussable. Oh, you can eat. Oh, you said
4	we can eat.
5	Okay. All in favor?
6	(Chorus of ayes.)
7	Okay. All opposed?
8	(No response.)
9	Motion carries.
10	We will take
11	CO-CHAIR STEINWALD: We need to
12	take some lunch, yes?
13	CO-CHAIR ROSENTHAL: Right. So
14	half an hour for lunch?
15	DR. LYNN: Can I ask you a
16	question?
17	CO-CHAIR ROSENTHAL: Yes,
18	absolutely.
19	DR. LYNN: Will 1599 be discussed
20	at 2:30, or will that be tabled as well?
21	CO-CHAIR ROSENTHAL: Oh, 1599 will
22	be discussed in about a half an hour. Sorry,

	Page 199
1	we should have clarified that.
2	DR. LYNN: Okay. So we are going
3	to do that right after lunch.
4	CO-CHAIR ROSENTHAL: Yes, right
5	after lunch.
6	DR. LYNN: Okay.
7	CO-CHAIR ROSENTHAL: So about a
8	half an hour break, and then we will go right
9	into 1599.
10	MS. ZIELINSKI: Was that agenda
11	item this is the first I've heard of it.
12	I'm not sure if our resource is going to be
13	available. I have him coming at 2:30. I was
14	not aware of this agenda change.
15	MS. WILBON: Cheri, I think I sent
16	you an e-mail yesterday afternoon about 1572
17	getting moved and 1591 getting removed.
18	MS. ZIELINSKI: And then we
19	started today, but then those there were no
20	changes to it.
21	CO-CHAIR STEINWALD: Well, the
22	question is, do you think that you could get

	Page 200
1	the person that we need to have involved at
2	12:45?
3	MS. ZIELINSKI: Not in a half
4	hour. I apologize. I have him coming at
5	2:30, which was what the agenda had said.
6	DR. ROSENZWEIG: I'm going to sign
7	off here. Thank you very much. Bye-bye.
8	CO-CHAIR ROSENTHAL: We'll confer
9	with staff here, and we'll get back to you on
10	this.
11	CO-CHAIR STEINWALD: But as it
12	stands, we're going to start the discussion at
13	12:45.
14	MS. ZIELINSKI: Ashlie, can I talk
15	to you offline?
16	MS. WILBON: Sure.
17	MS. ZIELINSKI: I'm not going to
18	be able to have a resource there for that
19	discussion. I -
20	MS. WILBON: Okay. Give us some
21	time to confer to see what we can do.
22	MS. ZIELINSKI: Okay. So you'll

	Page 201
1	send me an e-mail, then?
2	MS. WILBON: Yes, I will.
3	MS. ZIELINSKI: Thank you.
4	CO-CHAIR ROSENTHAL: We are going
5	to adjourn now. We will confer and we will
6	have an offline conversation with you about
7	how we are going to manage this.
8	MS. ZIELINSKI: Okay. Thank you.
9	(Whereupon, at 12:16 p.m., the
10	proceedings in the foregoing
11	matter recessed for lunch.)
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
	Neal R Gross & Co Inc

	Page 202
1	A-F-T-E-R-N-O-O-N S-E-S-S-I-O-N
2	(12:53 p.m.)
3	CO-CHAIR STEINWALD: It's the
4	sprint to the finish line, and the sooner we
5	start the sooner we can go home.
6	If my co-chair would come and take
7	the take his seat. All right.
8	Well, in the course of a number of
9	challenging discussions, we have an extra
10	challenge. The agenda says we are going to
11	have the usability and feasibility wrap up of
12	the ETG-based non-condition-specific resource
13	use measure by Ingenix.
14	We have, in fact, had a conference
15	call that many of you were present at, and we
16	discussed the importance and the scientific
17	acceptability criteria.
18	However, we did not have any
19	official vote, even though some people
20	attempted to access the monkey the monkey
21	bars
22	(Laughter.)

	Page 203
1	service, okay. All right.
2	That either didn't get recorded or it's
3	unofficial, and so we do have to go back and
4	again, since we're acting as our own TAP,
5	we have to vote on the individual subcriteria
6	of the measures that we have already
7	discussed.
8	We hope we are going to be able to
9	leverage the discussion that we already had.
10	Sally and staff will use their notes and
11	remind us of main points that were made or
12	conclusions that were drawn during our
13	discussion of importance and scientific
14	acceptability.
15	And the measure developer was
16	present and did make a presentation of the
17	overall characteristics of the measure. I
18	guess there is some question about whether the
19	appropriate person from Ingenix will be able
20	to join us or not in this conversation, but we
21	will forge ahead in any case.
22	Ingenix, are you on the line?

	Daga 204
1	Page 204 DR. DUNN: Yes. Hi. This is Dan
2	Dunn from Ingenix.
3	CO-CHAIR STEINWALD: Good. Thank
4	you. So you are available to respond to
5	questions and points made.
6	DR. DUNN: Yes, sure. Happy to.
7	CO-CHAIR STEINWALD: Okay. But
8	why don't we go directly all right.
9	Ingenix, please say your name again, please?
10	DR. DUNN: Hi. This Dan Dunn,
11	Ingenix.
12	CO-CHAIR STEINWALD: Okay. Would
13	you give us an overview of your measure,
14	please, for the members of the Committee who
15	weren't present on the conference call?
16	DR. DUNN: Sure. Just to confirm,
17	we are talking about the population-based
18	measure for total cost, right?
19	CO-CHAIR STEINWALD: That's
20	correct, the non-condition-specific measure.
21	DR. DUNN: Okay. Thank you. This
22	is a measure, you know, based on a title which

Page 205 1 is designed to be not condition-specific, but 2 to be a measure of groups of individuals at a population or member level, if you will, so 3 it's not looking at their resource use related 4 5 to congestive heart failure or diabetes. It's looking at their resource use for all the 6 7 services and all the conditions that they 8 present with. The measure includes total 9 resources or total cost as one of the 10 numerators of measures. It includes resources 11 12 by type of service, the cost as well, and also includes some utilization measures, such as 13 14 in-patient admits, days, and so on. The risk adjustment approach is --15 16 I'm sorry, just sort of step back, so there is -- you know, including all members in the 17 18 measure, with risk adjustment based on their 19 underlying risk as measured by episode risk 20 Each individual information is groups. 21 processed to identify all those numerator measures to all of the cost in use. 22

	Page 206
1	Also, the information for a 12-
2	month period is processed through episode risk
3	groups, which is a risk adjustment methodology
4	that uses episode treatment groups and
5	episodes of care as its foundation.
6	And ERGs is essentially looking at
7	an individual mix of episodes of care and
8	translating that into an overall risk core,
9	and that risk core is then used to risk adjust
10	the measures themselves.
11	CO-CHAIR STEINWALD: Remind us,
12	was there a standardized pricing or costing
13	technique used as well?
14	DR. DUNN: No, this has actually
15	been applied using either approach. It will
16	work either way, and we left that up to the
17	user to decide which way they wanted to go.
18	CO-CHAIR STEINWALD: Steering
19	Committee members, any questions for Dan
20	before we proceed?
21	(No response.)
22	All right. Then, let's bring

	Page 207
1	importance up. Individual criteria.
2	MR. PHILLIPS: I have do we
3	have a TAP?
4	CO-CHAIR STEINWALD: No. We're
5	the TAP.
6	(Laughter.)
7	MS. TURBYVILLE: Right. So in
8	this measure, like the other non-condition-
9	specific measure submitted by HealthPartners,
10	the Steering Committee is serving both as the
11	Technical Advisory Panel, so you will be
12	rating each of the subcriteria, and then, of
13	course, as the Steering Committee.
14	We have a few notes about what we
15	heard on the call, realizing that we would
16	follow up. And we did feel confident that the
17	Committee, acting as the TAP during the
18	June 22nd call, wrapped up importance.
19	The notes that we walked away
20	was that, in our sense, though this is without
21	a final rating, so it's those who shared their
22	sentiments that the measurement area is of

high impact. There is a resource use and cost problem that the description of the purpose of the measurement was described well enough in the submission, and that they were in -- they were able to meet the criterion about the service categories that they are proposing as they are quite numerous and comprehensive. That's what we heard. Those were our walkaways. CO-CHAIR STEINWALD: So are we prepared to vote on the subcriterion 1A? And it's -- this is one where we vote high, moderate, low, or insufficient. Are we ready? Okay. MS. TURBYVILLE: Great. So there are 16 Steering Committee members here in the room, and there were 15 high and one moderate. So moving on to subcriterion 1B, demonstration of resource use or cost problems and opportunity for improvement includes showing data demonstrating variation, et

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

Page 208

Page 209 1 cetera. 2 CO-CHAIR STEINWALD: Can we take 3 the vote? All right. 4 MS. TURBYVILLE: Thirteen high, 5 three moderate. 6 Moving on to subcriterion 1C, 7 which is that the purpose and objective of the 8 resource use measure is clearly described. 9 Twelve high, four moderate. 10 Moving on to 1D, which is that the resource use service categories that are 11 included are consistent with and 12 13 representative of the conceptual construct 14 represented by the measure. Eight high and eight moderate. 15 16 For our -- because this split is a 17 little bit different, I would be interested if 18 anyone who voted on moderate, if you could 19 give us a little input on that, so we can 20 capture that in our notes. 21 It's the 1D which is that the 22 resource use service categories are consistent

Page 210 with the conceptual construct of the measure. DR. NEEDLEMAN: Yes, I voted moderate here, just because the pharmacy data is not required, the mental health carve-outs are not clear. Those are important cost categories and resource use categories, and I'm concerned that they're not always consistently present. MS. TURBYVILLE: Anyone else who thinks it might be new information for us to consider? (No response.) All right. Well, then, let's just move on to scientific acceptability. CO-CHAIR STEINWALD: No, we have the MS. TURBYVILLE: Oh, I'm sorry. CO-CHAIR STEINWALD: This should be MS. TURBYVILLE: Clearly, I'm going faster than I'm supposed to. 2 CO-CHAIR STEINWALD: This is a yes		
2 DR. NEEDLEMAN: Yes, I voted 3 moderate here, just because the pharmacy data 4 is not required, the mental health carve-outs 5 are not clear. Those are important cost 6 categories and resource use categories, and 7 I'm concerned that they're not always 8 consistently present. 9 MS. TURBYVILLE: Anyone else who 10 thinks it might be new information for us to 11 consider? 12 (No response.) 13 All right. Well, then, let's just 14 move on to scientific acceptability. 15 CO-CHAIR STEINWALD: No, we have 16 the 17 MS. TURBYVILLE: Oh, I'm sorry. 18 CO-CHAIR STEINWALD: This should 19 be 20 MS. TURBYVILLE: Clearly, I'm 21 going faster than I'm supposed to.		Page 210
moderate here, just because the pharmacy data is not required, the mental health carve-outs are not clear. Those are important cost categories and resource use categories, and I'm concerned that they're not always consistently present. MS. TURBYVILLE: Anyone else who thinks it might be new information for us to consider? (No response.) All right. Well, then, let's just move on to scientific acceptability. CO-CHAIR STEINWALD: No, we have the MS. TURBYVILLE: Oh, I'm sorry. CO-CHAIR STEINWALD: This should be MS. TURBYVILLE: Clearly, I'm going faster than I'm supposed to.	1	with the conceptual construct of the measure.
 is not required, the mental health carve-outs are not clear. Those are important cost categories and resource use categories, and I'm concerned that they're not always consistently present. MS. TURBYVILLE: Anyone else who thinks it might be new information for us to consider? (No response.) All right. Well, then, let's just move on to scientific acceptability. CO-CHAIR STEINWALD: No, we have the MS. TURBYVILLE: Oh, I'm sorry. CO-CHAIR STEINWALD: This should be MS. TURBYVILLE: Clearly, I'm going faster than I'm supposed to. 	2	DR. NEEDLEMAN: Yes, I voted
5 are not clear. Those are important cost 6 categories and resource use categories, and 7 I'm concerned that they're not always 8 consistently present. 9 MS. TURBYVILLE: Anyone else who 10 thinks it might be new information for us to 10 consider? 12 (No response.) 13 All right. Well, then, let's just 14 move on to scientific acceptability. 15 CO-CHAIR STEINWALD: No, we have 16 the 17 MS. TURBYVILLE: Oh, I'm sorry. 18 CO-CHAIR STEINWALD: This should 19 be 20 MS. TURBYVILLE: Clearly, I'm 21 going faster than I'm supposed to.	3	moderate here, just because the pharmacy data
 categories and resource use categories, and I'm concerned that they're not always consistently present. MS. TURBYVILLE: Anyone else who thinks it might be new information for us to consider? (No response.) All right. Well, then, let's just move on to scientific acceptability. CO-CHAIR STEINWALD: No, we have the MS. TURBYVILLE: Oh, I'm sorry. CO-CHAIR STEINWALD: This should be MS. TURBYVILLE: Clearly, I'm going faster than I'm supposed to. 	4	is not required, the mental health carve-outs
7 I'm concerned that they're not always 8 consistently present. 9 MS. TURBYVILLE: Anyone else who 10 thinks it might be new information for us to 11 consider? 12 (No response.) 13 All right. Well, then, let's just 14 move on to scientific acceptability. 15 CO-CHAIR STEINWALD: No, we have 16 the 17 MS. TURBYVILLE: Oh, I'm sorry. 18 CO-CHAIR STEINWALD: This should 19 be 20 MS. TURBYVILLE: Clearly, I'm 21 going faster than I'm supposed to.	5	are not clear. Those are important cost
<pre>8 consistently present. 9 MS. TURBYVILLE: Anyone else who 10 thinks it might be new information for us to 11 consider? 12 (No response.) 13 All right. Well, then, let's just 14 move on to scientific acceptability. 15 CO-CHAIR STEINWALD: No, we have 16 the 17 MS. TURBYVILLE: Oh, I'm sorry. 18 CO-CHAIR STEINWALD: This should 19 be 20 MS. TURBYVILLE: Clearly, I'm 21 going faster than I'm supposed to.</pre>	6	categories and resource use categories, and
9 MS. TURBYVILLE: Anyone else who 10 thinks it might be new information for us to 11 consider? 12 (No response.) 13 All right. Well, then, let's just 14 move on to scientific acceptability. 15 CO-CHAIR STEINWALD: No, we have 16 the 17 MS. TURBYVILLE: Oh, I'm sorry. 18 CO-CHAIR STEINWALD: This should 19 be 20 MS. TURBYVILLE: Clearly, I'm 21 going faster than I'm supposed to.	7	I'm concerned that they're not always
10 thinks it might be new information for us to 11 consider? 12 (No response.) 13 All right. Well, then, let's just 14 move on to scientific acceptability. 15 CO-CHAIR STEINWALD: No, we have 16 the 17 MS. TURBYVILLE: Oh, I'm sorry. 18 CO-CHAIR STEINWALD: This should 19 be 20 MS. TURBYVILLE: Clearly, I'm 21 going faster than I'm supposed to.	8	consistently present.
<pre>11 consider? 12 (No response.) 13 All right. Well, then, let's just 14 move on to scientific acceptability. 15 CO-CHAIR STEINWALD: No, we have 16 the 17 MS. TURBYVILLE: Oh, I'm sorry. 18 CO-CHAIR STEINWALD: This should 19 be 20 MS. TURBYVILLE: Clearly, I'm 21 going faster than I'm supposed to.</pre>	9	MS. TURBYVILLE: Anyone else who
<pre>12 (No response.) 13 All right. Well, then, let's just 14 move on to scientific acceptability. 15 CO-CHAIR STEINWALD: No, we have 16 the 17 MS. TURBYVILLE: Oh, I'm sorry. 18 CO-CHAIR STEINWALD: This should 19 be 20 MS. TURBYVILLE: Clearly, I'm 21 going faster than I'm supposed to.</pre>	10	thinks it might be new information for us to
13All right. Well, then, let's just14move on to scientific acceptability.15CO-CHAIR STEINWALD: No, we have16the17MS. TURBYVILLE: Oh, I'm sorry.18CO-CHAIR STEINWALD: This should19be20MS. TURBYVILLE: Clearly, I'm21going faster than I'm supposed to.	11	consider?
<pre>14 move on to scientific acceptability. 15 CO-CHAIR STEINWALD: No, we have 16 the 17 MS. TURBYVILLE: Oh, I'm sorry. 18 CO-CHAIR STEINWALD: This should 19 be 20 MS. TURBYVILLE: Clearly, I'm 21 going faster than I'm supposed to.</pre>	12	(No response.)
15 CO-CHAIR STEINWALD: No, we have 16 the 17 MS. TURBYVILLE: Oh, I'm sorry. 18 CO-CHAIR STEINWALD: This should 19 be 20 MS. TURBYVILLE: Clearly, I'm 21 going faster than I'm supposed to.	13	All right. Well, then, let's just
<pre>16 the 17 MS. TURBYVILLE: Oh, I'm sorry. 18 CO-CHAIR STEINWALD: This should 19 be 20 MS. TURBYVILLE: Clearly, I'm 21 going faster than I'm supposed to.</pre>	14	move on to scientific acceptability.
<pre>17 MS. TURBYVILLE: Oh, I'm sorry. 18 CO-CHAIR STEINWALD: This should 19 be 20 MS. TURBYVILLE: Clearly, I'm 21 going faster than I'm supposed to.</pre>	15	CO-CHAIR STEINWALD: No, we have
<pre>18 CO-CHAIR STEINWALD: This should 19 be 20 MS. TURBYVILLE: Clearly, I'm 21 going faster than I'm supposed to.</pre>	16	the
<pre>19 be 20 MS. TURBYVILLE: Clearly, I'm 21 going faster than I'm supposed to.</pre>	17	MS. TURBYVILLE: Oh, I'm sorry.
20 MS. TURBYVILLE: Clearly, I'm 21 going faster than I'm supposed to.	18	CO-CHAIR STEINWALD: This should
21 going faster than I'm supposed to.	19	be
	20	MS. TURBYVILLE: Clearly, I'm
22 CO-CHAIR STEINWALD: This is a yes	21	going faster than I'm supposed to.
	22	CO-CHAIR STEINWALD: This is a yes

	Page 211
1	or no. Are you ready? Go.
2	MS. TURBYVILLE: Okay. For
3	overall importance, the final tally is 16 yes.
4	So now we can move on to scientific
5	acceptability. Fantastic. Do you want me to
6	recap some of the
7	CO-CHAIR STEINWALD: Yes. I'm not
8	sure if it's good to recap it all at once or
9	parse it out? I leave it up to you. It
10	depends, really, on how much recapping there
11	needs to be.
12	MS. TURBYVILLE: These are very
13	draft notes, because we hadn't yet tried to
14	synthesize them for appropriate distribution
15	at this time. We heard questions about making
16	sure the which is the minimum threshold on
17	face validity was explained, and I believe
18	that Ingenix provided more clarity on that.
19	We did hear a lot of questions
20	around the risk adjustment method and wanting
21	more explanation of how it worked and what
22	that meant for the ERG measure, and how the

Page 212 1 weights were assigned to the ETG. And then, 2 we did hear a request for a verbal description of the individual R squareds. 3 4 I do want to say that there have 5 been a couple of questions to Ingenix about the ERG measures, primarily about -- and let 6 7 me pull it up, because we documented it and 8 they did respond verbally, and it gets the 9 scientific acceptability. Just give me -- I think I remember, but because my brain is in 10 crash mode, I do not want to inadvertently 11 provide you -- you have notes, too? 12 While I pull up their response, 13 14 Ashlie, do you want to -- just on scientific acceptability, in general. 15 16 MS. WILBON: So I'm looking 17 through my notebook here. So for reliability, I remember that Carlos was on the call, and he 18 19 was -- you guys had asked him for his input on 20 reliability and validity, and he had thought 21 that they had done a good job of their 22 reliability testing, and that there was I

1	
	Page 213
1	think a 99 percent match in the way they had
2	compared their results and their reliability
3	testing, that they he didn't find any
4	results for face validity in the submission
5	that was given.
6	There was some discussion about
7	the risk adjustment and how the risk
8	adjustment assigned severity scores, taking
9	into account comorbids, and some explanation
10	of how the ERG grouping of ETGs and how
11	they assign weights using the ETG risk score.
12	CO-CHAIR STEINWALD: These are
13	questions that were raised that Ingenix
14	responded to?
15	MS. WILBON: Yes, it was more of
16	I think I was writing down more where the
17	discussion
18	CO-CHAIR STEINWALD: Okay.
19	MS. WILBON: was going, and I
20	think there was definitely some I remember
21	Dan it might have been Dan that was on the
22	phone, and he can clarify if he also remembers

	Page 214
1	from that phone call. But I know there was
2	some questions from the Steering Committee
3	about for him to kind of explain how the
4	risk models work and how the ETGs feed into
5	the ERG in determining the risk adjustment.
6	DR. WILLIAM RICH: All of a sudden
7	my brain is clearing. I do remember the
8	construct was that you heard it addressed,
9	how they do it for a measure. But how you do
10	it to a population-based thing didn't make a
11	lot of sense to us at face value, so that's
12	why we asked them to.
13	MS. TURBYVILLE: And then, Ingenix
14	had provided some written input to us, a
15	couple of things specifically, and I think
16	Taroon also may have something to add. But
17	there was a question about what happens to
18	records or claims that do not match to the
19	ETGs and what is the implications for the then
20	total cost of care that the ERG measure is
21	putting forth.
22	Ingenix did respond that, as far

	Page 215
1	as identifying the members who are in ERG
2	and, Dan, please correct me if I'm not
3	representing your written response back
4	accurately that they might not be included
5	in the measure, but all costs are.
6	So even if a claim is not being
7	grouped by the ETG when they are estimating
8	the total cost, they go back and make sure the
9	claims whether or not they made it into the
10	ETG that is helping support the risk
11	adjustment. They are still including those in
12	their total cost, and they provided some
13	statistics on those implications, but I think
14	that gets to the heart of the question on that
15	one.
16	So they, while not included in the
17	ETG and risk adjustment, they are included in
18	total cost.
19	And then, they did respond to us
20	formally about more adequately describing how
21	the face validity, at minimum, was vetted
22	through their process.

	Page 216
1	Did you have something to add to
2	what you have or
3	CO-CHAIR STEINWALD: Then, why
4	don't we go to the subcriteria, and then if
5	there's more discussion
6	MS. TURBYVILLE: Walk through?
7	CO-CHAIR STEINWALD: Yes.
8	MS. TURBYVILLE: Okay. So 2A(1),
9	if you recall, having just gone through this
10	earlier today, is about the precision of the
11	specifications that are provided, such that it
12	could be implemented consistently. So it
13	includes, as you can see, many components. So
14	how well defined and precise are the
15	specifications?
16	CO-CHAIR STEINWALD: Questions?
17	(No response.)
18	Okay. Then, let's call the vote.
19	MS. TURBYVILLE: We have 10 high,
20	five moderate, and one low.
21	And so moving on to 2B(2), which
22	focuses on the reliability testing
Page 217 demonstrating that the results are repeatable 1 2 was the -- is 2A(2). 3 CO-CHAIR STEINWALD: Call the 4 vote. 5 MS. TURBYVILLE: Nine high, seven 6 moderate. Okay. 7 Overall reliability of the measure 8 as submitted. Eight high, seven moderate, one 9 low. 10 I'm tempted to --DR. BARNETT: Well, I voted low. 11 12 (Laughter.) So, you know, I don't -- I don't 13 14 see -- so one thing that the -- some of the measures that we've done actually have some 15 measure -- have some indication of how well 16 17 the case mix measures perform, and also how 18 well they repeat in different years for the 19 same providers. And so I don't see that sort 20 of reliability testing in this submission. 21 DR. REDFEARN: Well, Paul, the 22 ERGs was in the Society of Actuaries paper,

Page 218 along with all of the other ones and tested in 1 2 all those same ways, and it performs about the 3 same as the others. This is Dan. 4 DR. DUNN: We did 5 submit some R squared measures as well. Actually, we did reference the SOA study in 6 7 our internal testing. We did -- you're right, 8 we did not cover the year over year for the 9 same provider issue. We did not comment on 10 that. 11 DR. BARNETT: So I'll just 12 observe, you know, the Adams paper which was -- you know, you distributed to us before we 13 14 started our meeting last year -- that was sort of their -- the key issue was is that -- for 15 them was is that you would want a provider to 16 17 be judged the same way or similar ways. 18 You would want them to flip-flop 19 around from year to year. You would expect 20 that they would be doing things reasonably the 21 same. Or another way of thinking about it was 22 with different cohorts of patients that their

	Page 219
1	practice would style would end up showing
2	the same result.
3	If you split the sample, say, and
4	half their patients, and then compared that to
5	another half of patients, you would expect
б	them to get rated about the same. So that's
7	the kind of measures of reliability that I
8	hope we would be looking at in these measures.
9	DR. DUNN: And then, we did see
10	that clarification, the Adams paper and
11	others, in The New England Journal. That was
12	relating to episode-based measures, and this
13	was a population-based measure.
14	But the point is still valid
15	you would want the quality of the one of
16	the qualities of the measure is that, you
17	know, time over time consistency and just
18	as a note, you know, I think the conclusion of
19	that was you need a reasonable sample size to
20	support, you know, that type of reliability.
21	And we did provide some guidance
22	in our response around both that issue as well

	Page 220
1	as tests of statistical significance, which
2	should take into account, you know,
3	appropriate sample size as well as the general
4	precision of the measure.
5	CO-CHAIR STEINWALD: Okay. Let's,
6	if we can, move on to validity, and keep in
7	mind that there are six separate subcriteria
8	for validity.
9	MS. TURBYVILLE: Okay. So two
10	thanks, Dan. So 2B(1) is about the measure
11	specifications being consistent with the
12	evidence presented to support the focus of the
13	measurement under criterion 1B. So is it
14	consistent with what was presented under
15	importance for its purpose, as specified?
16	CO-CHAIR STEINWALD: Just a
17	footnote here. My recollection of the
18	conference call is that there was much more
19	discussion and some disagreement or different
20	kinds of concerns raised in the validity area.
21	So this is an area where we may want to raise
22	some of those concerns again for the benefit

Page 221 1 of the entire group. 2 Should I call the vote? All 3 right. Go ahead. MS. TURBYVILLE: For 2B(1) we have 4 5 seven high, eight moderate, and one low. 6 So moving on to 2B(2), which is 7 about the validity testing itself, 8 demonstrating that the measure data elements 9 are correct, or the measure score correctly reflects the costs of care or resources 10 provided and adequately distinguish higher and 11 12 lower. 13 DR. O'NEILL: And it looks like Carlos had a lot of comments on this 14 15 particular one. 16 CO-CHAIR STEINWALD: Comments or 17 questions? 18 (No response.) 19 Okay. Let's call the vote. Oh, 20 Carlos's comments. 21 (Laughter.) 22 DR. BARNETT: I was trying to find

	Page 222
1	I tried to find Carlos's comments in the
2	CO-CHAIR STEINWALD: Okay.
3	DR. BARNETT: it's in the other
4	file.
5	CO-CHAIR STEINWALD: We'll pause,
6	then. My recollection was that he said that
7	there wasn't much in the way of validity
8	testing. That was what their summary
9	DR. O'NEILL: They said they were
10	going to follow up, and they did, right,
11	follow up?
12	MS. TURBYVILLE: Right. They
13	followed up and provided a little information
14	to demonstrate face validity.
15	Dan, did I get that correct?
16	DR. DUNN: That's right, Sally.
17	MS. TURBYVILLE: So, and then just
18	as a reminder, as we discussed yesterday from
19	the NQF testing task force report that face
20	validity would be the minimum threshold to
21	demonstrate validity, that it is something
22	that we allow to come through to demonstrate

	Page 223
1	validity, but it is kind of the minimum.
2	CO-CHAIR ROSENTHAL: I'm trying to
3	play by the rules now. What would a statement
4	of face validity be against this measure?
5	What would be an articulation of that? I'm
6	not asking that as a challenge. I'm asking it
7	because I'm unclear in my own mind of what a
8	statement of face validity would be against
9	this.
10	I get the definition, but I'm
11	trying to I'm posing the question for
12	myself of, what would that mean in
13	relationship to this measure? Open to anybody
14	to help me with.
15	MS. GRABERT: I don't have a
16	response to your question. I have a question
17	for the developer. As I read this definition
18	it says, "Validity testing demonstrates that
19	data elements are correct, or that the
20	measures score correctly reflects the cost of
21	the care."
22	So if you accumulate all of the

Page 224 1 episodes into one per capita measure, how do 2 you account for the fact that an individual -whoever this is attributed to, some of the 3 episodes may be high cost and some of the 4 5 episodes may be low cost, when you look at the 6 total resource utilization. 7 DR. DUNN: Yes. So maybe this is 8 a clarification, so -- and I apologize if this wasn't clear in our submission. So think of 9 10 it as a numerator and denominator type of 11 concept. 12 In the numerator, we are capturing all of the costs for an individual, you know, 13 14 whether or not they grouped episodes, no matter what episode they grouped to -- you 15 know, it's very similar to some of the other 16 17 population-based measures. You see like the 18 NCQA or you measure, for example, all the 19 costs for the individual identified. 20 And then, where the episode, then 21 episode risk groups, come in is categorizing 22 individuals based on their relative risk. So

	Page 225
1	it is going to capture all of the costs, you
2	know, from high, low cost episodes. Even
3	things that didn't group to episodes are part
4	of the measure.
5	But getting back to I think the
б	point you're getting at is, what do we do with
7	outlier patients? And part of our
8	specification was a guideline that you would,
9	you know, develop an approach for outliers on
10	the higher side, and we had proposed as the
11	guideline there that you would Windsorize or
12	truncate the costs for high or, you know,
13	really outlier patients at some level.
14	So, you know, for example, say
15	that was \$50,000. We would count the first
16	\$50,000 towards the measure and ignore those
17	other dollars above that threshold for the
18	patient.
19	MS. GRABERT: Do you Windsorize
20	for outlier episodes as opposed to outlier
21	patients?
22	DR. DUNN: It's outlier patients.

1	
	Page 226
1	I'm sorry. Did I say episodes? It's a
2	patient-based measure. The only real episodes
3	at play here is in trying to estimate that
4	an overall level of risk for the patient.
5	CO-CHAIR ROSENTHAL: Is the answer
6	to my question that, in fact, it is ipso facto
7	valid because it sums up total cost, and the
8	total cost is the total cost? So it, by
9	definition, is has face validity? I'm
10	trying to figure out what the criteria is for
11	answering this question, so I can figure out
12	how I should vote.
13	CO-CHAIR STEINWALD: Okay. Total
14	costs are generated through claims. Claims
15	have their own adjudication process, so that's
16	an element of it as well. But then, it is
17	subject to all the other kinds of problems of
18	the kind that Jack and others have raised.
19	Jack?
20	DR. NEEDLEMAN: Yes. Well, I'm
21	going to raise it again.
22	(Laughter.)

	Page	227
1	Again, we have got you've dealt	
2	with the pharmacy carve-outs by acknowledging	
3	some of your folks don't have pharmacy data.	
4	And pharmacy isn't a problem in terms of	
5	identifying ETG groups, because pharmacy claim	
б	cannot be the trigger event for an ETG. So it	
7	doesn't affect your risk adjustment.	
8	But you have also got carve-outs	
9	in some of your populations for behavioral	
10	health or mental health benefits. And you've	
11	got ETGs, which will be affecting your risk	
12	adjustment that are mental health based, and	
13	there are clearly costs associated with	
14	treating various kinds of behavioral health	
15	issues.	
16	So you've got some groups with	
17	carve-outs and some groups without. Can you	
18	tell us what kind of bias is being introduced	
19	into the measure to not have to have carve-	
20	outs and whether what kinds of steps you	
21	take to adjust for that in your analysis.	
22	DR. DUNN: Again, that's a good	

	Page 228
1	point, and this did come up in the earlier
2	meeting. And maybe even take a step back, you
3	know, if our specification was assuming we
4	at least had complete medical services, and
5	then there was the option that we could risk
6	adjust, you know, for the difference, or they
7	would measure adjustment for the difference if
8	someone had pharmacy data available or not.
9	So missing mental health or
10	behavioral health claims or lab claims or
11	anything else, that bets against our, you
12	know, guideline and specification for the
13	measure.
14	I'm not sure that helped, but, you
15	know, obviously, if you want me to answer the
16	question if someone didn't have information,
17	I certainly wouldn't compare, say, one
18	organization against another where one had
19	that information, one didn't.
20	You potentially could argue the
21	measure could still work if you were able to
22	equalize, you know, the fact that you didn't

	Page 229
1	have behavioral health services on either
2	side. But that wouldn't be my recommendation.
3	It would be, you know, that you would have,
4	you know, complete and consistent medical
5	service claims as a minimum, and we and if
6	you have pharmacy data, we were able to
7	measure data to use on it, and it adjusts
8	appropriately for people with and without.
9	CO-CHAIR STEINWALD: Tom?
10	CO-CHAIR ROSENTHAL: Jack, I think
11	this is an issue of, to some extent, possibly
12	of how these measures have been used in
13	practice, which is, as it was described either
14	at a health plan level or a state level or
15	whatever, where the differences in and then
16	applied it to physician groups.
17	So if it's Blue Cross of Ohio, the
18	carve-outs are going to be basically the same.
19	And so when they're saying physician group A,
20	physician group B, physician group C are
21	different, they have accounted for, in
22	general, the pharmacy benefit or lack thereof,

Γ

1	
	Page 230
1	but that could be different for, you know, the
2	State of Wisconsin, if they chose to do it.
3	So there's internal consistency
4	when it's used by one set of people. But it
5	raises the question, which I think will come
6	up in 2B(2), of, as we talked about yesterday,
7	how comparable are these results across
8	entities that might be using this, and then
9	the challenge of some having pharmacy in and
10	some having pharmacy out, some having mental
11	health in, some having mental health out, is
12	going to render those comparisons to be
13	DR. NEEDLEMAN: Yes. And if
14	you've got physicians with you know, who
15	are serving patients in multiple health plans,
16	some of which have carved out mental health
17	benefits, and some of which haven't, and
18	you're getting data from all of them and you
19	want to pool it, so you get a richer vision of
20	what the experience of this of physician A
21	is, you've got real problems if
22	CO-CHAIR ROSENTHAL: Then you've

	Page 231
1	got real validity problems.
2	DR. NEEDLEMAN: You've got both
3	risk adjustment problems, and then you've got
4	cost problems.
5	CO-CHAIR ROSENTHAL: I think
6	that's I mean, I've been thinking what I'd
7	vote on this one, and I think it's 2B(2). And
8	the same issues will come up about cost
9	adjusters across geographies, which I don't
10	think are here, because, again, they are not
11	using standardized pricing on this.
12	DR. DUNN: This is Dan. Maybe I
13	can in my mind, I don't think this relates
14	to the validity of the measure, because the
15	measure itself, you know, includes the
16	behavioral health services or any carve-out as
17	part of the specification. It maybe relates
18	more to applicability and challenges in
19	measurement using this measure.
20	CO-CHAIR STEINWALD: Okay. Any
21	further this is still 2B(2) on validity
22	testing? Can we call the vote?

	Page 232
1	DR. BARNETT: I just wanted to
2	we have mentioned Carlos's work.
3	CO-CHAIR STEINWALD: Right.
4	DR. BARNETT: And then, but we
5	never we never actually said, "What does it
6	say?" And so he says, "Has measured score
7	validity been shown?" and his response is,
8	"No."
9	"Description of the approach used
10	to test validity lacks detail and clarity."
11	I'm just reading from this, right? "It is
12	mentioned that the process described above to
13	test validity included a review by clinical
14	analysts to assess face validity, but no
15	details are provided."
16	And then in the fourth paragraph,
17	"Finally, there is an attachment in the
18	submission labeled 'Reliability Validity
19	Testing' consisting of several tables
20	describing resource use and its components for
21	different peer groups stratifying by the
22	presence of pharmacy benefits. Unfortunately,

	Page 233
1	there is no description accompanying the
2	tables that explain how they relate to
3	validity to reliability and validity." So
4	that's Carlos's
5	MS. TURBYVILLE: Right. And so
6	then there was thank you, Paul. That's
7	absolutely right. And then, there was follow
8	up by Ingenix. The table that was attached
9	wasn't intentionally supposed to be a part of
10	their reliability testing.
11	What I understand and what was
12	submitted was face validity was established
13	for this measure. So as far as the table
14	having empirical results and validity, it was
15	really focused on the face validity, which
16	they did provide a more detailed review of how
17	they vetted it.
18	CO-CHAIR STEINWALD: Anything
19	further?
20	(No response.)
21	Okay. Then, we'll call the vote.
22	MS. TURBYVILLE: For 2B(1), we

Pa	ıge	234
1 have eight moderate and six low.		
2 Moving on to 2B(3), which is		
3 exclusions are supported by the clinical		
4 evidence, they are supported yes, 2B(3).		
5 CO-CHAIR STEINWALD: All right.		
6 This is the one that addresses exclusions.		
7 Jack has already weighed in. Anyone else 1	lke	
8 to raise a question or make a comment?		
9 (No response.)		
10 Well, there are no exclusions of	-	
11 resource use. That I think was explained		
12 pretty clearly. And, yes, I don't have 1	Ξ	
13 mean, there is certainly the carve-outs issue	ıe,	
14 but I don't have anything else to raise		
15 myself. Anyone?		
16 MS. TURBYVILLE: Dan, do you was	ıt	
17 to briefly describe what exclusions the ERG		
18 measure specifies?		
19 DR. DUNN: Is the question patie	ent	
20 exclusions or service exclusion?		
21 MS. TURBYVILLE: Patient		
22 exclusions.		

	Page 235
1	DR. DUNN: There are no patient
2	exclusions other than which I guess there
3	are patient exclusions the handling of
4	patients with extremely high cost due to
5	outlier methodology, but there are no patient
6	exclusions.
7	CO-CHAIR STEINWALD: Anything
8	further?
9	DR. O'NEILL: What Carlos refers
10	to as low outliers, that is not excluded.
11	CO-CHAIR STEINWALD: That's for
12	you, Dan.
13	DR. DUNN: Yes. No, there would
14	be no outliers, because there is not a lot of
15	different from an episode, a lot of people
16	have no services, no costs in any given year.
17	But a low outlier doesn't apply to this type
18	of measure.
19	CO-CHAIR STEINWALD: Okay. Any
20	further?
21	(No response.)
22	Okay. Let's call the vote.

	Page 236
1	MS. TURBYVILLE: Nine high, four
2	moderate, and two low.
3	CO-CHAIR STEINWALD: Okay. Then,
4	on to 2B(4), which is where risk adjustment is
5	addressed. I have I am going to, with some
6	trepidation, raise the same question that I
7	raised before on the conference call. I don't
8	understand, once you accomplish risk
9	adjustment through ERGs, why the patients then
10	subsequently need to be grouped into ETGs as
11	well.
12	DR. DUNN: Yes, they do not I
13	apologize again if this wasn't clear in the
14	submission. Think of the ERG risk adjustment
15	having two steps. One step is to categorize
16	the patient's ETG, so what episodes were
17	observed. If they have congestive heart
18	failure episodes, diabetes, episodes, and even
19	within diabetes episodes, what level of
20	severity are they? That's step one, and that
21	is where ETGs play a role.
22	Second step is taking those

Page 237 1 episode results of the presence or absence of 2 episode -- of certain ETGs for an individual and translating that into an overall risks 3 So think of ETGs as giving is the risk 4 core. 5 markers, if you will, similar to the way, you 6 know, the CMS HCC model has diagnosis-based 7 markers of risk. 8 ERGs also has diagnosis-based 9 markers of risk, but that sort of diagnostic 10 categorization is based on the episode of care framework. And once you have a member's 11 12 episode of care, you know what ETGs mix they had, and where computing an overall ERG risk 13 14 score. 15 But once you have an ERG risk 16 score, you don't need to use ETGs at any point 17 in either the measure numerator or denominator. 18 19 CO-CHAIR STEINWALD: Thank you. 20 That helps. Any questions or comments? 21 DR. O'NEILL: My question has to 22 do with whether or not a situation, you know,

	Page 238
1	with the Dartmouth Atlas that shows that there
2	is different levels of utilization in
3	different populations.
4	If you had a high level of
5	utilization of a given set of procedures,
б	would that set off more ETG identification of
7	patients that would drive a higher risk score
8	through the ERG, or would that look like
9	overutilization? I'm just wanting to make
10	sure that the frequency of a treatment that
11	would trigger an identification of a patient
12	is looked at independently of the utilization
13	that is evident in the database. You know,
14	I'm trying to make sure this isn't circular.
15	CO-CHAIR STEINWALD: You don't
16	want to Dan, that's for you. Go ahead.
17	DR. DUNN: Okay. Good question.
18	You know, ETGs are diagnosis based. So, you
19	know, even though ETGs won't capture the fact
20	that someone had a you know, with a CAD
21	episode had a CABG surgery or catheterization,
22	you know, that doesn't effect what ETGs are in

	Page 239
1	that, just kind of what is observed within the
2	episode. And so then, following from that,
3	given ETGs is driving ERGs, that wouldn't
4	affect the risk scoring that should be
5	observed as over a relative over or under
6	utilization.
7	CO-CHAIR STEINWALD: Satisfied?
8	Yes. So the even the frequency of
9	episodes, then, would not generate a higher
10	ERG score.
11	DR. DUNN: No, that could be so
12	if they're diagnosis based, so if, you know,
13	certain patients in an area had, you know,
14	more had a higher prevalence of CAD or
15	hypertension or congestive heart failure
16	episodes, that does drive risk score for the
17	area.
18	So whatever is, you know,
19	triggering those similar to any of these
20	models, risk models, things that are
21	triggering more observable and usable
22	diagnoses are going to you know, going to

Page 240 1 generate a higher number of episodes or 2 diagnoses and higher levels of risk. DR. O'NEILL: Can I use as an 3 example lumbar fusion where in some 4 5 neighborhoods that looks like an automatic 6 surgical case, and then other places it does 7 not. And the fact that a higher percentage of 8 people would get the surgery would not 9 necessarily indicate that there is a higher level of more severe back pain. 10 CO-CHAIR STEINWALD: But it would 11 12 generate a higher risk score. 13 DR. O'NEILL: That's right. 14 DR. DUNN: No, it would not, because what drives the risk score is the 15 16 diagnosis of back pain, not whether there was 17 lumbar fusion or not. 18 CO-CHAIR STEINWALD: You know, I 19 think part of the -- and accepting what you 20 say, the very fact that you call them ETGs, 21 where the T stands for "treatment," is a 22 source of some confusion. Paul?

Page 241 I was going to say, 1 DR. BARNETT: 2 my understanding is that ETG is sort of a way of grouping the records, and then the ERG is 3 based on the codes in there. And they don't 4 5 allow the medical treatments to define the risk group, except they said one category, 6 7 which was malignant neoplasm. 8 So I think that we're going to 9 find that every time we rely on claims data, administrative data, to characterize the 10 health of a population, that we are going to 11 be in this -- in this -- have this same 12 13 problem. And that actually it seems to me 14 that this is as best we can parse it out from what's available to us, that this is a pretty 15 elegant solution, that they are only looking 16 17 at the diagnosis and not the procedures that 18 were done, not the treatment. 19 But where all the risk models 20 break down is for the people who don't get 21 very much care. If they're outside the health 22 care system, we don't really know what their

	Page 242
1	health state is, and so, really, at the low
2	end risk models perform poorly. But, you
3	know, there is not so many resources being
4	used in that case, so maybe we are less
5	worried about it.
6	So it seems like a very elegant
7	and detailed method, and it makes me wonder
8	how well this performs compared to some of the
9	simpler models that are more transparent and
10	free, like the HCCs, so this is presumably a
11	pretty expensive product to go this route for
12	a case mix.
13	And so what are we gaining? You
14	know, what's the marginal benefit from this
15	more extensive case mix measure compared to
16	something that is free like HCC or maybe just
17	a different product?
18	And we have that Society of
19	Actuaries study that I have not read or seen,
20	which seems to say they all perform equally
21	well. So we have to think, well, do we need
22	to spend millions of dollars, because, after

	Page 243
1	all, we are really using all of the
2	complicated ETG/ERG stuff for is to get a case
3	mix measure. The rest of it is just total
4	costs in that year pretty much.
5	CO-CHAIR STEINWALD: Further
6	comments, questions?
7	DR. BARNETT: Well, I'd actually
8	like to know if the measure developer has an
9	idea of what is the marginal benefit of their
10	case mix measure in terms of variance
11	explained compared to some of the others.
12	CO-CHAIR STEINWALD: Dan, you're
13	up.
14	DR. O'NEILL: Sure. And maybe
15	I'll note the free the free HCC model is
16	the one that I'm at least my understanding
17	is the one, you know, modified by CMS to
18	support Medicare Advantage payments, built for
19	an elderly population, and actually somewhat
20	different than a model that you would likely
21	use for measurement purposes.
22	You know, on purpose, the CMS

	Page 244
1	excluded some diagnoses and/or some HCCs in
2	that model, so it I'm not sure I would use
3	the free model here.
4	But, you know, in terms of the
5	other approaches and there are you know,
6	there are, you know, other, you know,
7	methodologies to do this, like ACGs, the
8	commercial HCC model which is licensed in the
9	same way ERGs is, you know, we have always
10	found we have done as well or better than the
11	competitor.
12	So it the characterization that
13	it is they are all in the same ballpark is
14	probably valid, and, you know, I think there
15	is reasons, though, people would use one of
16	the commercial models, whether ACGs, you know,
17	DXCG, HCCs, or ERGs, you know, versus what is
18	free, you know, through the CMS HCC model, for
19	example.
20	CO-CHAIR STEINWALD: Further
21	comments or questions?
22	(No response.)

Page 245 This is 2B(4). Can I call the 1 2 vote? 3 MS. TURBYVILLE: Six high, eight moderate, and one low. 4 5 So moving on to 2B(6), which is --CO-CHAIR STEINWALD: Five. 6 7 MS. TURBYVILLE: Oh, sorry. Thank 8 you. 2B(5), which is that the data analyses demonstrate methods for scoring and analysis 9 10 of the specified measure allowed for identification of statistically significant 11 12 and practically or clinically meaningful differences in performance, or there is 13 14 evidence of overall less-than-optimal 15 performance. 16 CO-CHAIR STEINWALD: Tom, do you 17 have something? 18 CO-CHAIR ROSENTHAL: A question I 19 want to clarify, if I could, is, have there 20 been instances where this measure has compared 21 across geographies? So I think this is 22 addressed to the developers.

Page 246 Well, for this and 1 DR. DUNN: 2 measurement applications, I don't know of any 3 application that goes beyond, you know, what geographic area, like a state or market. 4 It 5 could be used for that purpose, but I am not aware of any. 6 7 CO-CHAIR ROSENTHAL: Just to stay 8 somewhat internally consistent, to my 9 knowledge, it has not been used across 10 geographies. And, again, I would submit that the -- a) it hasn't, and part of the reason it 11 12 hasn't is that isn't the way it has been used, and that we get into the same set of issues 13 14 that we talked about yesterday, which is this is a total -- this is about a dollar 15 16 denominated number, not a resource use that 17 has standardized pricing. 18 And so the aptness and accuracy of 19 a comparison of applying this in one geography 20 won't be -- for some provider group that you 21 say this primary care doctor has 1.8X of the 22 norm of utilization using the ETG grouper

	Page 247
1	won't be a meaningful comparison of comparing
2	individual doctor internists in another part
3	of the country, or a group of internists who
4	might have .8. It's quite possible that those
5	numbers will be would be incorrect.
6	CO-CHAIR STEINWALD: Bill?
7	DR. WILLIAM RICH: You also state,
8	again, that this can be used this is a
9	total resource use measure. But you also say
10	it can be used for comparing physicians. We
11	have the same issue. You avoid the issue of
12	attribution if you just look at total costs,
13	total resource use.
14	You also address that stated
15	that you will eliminate some for low number.
16	What is there a specific low number that is
17	specified, or is that based on statistical
18	significance of that individual provider? But
19	you specifically say there is a low number.
20	What does that mean?
21	DR. DUNN: So this is related to
22	low number of patients, for example, for a

Page 248 measurement entity, like a physician. 1 That's 2 the question? Yes, we actually didn't specify 3 when we specified a statistical significance 4 5 test using confidence intervals or something similar. And we also I believe had submitted 6 7 -- you can almost get two thresholds here. 8 One may be more judgmental is -- what is the 9 number of patients that it's even worth reporting a number, you know, even with a 10 confidence interval? 11 12 And we had just suggested that number, you know, was 30, and -- but, you 13 14 know, beyond that is, you know, some 15 application of a statistical test that adjusts 16 a sample size, and that that was our preferred 17 approach. 18 CO-CHAIR ROSENTHAL: We're a 19 little bit recapitulating the same thing we 20 talked about in the diabetes measure, but I --21 it feels to me even more troubling here of 22 this balance between an attribution model that

	Page 249
1	is quite specific, but the specificity creates
2	issues.
3	But it's not certain to me that
4	you solve the specificity problems by making
5	it totally more or less open-ended, that the
6	individual user in an individual site can sort
7	of decide how they want to attribute it.
8	I think, then, the comparisons
9	from one place to the other, possibly now even
10	within a state, could be quite challenging.
11	And I'm personally trying to be internally
12	consistent with our discussions in fairness,
13	and our Health Partners friends are sitting
14	here. So in respect to that, I am trying to
15	be internally consistent.
16	But I also don't want to
17	necessarily recapitulate the whole set of
18	arguments from yesterday, but I do think they
19	
20	DR. WILLIAM RICH: My point is
21	just to point out we have the same issue.
22	CO-CHAIR ROSENTHAL: The same

	Page 250
1	issue I believe resides here.
2	CO-CHAIR STEINWALD: It's the same
3	issue. But I am going to call on Mary Kay,
4	who is going to tell us why there are times
5	when we want to we don't want to adjust.
6	DR. O'NEILL: Well, it does state
7	in here you can use standardized pricing.
8	It's not only the real dollar thing.
9	DR. DUNN: And maybe to comment
10	that's correct, you can use standard pricing.
11	And, you know, the State of Wisconsin, for
12	example, uses this measure, and they use
13	standard pricing to do comparisons across the
14	state.
15	And maybe to point to attribution
16	is you know, I think we provided the
17	guideline there on what are reasonable ways to
18	do that. I think the challenge is, you know,
19	depending where you're using this, whether
20	it's, you know, for an ACO or for an
21	individual physician or places where I
22	mean, there is still some gatekeeper type

Page 251 1 arrangements. 2 You know, attribution is -- the right attribution approach often, you know, 3 4 makes sense for where the application is applied. That's why we had provided it as a 5 6 guideline with options rather than out of the 7 specification itself. 8 CO-CHAIR STEINWALD: Yes, Mary 9 Kay. DR. O'NEILL: So to talk about 10 this for a moment, I mean, if you -- if we are 11 12 going to do our famous Memphis-Minneapolis comparison --13 14 (Laughter.) So if we ran standardized pricing 15 16 in those two markets, which is a surrogate for utilization -- and I'm taking standardized 17 18 pricing as a function of essentially weighting 19 the different types of services, which is why 20 use it and not just utilization numbers. So 21 like you're a little off on your labs, but 22 nobody is going in the hospital, it's less of

Page 252 a big deal. 1 2 What I would really love to be able to see is to do the standardized pricing 3 4 check and see where people are comparatively 5 on their utilization, then run the real 6 dollars and see where we're spending our most 7 money. And the combination of those two 8 analyses would be the most powerful thing that 9 we could do. 10 If in fact CO-CHAIR ROSENTHAL: standardized pricing were specified, I would 11 12 probably be in favor of the whole thing. Well, I get it, but, I mean, it's not clear to 13 14 me -- first of all, when we asked them on the 15 phone, that was the first question the Chair 16 posed to the developers, "Was there standardized pricing?" and the answer was no. 17 18 So --19 MS. YANAGIHARA: They don't 20 specify a particular standardized pricing 21 methodology, but it can be -- this methodology 22 can be used with standardized pricing. So you
	Page 253
1	can use the NCQA one posted on their website
2	for I mean, there
3	CO-CHAIR ROSENTHAL: Yes, but
4	somebody has got to do it. This is the
5	measurement. I mean
6	MS. YANAGIHARA: Right.
7	CO-CHAIR ROSENTHAL: I don't
8	know what the rule set is around, again,
9	something being a guideline versus being
10	specified, but it seems to me, again, this
11	needs to be specified and not just kind of,
12	"Oh, it's out there," and then they can sell
13	it. I mean, they are a commercial entity.
14	If they can sell it to people who
15	want to use it any old way, we are supposed to
16	be adjudicating this for the country. So I
17	think it has to be specified and not just kind
18	of people can use it any old way they want.
19	And that is a problem, because we've been told
20	over and over, once we approve it, people can
21	use it any way they want consistent with the
22	actual written measurements.

	Page 254
1	MS. TURBYVILLE: So whether or not
2	you think it's complete enough, they do
3	explicitly state in their specification that
4	the measure should use complete and valid
5	financial amounts, or a standard price-to-
6	resource cost amount. Is that that's as
7	submitted by the spec, but so
8	CO-CHAIR ROSENTHAL: I don't think
9	those are equivalent. The first one of those
10	is in fact if in fact you have total claim
11	data from a particular plan, you've got
12	you've met Category 1. And that does not
13	invoke standardized pricing. In fact, they
14	use standardized pricing in that articulation
15	of it sort of in lieu of maybe we've got
16	inadequate claims data, so we'll use some kind
17	of standardized pricing to do it. Well,
18	that's the way I heard it.
19	MS. TURBYVILLE: I don't want to
20	unfairly represent what they wrote.
21	DR. BARNETT: So this kind of
22	relates to which peer are you being compared

-	
	Page 255
1	to, and in terms of the performance results
2	reported, which is I think what we're the
3	topic we're on right now. So there is in the
4	submission packet a sample report for the year
5	ending 12/31/2007 or two years ending
6	December 2007, and it shows a cost and also
7	utilization for this provider compared to the
8	peers. And there it is magically on the
9	screen in front of us. Very good, Ashlie.
10	And, boy, it took me a lot longer
11	than that to chase this down. And so the
12	question it says page 4 on the paper, but
13	
14	MS. WILBON: If you open the PDF
15	packet, it's bookmarked. Item S12, Attachment
16	Sample Score Report. If your bookmark doesn't
17	open when you open the file, just click on the
18	bookmark icon and you can
19	DR. BARNETT: So is it up to the
20	consumer to identify the peer, or is that
21	something that comes with the product? And
22	then, how do I know if I'm the primary care

	Page 256
1	physician and my pharmacy costs here are 32.78
2	versus the peers' let's see, I guess we're
3	on a slightly different page. Next page
4	maybe. So how my costs are actually
5	different from the my peers' cost. Whether
6	that's a really significant difference or
7	it's a little bit further than is it?
8	CO-CHAIR ROSENTHAL: Is the one
9	she's looking at close enough?
10	DR. BARNETT: No, this is the one
11	I was thinking of, see? So here we have my
12	actual and then my peers. And so I'm
13	wondering, well, who is my peer? Is the user
14	of this responsible for finding the peer to be
15	compared to, and defining that peer, and how
16	do I know that the my costs are
17	significantly better or worse than the peers?
18	I mean, is there some sort of confidence
19	interval or statistical significance that
20	comes with this?
21	DR. PETER: Yes, it says it
22	actually at the first page of the report. It

	Page 257
1	has I think maybe the results of the sample
2	were not on the first page of the report,
3	which is page 80 of the PDF, there it says
4	you see the little sort of footnote it says,
5	"Statistical significance," I think if it were
6	it would have an asterisk, but I don't think
7	it is, so it's not it doesn't say "not
8	statistically significant."
9	CO-CHAIR STEINWALD: Dan, can you
10	tell us, for purposes of this analysis, how
11	peer groups were defined?
12	DR. DUNN: Sure. That isn't part
13	of the specification. You know, to be honest,
14	it is usually something that the user defines
15	given a guideline as usually, you know,
16	same specialty within a homogeneous geographic
17	area.
18	But you do get I'm not sure how
19	you would ever specify that, to be honest,
20	but, you know, I guess you could say only use
21	for providers, physicians where their
22	specialty is X or Y, but then the geographic

	Page 258
1	definition I think would be pretty
2	challenging, and even you could go beyond that
3	to be honest.
4	So in terms of peers and the
5	related followup question was related to
6	confidence intervals between many of the
7	measures, and that is although not shown on
8	that report, that was part of our, you know,
9	recommendation was to use confidence intervals
10	to assess differences between a provider and
11	their peers.
12	And most I think as a all of
13	and just as a note, that is just a
14	representation of how this measure may be
15	reported. You know, there are some users, in
16	my experience, of this measure who decide to
17	report by using a different format and
18	template. So that is not necessarily tied to
19	the measure itself.
20	CO-CHAIR STEINWALD: Thank you.
21	Any further
22	DR. BARNETT: I guess the question

	Page 259
1	is is have has this been done, or is
2	this something that is hypothetical, that
3	could be done?
4	DR. DUNN: Sorry. Your question
5	has this measure been used? And the answer
6	is yes.
7	CO-CHAIR STEINWALD: And I thought
8	I heard you say that the kind of analysis that
9	we are looking at here is likely to be
10	confined to within geographic area, as I
11	understood.
12	DR. DUNN: Right. That's not part
13	of the specification, but my experience is it
14	is always linked to a geographic area, and it
15	is you know, this type of measure, when
16	used for physicians, always linked to either
17	a general adult permanent care concept,
18	internal medicine/family practice combined, or
19	those separately, and then pediatrics is a
20	separate entity.
21	And, you know, increasingly now
22	you will see organizations looking to use this

1 type of measure for ACOs or medical homes as	ge 260
2 well, but there may be more groupings of	
3 providers and individual providers.	
4 DR. O'NEILL: So to Tom's point	
5 and concern historically that we have	
6 difficulty we get into difficulties in	
7 trying to compare delivery in different	
8 markets with different market structure and	
9 habits and all of those kinds and, you	
10 know, contracted rates, that that has not	
11 actually to date been an application. But	
12 some of your concerns are to make this measured	re
13 able to be used in that fashion. Is that	
14 CO-CHAIR ROSENTHAL: That has been	en
15 my concern.	
DR. O'NEILL: Yes.	
17 CO-CHAIR ROSENTHAL: And we did	
18 see one that had a very specified standardize	ed
19 pricing. I can't remember which one it is	
20 now. They are all running together. But we	
21 had one that had it very well specified a	
22 standard oh, yes, that's right, it was the	9

	Page 261
1	Health Partners resource use one, the initial
2	one that we approved.
3	And they exist this is not, you
4	know, impossible. It just so I you
5	know, I think this is the same set of issues
6	that we talked about yesterday.
7	CO-CHAIR STEINWALD: Bill?
8	DR. WILLIAM RICH: I think we're
9	seeing a real issue with a commercial product
10	that can be sold and adapted for many
11	different ways. I don't know how we are going
12	to ever address this issue.
13	At least they're honest enough to
14	say that it that this if there is any
15	attribution, they say what it is and people
16	are free to use it any way they want. I don't
17	know how we can control that except to express
18	some concerns as we have as we go along. And
19	we don't have any primary care docs here
20	anymore, but oh, I I'm sorry. I have a
21	right homonymous hemianopsia, but
22	(Laughter.)

Page 262 1 I actually got that out after 2 lunch. But I don't think we are ever going to be able to control the -- they are very honest 3 enough to say, if you look at their 4 5 applicability, they list a whole bunch of 6 different things. 7 And so we're trying to hit a 8 moving target. Whether it's, you know, how 9 the things are aggregated to the doc, whether it's standard pricing or not, I don't think we 10 are going to be able to address that except to 11 12 express some concern that if you are going to compare across areas, geographic areas, that 13 14 there be standardized pricing. 15 CO-CHAIR STEINWALD: Any further 16 17 (No response.) Hearing none, this is 2B(5), let's 18 19 call the vote. 20 High five, moderate seven, low 21 three. 22 And now we go on to 2B(6), which

	Page 263
1	is possibly non-applicable.
2	MS. YANAGIHARA: Just a quick
3	it's kind of related to the standardized
4	pricing, because I think it's going to keep
5	coming up over and over. But I wonder I
6	think with attribution that is tied more
7	closely to the business case than business use
8	of it.
9	But with standardized pricing I am
10	wondering if there might be an opportunity to
11	select a standardized pricing methodology that
12	would then should be I mean, as the
13	endorsed standardized pricing methodology. It
14	doesn't seem like there is much as much tie
15	to the business use in that case. It's just
16	really how do you cost a particular item.
17	So I'm just thinking I'm not
18	saying we should adjust that today, but just
19	for future thinking and NQF work, it may be
20	worth it, because that would help standardize
21	things and not just, well, pick whatever
22	method out there, but here is the endorsed

Page 264 1 method. 2 CO-CHAIR STEINWALD: This is for Helen's bucket list. 3 4 (Laughter.) 5 All right. So 2B(6) is nonapplicable. And that means that we have an 6 7 overall vote on --8 PARTICIPANT: Did we do 2C? CO-CHAIR STEINWALD: No, we have 9 to do an overall on 2B? First --10 DR. BARNETT: Can I just follow up 11 12 something -- on what was just said about the standardized pricing? 13 14 CO-CHAIR STEINWALD: Yes. 15 DR. BARNETT: Which is this is not 16 trivial. Every year there is dozens, if not 17 hundreds, of new CTP codes and HCPCS codes to 18 add. Two years ago they entirely revised the 19 DRG system. 20 As head of a center that does this 21 routinely, it costs a lot of money, and it's 22 non-trivial.

Page 265
CO-CHAIR STEINWALD: Duly noted.
Somebody raised a question about 2B(6)?
MS. WILBON: Right. It talks
about multiple data sources.
CO-CHAIR STEINWALD: Right.
MS. WILBON: We can open it up for
discussion. But generally, since they are
only using admin data, then it's not really
right. Okay.
CO-CHAIR STEINWALD: It's non-
applicable, which means, then, we move to an
overall vote on validity and taken as a whole.
Call the vote?
MS. TURBYVILLE: Two high, 10
moderate, and three low for overall validity.
CO-CHAIR STEINWALD: Okay.
MS. TURBYVILLE: Okay. So now to
2C, which is the last subcriterion for
scientific acceptability, and it is concerning
disparities in care, if they have been
identified, that the measure specification
scoring and analysis allow for identification

Page 266 of disparities through stratification of 1 2 results -- again, getting to that one exposed these differences. The examples are race, 3 4 ethnicity, et cetera. 5 MS. WILBON: So I just wanted to interject quickly. I do have some notes from 6 7 a call on your discussion on this, and it was 8 talked about that, to the degree that low SES 9 and different racial groups use more or less resources, that it is relevant. 10 But it's often not captured in the 11 12 admin data, and that it can't be captured systematically right now, and that the 13 14 Committee would recommend that this would be captured in the future in this measure to the 15 degree that it's possible. 16 17 CO-CHAIR STEINWALD: Further 18 discussion or questions? 19 (No response.) 20 Let's call the vote, keeping in 21 mind that there are four choices. 22 (Laughter.)

	Page 267
1	MS. TURBYVILLE: So four moderate,
2	two low, and nine insufficient.
3	CO-CHAIR STEINWALD: And now
4	well, yes, we have an overall on scientific
5	acceptability. This should be
6	MS. WILBON: I can read it aloud.
7	So keeping in mind that grid that we've been
8	referring to for the overall scientific
9	acceptability votes, your rating for the
10	overall reliability was eight high, seven
11	moderate, and one low. And your overall
12	rating for validity that you just completed
13	was two high, 10 moderate, and three low.
14	CO-CHAIR STEINWALD: So can we
15	call the overall for scientific acceptability?
16	MS. TURBYVILLE: So for overall
17	scientific acceptability for this measure, we
18	have nine yes and six no.
19	CO-CHAIR STEINWALD: So now that
20	we've finished our recapitulation of our
21	conference call
22	MS. TURBYVILLE: It was much

Page 268 shorter this time. 1 2 CO-CHAIR STEINWALD: -- then we move on to usability, and we have had a number 3 of discussions of usability. But we do have 4 5 four subcriteria that we have to separately vote on. Would anyone object if we moved 6 7 right to the first one? 8 (No response.) 9 Okay. MS. TURBYVILLE: So 3A asks about 10 11 the measure performance results are reported 12 to the public in national or community reporting programs by the time of endorsement 13 14 maintenance review. This is actually the time of initial review and is not being currently 15 reported for public and accountability models, 16 17 whether there is demonstration that it will or does benefit those models in which it is 18 19 reported. 20 CO-CHAIR STEINWALD: A question 21 for Dan. Has this measure been used in any 22 published peer reviewed articles?

	Page 269
1	DR. DUNN: No, it has not.
2	DR. WILLIAM RICH: Is it currently
3	being used to profile physicians on an
4	individual level, group level?
5	DR. DUNN: Yes.
6	CO-CHAIR ROSENTHAL: Do we know,
7	though, a public reporting of any of those
8	individual analyses?
9	DR. DUNN: No. They are used for,
10	you know, information-sharing with physicians
11	where the users will present and discuss
12	results with, you know, those folks who are
13	deemed to be outliers, either that or used in
14	some cases to you know, if there is some
15	pay for performance type strategy, so both
16	that information-sharing and there may be some
17	financial compensation related to performance
18	based on the measure. But taking those
19	results and reporting them to the public, I am
20	not aware of that happening.
21	CO-CHAIR STEINWALD: Further
22	comments or questions? Doris?

	Page 270
1	DR. PETER: Sorry. I have a
2	question about the document you submitted in
3	the under public reporting. It says that
4	the information was used to support public
5	reporting initiatives. It looks like it is
6	health plan related, but so was that not to
7	the public? On page 32 of your submission,
8	U1.1.
9	DR. DUNN: And so does that has
10	that been put on our website, for example, and
11	has Dr whatever Jones, Dr. Smith, and
12	so on, that was my interpretation of public
13	reporting, and that was what I was responding
14	to.
15	DR. PETER: Well, just in the
16	phrase above it says public reporting
17	disclosure to performance of performance
18	results to the public at large. So in some
19	form I guess it wouldn't have to be I
20	don't know, it just this is your
21	submission. It says current use for public
22	reporting. Am I missing something?

Page 271 DR. O'NEILL: It looks like it 1 2 might be on a health plan --3 DR. PETER: Health plan level, right, right. So to the beneficiaries of that 4 5 provider, is that where they're reported? But it's to the public, I mean, to the people who 6 7 are covered, the patients covered by the plan. 8 DR. O'NEILL: Right. 9 DR. PETER: Not the providers. DR. O'NEILL: And it wouldn't be a 10 11 publicly available -- you couldn't go on --DR. PETER: No, but if I were a 12 13 covered provider. 14 DR. O'NEILL: Right, right. 15 DR. PETER: Okay. That's what I 16 wanted to clarify. 17 CO-CHAIR STEINWALD: Oh, go Bill? ahead, Dan. I'm sorry. 18 19 DR. DUNN: Again, I wouldn't 20 change my response. I'm -- an inconsistency 21 of my response in the -- what we've put -- to 22 my knowledge, that has not been done, and I

	Page 272
1	think I'm being accurate. Not that it
2	couldn't be done, but I do not know of that
3	happening.
4	CO-CHAIR STEINWALD: Bill?
5	DR. WILLIAM RICH: Is the since
6	you said it is used for payment between the
7	payers and the individuals, is the tiering
8	that results from the use of this tool, is
9	that publicly available?
10	DR. DUNN: Well, I'll have to get
11	back to you on that. I can't completely
12	answer that. I do not know of that, but I
13	couldn't be sure.
14	CO-CHAIR STEINWALD: Anything
15	further?
16	(No response.)
17	Okay. Let's call the vote.
18	MS. TURBYVILLE: So for three
19	yes, 3A, four moderate, six low, and four
20	insufficient.
21	CO-CHAIR STEINWALD: Okay.
22	MS. TURBYVILLE: So moving on to
	Neal R. Gross & Co., Inc.

	Page 273
1	3B, which is about measured performance
2	results are considered meaningful,
3	understandable, and useful to the intended
4	audience for both public reporting and
5	informing quality improvement.
6	CO-CHAIR STEINWALD: Questions or
7	comments?
8	DR. WILLIAM RICH: This is going
9	to make this itself.
10	(Laughter.)
11	If you a four-person internal
12	medicine group on the east side, which is
13	fairly affluent compared to a four-doc east
14	internal medicine group on the west side,
15	which is probably 80 percent African-American.
16	These are not actionable reports,
17	because of the different patient populations
18	and the aggregate costs. So how is an
19	internist going to find these reports
20	actionable? That's a question there.
21	DR. DUNN: Well, the assumption is
22	that you are making you cannot compare

	Page 274
1	that it is not being appropriately adjusted
2	for. Is that the point, that there are
3	differences in those patients that has been
4	captured by the measure, therefore
5	DR. WILLIAM RICH: Right. And
6	actually they are not actionable. Some of
7	them are, some of the costs are actionable.
8	DR. DUNN: Maybe take if I
9	could take it separately and at a general
10	level, then comment I think there's two
11	questions in that question. One is, you know,
12	what is the composition of the peer group?
13	And if it's heterogeneous in some way, does
14	that compromise the ability to interpret
15	results? And put that one aside for the
16	moment. And the second and are these
17	measures actionable?
18	You know, you have the total cost
19	measure, which is a challenge in terms of
20	actionability, which is why we also specified
21	the major components of total costs, so
22	they're broken into imaging of different

Page 2751types, breaking out advanced imaging, you2know, breaking out, you know, labs from, you3know, sort of specialty and consultative and4hospital, and so on.5You know, and I guess I would6argue those measures have some level of7actionability. If total cost is measured on8its own, I think it's more of a challenge.9CO-CHAIR STEINWALD: Further10comments or comments, questions?11(No response.)12Can we call the vote on 3B?13DR. WILLIAM RICH: We haven't14answered the last part of the question about15heterogeneity, if they16CO-CHAIR STEINWALD: Okay. Hold17off for a second. Go ahead.18DR. DUNN: Oh, I'm yes, I'm not19sure how to answer that one. I think that20constructed the right peer grouping? It also21gets back to that question on, how do you	1	
know, breaking out, you know, labs from, you know, sort of specialty and consultative and hospital, and so on. You know, and I guess I would argue those measures have some level of actionability. If total cost is measured on its own, I think it's more of a challenge. CO-CHAIR STEINWALD: Further comments or comments, questions? (No response.) Can we call the vote on 3B? DR. WILLIAM RICH: We haven't answered the last part of the question about heterogeneity, if they CO-CHAIR STEINWALD: Okay. Hold off for a second. Go ahead. DR. DUNN: Oh, I'm yes, I'm not sure how to answer that one. I think that must be more to the point of, have you constructed the right peer grouping? It also		Page 275
know, sort of specialty and consultative and hospital, and so on. You know, and I guess I would argue those measures have some level of actionability. If total cost is measured on its own, I think it's more of a challenge. CO-CHAIR STEINWALD: Further Comments or comments, questions? (No response.) Can we call the vote on 3B? DR. WILLIAM RICH: We haven't answered the last part of the question about heterogeneity, if they CO-CHAIR STEINWALD: Okay. Hold off for a second. Go ahead. DR. DUNN: Oh, I'm yes, I'm not sure how to answer that one. I think that must be more to the point of, have you constructed the right peer grouping? It also	1	types, breaking out advanced imaging, you
 hospital, and so on. You know, and I guess I would argue those measures have some level of actionability. If total cost is measured on its own, I think it's more of a challenge. CO-CHAIR STEINWALD: Further comments or comments, questions? (No response.) Can we call the vote on 3B? DR. WILLIAM RICH: We haven't answered the last part of the question about heterogeneity, if they CO-CHAIR STEINWALD: Okay. Hold off for a second. Go ahead. DR. DUNN: Oh, I'm yes, I'm not sure how to answer that one. I think that must be more to the point of, have you constructed the right peer grouping? It also 	2	know, breaking out, you know, labs from, you
5 You know, and I guess I would 6 argue those measures have some level of 7 actionability. If total cost is measured on 8 its own, I think it's more of a challenge. 9 CO-CHAIR STEINWALD: Further 10 comments or comments, questions? 11 (No response.) 12 Can we call the vote on 3B? 13 DR. WILLIAM RICH: We haven't 14 answered the last part of the question about 15 heterogeneity, if they 16 CO-CHAIR STEINWALD: Okay. Hold 17 off for a second. Go ahead. 18 DR. DUNN: Oh, I'm yes, I'm not 19 sure how to answer that one. I think that 20 constructed the right peer grouping? It also	3	know, sort of specialty and consultative and
 argue those measures have some level of actionability. If total cost is measured on its own, I think it's more of a challenge. CO-CHAIR STEINWALD: Further comments or comments, questions? (No response.) Can we call the vote on 3B? DR. WILLIAM RICH: We haven't answered the last part of the question about heterogeneity, if they CO-CHAIR STEINWALD: Okay. Hold off for a second. Go ahead. DR. DUNN: Oh, I'm yes, I'm not sure how to answer that one. I think that must be more to the point of, have you constructed the right peer grouping? It also 	4	hospital, and so on.
7 actionability. If total cost is measured on 8 its own, I think it's more of a challenge. 9 CO-CHAIR STEINWALD: Further 10 comments or comments, questions? 11 (No response.) 12 Can we call the vote on 3B? 13 DR. WILLIAM RICH: We haven't 14 answered the last part of the question about 15 heterogeneity, if they 16 CO-CHAIR STEINWALD: Okay. Hold 17 off for a second. Go ahead. 18 DR. DUNN: Oh, I'm yes, I'm not 19 sure how to answer that one. I think that 20 must be more to the point of, have you 21 constructed the right peer grouping? It also	5	You know, and I guess I would
8 its own, I think it's more of a challenge. 9 CO-CHAIR STEINWALD: Further 10 comments or comments, questions? 11 (No response.) 12 Can we call the vote on 3B? 13 DR. WILLIAM RICH: We haven't 14 answered the last part of the question about 15 heterogeneity, if they 16 CO-CHAIR STEINWALD: Okay. Hold 17 off for a second. Go ahead. 18 DR. DUNN: Oh, I'm yes, I'm not 19 sure how to answer that one. I think that 20 constructed the right peer grouping? It also	6	argue those measures have some level of
9CO-CHAIR STEINWALD: Further10comments or comments, questions?11(No response.)12Can we call the vote on 3B?13DR. WILLIAM RICH: We haven't14answered the last part of the question about15heterogeneity, if they16CO-CHAIR STEINWALD: Okay. Hold17off for a second. Go ahead.18DR. DUNN: Oh, I'm yes, I'm not19sure how to answer that one. I think that20constructed the right peer grouping? It also	7	actionability. If total cost is measured on
<pre>10 comments or comments, questions? 11 (No response.) 12 Can we call the vote on 3B? 13 DR. WILLIAM RICH: We haven't 14 answered the last part of the question about 15 heterogeneity, if they 16 CO-CHAIR STEINWALD: Okay. Hold 17 off for a second. Go ahead. 18 DR. DUNN: Oh, I'm yes, I'm not 19 sure how to answer that one. I think that 20 must be more to the point of, have you 21 constructed the right peer grouping? It also</pre>	8	its own, I think it's more of a challenge.
11 (No response.) 12 Can we call the vote on 3B? 13 DR. WILLIAM RICH: We haven't 14 answered the last part of the question about 15 heterogeneity, if they 16 CO-CHAIR STEINWALD: Okay. Hold 17 off for a second. Go ahead. 18 DR. DUNN: Oh, I'm yes, I'm not 19 sure how to answer that one. I think that 20 must be more to the point of, have you 21 constructed the right peer grouping? It also	9	CO-CHAIR STEINWALD: Further
12Can we call the vote on 3B?13DR. WILLIAM RICH: We haven't14answered the last part of the question about15heterogeneity, if they16CO-CHAIR STEINWALD: Okay. Hold17off for a second. Go ahead.18DR. DUNN: Oh, I'm yes, I'm not19sure how to answer that one. I think that20must be more to the point of, have you21constructed the right peer grouping? It also	10	comments or comments, questions?
13DR. WILLIAM RICH: We haven't14answered the last part of the question about15heterogeneity, if they16CO-CHAIR STEINWALD: Okay. Hold17off for a second. Go ahead.18DR. DUNN: Oh, I'm yes, I'm not19sure how to answer that one. I think that20must be more to the point of, have you21constructed the right peer grouping? It also	11	(No response.)
14 answered the last part of the question about 15 heterogeneity, if they 16 CO-CHAIR STEINWALD: Okay. Hold 17 off for a second. Go ahead. 18 DR. DUNN: Oh, I'm yes, I'm not 19 sure how to answer that one. I think that 20 must be more to the point of, have you 21 constructed the right peer grouping? It also	12	Can we call the vote on 3B?
15 heterogeneity, if they 16 CO-CHAIR STEINWALD: Okay. Hold 17 off for a second. Go ahead. 18 DR. DUNN: Oh, I'm yes, I'm not 19 sure how to answer that one. I think that 20 must be more to the point of, have you 21 constructed the right peer grouping? It also	13	DR. WILLIAM RICH: We haven't
16 CO-CHAIR STEINWALD: Okay. Hold 17 off for a second. Go ahead. 18 DR. DUNN: Oh, I'm yes, I'm not 19 sure how to answer that one. I think that 20 must be more to the point of, have you 21 constructed the right peer grouping? It also	14	answered the last part of the question about
<pre>17 off for a second. Go ahead. 18 DR. DUNN: Oh, I'm yes, I'm not 19 sure how to answer that one. I think that 20 must be more to the point of, have you 21 constructed the right peer grouping? It also</pre>	15	heterogeneity, if they
18DR. DUNN: Oh, I'm yes, I'm not19sure how to answer that one. I think that20must be more to the point of, have you21constructed the right peer grouping? It also	16	CO-CHAIR STEINWALD: Okay. Hold
<pre>19 sure how to answer that one. I think that 20 must be more to the point of, have you 21 constructed the right peer grouping? It also</pre>	17	off for a second. Go ahead.
20 must be more to the point of, have you 21 constructed the right peer grouping? It also	18	DR. DUNN: Oh, I'm yes, I'm not
21 constructed the right peer grouping? It also	19	sure how to answer that one. I think that
	20	must be more to the point of, have you
22 gets back to that question on, how do you	21	constructed the right peer grouping? It also
	22	gets back to that question on, how do you

Page 276 1 measure disparities and have them unveiled by 2 this type of measure? And, you know, if you measure just 3 those differences in SES and other factors, 4 5 then you are not going to observe them. If you decide that those were appropriate things 6 7 to adjust for in a measure, then you would 8 stratify the population when you create your 9 peer groupings, you know, to support that type of difference. 10 11 I'm not sure I answered your 12 question, but I -- it's -- you know, it relates to the objective of the measurement, 13 14 and to what extent you'd want to be homogeneous in terms of the peers you are 15 16 comparing a physician against or the 17 organization. 18 CO-CHAIR STEINWALD: Paul? 19 DR. BARNETT: I was just going to 20 say, those problems are going to exist for 21 every measure we are going to look at for the 22 whole course of this. And I think we are

1unfairly putting them on the spot for those2issues.3CO-CHAIR STEINWALD: Barbara?4DR. RUDOLPH: I agree, and in the5old days when you did risk adjustment you6included those data elements in your risk7adjustment. You include race and ethnicity,8and SES if you had it, so but then we9wisely NQF took those out, so that we could10stratify. But in and I agree with Paul11that we are just not capable of doing that12yet.13CO-CHAIR STEINWALD: Any further?14(No response.)15Okay. We will recall the vote.16MS. TURBYVILLE: Okay. So we have17three high, six moderate, three low, and three18insufficient.19CO-CHAIR STEINWALD: That's very20symmetrical.21(Laughter.)		
2 issues. 3 CO-CHAIR STEINWALD: Barbara? 4 DR. RUDOLPH: I agree, and in the 5 old days when you did risk adjustment you 6 included those data elements in your risk 7 adjustment. You include race and ethnicity, 8 and SES if you had it, so but then we 9 wisely NQF took those out, so that we could 10 stratify. But in and I agree with Paul 11 that we are just not capable of doing that 12 yet. 13 CO-CHAIR STEINWALD: Any further? 14 (No response.) 15 Okay. We will recall the vote. 16 MS. TURBYVILLE: Okay. So we have 17 three high, six moderate, three low, and three 18 insufficient. 19 CO-CHAIR STEINWALD: That's very 20 symmetrical. 21 (Laughter.)		Page 277
3CO-CHAIR STEINWALD: Barbara?4DR. RUDOLPH: I agree, and in the5old days when you did risk adjustment you6included those data elements in your risk7adjustment. You include race and ethnicity,8and SES if you had it, so but then we9wisely NQF took those out, so that we could10stratify. But in and I agree with Paul11that we are just not capable of doing that12yet.13CO-CHAIR STEINWALD: Any further?14(No response.)15Okay. We will recall the vote.16MS. TURBYVILLE: Okay. So we have17three high, six moderate, three low, and three18insufficient.19CO-CHAIR STEINWALD: That's very20symmetrical.21(Laughter.)	1	unfairly putting them on the spot for those
4DR. RUDOLPH: I agree, and in the5old days when you did risk adjustment you6included those data elements in your risk7adjustment. You include race and ethnicity,8and SES if you had it, so but then we9wisely NQF took those out, so that we could10stratify. But in and I agree with Paul11that we are just not capable of doing that12yet.13CO-CHAIR STEINWALD: Any further?14(No response.)15Okay. We will recall the vote.16MS. TURBYVILLE: Okay. So we have17three high, six moderate, three low, and three18insufficient.19CO-CHAIR STEINWALD: That's very20symmetrical.21(Laughter.)	2	issues.
5 old days when you did risk adjustment you 6 included those data elements in your risk 7 adjustment. You include race and ethnicity, 8 and SES if you had it, so but then we 9 wisely NQF took those out, so that we could 10 stratify. But in and I agree with Paul 11 that we are just not capable of doing that 12 yet. 13 CO-CHAIR STEINWALD: Any further? 14 (No response.) 15 Okay. We will recall the vote. 16 MS. TURBYVILLE: Okay. So we have 17 three high, six moderate, three low, and three 18 insufficient. 19 CO-CHAIR STEINWALD: That's very 20 symmetrical. 21 (Laughter.)	3	CO-CHAIR STEINWALD: Barbara?
 included those data elements in your risk adjustment. You include race and ethnicity, and SES if you had it, so but then we wisely NQF took those out, so that we could stratify. But in and I agree with Paul that we are just not capable of doing that yet. CO-CHAIR STEINWALD: Any further? (No response.) Okay. We will recall the vote. MS. TURBYVILLE: Okay. So we have three high, six moderate, three low, and three insufficient. CO-CHAIR STEINWALD: That's very symmetrical. 	4	DR. RUDOLPH: I agree, and in the
7 adjustment. You include race and ethnicity, 8 and SES if you had it, so but then we 9 wisely NQF took those out, so that we could 10 stratify. But in and I agree with Paul 11 that we are just not capable of doing that 12 yet. 13 CO-CHAIR STEINWALD: Any further? 14 (No response.) 15 Okay. We will recall the vote. 16 MS. TURBYVILLE: Okay. So we have 17 three high, six moderate, three low, and three 18 insufficient. 19 CO-CHAIR STEINWALD: That's very 20 symmetrical. 21 (Laughter.)	5	old days when you did risk adjustment you
8 and SES if you had it, so but then we 9 wisely NQF took those out, so that we could 10 stratify. But in and I agree with Paul 11 that we are just not capable of doing that 12 yet. 13 CO-CHAIR STEINWALD: Any further? 14 (No response.) 15 Okay. We will recall the vote. 16 MS. TURBYVILLE: Okay. So we have 17 three high, six moderate, three low, and three 18 insufficient. 19 CO-CHAIR STEINWALD: That's very 20 symmetrical. 21 (Laughter.)	6	included those data elements in your risk
9 wisely NQF took those out, so that we could stratify. But in and I agree with Paul that we are just not capable of doing that yet. 12 yet. 13 CO-CHAIR STEINWALD: Any further? 14 (No response.) 15 Okay. We will recall the vote. 16 MS. TURBYVILLE: Okay. So we have 17 three high, six moderate, three low, and three 18 insufficient. 19 CO-CHAIR STEINWALD: That's very 20 symmetrical. 21 (Laughter.)	7	adjustment. You include race and ethnicity,
<pre>10 stratify. But in and I agree with Paul 11 that we are just not capable of doing that 12 yet. 13 CO-CHAIR STEINWALD: Any further? 14 (No response.) 15 Okay. We will recall the vote. 16 MS. TURBYVILLE: Okay. So we have 17 three high, six moderate, three low, and three 18 insufficient. 19 CO-CHAIR STEINWALD: That's very 20 symmetrical. 21 (Laughter.)</pre>	8	and SES if you had it, so but then we
<pre>11 that we are just not capable of doing that 12 yet. 13 CO-CHAIR STEINWALD: Any further? 14 (No response.) 15 Okay. We will recall the vote. 16 MS. TURBYVILLE: Okay. So we have 17 three high, six moderate, three low, and three 18 insufficient. 19 CO-CHAIR STEINWALD: That's very 20 symmetrical. 21 (Laughter.)</pre>	9	wisely NQF took those out, so that we could
12yet.13CO-CHAIR STEINWALD: Any further?14(No response.)15Okay. We will recall the vote.16MS. TURBYVILLE: Okay. So we have17three high, six moderate, three low, and three18insufficient.19CO-CHAIR STEINWALD: That's very20symmetrical.21(Laughter.)	10	stratify. But in and I agree with Paul
 13 CO-CHAIR STEINWALD: Any further? 14 (No response.) 15 Okay. We will recall the vote. 16 MS. TURBYVILLE: Okay. So we have 17 three high, six moderate, three low, and three 18 insufficient. 19 CO-CHAIR STEINWALD: That's very 20 symmetrical. 21 (Laughter.) 	11	that we are just not capable of doing that
<pre>14 (No response.) 15 Okay. We will recall the vote. 16 MS. TURBYVILLE: Okay. So we have 17 three high, six moderate, three low, and three 18 insufficient. 19 CO-CHAIR STEINWALD: That's very 20 symmetrical. 21 (Laughter.)</pre>	12	yet.
15Okay. We will recall the vote.16MS. TURBYVILLE: Okay. So we have17three high, six moderate, three low, and three18insufficient.19CO-CHAIR STEINWALD: That's very20symmetrical.21(Laughter.)	13	CO-CHAIR STEINWALD: Any further?
MS. TURBYVILLE: Okay. So we have MS. TURBYVILLE: Okay. So we have three high, six moderate, three low, and three insufficient. CO-CHAIR STEINWALD: That's very Symmetrical. (Laughter.)	14	(No response.)
<pre>17 three high, six moderate, three low, and three 18 insufficient. 19 CO-CHAIR STEINWALD: That's very 20 symmetrical. 21 (Laughter.)</pre>	15	Okay. We will recall the vote.
<pre>18 insufficient. 19 CO-CHAIR STEINWALD: That's very 20 symmetrical. 21 (Laughter.)</pre>	16	MS. TURBYVILLE: Okay. So we have
19 CO-CHAIR STEINWALD: That's very 20 symmetrical. 21 (Laughter.)	17	three high, six moderate, three low, and three
20 symmetrical. 21 (Laughter.)	18	insufficient.
21 (Laughter.)	19	CO-CHAIR STEINWALD: That's very
	20	symmetrical.
22 MS TURBYVILLE: Okay	21	(Laughter.)
	22	MS. TURBYVILLE: Okay.

	Page 278
1	CO-CHAIR STEINWALD: All right.
2	Moving on? On to 3C.
3	MS. TURBYVILLE: All right. So on
4	to 3C, the data and the results detail are
5	maintained such that the resource use measure
6	can be decomposed to facilitate transparency
7	and understanding.
8	CO-CHAIR STEINWALD: Comments,
9	questions? Tom?
10	CO-CHAIR ROSENTHAL: If we were
11	going to be internally consistent, we would
12	review our diabetes vote.
13	MS. WILBON: I can do that for you
14	real quick. So this I don't have that
15	vote. Did you guys write that down? I don't
16	have it. Just bear with me for a second.
17	CO-CHAIR STEINWALD: Sorry.
18	Anything further? I'm not hearing anything
19	further except for people cranking up. Vote,
20	let's call the vote.
21	MS. TURBYVILLE: Okay. So we have
22	one high, eight moderate, five low, and one
	Neal P. Grogg & Co. Inc.

Page 279 1 insufficient. Getting a little bit more to 2 the normal distribution there. 3 CO-CHAIR STEINWALD: Yes. Is 3D a 4 non-A? 5 MS. TURBYVILLE: Yes. 3D on the 6 harmonization of the measures we explicitly 7 told the measure developers at this point not 8 to try and harmonize it. As the project 9 progressed, if that came up as an issue, we 10 would work with them and you through that. So it's non-applicable at this time. 11 12 So that means that we would be 13 ready to ask you all to rate usability overall for this measure. 14 15 MS. WILBON: And just a quick clarification -- the reason why we couldn't 16 17 find the score, the usability score for 3C, is because the TAP scored that. That was a 18 19 diabetes measure, and the TAP scored the 20 subcriteria. 21 So that's why we couldn't find it 22 in what the Steering Committee had done

Page 280 1 because it was in the TAP notes. You guys 2 just scored the overall criteria for that one. 3 CO-CHAIR STEINWALD: Right. 4 MS. WILBON: Okay. 5 CO-CHAIR STEINWALD: Let's call the vote, overall usability. 6 7 MS. TURBYVILLE: One more? There 8 we go. So for overall reliability we have 10 9 moderate --10 DR. DUNN: Usability. MS. TURBYVILLE: It ends with a T-11 12 Y, okay? 13 (Laughter.) 14 I even got the L right. For 15 overall usability -- sorry, Dan -- the score is 10 moderate and five low. And at this 16 17 time, based on where we are, feasibility will 18 not be assessed by the Steering Committee on 19 the Ingenix measures. 20 CO-CHAIR STEINWALD: And the 21 reason for that is the same as the prior 22 We don't have the information on measure.

Page 281 1 pricing. Is that correct? 2 DR. BURSTIN: Right. So once Ingenix shares with the Steering Committee the 3 fee schedule for the measure, which we will 4 5 then share with you, we will return to 6 feasibility on both of the Ingenix measures so 7 you can assess feasibility and your overall recommendation for the measure. 8 9 MS. TURBYVILLE: So I think, Dan, 10 that's all the questions for you. We really appreciate you adjusting your schedule and 11 12 providing responses and input to the Steering 13 Committee today. 14 DR. DUNN: Okay. Thank you. Take 15 care. 16 MS. WILBON: Operator, can you 17 open the line to see if there is anyone who 18 would like to provide a comment, a public 19 comment to the Steering Committee, before we 20 wrap up? 21 OPERATOR: Yes, thank you very 22 much, and I will open it up.

	Page 282
1	MS. WILBON: Okay. Is there
2	anyone on the line who would like to ask a
3	question for the Steering Committee?
4	(No response.)
5	Anyone in the audience who would
6	like to ask a question or make a comment to
7	the Steering Committee based on the
8	discussion?
9	(No response.)
10	Okay.
11	MS. TURBYVILLE: Clearly, we want
12	to say thank you, and thank you for hanging in
13	there for two days, in addition to all of the
14	pre-work and conference calls that we have had
15	all through this year.
16	I think we have a few next steps.
17	I will ask Ashlie to speak to those, but I
18	want to make sure I give the Co-Chairs an
19	opportunity to provide any final thoughts on
20	the past two days. Or is everybody done?
21	Which is fine. We can just wrap it up.
22	(Laughter.)

	Page 283
1	CO-CHAIR STEINWALD: All right.
2	Tom, you're up.
3	(Laughter.)
4	CO-CHAIR ROSENTHAL: I checked out
5	about 30 seconds ago.
6	MS. TURBYVILLE: Anybody else?
7	DR. BARNETT: So the voting
8	process and the being able to collectively see
9	where we were at in polling was very helpful
10	I think for the process. And if, when we're
11	participating in conference calls, we had some
12	way to do through the meeting, so I know that
13	we Web Meeting and Microsoft Live Meeting,
14	they all have poll functions, right? So we
15	can use the poll function in the future. That
16	would be great.
17	The other thing is, just as a
18	consumer of all the materials, it was hard for
19	me to keep them straight, and it would be
20	great if we had some consistent way of naming,
21	you know, like the consultant's document and
22	the the submissions all pretty much began

	Page 284
1	with the submission number, and that was very
2	helpful.
3	And if the attachments also began
4	with the submission number, I think that would
5	help us, you know, keep things straight. So,
б	you know, that that was a struggle for me
7	to you know, and I'm
8	MS. TURBYVILLE: Yes, it's a lot.
9	DR. BARNETT: It's a lot of stuff,
10	so to the extent that you can kind of help us
11	by organizing it, that would be great.
12	DR. NEEDLEMAN: Likewise, you
13	know, Carlos's submission were extraordinarily
14	helpful, but some got labeled with numbers,
15	multiple numbers, because multiple things
16	one in a document. I'd rather have more
17	documents that are easy to find.
18	MS. WILBON: Okay. That's
19	helpful. We try to sometimes do things in a
20	PDF and bookmark, because we don't want to
21	send you like 50 files and then it gets hard
22	to send them through e-mail. So, you know, we

	D 005
1	Page 285 try to think about when it's best to try to
	cry co chink about when it's best to try to
2	package things in one one PDF versus
3	sending separate files.
4	So, you know, we do weigh that,
5	but it's hard sometimes when we have so many
6	things to send you, and we don't want to have
7	to send you 10 e-mails to get so many
8	documents to you.
9	DR. BARNETT: So the website is
10	great. I don't know whether you know, are
11	some of the things some of the things
12	what do I want to say? Confidential, you
13	can't put them on the website, but
14	MS. WILBON: We
15	DR. BARNETT: But all the
16	submissions could be gotten from the website,
17	and that was very helpful.
18	MS. WILBON: Yes.
19	DR. BARNETT: And all the meeting
20	minutes and those sorts of things.
21	MS. WILBON: It's timing.
22	Sometimes it takes us we don't have the

	Page 286
1	ability to personally post things to the
2	website, so, you know, we may have something
3	ready for you, but we have to wait two or
4	three days for it to get posted to the
5	website.
б	So rather than waiting for there
7	to be like a hyperlink, we sometimes will just
8	go ahead and send it to you, so
9	DR. BARNETT: Well, there's Google
10	Groups, there's SharePoint.
11	DR. BURSTIN: And SharePoint has
12	just been put into place, so my guess is
13	within the next
14	MS. WILBON: We're working on it.
15	We're but that's helpful.
16	CO-CHAIR ROSENTHAL: Doris?
17	DR. PETER: Yes, I was going to
18	bring up the SharePoint site, because I know
19	we had talked about that before. But I also
20	wanted to say thank you for all your help. I
21	know it's a lot of documents for you, too, so
22	thank you.

	Page 287
1	MS. WILBON: Thank you.
2	DR. WILLIAM RICH: Ditto. I'd
3	like to thank the staff, because I don't even
4	know how to work a watch, so I really
5	appreciate their help.
б	MS. TURBYVILLE: Is someone on the
7	phone?
8	DR. JEFFREY RICH: Yes, it's Jeff
9	Rich.
10	MS. TURBYVILLE: Jeff, hey,
11	welcome.
12	DR. JEFFREY RICH: Thanks. I
13	wanted to make a comment about the
14	documentation, if I may. Sometimes the
15	applications are so complex, and having them
16	on your laptop trying to find bullet points,
17	you know, while we're talking is a little bit
18	difficult.
19	I might suggest that having an
20	executive summary of the application would be
21	very helpful, just, you know, basic things
22	like where is the level of attribution, you

	Page 288
1	know, what time period are we talking about,
2	it's easy I mean, because as you go through
3	it and talk and have discussions, I am always
4	flipping back and forth through a very long
5	document trying to redefine that for myself.
6	And I don't know if I'm the only
7	dysfunctional one in the group, but it would
8	help me a lot, you know, with that. I don't
9	know if anyone else feels the same.
10	CO-CHAIR ROSENTHAL: I had the
11	same feeling. And, obviously, the
12	applications have to be thorough and detailed
13	and all the rest of that. But as we are
14	beginning to figure out where the honing-in
15	points are I mean, for example, I now know
16	that the attribution thing is in Section 11.
17	But if it could either be
18	highlighted or pulled out, those very key
19	things, what the risk adjusting methodology is
20	in a couple of bullet points, but I I
21	hesitated to make the suggestion, because I
22	think the staff has already got a ton of work.
i	
----	--
	Page 289
1	But if it cold be done without making it a
2	ton-plus of work, that really it would be
3	helpful.
4	And also, trying to keep the thing
5	straight, because to now go back and compare
6	one to another is really a big challenge. And
7	yet there are really only a half a dozen
8	elements that are kind of the key ones that we
9	are going seeming to come back to over and
10	over now.
11	DR. BARNETT: And maybe we could
12	just skip importance.
13	(Laughter.)
14	I mean, the reason that these
15	that we even have these measures is because
16	NQF has already decided that they're
17	important. So I'm not sure we gain much by
18	all of that.
19	MS. TURBYVILLE: I think the only
20	time potentially it could come in is if it's
21	really not a resource use measurement area,
22	but I think that's right, so

	Page 290
1	DR. O'NEILL: Could I just I
2	mean, this has been a great exercise, and it
3	is I think there is a couple of overarching
4	things. I guess I'm a convert from Jack here.
5	There are a few overarching things that have
6	come up over and over again.
7	And as a Steering Committee in
8	this area, I don't know if there is any
9	opportunity to do something like advocate for
10	things like pharmacy data to be included. I
11	mean, there is ways of making this happen in
12	the commercial world by having the data
13	sharing be a standard part of contracting with
14	the PBM and things like that.
15	But in terms of having the
16	resources at our fingertips to analyze how
17	well things are going, there are some
18	overarching things that I think we have kind
19	of learned here. I just hope we can capture
20	them as a kind of policy or, you know,
21	standard that we would like to see on a go-
22	forward basis. And it's outside of each

Page 291 individual measure, so --1 2 CO-CHAIR STEINWALD: Jack? 3 DR. NEEDLEMAN: Yes, two things. 4 First, in terms of process, I thought that 5 Sally occasionally asking people who were at 6 the extreme to explain their votes in a non-7 judgmental way --8 (Laughter.) 9 -- was extremely helpful. And I 10 actually think there may be opportunities to think about straw polls before the formal poll 11 12 is taken -- vote is taken. Just have us do it once and see where we are, because there is at 13 14 least one vote. If I had known it would have been as close as it was, I would have switched 15 16 from one category to another, from a yes to a 17 no. 18 So I just want to encourage Bruce 19 and Tom to think about straw polls as a way of 20 checking how much consensus there is, how much 21 we need to discuss things, so that might be 22 helpful to use the technology.

I	
	Page 292
1	The other thing I want to thank
2	the staff. The materials were great.
3	Everything you did in real time as we were
4	working was great. Helen, you are a very
5	lucky person.
6	(Laughter.)
7	CO-CHAIR STEINWALD: Anything
8	further?
9	MS. WILBON: I just wanted to
10	thank the Co-Chairs for your efforts
11	throughout the last couple of days. It really
12	helps when you have two good Co-Chairs to lead
13	you through a meeting as arduous as this, and
14	we recognize that the materials are quite
15	challenging, and we appreciate everyone
16	sticking through.
17	And I also want to thank Jeptha
18	and Jaime, because they have already had a TAP
19	meeting and then they kind of had to rehash
20	the whole thing again and be prepared to that
21	level again. So I don't know if Jeptha is on
22	the line, but I wanted to thank him for that,

Page 293 1 and Jaime, who is off the phone, so --2 CO-CHAIR STEINWALD: Okay. 3 MS. WILBON: -- thanks. DR. BURSTIN: Please leave your 4 5 voting devices. 6 MS. WILBON: Yes, don't take them 7 with you. 8 DR. BURSTIN: They don't work on 9 anything else. 10 DR. NEEDLEMAN: Did we just get finished an hour early? 11 12 DR. BURSTIN: Yes, 13 congratulations. CO-CHAIR STEINWALD: If we can --14 15 if I can adjourn the meeting. It's adjourned. 16 17 (Whereupon, at 2:32 p.m., the proceedings in the foregoing matter were adjourned.) 18 19 20 21 22

	010 0 15 0 5 10			15 5 05 5 10 6 0
A	212:9,15 265:19	activities 78:17	adequately 113:18	15:5 85:5 136:3
abandon 36:11	267:5,9,15,17	79:3	215:20 221:11	241:10
ability 8:1 62:5	accepting 240:19	activity 65:19	adjourn 3:22 5:4	admissions 55:13
64:19 133:8	access 22:8 62:5	actual 12:9 18:4	201:5 293:15	95:9
175:18 192:5	202:20	53:12,18 54:1	adjourned 293:16	admits 205:14
193:8 274:14	accessible 182:8	61:10 66:22 84:22	293:18	admitted 94:18
286:1	accident 94:1	94:4 98:11 147:14	adjudicating	adopted 105:1
able 4:21 5:4 13:14	accompanied 98:14	162:6 191:22	253:16	adult 259:17
21:15 43:18 48:9	accompanying	253:22 256:12	adjudication	advanced 78:4,13
53:16,17,21 54:3	233:1	Actuaries 217:22	226:15	107:3 275:1
60:22 61:4,9 66:5	accomplish 236:8	242:19	adjust 52:22 66:22	advantage 48:8
68:5,6 69:21 70:1	account 37:18	acuity 27:18	171:1 206:9	130:18 181:16
70:1,2,10 75:1	137:19 169:15	acute 60:13,14 63:2	227:21 228:6	243:18
92:13 126:4	213:9 220:2 224:2	94:18 115:10	250:5 263:18	adverse 78:22
128:15 129:14	accountability 8:2	Adams 218:12	276:7	107:8 195:7
133:10 138:21	115:3,6 119:22	219:10	adjusted 150:2	advisor 65:1
151:5,19 163:16	268:16	adapt 28:17	151:12 169:1	Advisory 207:11
170:14 184:8	accountable 108:3	adaptation 33:4,15	188:21 274:1	advocate 290:9
194:19 200:18	115:16	adapted 261:10	adjuster 173:14,15	affect 52:6,12,15
203:8,19 208:6	accounted 141:16	add 29:1 32:22	adjusters 173:18	61:22 227:7 239:4
228:21 229:6	169:3 229:21	68:20 71:14 77:18	231:9	affluent 273:13
252:3 260:13	accumulate 223:22	79:13,15 114:6	adjusting 117:1	afraid 34:13
262:3,11 283:8	accuracy 246:18	133:18 142:9	168:20 171:4	African 31:12,20
ABMS 2:18,21	accurate 70:10	145:22 179:2	176:11 281:11	African-American
56:15 77:5 80:13	272:1	214:16 216:1	288:19	273:15
86:4 114:12 118:7	accurately 59:21	264:18	adjustment 27:18	afternoon 199:16
133:6	215:4	adding 107:16,17	88:1,3,7,13	age 84:9
ABMS-REF 3:8,11	ACG 29:20	addition 87:3	110:11 113:12	agenda 5:3 199:10
absence 62:2 237:1	ACGs 12:8,10,12	111:10 120:21	114:11 115:1	199:14 200:5
absolute 196:1	12:18 193:9 244:7	129:13 137:17	116:2 120:12	202:10
absolutely 157:2,20	244:16	149:1 282:13	124:17 125:10,20	ages 84:14
158:8 162:20	ACG's 6:9 14:3	additional 51:16	143:13,14 144:3	aggregate 52:16
164:15 191:19	acknowledge 54:22	54:11 71:5 116:10	146:10,13 148:20	68:22 74:9 273:18
198:18 233:7	acknowledging	117:19 118:3	151:11 169:4	aggregated 262:9
abstain 41:4 76:4,9	227:2	additionally 116:17	175:14 176:9	aggregator 74:22
abstaining 41:12	ACO 28:15 250:20	address 23:21	205:15,18 206:3	ago 12:1 146:3
acceptability 4:11	ACOs 260:1	30:22 31:7,16	211:20 213:7,8	150:4 151:14
7:10 40:8 45:11	act 25:16	81:18 142:14	214:5 215:11,17	194:1 264:18
83:9 91:12 112:11	acting 7:11 163:13	247:14 261:12	227:7,12 228:7	283:5
113:10 123:3,7	203:4 207:17	262:11	231:3 236:4,9,14	agonists 111:15
126:12,15 127:10	action 24:11	addressed 150:18	277:5,7	agree 53:3 123:15
128:22 129:3	actionability	178:6 195:9 214:8	adjustments 133:9	130:15 168:16
132:5 135:17	274:20 275:7	236:5 245:22	adjusts 229:7	277:4,10
140:21 141:2	actionable 35:8	addresses 234:6	248:15	agreed 69:22 81:10
145:8 176:18	273:16,20 274:6,7	adequate 57:11,11	admin 265:8	139:3
202:17 203:14	274:17	140:6 143:6	266:12	agreeing 53:4
210:14 211:5	active 59:9 65:8	144:17	administrative 5:6	agreement 62:17

				C
70:22	130:19 144:10	apparently 83:21	approved 194:1	asking 16:18 18:5
ahead 8:14 10:15	160:13 173:6	99:4	261:2	21:17 58:17
11:9,20 13:13	186:6 227:21	appeared 88:4	approximately	108:14 116:21
16:16 23:10,22	245:9 257:10	143:4 147:17,18	99:9	150:21 223:6,6
39:18 83:3 135:13	259:8 265:22	appears 119:13	approximating	291:5
203:21 221:3	analysts 232:14	161:7 176:18	18:22	asks 268:10
238:16 271:18	analytic 73:19	applicability	apropos 175:1	aspect 65:5 79:4
275:17 286:8	87:10	231:18 262:5	aptness 246:18	143:22 147:4
aides 64:6	analyze 290:16	applicable 10:19	arbitrary 120:10	175:19
Aim 28:7 30:12	and/or 244:1	59:10 68:16 89:10	arduous 292:13	ass 16:18 19:2
alert 142:16	Angeles 1:22	264:6 265:11	area 60:17 70:4	assess 88:7 178:10
algorithm 90:12	ankles 106:16	application 12:18	78:12 81:22 82:1	192:8 193:13
algorithms 17:11	ANN 1:21	165:15 166:18	152:4 158:10	232:14 258:10
74:15	announcement	246:3 248:15	207:22 220:20,21	281:7
alike 123:11	133:19	251:4 260:11	239:13,17 246:4	assessed 280:18
alleviate 78:18	annual 69:1	287:20	257:17 259:10,14	assessment 104:21
allow 39:2 65:10	annually 56:5	applications	289:21 290:8	193:18
222:22 241:5	answer 21:18 50:17	165:21 246:2	areas 28:10,17	assign 31:4 44:12
265:22	55:5 60:11 61:1,4	287:15 288:12	65:17 81:19	57:12 156:22
allowed 12:2 70:18	70:12 95:19 98:10	applied 45:6 58:22	262:13,13	213:11
154:21 245:10	103:18 106:12	98:7 178:7 206:15	arena 62:11	assigned 43:10
allows 57:12	109:6 113:18	229:16 251:5	argue 146:22	56:8 137:4 156:19
alongside 45:1	163:16 164:2,5,8	apply 16:1 49:17	228:20 275:6	159:5,13,15,16
aloud 267:6	169:6 170:7,8	82:21 88:13	arguments 54:3	163:1,5 183:17
alternative 161:8	174:13 226:5	160:10 178:16	249:18	212:1 213:8
alternatives 159:1	228:15 252:17	196:12 235:17	ARJUN 2:20	assigning 89:15
Alto 1:15	259:5 272:12	applying 246:19	arrangement 22:7	assignment 27:16
amazing 111:22	275:19	appreciate 34:1	arrangements	assignments
amend 19:6	answered 116:5	170:13 281:11	20:10 251:1	150:10
American 1:19	275:14 276:11	287:5 292:15	artery 3:11 167:12	associated 5:19 6:2
31:12	answering 226:11	appreciates 91:8	169:8,13,20	6:6 12:4 14:10
Americans 31:20	answers 152:21	approach 44:19	172:14	17:2,20 18:22
AMI 80:1	170:10	52:1 61:17 80:3	articles 268:22	78:17 80:16 94:19
AMIN 2:10	antiretrovials 26:3	88:3,6 161:18	articulation 223:5	96:1 115:8 146:20
amount 18:11 65:4	anybody 24:17	166:2 168:17	254:14	227:13
70:19 97:6 107:17	110:13 126:4	170:17 205:15	Ascension 1:21	Associates 2:4
142:10 191:2	161:16 182:3	206:15 225:9	ascribing 115:6	Association 1:19
254:6	183:5 223:13	232:9 248:17	Ashlie 2:13 5:6,16	2:6,7
amounts 254:5	283:6	251:3	11:22 37:16 118:2	assume 144:15
amputation 115:11	anymore 165:8,10	approaches 10:4	132:5 200:14	196:21
161:14	261:20	244:5	212:14 255:9	assuming 53:20
analyses 245:8	anyway 63:8 65:18	appropriate 120:1	282:17	160:21 182:12
252:8 269:8	apart 166:1,21	203:19 211:14	aside 274:15	228:3
analysis 27:15 68:1	apologize 142:13	220:3 276:6	asked 55:2 99:7	assumption 273:21
73:5,19 74:10	200:4 224:8	appropriately	136:15 138:2	asterisk 257:6
81:8 91:7 118:10	236:13	229:8 274:1	142:14 212:19	Atlas 238:1
118:12 119:8	apparent 95:16	approve 253:20	214:12 252:14	attached 233:8

r				
attachment 232:17	126:18	balance 248:22	46:2 47:21 52:9	232:22
255:15	availability 37:13	ballpark 244:13	58:13 66:14 67:21	best 117:17 152:17
attachments 284:3	38:6 177:13	band 84:9	72:2 92:13 105:3	162:3 163:14
attempted 202:20	available 4:20	Bank 56:1	106:7 116:2	168:4 188:22
attributable 100:5	12:11,19 16:11,13	Barbara 2:5 277:3	137:21 141:10	241:14 285:1
120:18 157:14	19:21 20:11,19,20	bariatric 84:1	142:21 153:13	bets 228:11
164:19 165:8,10	38:8 51:5 56:9	93:19	166:19 172:7,19	better 47:2 161:19
attribute 49:20	57:1,6 61:16 73:3	BARNETT 1:15	173:5 178:13	161:20 162:11
90:4,19 91:1	199:13 204:4	15:21 24:14 57:21	229:18	168:17 244:10
92:13 107:5	228:8 241:15	71:13 119:10	basis 58:17 290:22	256:17
121:10 133:11	271:11 272:9	122:21 132:22	bear 7:2 278:16	beyond 55:13 64:4
249:7	average 18:11 19:7	164:12,16 166:22	becoming 23:2	66:12 246:3
attributed 25:7,22	100:3 151:3	167:9 180:1	171:9	248:14 258:2
26:7 48:19,21	153:10	217:11 218:11	began 283:22 284:3	bias 227:18
78:15 79:8 81:3	avoid 66:10 247:11	217:11 218:11 221:22 222:3	beginning 123:10	biased 18:15
	aware 84:15 199:14		196:21 288:14	biases 99:22
90:12 91:2 92:16		232:1,4 241:1	begs 109:2	
99:11 100:9	246:6 269:20	243:7 254:21	behalf 174:18	big 100:14 129:20
103:13 107:9	ayes 198:6	255:19 256:10		143:11 157:5
164:1 224:3	A-F-T-E-R-N-O	258:22 264:11,15	behavioral 21:6	167:10 185:5
attributing 28:1	202:1	276:19 283:7	65:1 173:9,17	191:20 252:1
52:2 163:7	a-vis 115:11	284:9 285:9,15,19	227:9,14 228:10	289:6
attribution 25:4	a.m 1:12 4:2	286:9 289:11	229:1 231:16	bigger 17:13 35:3,4
79:7 89:14 90:9	134:21,21	barrier 37:19 39:3	believe 4:13 11:22	175:13
92:12 120:4,5,9	<u> </u>	39:4 133:16	56:12 118:11	biggest 35:6 92:1
154:3 158:12,17	b 22:1 190:3 229:20	barriers 20:1 23:18	143:13 158:22	92:10
158:20 159:1,17	b 22.1 190.3 229.20 back 5:14 17:7,19	37:11,12	211:17 248:6	bill 5:13 30:20
160:7,10,22 162:2	18:2,19 21:15,16	bars 128:6 202:21	250:1	65:11 112:8 113:6
162:13,16,22	24:1 31:11 36:19	based 3:9 14:4,5	below-knee 115:11	114:20 118:15
163:9,11 191:3,5	37:17 42:14 52:11	15:4 18:9 34:5,14	Ben 2:16 59:16	122:20 125:15
191:6 247:12	52:20 59:5 60:13	49:2 53:11,19	70:11	134:14 149:21
248:22 250:15	66:2 73:7 75:17	64:8 79:9 85:4	benchmark 137:2	152:5 183:8
251:2,3 261:15	105:9 108:21	88:5 90:13 91:17	153:9	185:14 247:6
263:6 287:22		113:22 125:1	benchmarks 68:11	261:7 271:17
288:16	109:18 113:7	135:2,21 136:10	73:11	272:4
attributions 176:13	118:9 122:19	136:14 141:14	beneath 61:11	billed 51:3,7
audience 9:20	134:13 136:4	146:19 155:14	beneficial 4:8	bit 94:15 115:5
273:4 282:5	141:15 154:8,15	174:1,2 204:22	beneficiaries 271:4	143:5 168:3 169:2
audit 70:8 72:13,14	155:18 163:18	205:18 224:22	beneficiary 21:10	186:5 196:16
72:15,18 75:6,6,7	168:20 182:20	227:12 237:10	benefit 17:18 18:4	209:17 248:19
75:9	191:4 196:4 197:7	238:18 239:12	18:12,19 22:17	256:7 279:1
auditing 72:3	200:9 203:3	241:4 247:17	45:14 65:19	287:17
auditor 70:17,20	205:16 215:3,8	269:18 280:17	137:20,22 138:1	black 75:3,7 143:16
auditors 72:15,16	225:5 228:2	282:7	193:20 220:22	143:22 179:20
automate 71:3	240:10,16 272:11	bases 162:22	229:22 242:14	181:18
automatic 71:4,5	275:22 288:4	basic 79:11 114:13	243:9 268:18	blah 114:1,1,1
240:5	289:5,9	116:4 287:21	benefits 19:8 21:5	Blue 229:17
automatically	bad 92:6	basically 22:13	227:10 230:17	board 7:15 14:17

10.14 29.20 (2.20	building 160,15	267.15 21 272.17	52.17 52.10 50.4	220.18 224.12
19:14 38:20 63:20	building 169:15	267:15,21 272:17	52:17 53:10 59:4	229:18 234:13
193:22	built 188:3 243:18	275:12 278:20	60:11,13,14,15	carving 20:11
body 74:9 170:14	bullet 287:16	280:5	61:10,15,18,21	case 8:21 13:1
bookmark 255:16	288:20	called 13:21 147:21	62:3,5 63:2 64:4,6	19:10 23:7 29:3
255:18 284:20	bumps 106:15	calling 6:16 195:21	64:20 65:3,11	64:22 84:17 111:5
bookmarked	bunch 73:9 262:5	calls 282:14 283:11	68:8 77:4 79:4	122:12 137:4
255:15	bundle 60:15	CAMILLE 2:12	89:1 90:2,4 93:11	138:22 149:14,17
BOWHAN 1:17	burden 46:6 60:12	cancer 59:9	93:11 102:21	156:20 158:20
178:22 179:9	187:4,20 188:1	cap 66:13,15	107:1,2,9,20	163:12 164:20
box 75:3,7 143:16	BURSTIN 2:10	capable 277:11	115:16 121:3,20	176:6 203:21
143:22 179:20	5:18 6:4 11:21	capita 49:1,2 224:1	124:1 147:5,9,12	217:17 240:6
181:18	14:1 40:3,20	Capital 1:10	147:21 161:11	242:4,12,15 243:2
boy 69:4 255:10	41:13 63:14 128:3	caps 66:13	163:7,12,20,22	243:10 263:7,15
brain 212:10 214:7	131:6 193:3 281:2	capture 21:3 53:17	166:5,15 167:2,5	cases 30:13 95:3
break 133:20 134:1	286:11 293:4,8,12	62:21 108:12	168:12 171:6	98:4 103:13
134:7,19 199:8	business 22:6,10	186:18 209:20	206:5,7 214:20	123:21 137:21
241:20	65:22 263:7,7,15	225:1 238:19	221:10 223:21	143:5 151:2 153:1
breaker 50:21	businesses 34:19	290:19	237:10,12 241:21	153:2,4,20,21,22
54:14	button 11:12	captured 21:2	241:22 246:21	154:4,13 156:13
breaking 75:16	Bye-bye 200:7	146:5 151:3	255:22 259:17	157:14 158:1,5
275:1,2	bypass 169:7	169:10,20 172:8	261:19 265:20	269:14
brief 5:18,20 77:15	<u> </u>	266:11,12,15	281:15	cast 188:16
135:14		274:4	careful 91:9 99:20	categories 44:14,21
briefest 4:5	C 190:4 229:20	captures 147:1	133:6	44:22 52:9 53:19
briefly 110:18	CABG 168:22	172:5	carefully 138:17	54:2 82:14 122:6
111:2 186:4	169:20 170:5	capturing 16:21	cares 121:11	124:4 136:22
234:17	238:21	55:14 56:1 194:17	caring 25:20	138:6 208:7
Brigham 2:20	CAD 79:19 238:20	224:12	Carlos 50:6 113:10	209:11,22 210:6,6
bring 60:18 66:2,5	239:14	card 134:16	113:16 118:4,9,22	categorization
101:21 152:11	calculate 155:19	cardiac 25:19	119:4,6,15 130:17	237:10
171:15 196:4	calculated 73:16	115:14	212:18 221:14	categorize 236:15
206:22 286:18	172:18	cardiologist 35:13	235:9	categorizing
bringing 17:18	calculating 138:8	cardiologists 25:18		224:21
brings 91:3	calculation 20:12	Cardiothoracic 2:2	222:1 232:2 233:4	category 48:5
broad 15:20 63:18	California 1:22	cardiovascular	284:13	104:7 112:12
broadly 83:2	38:21 185:6	45:7 107:16	carrier 64:14 65:16	156:6,13 157:6
128:11	call 29:3,13 166:10	cards 134:12	carries 198:9	241:6 254:12
broken 176:4	197:8 202:15	care 1:15 3:4,7,10	carve 19:9 21:7	291:16
274:22	204:15 207:15,18	15:3,14 17:8 25:5	22:5 38:3,6	catheterization
brought 27:13	212:18 214:1	25:6,7,9,11,15,17	227:19	238:21
Bruce 1:12,15 6:18	216:18 217:3	25:21,22 26:5,7	carved 17:6 20:3	caught 90:10
106:9 291:18	220:18 221:2,19	27:4 28:2,4,5,6,9	21:22 230:16	cause 98:8
BSN 2:13	231:22 233:21	28:16 29:10,19	carve-out 174:4	caused 85:21
bucket 264:3	235:22 236:7	30:3,12,14,17	231:16	causes 14:10
buckets 104:9	240:20 245:1	31:5,19,20 35:12	carve-outs 16:18	cell 124:8
build 60:8 146:16	250:3 262:19	36:10 38:19 48:2	104:16 173:4,8,17	center 1:11,21,25
146:17,17 180:20	265:13 266:7,20	48:15 51:6,10	210:4 227:2,8,17	180:6 264:20

certain 53:8 54:17 characterized 241:9 254:16 collecting 48:12 clinically 146:6 54:18 97:6 104:20 claims-based 50:19 188:17 189:4 104:2 68:3 105:5.21 142:10 **charge** 17:19 54:15 245:12 collection 23:13 191:2 237:2 charged 134:9 clarification 15:10 **clinician** 26:5 81:8 37:8 73:20 **charges** 17:17 239:13 249:3 84:8 85:2 86:19 105:10 145:18 collectively 283:8 certainly 97:8 chart 85:4 108:18 113:5 clinicians 54:18 **color** 32:9 combination 48:10 121:16 143:17 chase 255:11 125:14 154:17 175:16 clinics 26:13 32:8 152:9 157:16 check 118:11,18 176:16 177:15 48:11 97:15 252:7 168:16 175:7 252:4 219:10 224:8 **clock** 102:22 **combine** 172:12 228:17 234:13 **checked** 283:4 279:16 close 23:3 32:13 **combined** 259:18 **certified** 70:17.20 clarified 90:6 41:18 100:3 163:6 come 12:2 27:19 checking 75:17 291:20 256:9 291:15 72:15 111:18 199:1 29:17 54:21 73:10 **cetera** 209:1 266:4 **Cheri** 2:22 135:6 **clarify** 50:1 82:22 closely 29:2 91:16 101:3 104:19 Chad 2:17 27:10 181:1 199:15 103:7 114:4 118:3 93:19 263:7 110:4 112:14 28:20 **CHF** 165:4 119:16 160:6 **closer** 70:16 134:14 143:12 213:22 245:19 **chair** 4:18 36:14 **chicken** 167:14 **CMS** 88:5 146:2 150:8 159:19 57:19 58:5 114:9 **choice** 168:13 271:16 237:6 243:17,22 172:12 197:7 252:15 **choices** 266:21 clarity 87:2 211:18 244:18 202:6 222:22 challenge 61:7,8 choosing 22:16 232:10 code 56:7 61:9 224:21 228:1 202:10 223:6 **clear** 86:10.18 141:16 167:20.21 230:5 231:8 289:9 124:5 230:9 250:18 **Chorus** 198:6 87:20 88:12 167:22 289:20 290:6 274:19 275:8 **chose** 230:2 107:11 124:9 coded 115:12 **comes** 55:22 110:9 289:6 **chosen** 113:15 136:21 141:12 **codes** 63:18 65:10 153:2 167:17 challenges 152:9 **chronic** 3:11 17:3 168:21 196:19 83:19,21 93:9,18 255:21 256:20 210:5 224:9 152:12 231:18 64:10 80:3 94:9 93:22 94:3,10 comfortable 105:9 challenging 161:9 98:1 105:14,16,18 236:13 252:13 97:16 137:7,9,14 107:22 132:17 167:18 202:9 147:8 148:11 **coming** 65:15 clearing 214:7 142:8,17 180:14 249:10 258:2 164:20 181:11 clearly 5:13 9:8 182:1,6 241:4 72:11 91:22 105:5 199:13 200:4 292:15 **chunk** 98:21 21:12 38:13.22 264:17.17 **chance** 12:16 14:20 **CIGNA** 1:23 coding 85:7 181:22 263:5 39:5 60:4 68:6 30:22 40:14 41:20 **circular** 238:14 81:2.10 82:7 181:22 comment 3:16 116:13 139:11 citations 46:8 84:19 107:12 coexisting 125:9 27:10 40:16 41:14 194:4 cited 181:5 139:22 157:9 **cognizant** 107:12 51:20 60:7 61:6 **Cities** 36:3 193:22 194:6 **change** 31:19 99:19 **cohort** 98:7 100:15 64:2,13 73:2 75:6 154:17 199:14 **claim** 137:6 151:21 209:8 210:20 101:11,21 103:8 106:5 110:8 168:5 215:6 227:5 227:13 234:12 108:18,19,22 271:20 112:10 114:20,21 **changed** 84:22 85:1 254:10 282:11 109:5 155:12 125:15 128:17,20 139:11 claims 15:5,15,15 click 13:5 255:17 **cohorts** 218:22 131:6 145:18 **changes** 199:20 15:18 17:13 18:2 **client** 14:5 **cold** 289:1 146:9 147:17 characteristic **Collaborative** 1:17 21:13 53:11 65:21 **clients** 181:12 148:10 149:2 146:15 104:4 136:3,4 **clinic** 26:4 27:16 33:12 155:21 161:17 characteristics **clinical** 10:11 15:1 colleagues 186:22 150:14 151:5 179:8 218:9 234:8 203:17 165:15 168:8 15:14 30:16 33:5 187:6 250:9 274:10 **collect** 69:21 70:1 characterization 174:10 184:15 33:9 97:8 117:11 281:18,19 282:6 244:12 70:10 74:9 287:13 185:3 214:18 136:8 167:21 characterize 187:13 232:13 collected 20:2 48:1 215:9 226:14.14 comments 27:10 241:10 228:10,10 229:5 234:3 73:3,4 28:21 40:13 41:14

			I	
62:14 63:9 67:6	comorbids 213:9	159:19 180:8	concerning 265:19	172:15 205:5
75:13 91:19 93:2	company 65:5	complicated 74:1	concerns 35:2 40:7	236:17 239:15
113:11 114:2	comparable 27:21	90:7 110:12,16,21	42:6 58:1 86:8,15	congratulations
117:7 122:15	65:17 66:12	111:16 180:21	86:20 91:4 99:21	293:13
145:7 221:14,16	141:14 230:7	243:2	114:3 120:7,7	consensus 1:3
221:20 222:1	comparatively	complication	122:1 130:4	40:13,18,19 41:10
237:20 243:6	252:4	145:22 172:6	136:17 178:6	41:18 195:21
244:21 269:22	compare 31:14	complications	220:20,22 260:12	291:20
273:7 275:10,10	64:15,16 74:13	107:8 171:5	261:18	consequence 24:20
278:8	117:8 131:10	172:20	concluded 137:15	30:2
commercial 14:7	144:17 228:17	comply 72:17	concludes 76:11	consequences 24:8
55:20 112:18,22	260:7 262:13	component 27:11	132:18 133:4	24:16 31:18 70:6
113:2 244:8,16	273:22 289:5	32:20	conclusion 219:18	171:5 195:8
253:13 261:9	compared 31:13	components 17:4	conclusions 203:12	consequently 53:9
290:12	34:10 89:5 117:2	43:11 52:18 57:14	concurrent 96:12	consider 15:12,15
committee 1:4,10	136:13 137:6	61:20 186:15	condition 18:10	38:2 63:15,19
7:11 11:8 19:18	191:8 192:2 213:2	216:13 232:20	105:7,14 119:22	132:19 133:1
42:10 43:9,10	219:4 242:8,15	274:21	122:6	210:11
46:14,19 47:14	243:11 245:20	composition 31:9	conditions 116:22	considerable 57:1
50:5 54:22 63:17	254:22 255:7	274:12	117:21,22 125:9	consideration 12:6
71:11 82:3 91:7	256:15 273:13	comprehensive	173:20 181:11	12:14 15:22 37:15
99:14 118:9 140:9	compares 52:22	22:10 208:8	205:7	133:6
142:16,20 175:16	comparing 247:1	compression	condition-specific	considered 9:18
193:5 194:3 196:4	247:10 276:16	125:22	17:11 205:1	26:9 34:17 36:9
204:14 206:19	comparison 246:19	compromise	confer 200:8,21	84:7 193:7 273:2
207:10,13,17	247:1 251:13	274:14	201:5	considering 64:11
208:17 214:2	comparisons	computer 13:18	conference 1:10	83:1 85:3 141:17
266:14 279:22	230:12 249:8	43:19	202:14 204:15	consistency 141:22
280:18 281:3,13	250:13	computing 237:13	220:18 236:7	175:8 219:17
281:19 282:3,7	compelling 23:7	concentrated	267:21 282:14	230:3
290:7	compensation	147:20	283:11	consistent 9:9 48:3
common 40:10	269:17	concept 103:12	confidence 156:2	82:14 86:6 87:17
50:2	compete 64:19	172:10 224:11	156:11 248:5,11	129:10 130:6
commonly 42:1	competitor 244:11	259:17	256:18 258:6,9	142:3 157:2 163:5
96:5	complete 5:3 6:19	conceptual 209:13	confident 207:16	209:12,22 220:11
communities 49:17	6:21 196:17 228:4	210:1	Confidential	220:14 229:4
community 7:19	229:4 254:2,4	concern 19:15 58:4	285:12	246:8 249:12,15
33:4,10,12,15	completed 7:10	60:4 70:6 82:9,13	confined 259:10	253:21 278:11
35:9 36:1,2,6,7	267:12	89:17 97:7 98:9	confirm 204:16	283:20
162:15 268:12	completely 113:13	101:3,4 106:20	confirmation 88:2	consistently 38:15
comorbid 174:1	168:21 272:11	113:8 122:7	confounder 96:21	210:8 216:12
comorbidities	complex 131:21	123:19 144:1	confused 55:2	consisting 232:19
141:11 185:22	158:13 179:3,6,13	167:10 176:10	confusing 111:4	constitute 37:19
186:19 188:8	179:16 197:5	177:12 191:2	136:18	constraint 196:2
comorbidity	287:15	260:5,15 262:12	confusion 5:11	construct 183:5
145:22 173:11	complexity 78:5	concerned 94:15	240:22	209:13 210:1
187:2,17	90:9 108:13	123:16,19 210:7	congestive 60:19	214:8

				Page 30
constructed 180:19	coordination 28:5	costing 17:11 86:17	cover 218:8	124:18 125:13
181:21 182:6,7	29:5 51:6 52:18	86:17 206:12	coverage 98:19	126:7 127:3,20,22
183:1 275:21	61:15,21 62:3	costs 5:19 6:2 12:9	99:18 100:21	128:7 129:1,4,16
construction 10:11	65:11	15:22 17:3,9,12	104:1.3.4	130:22 131:17
consultant's 283:21	COPD 187:22	17:20 18:11,22	covered 5:14 14:6,6	132:8,11 133:3
consultation	core 18:17 206:8,9	25:10 26:6 30:7	32:15 36:14 47:12	134:18,22 135:7
124:19	237:4	34:18,19,20 48:18	126:8 271:7,7,13	135:12 138:12
consultative 275:3	corner 34:9	53:7 54:1,1 62:21	co-chair 1:14,15	140:7,16 145:5
consumer 255:20	coronary 3:11	66:11,14 78:22	4:3 6:1,11,14,17	148:8 149:21
283:18	167:12 169:7,8,13	79:2 80:16 90:5,5	7:5,8 8:3,8,15	150:17 154:2
Consumers 1:25	169:19 172:14	90:12 117:2 124:1	9:12 11:17 13:12	155:7,10,20 157:8
contact 5:16	correct 12:19 160:8	136:9,10 138:5	14:15 15:9,12,17	158:8 160:5,20
contacted 134:10	176:14 204:20	141:15,18 143:22	16:4,15 20:15,18	164:3,7,11,15
contacts 159:2,7,7	215:2 221:9	147:20 156:15	23:4,20 24:13	168:18 169:22
159:8,9,12	222:15 223:19	164:18,18 168:12	26:14 27:7 29:21	170:3,6,12 171:11
contained 104:12	250:10 281:1	172:19 187:12	30:20 33:20 36:13	170:3,6,12 171:11
167:22	correctly 85:8	190:12 215:5	36:20 38:1 39:8	171:14 172:22
content 20:16	148:7 221:9		39:22 40:17 41:1	174:12,15 175:21
	223:20	221:10 224:13,19 225:1,12 226:14		, ,
contentious 162:5 CONTENTS 3:1			42:2,11 43:2 44:2	178:19 179:7,14
	correlate 70:2	227:13 235:16	45:8 46:11,17	182:9,16 183:8,20
context 7:22 78:16	cost 3:4 17:8 19:8	243:4 247:12	47:5 48:13 49:7	184:5,18,22
79:1 131:13	30:17 38:18 48:15	256:1,4,16 264:21	49:13,22 50:8	185:11,16 189:15
continue 60:14	48:19 53:10,12	273:18 274:7,21	51:20 53:2,6	190:17,22 191:14
194:13,14	59:4 60:21 61:11	cost-of 107:19	57:17 58:7,11,16	191:18 192:4,11
continued 193:15	63:3,6,18,22	cost-of-care 48:11	59:13 60:3 62:13	192:14,21 194:16
continuing 103:5	65:18 80:21 81:15	107:14	64:12 66:1,19	195:12,18,22
contract 56:20	86:7 93:11 97:6	count 9:8 225:15	67:2,5,15,20	196:9,11 197:14
72:17	108:3,5 130:7	counted 25:15	68:15 69:3,10,13	197:16,19 198:11
contracted 260:10	133:12 136:12,14	86:13 102:21	69:16 70:11 71:10	198:13,17,21
contracting 290:13	138:9 139:7,15	counting 51:3	71:16 72:21 74:2	199:4,7,21 200:8
contracts 21:19	141:15 142:5	103:2	74:6,14,19 75:2	200:11 201:4
22:18	157:3,4 159:21	country 28:11,18	75:12 76:2,10,14	202:3,6 204:3,7
contractual 20:10	165:7,9,18,19	32:6 34:9 247:3	76:17,22 77:8,13	204:12,19 206:11
22:14	169:18,18,19	253:16	80:8 82:17 83:10	206:18 207:4
contrasts 186:10	172:5,13,13,13	counts 159:2	89:6 91:5 93:3	208:11 209:2
contribute 59:4	173:5,10,12,12	couple 12:1 13:19	95:12,18 96:19	210:15,18,22
control 261:17	185:15 186:17	27:10 72:1 91:20	97:10,17 98:2,13	211:7 213:12,18
262:3	188:5,6 204:18	118:12 119:18	98:18 101:6,15	216:3,7,16 217:3
controlling 143:22	205:10,12,22	149:22 181:2	102:6 103:6,19	220:5,16 221:16
controversial 40:11	208:2,20 210:5	188:14 193:4	104:14,18 106:4	222:2,5 223:2
conversation 19:3	214:20 215:8,12	194:1 212:5	108:9 110:17	226:5,13 229:9,10
21:3 50:11 58:21	215:18 223:20	214:15 288:20	111:1,13,19 112:6	230:22 231:5,20
72:2 105:10 133:8	224:4,5 225:2	290:3 292:11	112:13 113:3	232:3 233:18
174:21 196:19	226:7,8,8 231:4,8	course 147:9 189:2	114:5 115:19	234:5 235:7,11,19
201:6 203:20	235:4 254:6 255:6	202:8 207:13	116:6 118:2,14,19	236:3 237:19
convert 290:4	256:5 263:16	276:22	119:12 120:3	238:15 239:7
coordinated 68:7	274:18 275:7	covariates 88:10	121:8 122:13	240:11,18 243:5

243:12 244:20	critical 149:19	70:1,8,10,16,19	dealing 17:1,2 95:7	definitions 111:17
245:6,16,18 246:7	161:2,5	71:1,7,8 72:11,16	95:8 162:1 173:3	188:9
247:6 248:18	criticism 133:15	73:2,4,9,15,15,20	173:16	degree 99:15 108:5
249:22 250:2	critique 99:1	74:9,10,21 85:4,5	dealings 22:14	266:8,16
251:8 252:10	Cross 229:17	85:5 89:9 95:22	dealt 174:5 189:19	degrees 124:2
253:3,7 254:8	cross-checking	99:15,16,20	227:1	delay 5:9
256:8 257:9	163:8	104:13 112:19,20	debate 85:22	deliver 53:12
258:20 259:7	crunch 73:10	124:8 125:3,21	debated 106:12	delivered 35:12
260:14,17 261:7	crusade 62:22	131:9 137:1,2,2	175:9	delivery 15:3 64:17
262:15 264:2,9,14	CTP 264:17	138:5 144:19,19	December 101:20	260:7
265:1,5,10,16	culling 98:3	151:16,18 152:11	255:6	Delores 72:22
266:17 267:3,14	cultures 32:18	152:15,16,20	decide 37:22 152:6	Delphi 114:19
267:19 268:2,20	current 52:20	154:9 156:1 157:7	206:17 249:7	117:11
269:6,21 271:17	66:22 270:21	157:16 163:15	258:16 276:6	demonstrate 131:8
272:4,14,21 273:6	currently 20:9	168:8 173:5,6	decided 38:2	155:6 222:14,21
275:9,16 276:18	192:12 268:15	175:18 177:14,19	289:16	222:22 245:9
277:3,13,19 278:1	269:2	183:13 184:21	decipher 179:10	demonstrated
278:8,10,17 279:3	CURTIS 1:17	185:3 190:11,13	182:21	23:15 37:9 175:8
280:3,5,20 283:1	12:17 49:4 89:13	192:6 193:9	decision 68:6	demonstrates
283:4 286:16	89:21 129:22	208:22 210:3	196:20	108:11 223:18
288:10 291:2	170:16 176:1,4	221:8 223:19	decompose 192:5	demonstrating
292:7 293:2,14	curve 137:5	227:3 228:8 229:6	decomposed 10:12	208:22 217:1
Co-Chairs 1:12	customers 166:16	229:7 230:18	192:10 278:6	221:8
282:18 292:10,12		241:9,10 245:8	decomposition	demonstration
CPT 56:7		254:11,16 265:4,8	192:5	208:20 268:17
cranking 278:19	d 22:1 190:4	266:12 277:6	decrease 97:5	denominated
crash 212:11	damage 107:18	278:4 290:10,12	decreased 150:9	246:16
create 197:3 276:8	Dan 2:15 204:1,10	database 55:20	deemed 269:13	denominator 25:2
created 113:1	206:19 213:21,21	86:4 139:13	deep 64:9	44:16 73:21
136:7	215:2 218:4	188:13 238:13	deeply 62:7	224:10 237:18
creates 20:3 106:18	220:10 222:15	databases 22:22	default 124:11	dense 151:17
249:1	231:12 234:16	data-sharing 22:18	define 95:21	depending 162:17
creating 136:1	235:12 238:16	date 193:10 194:14	147:11 241:5	250:19
credit 134:12,13,16	243:12 257:9	260:11	defined 81:2 83:15	depends 157:22
crediting 134:16	268:21 271:18	Dave 157:21 158:6	103:8 216:14	211:10
crisply 195:15	280:15 281:9	David 1:24 2:2	257:11	depression 17:2
criteria 4:14,16	Dartmouth 238:1	112:8 113:6 114:5	defines 257:14	173:11
43:4 49:16 84:6	data 10:9 15:2,5,13	119:17 145:7	defining 10:12	derived 117:3,10
85:10 86:21 87:18	15:15 16:10,13	day 3:2 4:11 5:9	256:15	describe 139:22
90:14 109:16,17	17:13 18:2,18 19:21 21:13,15	44:19	definitely 171:9	160:12 162:3
111:4 123:2	22:8 23:13,18	days 13:20 40:10	213:20	234:17
182:10 194:9	35:14 37:7,12	118:1 205:14	definition 33:13	described 55:9
196:7 202:17	38:6,8,19 39:6	277:5 282:13,20	85:21 101:22	59:21 82:7 113:13
207:1 226:10	48:11 54:7,11	286:4 292:11 deal 25:2 4 50:20	145:10,12,17	113:18 116:19
280:2	55:22 61:16 65:1	deal 35:3,4 50:20	146:8,20 223:10	120:1 125:12
criterion 14:16	65:21 68:4 69:21	54:14 135:1 174:4 252:1	223:17 226:9 258:1	185:14 208:4 209:8 229:13
208:6 220:13	00.41 00.7 07.41		1 2 3 6 1	1 /09:0 //9:10
		202.1	200.1	20,10 22,110

				Page 302
232:12	245:22 252:16	188:3 189:1,9	266:3 274:3 276:4	169:19 172:5
describing 215:20	279:7	190:10,14,16	different 27:3,5	173:10 188:5
232:20	development 28:15	191:21 205:5	28:17 33:13 36:2	196:22
description 84:18	61:14 186:10	236:18,19 248:20	44:20 55:8,17	directed 62:15 63:9
137:18 165:13	devices 293:5	278:12 279:19	56:17 57:14,15,16	direction 66:18
179:1 208:3 212:2	diabetes 3:6,8,9	diabetes-related	61:3 64:20 65:20	directions 123:16
232:9 233:1	4:17,18,22 5:2 7:1	94:3,22 95:1,9	74:3,4 78:2,4,6	directly 8:5 62:1
descriptive 113:19	42:13 43:2 44:4,9	97:16 147:5 172:1	79:16 130:13	134:14 169:9
deserves 40:4,15	44:15 46:4,6	173:11	136:11 138:6,7,9	176:10 204:8
design 27:21 36:5	48:16 51:7 59:12	diabetes-specific	144:14 146:1,11	Director 135:20
designed 64:15	77:4,15,22 78:7	79:2 93:10	146:21 150:3	disagreement 70:4
147:2 205:1	79:12 80:17,19,22	diabetic 29:18 98:6	151:11 154:14	82:16 87:22
designs 28:17	84:10,12,13,19,20	142:17 166:15	159:13 160:16,18	129:20 141:6
detail 45:5 82:10	85:15,16 89:1	167:6,7	160:21 162:1,2	143:5 220:19
157:22 232:10	90:7,13 93:12,19	diabetics 106:8	163:9 164:13	disclosure 270:17
278:4	94:10,11,12,20	diagnosed 85:18,19	167:1 168:6 176:6	discontinuous
detailed 21:15	95:22 96:2,4,8,13	101:19 107:4	178:17 191:5	100:21
56:11 137:18	96:17 97:3,5,11	188:6	209:17 217:18	discuss 11:4 80:10
233:16 242:7	99:12 100:19	diagnoses 104:20	218:22 220:19	83:11,11 110:13
288:12	102:7,8,16,21	174:9 239:22	229:21 230:1	158:14 177:2
details 10:9 131:22	103:3,5 106:6	240:2 244:1	232:21 235:15	269:11 291:21
132:1 197:6	107:2,11 109:3,9	diagnosis 80:22	238:2,3 242:17	discussable 197:20
232:15	110:5 115:8,13,16	85:16 101:19,22	243:20 251:19	197:21 198:3
detect 106:19	117:1 121:1,7,18	102:1,5,8,18	256:3,5 258:17	discussed 4:14
detected 24:12	121:21 125:8	105:22 137:5,7,8	260:7,8 261:11	26:16 32:11 34:22
26:19	133:11,22 135:2	137:14 161:1	262:6 266:9	69:2 80:15,15
detection 128:4	136:2,4,7,10	167:5,20 187:13	273:17 274:22	81:16,20 82:12
determination	137:3,4,20 138:4	238:18 239:12	differential 51:15	89:15 145:3 191:4
156:14 157:6	139:1 141:16,19	240:16 241:17	differentiate 126:4	198:19,22 202:16
168:1	142:6,18 145:11	diagnosis-based	differently 107:16	203:7 222:18
determined 86:13	145:12 146:5,14	237:6,8	169:1	discussing 129:21
determining 214:5	146:18,20 147:8	diagnostic 237:9	differs 164:17	discussion 4:9 6:3
develop 107:19	148:11 150:22	diagnostic-based	180:3	6:19 8:4 26:20
120:14 225:9	158:20 159:3,4,12	136:8	difficult 35:15	31:7 33:1,21 34:5
developed 46:1	159:15,16 161:10	differed 146:4	60:10 70:9 85:4	34:14,21 38:4
186:5 188:7 189:7	163:7,21 164:1,17	difference 31:8,9	107:20 108:11	39:9,18 40:1,4
developer 13:5,6	164:22 165:2,8,10	44:18 51:9 62:9	128:16 131:10	42:4 43:13 45:17
42:22 50:16 57:18	165:16,18,19	153:14 156:7	178:10 192:8	47:7,10 50:2,9,13
61:2 72:1 84:11	166:8 167:2,5,6	158:5 175:15	287:18	67:7 69:4 71:17
101:14 112:17	167:11,16 168:22	228:6,7 256:6	difficulties 89:15	76:5,11 80:11
114:7,16 116:1	169:14,16,18	276:10	161:9 260:6	93:4 95:2 101:5
147:16 150:1	171:19 172:5,6,10	differences 51:19	difficulty 176:13	105:21 108:11
171:18 203:15	172:14,17,20,21	54:5 88:17 137:12	260:6	110:14 112:14
223:17 243:8	173:10 177:10	139:17 144:7	dilemma 180:19,22	118:20 128:10,14
developers 11:1	178:1,5,17 180:3	149:8 153:8,11,12	dimensions 82:20	128:18,19 130:1
41:21 55:6 61:8	181:5 182:2 187:3	155:6 229:15	108:14 126:13	132:3,19 133:4
99:1 123:8 138:19	187:16,18,21	245:13 258:10	direct 165:18	134:5 139:8,13,16
L				

				Page 30.
140:8,22 181:3	divide 148:11,12	downstream 93:1	140:14 141:3	260:4,16 261:8
182:10 192:15	DM 52:4	downstream <i>53</i> .1 dozen 289:7	142:12,19 145:9	264:11,15 269:1,2
195:15 196:8	DME 97:20	dozens 264:16	147:4 148:10	269:5,9 270:1,9
197:20 200:12,19	doc 121:3 161:11	Dr 3:20 5:18 6:4,13	149:22 150:19	270:11,11,15
203:9,13 213:6,17	262:9	6:15,18 7:4,7	151:4,7,9,15,22	271:1,3,8,9,10,12
216:5 220:19	docs 121:20 156:5	11:21 12:17 14:1	152:5,8 154:6,11	271:14,15,19
265:7 266:7,18	261:19	15:21 16:17 20:5	155:16,21 157:19	272:5,10 273:8,21
282:8	doctor 156:14,20	20:13 21:4 22:2	158:19 160:11,14	274:5,8 275:13,18
discussions 28:13	159:14,16 166:5	24:14 26:16 30:1	161:21 162:16,19	276:19 277:4
33:2 43:4 83:12	246:21 247:2	30:21 34:4 40:3	162:20,21 163:10	280:10 281:2,14
98:21 193:15	doctors 154:12	40:20 41:13 42:15	163:15,18 164:5	283:7 284:9,12
195:2 202:9	156:19,22 159:13	43:15 44:1 45:22	164:10,12,16	285:9,15,19 286:9
249:12 268:4	document 13:10,11	46:13 47:11,17,20	165:12 166:22	286:11,17 287:2,8
288:3	109:16 142:22	48:21 49:4,10,14	167:3,9,16 169:5	287:12 289:11
disease 3:11 25:20	270:2 283:21	50:15 53:2,5	170:2,4,9,16	290:1 291:3 293:4
		-		
26:4,8 60:12	284:16 288:5 documentation	54:13 57:21 58:9	171:13,17 172:4 173:2,21 174:13	293:8,10,12 draft 41:17 211:13
64:10,22 78:1,3		58:12 59:14,17,18	,	
80:4 81:1 94:9	117:19 180:12	59:20 63:14 64:13	175:6 176:1,4,14	dramatically 99:19
95:14 96:6,11	287:14	67:18,21 68:19	177:5 180:1 183:9	150:9
104:16 105:18	documented	69:19 71:13,20	184:3,12,20 185:2	drawn 203:12
147:8 164:21	185:21,22 186:7	76:13,15,20 77:7	185:12,18 186:13	DRG 264:19
165:3,9 167:12	212:7	77:10,12,16 79:15	189:8,9,10,13,14	drill 54:11
169:8,14,20 172:7	documents 153:3	80:12 83:13 89:8	190:8,19 191:1,16	drive 13:3 238:7
172:14 187:4,19	284:17 285:8	89:13,18,21,22	191:20 192:7,12	239:16
188:1 190:12	286:21	90:8 93:7,15 94:8	193:3 195:5,17,20	driven 125:3
diseases 31:13 48:5	doing 18:6,9 19:7	94:16 95:17,20	197:12,15,18	drivers 126:14
165:16 188:9	51:17 63:21 64:9	96:22 97:15,19	198:15,19 199:2,6	drives 240:15
disincentive 25:8	91:7,9 119:21	98:10 99:13 100:4	200:6 204:1,6,10	driving 27:4 66:11
26:11	124:6,14,15	100:12 101:8,13	204:16,21 206:14	239:3
disparities 31:12	146:12 153:3,7	101:17 102:10,11	210:2 214:6	dropped 125:5
32:13 81:18,19	158:3 160:18	102:17 103:17,21	217:11,21 218:4	137:5
89:11 129:15	166:11 218:20	104:8 106:10	218:11 219:9	dropping 124:7
145:1 265:20	277:11	108:17 109:6,11	221:13,22 222:3,9	drug 84:3 103:22
266:1 276:1	dollar 246:15 250:8	109:13,15,19	222:16 224:7	drugs 96:16 97:2,4
displaying 43:20	dollars 151:2	110:1,3,8,20	225:22 226:20	97:13
distinctions 85:6	225:17 242:22	111:3,14 112:21	227:22 230:13	due 20:10 81:21
distinguish 144:13	252:6	113:7 114:6	231:2,12 232:1,4	181:4,7 235:4
221:11	DOLORES 2:6	115:22 116:8,18	234:19 235:1,9,13	Duly 265:1
distinguishing	domain 74:16	119:4,10,19 120:5	236:12 237:21	dump 63:1
103:15	DORIAN 2:11	120:6 121:15	238:17 239:11	dumped 63:5
distributed 218:13	Doris 1:25 68:17	122:21 123:14	240:3,13,14 241:1	dumping 63:1
distribution 43:20	101:7 269:22	124:20 125:17	243:7,14 246:1	Dunn 2:15 204:1,2
117:16 211:14	286:16	128:3,21 129:2,6	247:7,21 249:20	204:6,10,10,16,21
279:2	double 118:11	129:19,22 130:15	250:6,9 251:10	206:14 218:4
Ditto 287:2	doubt 58:17 133:10	130:16 131:6	254:21 255:19	219:9 222:16
dive 62:6 64:9	157:10 158:9	132:7,10,22 135:5	256:10,21 257:12	224:7 225:22
diverse 32:4,7,19	downloaded 13:19	135:11,19 138:15	258:22 259:4,12	227:22 231:12
	-	-		-

	1	I	1	1
234:19 235:1,13	effects 188:4	168:5	entities 14:9 65:12	238:8 239:10
236:12 238:17	efficiencies 197:4	eliminate 247:15	230:8	241:3
239:11 240:14	efficiency 156:22	eliminating 100:15	entity 34:8 160:8	ERGs 206:6 217:22
246:1 247:21	efficient 156:8,15	100:20	248:1 253:13	236:9 237:8 239:3
250:9 257:12	effort 10:22 91:8	emails 118:18	259:20	244:9,17
259:4,12 269:1,5	138:18,19	emphasizes 63:17	entry 86:11	error 20:4 71:9
269:9 270:9	efforts 12:22	empirical 233:14	envision 181:14	errors 23:13 24:7
271:19 272:10	292:10	empirically 90:20	episode 3:7,10 81:7	37:2 70:19
273:21 274:8	egg 167:14	employees 72:19	102:22 136:2	especially 6:10
275:18 280:10	eight 9:4,6 10:6	employer 184:14	137:20 141:17	39:6 40:5,10
281:14	37:6 41:11 81:11	185:9	145:11,17,21	60:17 141:12
DXCG 244:17	176:21 183:15	employers 22:16	146:1,13,19 147:5	149:4 166:4 183:6
dysfunctional	209:14,15 217:8	EMR 61:14	147:14,21 148:14	ESRD 58:22 59:10
288:7	221:5 234:1 245:3	encourage 291:18	155:22 159:4,5,12	59:22
D.C 1:12	267:10 278:22	ended 158:16	164:2,20 165:7,14	essentially 77:18
	either 11:2 33:8	endocrinologist	167:1,8 168:14	206:6 251:18
E	38:11 57:18 62:14	35:13 121:2,16	169:10,11,21	established 102:7
ear 17:21	95:10 110:6	161:12	172:4,9,11 186:17	233:12
earlier 42:19 84:14	126:16 127:9	endorse 34:6	187:11 188:11	estimate 226:3
84:14 87:4 93:5	133:1 141:9 154:4	endorsed 11:2 33:3	205:19 206:2,4	estimating 215:7
93:18 109:18	157:3 196:20	33:8 263:13,22	224:15,20,21	estimation 171:2
193:6 216:10	203:2 206:15,16	endorsement 7:20	235:15 237:1,2,10	et 208:22 266:4
228:1	229:1,13 237:17	7:21 12:5 41:3	237:12 238:21	etcetera 37:14
early 293:11	259:16 269:13	131:7 268:13	239:2	ETG 3:9 135:1,21
easier 112:4 165:21	288:17	ENDORSING 1:4	episodes 64:21 77:3	145:13 166:10
165:22 166:20	elderly 243:19	ends 103:10,12	99:9,10 100:7	168:15 171:21
179:4	elect 115:19	161:14 280:11	136:4,5,6 147:12	181:8 212:1
easily 106:11	electronic 16:11,12	enduring 42:4	148:12,18 156:1	213:11 215:7,10
119:16	19:22 20:9,22	end-organ 107:18	156:10,19 157:1	215:17 227:5,6
east 273:12,13	21:21	end-stage 81:1	166:8 168:6	236:16 238:6
easy 284:17 288:2	electronically 9:13	107:18	172:12,20 181:21	241:2 246:22
eat 198:3,4	16:14 19:21 23:17	engage 184:9,19	182:7 183:6 206:5	ETGs 146:3 171:20
economic 46:5	elegant 241:16	England 219:11	206:7 224:1,4,5	172:1 182:2
economist 185:13	242:6	enhance 28:5	224:14 225:2,3,20	213:10 214:4,19
editorialize 76:21	element 18:14	enormously 133:13	226:1,2 236:16,18	227:11 236:10,21
education 121:7	27:17 226:16	enrollees 98:5,5	236:18,19 239:9	237:2,4,12,16
142:6,8,17	elements 15:2,13	101:11	239:16 240:1	238:18,19,22
educators 51:6	16:11,13 73:2	enrollment 49:18	episode-based	239:3 240:20
effect 99:3 187:17	79:11 119:3 176:5	111:4	219:12	ETG-based 3:12
187:21 188:5,19	221:8 223:19	ensure 102:2	equalize 228:22	202:12
238:22	277:6 289:8	enter 6:2	equally 242:20	ETG/ERG 243:2
effective 97:7 130:3	elevator 186:8,14	enters 148:4	equation 56:21	Ethan 1:20 90:8
143:21	189:6	entire 148:14,19	equivalent 254:9	ethnicity 266:4
effectively 44:13	Eleven 75:21	164:21 166:7	ERG 211:22 212:6	277:7
57:8,10	eligible 44:15 98:3	192:3 194:18	213:10 214:5,20	evaluate 7:13
effectiveness 48:2	101:11 142:18	221:1	215:1 234:17	evaluated 24:22
51:10 60:21	148:13,19 150:10	entirely 264:18	236:14 237:13,15	150:15 178:12
1				

62:18 66:15 81:2	136:20 171:20	FACC 1:17	101:4,5 123:9	field 108:12
excluded 60:1	explain 58:5	FAAN 1:21,22	62:11 64:8 92:11	188:22
105:11,21	experts 107:12	F	far 34:17 48:22	186:21 187:1,15
95:13 96:10	expert 43:5	-mans 203.7	Fantastic 211:5	143.13 144.20,20
exclude 85:3,12	259:13	e-mails 285:7	FANTA 2:12	143:15 144:20,20
exception 68:13	230:20 258:16	201:1 284:22	famous 251:12	141:10,21 143:6
Excel 13:10	102:20 145:14,15	e-mail 199:16	172:1,10,17	116:22 139:20
172:16 266:3	30:17 32:12	E&Ms 115:8	168:15 171:19	88:15 93:13,17
examples 25:18	experience 29:1	E&M 115:16	family 166:10	86:17,22 88:11,14
288:15	242:11	eyes 161:15	falls 104:7,9 157:14	felt 59:2 69:20 86:2
250:12 270:10	expenses 93:1 expensive 168:15	eye 90:10 165:5	fall 30:7 105:17 156:5	37:16 194:4 fell 155:13
225:14 240:4 244:19 247:22	expense 5:13	extremely 235:4 291:9	fairness 249:12	fees 12:4 13:22
187:22 224:18	expenditures 92:6	extreme 291:6	178:15 273:13	feels 248:21 288:9
	1		68:5 85:17 95:5 178:15 273:13	
33:6,14 37:13 38:18 105:12	154:5,5 156:16,16 expended 53:8	extraordinarily 284:13	23:2 42:1 48:3	feeling 45:15 288:11
example 26:2 30:14	136:9,14 153:9	extra 202:9	fairly 4:16 6:21	207:16
examining 136:3	expected 124:1	68:11	fair 120:2	176:16 181:16
examined 137:3	expectations 78:6	external 37:10	239:15	91:13 132:16
exaggerated 30:4	expectation 107:1	276:14 284:10	205:5 236:18	56:3 57:3,9 62:16
180:18 182:22	218:19 219:5	197:1 229:11	93:18 172:15,15	feel 36:15 52:2,14
111:7 124:21	expect 79:3 94:11	178:11 192:9	failure 60:19 83:19	feeds 55:22
100:5 102:10		138:18 173:18	fails 126:17,18	feedback 43:22
	existing 20:22 48:10			
47:1972:0,11 75:981:292:18		extent 51:14	factors 186:2 276:4	feed 214:4
exactly 6:4 47:19 47:19 72:6,11	261:3 276:20	extensively 114:15 116:20	factored 118:4 119:3,13	193:8,12 281:4
	107:13 173:4			fee 6:6 14:21,21 51:17 55:19 56:19
evolution 22:4 exact 63:16	290:2 exist 20:9 23:17	131:12 140:4 168:2 242:15	254:13 facto 226:6	
evident 238:13 evolution 22:4	290:2	131:12 140:4	252:10 254:10,10 254:13	feature 99:15
evident 238:13	exercise 194:19	extensive 70:21	252:10 254:10,10	184:7 194:9
234:4 245:14	executive 287:20	extant 53:14 97:12	238:19 240:7,20	feasible 69:20 72:9
144:22 220:12	235:2,5,6 exclusive 106:3	130:5	202:14 224:2 226:6 228:22	280:17 281:6,7
62:8 81:17 144:8	234:17,20,22 235:2,3,6	202:12 expressed 58:4	202:14 224:2	194:5,15,20 195:7
evidence 60:21	234:17,20,22	262:12	194:2 196:15	193.0,13,17,19
everyone's 13:18	143:9 234:3,6,10	express 261:17	183:21 191:2	194.4 192.22
everybody's 22:9	104:20 125:20	exposed 266:2	179:18 181:4,7	184:4 192:22
282:20	87:21 93:13 98:7	254:3 279:6	161:17 169:12	132:20 177:3
24:22 62:18 148:16 157:14	exclusions 58:2,2 58:22 59:9 87:12	explicitly 95:14	78:10 95:1 152:15	73:17 75:16
everybody 14:1 24:22 62:18	87:17 234:20	186:9,15 189:6 211:21 213:9	62:17 63:18 64:18 68:3 73:19 74:7	31:17 35:11 37:20 39:13 45:12 69:17
92:8	85:10 86:21,21	explanation 103:7	fact 25:13 59:22	12:15 14:22 23:19
eventually 78:10	exclusion 58:3 85:2	explains 180:13	278:6 fact 25:13 50:22	4:12 6:3,7 11:18
events 105:5	excluding 24:17	explaining 148:7	facilitate 10:13	feasibility 3:14
115:10,12 227:6			,	
	148:18	147:6,19 211:17 234:11 243:11	233:12,15	favor 198:5 252:12
event 60:5 80:2	244:1 excludes 101:10	explained 106:20	222:14,19 223:4,8 226:9 232:14	fashion 260:13 faster 210:21
evaluation 91:10 113:17	93:16 235:10 244:1	233:2 291:6	214:11 215:21	233:13
avaluation (1).1()	02.16 725.10	722.7 201.4	$1 - 214 \cdot 11 - 215 \cdot 21$	722.12

	I		I	
figure 18:18 53:15	171:22	215:20	front 40:1 94:5	generate 55:17
133:11 168:4	fitting 124:9	format 19:22 20:9	160:2 255:9	57:2 239:9 240:1
179:5 185:14	five 57:4 59:11	258:17	fulfilled 83:17	240:12
226:10,11 288:14	103:12 107:14	forms 116:20	full 63:20 147:14	generated 15:3,14
figuring 179:11	123:3 131:11	forth 72:6 214:21	147:22	226:14
file 113:2 119:11	132:11 141:8	288:4	function 72:3 102:4	generic 178:16
222:4 255:17	216:20 245:6	Forum 1:1 33:4,6	251:18 283:15	gentlemen 77:14
files 284:21 285:3	262:20 278:22	forward 39:2,4	functions 283:14	geographic 246:4
final 40:5 63:15	280:16	40:16 42:5 50:22	fundamentally	257:16,22 259:10
100:7 108:21	five-year 107:19	54:15 72:12	127:9	259:14 262:13
128:19 130:18	flat 21:7	133:16,22 194:10	further 39:8 76:5	geographical
196:20 207:21	flexibility 161:22	290:22	180:11 231:21	139:15
211:3 282:19	flexible 162:12	found 42:20 151:1	233:19 235:8,20	geographies 231:9
finally 69:17 138:2	flip 30:2	244:10	243:5 244:20	245:21 246:10
194:19 232:17	flipping 288:4	foundation 114:12	256:7 258:21	geography 246:19
financial 22:7	flip-flop 218:18	206:5	262:15 266:17	getting 17:7 21:13
254:5 269:17	floor 189:11	four 10:6,7 37:5	269:21 272:15	22:20 23:18 47:1
find 29:17 120:13	fly 123:5	43:2 59:8 69:11	275:9 277:13	65:10 69:5 92:15
213:3 221:22	focus 84:19 101:18	75:18 131:11	278:18,19 292:8	97:5 124:17
222:1 241:9	189:17,17 220:12	137:7 146:18	fusion 240:4,17	199:17,17 225:5,6
273:19 279:17,21	focused 84:12	209:9 236:1	future 12:22 19:12	230:18 266:2
284:17 287:16	233:15	266:21 267:1	60:11 82:2 97:1	279:1
finding 256:14	focuses 216:22	268:5 272:19,19	263:19 266:15	gigantic 157:11
fine 56:21 282:21	folder 13:3,9	fourth 137:5	283:15	give 7:22 23:9 44:5
fingertips 290:16	folks 18:6 43:10	232:16	FYI 63:12	45:9,18 47:8
finish 4:9,16 123:1	65:15 134:10	Four-D 16:2		67:16 69:18 77:17
202:4	185:19 227:3	four-doc 273:13	<u> </u>	82:3 128:4 174:18
finished 267:20	269:12	four-person 273:11	gain 289:17	175:3 177:3
293:11	follow 6:8 128:15	four-vessel 168:22	gaining 242:13	180:20,21 200:20
first 7:14,16 10:21	176:1 182:15,17	fracture 105:17	game 29:14	204:13 209:19
44:4 45:19 56:1	207:16 222:10,11	fractures 105:12	gamut 174:17	212:9 282:18
101:9 102:1,13,18	233:7 264:11	framework 237:11	gaps 32:14	given 10:21 17:22
115:1,20,22 125:1	followed 222:13	frankly 63:7 120:2	gatekeeper 30:4	46:20 92:5 168:7
133:14 137:8	following 40:7	free 91:13 124:18	163:13 250:22	213:5 235:16
145:9 151:9 152:8	79:21 111:20	242:10,16 243:15	gender 81:17	238:5 239:3
152:21 167:17	239:2	243:15 244:3,18	general 46:5,7	257:15
169:7 183:10	followup 258:5	261:16	54:20 62:16 63:10	gives 177:2
193:2 195:3	follow-up 103:4	freedom 124:2	87:6,8 88:14	giving 52:9,20
199:11 225:15	footnote 220:17	196:2	104:17 113:19,21	58:14 77:14 237:4
252:14,15 254:9	257:4	freely 56:9,22 57:6	175:12 212:15	glad 5:17 89:19
256:22 257:2	force 222:19	frequencies 45:2	220:3 229:22	global 146:14,22
264:10 268:7	foregoing 201:10	frequency 37:13	259:17 274:9	147:1
291:4	293:18	44:22 238:10	generalizability	gloss 131:22
fit 88:8 117:4,13,16	forge 203:21	239:8	91:4	GLP-1 111:14
125:1,1,6 128:5	form 21:21 270:19	frequent 121:4	generally 26:12	go 5:21 7:1 8:13,16
179:11	formal 291:11	frequently 56:3	67:22 157:13	8:18 9:14 10:14
fits 31:17 33:16	formally 163:5	friends 249:13	265:7	11:9,12,13,20

13:2 16:7,16	225:1 226:21	101:18 103:11	167:10 182:15	happen 25:5 41:22
23:10,22 29:14	229:18 230:12	107:10 108:4	203:18 235:2	73:5 106:7 134:15
31:11 39:18 40:15	236:5 239:22,22	109:21 121:9,11	256:2 257:20	290:11
40:20 41:7,13	241:1,8,11 250:3	121:22 125:11	258:22 270:19	happened 58:6
43:3 52:11 60:2	250:4 251:12,22	128:20 130:1	275:5 286:12	116:14
70:17 76:16,18,18	261:11 262:2,11	136:13 139:19	290:4	happening 96:2
83:3 108:4 109:15	262:12 263:4	142:18 145:12	guidance 23:9 82:3	176:12 188:10
113:7 122:19	273:8,19 276:5,19	153:10 176:16	219:21	269:20 272:3
135:13 154:8,15	276:20,21 278:11	182:13 184:16	guideline 97:9	happens 148:3
155:18 163:18	286:17 289:9	189:20 197:4	154:21 225:8,11	159:20 161:13
167:7 168:5,20	290:17	221:1 225:3	228:12 250:17	214:17
180:12 183:13,16	good 8:17 19:10,11	229:19,20,20	251:6 253:9	Happy 204:6
183:18 191:4	43:15 46:8 50:10	241:6 246:20	257:15	hard 13:1 62:21
199:8 202:5 203:3	69:5 74:15 77:8	247:3 269:4	guys 22:21 91:8	94:17 103:13
204:8 206:17	77:13 92:6 129:8	273:12,14 274:12	106:5,8 150:18	106:19 119:20
211:1 215:8 216:4	133:14 138:22	288:7	158:17 196:5	147:11 168:3
221:3 238:16	154:6 165:12,13	grouped 159:4	212:19 278:15	283:18 284:21
242:11 258:2	168:7 192:16	166:12 181:9	280:1	285:5
261:18 262:22	204:3 211:8	215:7 224:14,15		harmonization
271:11,17 275:17	212:21 227:22	236:10	H	10:20 11:3 68:14
280:8 286:8 288:2	238:17 255:9	grouper 137:13	habits 260:9	279:6
289:5 290:21	292:12	246:22	hairs 21:2	harmonize 11:1
goal 33:18	Google 286:9	groupers 150:7	half 76:16 91:2	279:8
goes 26:4 64:5	gotten 21:16	grouping 137:3,6,8	98:18 100:6,8	hate 31:11 168:20
145:20 168:14	285:16	213:10 241:3	101:9 102:13,14	HCC 88:5 116:22
193:1 246:3	GRABERT 1:19	275:21	102:18 158:13	122:6 124:4
going 5:21 9:14	112:4,9,16 223:15	groupings 260:2	198:14,22 199:8	185:20 186:10,18
16:5 17:12 18:16	225:19	276:9	200:3 219:4,5	187:4,8 237:6
25:8 26:10 29:14	graded 143:20	groups 31:3,4,5	289:7	242:16 243:15
34:9 35:19 42:12	graft 169:7	38:21 51:4,14	HALM 1:20	244:8,18
45:16 50:9 60:18	granularity 108:5	61:3 116:21	HAMLIN 2:16	HCCs 125:3
60:22 61:3 63:5	great 31:1 73:17	117:12 122:11	44:7 49:16 51:22	242:10 244:1,17
63:19 64:3 65:20	80:9 97:7,20	125:2 165:15	53:16 55:16 58:20	HCPCS 264:17
71:20 83:13 87:16	101:2,4 106:10	179:4 185:6,9	59:16,18 61:13	head 127:4,5 154:8
96:22 102:3,19	107:11 123:9	205:2,20 206:3,4	63:12 66:9,21	264:20
117:12 123:5	138:18 180:16	224:21 227:5,16	67:4 70:14 72:13	heads 35:10 196:22
124:8,12,12 126:4	208:16 283:16,20	227:17 229:16	74:17,20 76:12	health 1:15,21,23
126:12 133:16,20	284:11 285:10	232:21 257:11	hand 9:3,5 43:1	2:5 16:11,22 17:6
134:3,4 136:16	290:2 292:2,4	266:9 286:10	75:13 93:4 100:3	18:10 21:6,9,10
162:14 180:17	greater 14:12	group's 135:22	112:5 170:17	21:14,21 30:15
184:8,9 186:16	159:8	growing 32:4	171:12	38:12,19 49:6,7,9
193:14,17 195:9	grid 126:13,16,19	growingly 32:19	handle 5:22 63:20	49:20,20 51:4
196:15 199:2,12	127:7 267:7	guess 7:15 26:20	handled 27:1	52:3,3 56:13 64:6
200:6,12,17 201:4	ground 56:19 65:7	29:3,13 32:21	handling 235:3	64:22 65:1 72:4
201:7 202:10	group 2:5 21:22	34:11 58:2 70:6	handoff 29:10	72:14,17,18 73:8
203:8 210:21	31:19,21 61:7	92:1,10 101:2	handouts 29:7	93:1 136:13
213:19 222:10	77:19 79:5,9	105:20 162:3	hanging 282:12	152:16,18 162:1
	,			, ,
	•	•	•	•

152 0 15 10 10		100 0 100 10	1 1 1 5 0 1	
173:9,17,19,19	hello 6:13,14 42:15	190:2 192:18	honestly 153:1	hypothetical 259:2
174:1,3,3 175:17	42:15 132:7	208:1,13,18 209:4	168:3	T
184:9,13,20 210:4	HELM 90:8	209:9,14 216:19	honing-in 288:14	$\frac{1}{10000000000000000000000000000000000$
227:10,10,12,14	help 5:17 43:6 50:4	217:5,8 221:5	hope 76:16 77:1	icon 255:18
228:9,10 229:1,14	55:11 168:1 181:3	224:4 225:2,12	108:7 203:8 219:8	ICSI 33:10
230:11,11,15,16	223:14 263:20	235:4 236:1 238:4	290:19	ID 100:10 150:9
231:16 241:11,21	284:5,10 286:20	245:3 262:20	hopeful 4:15	idea 50:10 118:21
242:1 249:13	287:5 288:8	265:14 267:10,13	hopefully 122:19	196:8 243:9
261:1 270:6 271:2	helped 228:14	277:17 278:22	128:14,15 133:7	ideas 24:15 123:9
271:3	helpful 108:7	higher 24:18 49:8	174:7 195:3	ideation 162:8
healthcare 1:23 2:6	192:15 283:9	51:17 92:6 121:5	hoping 6:21	identical 44:21
25:10 63:3 65:13	284:2,14,19	121:5 154:4	horizon 23:1	identification
HealthPartners	285:17 286:15	156:15 221:11	hospital 1:19 2:6	79:22 87:4 88:15
2:17,17 3:4 4:9	287:21 289:3	225:10 238:7	2:20 30:6 95:4	97:13 101:20
6:9 7:9 12:8 13:8	291:9,22	239:9,14 240:1,2	191:12 251:22	102:2 122:4 144:5
19:4 27:8 42:3	helping 215:10	240:7,9,12	275:4	176:9 238:6,11
154:19 193:7	helps 43:21 237:20	highest 159:7	hospitalization	245:11 265:22
207:9	292:12	highlighted 288:18	27:17,19 30:6	identified 10:1
hear 36:13 42:16	hemianopsia	highlights 136:17	hospitals 63:2	79:19 80:6,18
58:8 67:19 77:9	261:21	highly 141:8 175:9	hotel 5:12,13,13	90:22 96:14 105:2
105:20 211:19	hemorrhage	highs 82:8	134:10,11,15	143:9 163:20
212:2	120:14,15	high-cost 120:19	hour 194:21 198:14	224:19 265:21
heard 36:5 50:3	HENDRICH 1:21	hire 184:1	198:22 199:8	identify 37:11 57:9
55:2 72:3 100:11	60:7 64:1	historic 18:11	200:4 293:11	61:10 96:8,16
107:10 110:13	hesitated 288:21	historically 17:5	hours 183:15	104:16 125:19
123:11 128:18	heterogeneity	21:14 22:5 27:1	185:14	151:5,19 153:7
131:18 199:11	275:15	260:5	housekeeping	159:2 205:21
207:15 208:9	heterogeneous	hit 136:17 262:7	134:6	255:20
211:15 214:8	274:13	HIV 17:20 25:21	HP 13:21	identifying 10:3
254:18 259:8	hey 287:10	59:10	huge 31:12 64:21	92:20 136:7
hearing 8:4 11:18	Hi 59:17 204:1,10	Hmong 32:5	101:10 107:17	152:13 215:1
61:2 71:18 76:6	hierarchical 122:5	hold 20:16 80:13	133:5 156:12	227:5
129:20 140:11	122:6	108:3 119:2	hundreds 264:17	IDs 152:18
179:15,21 182:12	high 8:13 9:2,16	165:17 189:17	hurdle 45:17 47:3	ignorance 95:13
262:18 278:18	10:6,17 11:7,15	275:16	hurt 23:19	ignore 225:16
heart 60:19 115:12	15:7 16:9 24:4,9	holding 112:5	hyperglycemia	II 1:4
165:3 172:15	25:10 37:3,5,21	holds 145:16	95:10 169:3	illness 105:16
205:5 215:14	39:21 46:9,15	home 64:6 202:5	hyperlink 286:7	139:18
236:17 239:15	47:4 52:7 58:13	homes 260:1	hypertension	illnesses 17:3
heavily 36:8	62:10 68:13 69:9	homicidal 162:8	239:15	illustrates 104:15
HEDIS 44:17 48:2	69:14 71:21 75:18	homogeneous	hypoglycemia	imagine 91:15 94:8
49:11 68:4	75:21 81:11,11,12	257:16 276:15	95:11	imaging 274:22
HEIM 2:17 28:22	85:17 123:4	homonymous	hypoglycemic 84:5	275:1
held 115:15	124:16 127:1,6,12	261:21	111:12	impact 46:9,15
Helen 2:10 11:19	127:17 128:6	honest 257:13,19	hypoglycemics	81:11 104:16
193:1 292:4	129:7,7 131:15	258:3 261:13	109:2,12,14,17	139:1 208:1
Helen's 264:3	139:1 157:3 162:9	262:3	hypothesis 63:8	imperfect 33:17

implement 22.7	24:7 37:2 70:5	increased 95:5	infection 17:21	inicatable 94.5
implement 33:7		increases 188:1	94:18	injectable 84:5 111:15
implementation 37:20 88:19	inaccurately			
	113:13	increasing 169:18	infectious 25:19	input 43:3,7,14
implemented 23:14	inadequate 119:5	increasingly 22:9	26:4,8	125:2 209:19
37:9 216:12	254:16	22:11,17 259:21	information 5:22	212:19 214:14
implication 126:3	inadvertently	independent 72:14	26:22 57:12 87:9	281:12
implications	212:11	72:16	99:17 105:15	insane 62:20
214:19 215:13	incentives 52:5	independently	106:17 116:11	inserted 64:3
importance 45:11	include 24:19	238:12	118:3,7 143:7	inside 138:4 146:18
45:14,15,16,20	61:15 152:15,19	index 3:4 57:8 80:2	154:18 167:22	165:21 187:11
46:2,9,19 47:3	173:18 277:7	102:8	177:8,22 182:21	188:5
81:11 82:19,21	included 83:18	indexed 48:18	193:11 194:13	instances 245:20
83:1,8 135:16	84:2 93:9 94:12	indicate 41:17	205:20 206:1	Institute 33:9
138:13,20 139:2	110:7 136:22	160:15 240:9	210:10 222:13	instruct 88:12
140:8 202:16	137:1 142:7,9	indicated 12:11	228:16,19 270:4	instrument 114:7
203:13 207:1,18	172:16 174:9	14:8	280:22	114:16 116:1
211:3 220:15	182:1 209:12	indicates 100:7	information-shar	insufficient 8:13
289:12	215:4,16,17	indicating 40:12	269:10,16	15:8 69:9 75:19
important 9:22	232:13 277:6	indication 98:6	informing 9:21	87:9 144:8 177:20
12:13 16:20 19:19	290:10	100:20 217:16	10:2 273:5	190:3 192:18,20
22:9,12 40:15	includes 37:15	indicts 72:8	infrastructure	208:14 267:2
51:1 63:15,19	95:10 205:9,11,13	indirect 169:19	64:21	272:20 277:18
67:3,6 88:20 90:1	208:21 216:13	186:17 188:4	Ingenix 2:15,18,19	279:1
93:13 105:15	231:15	indistinguishable	2:22 3:9,13 5:3	insulin 109:1,5,9
114:21 117:1	including 10:11	157:15	6:10 55:20 133:21	109:18,20,22
133:13 140:19	17:1 18:9 80:19	individual 53:19	133:22 135:3,3,15	110:6 111:6,11
142:11 144:13	81:19 88:8 94:2	57:13 72:4 73:13	135:18,21 142:13	121:1
149:14 153:6,16	106:14 109:17	73:13 74:11 79:8	143:13 177:11	insured 22:16
153:20 155:5	186:1,2 205:17	81:4,9 121:19	178:2,2 183:12	insurer 21:21
158:2 165:20	215:11	122:9 130:4	184:1 193:11,16	104:6
180:2,2 186:21	inclusion 84:6	143:19 144:17	194:12 196:13	intakes 29:7
187:1,16 193:21	85:10 87:17	176:5 178:12	202:13 203:19,22	integrated 2:6 65:1
194:3 197:6 210:5	108:22 109:16	186:12 187:5,6	204:2,9,11 211:18	Integration 33:9
289:17	124:12	203:5 205:20	212:5 213:13	intended 9:19 24:8
impossible 149:15	inclusive 105:1	206:7 207:1 212:3	214:13,22 233:8	273:3
261:4	106:2	224:2,13,19 237:2	280:19 281:3,6	intense 133:15
imprecision 18:14	incomplete 148:15	247:2,18 249:6,6	ingenix.com/tran	intentionally 233:9
improve 28:7 71:2	193:10	250:21 260:3	181:19	intents 125:18
improved 30:14,16	inconsequential	269:4,8 291:1	inherent 50:21	interact 120:11
30:17	24:9,10	individually 7:13	inherited 29:18	interested 183:5
improvement 9:21	inconsistency	individuals 34:20	inheriting 29:3	209:17
10:1,2 68:9,10	271:20	79:19 80:6 205:2	initial 7:21 21:10	interesting 24:5
208:21 273:5	inconsistent 161:5	224:22 272:7	100:18 102:20	33:21 96:21
improving 33:18	incorporate 12:4	industry 22:3	131:7 261:1	155:11
imputation 18:9,13	incorporated 194:5	64:14,16	268:15	interfering 8:21
18:21	incorrect 247:5	industry's 22:13	initially 72:8	interim 18:20
inaccuracies 23:12	increase 19:13 46:4	inefficient 156:9,15	initiatives 270:5	38:10 39:1 41:19
	1	1	1	

		L	I	
interject 266:6	36:15 38:3 54:20	71:19 74:3 93:6	Kay 1:23 21:18	knew 154:20
intermediate 60:16	59:22 60:11 64:6	103:20 122:20	26:15 36:19 64:12	know 12:10 18:5
64:4	68:14 70:3 72:5	171:12 173:1	97:18 185:11	20:18 22:1 26:16
internal 68:18	82:16 86:5,21	178:20 185:17	250:3 251:9	27:3 28:2 29:7
91:11 141:22	90:1 92:10 95:3	226:18,19 229:10	keep 18:5 39:2 51:2	32:1 33:17 36:3
175:7 218:7 230:3	96:13 100:5 101:4	234:7 290:4 291:2	54:21 131:13	38:12 39:17 56:15
259:18 273:11,14	104:15,18,19	Jack's 62:14 74:5	134:3,4 186:14	57:5 62:19 64:2
internally 161:4	105:22 108:1,2	Jaime 2:19 6:15	220:6 263:4	84:21 87:16 90:9
246:8 249:11,15	117:7 121:16	42:17 43:16 45:8	283:19 284:5	90:18 92:7 99:11
278:11	122:3 125:22	45:18 47:6,16	289:4	100:2 103:4,14
internist 273:19	132:19 133:7	58:7,16 67:13,15	keeping 191:11	104:6,8 107:7
internists 247:2,3	143:12 144:3,20	69:17 80:10 83:10	266:20 267:7	114:20 116:12
interpret 274:14	147:5 170:18	98:16 109:7	Kevin 2:21 77:6,8	117:4 118:21
interpretation	171:9 177:6,17	110:17 128:13	77:10,12,16 95:18	128:2,15 129:12
19:20 270:12	178:13 179:15,19	129:22 135:9	99:6 101:16	134:15 138:16
interrelated 131:2	179:20 180:9,16	138:13 140:22	103:21 106:4	139:10 143:21,21
interrupt 142:12	183:21 184:2,10	174:17 177:3	116:6 117:18	146:2 148:4,5
interval 248:11	190:9 191:20	190:5 192:22	key 27:17 194:17	150:21 152:9,10
256:19	193:5 218:9,15	292:18 293:1	195:2 196:6	153:1,5 155:12
intervals 121:4	219:22 229:11	Jaime's 45:13	218:15 288:18	156:5,12 157:20
156:3,12 248:5	234:13 247:11,11	Jeff 114:3 287:8,10	289:8	159:19 161:1,16
258:6,9	249:21 250:1,3	Jeffrey 2:2 108:16	kid 17:21	163:1,2,11 164:9
inter-related	261:9,12 279:9	287:8,12	kind 18:9 28:19	165:3,5,14,20
129:17	issues 4:13 5:6,21	Jeff's 113:8	29:4 35:16 39:2	166:19 167:13,19
intro 77:17	27:1,6 50:12 70:7	Jen 2:19 135:6	41:10 43:21 45:18	168:2,6,9,11,15
introduced 18:15	81:20 83:17 84:16	Jeptha 1:17 89:20	62:15 63:10,16	171:19 172:7,13
99:22 227:18	85:21 86:11 87:7	170:15 292:17,21	65:19 70:22 71:6	174:5,7 175:6
introduction 42:22	89:14 95:7 98:19	jettisoned 35:20	73:16 74:9 90:18	179:3,10,12 180:9
introductory 109:4	100:22 106:13	jive 188:8	90:20 94:13 111:4	180:14 181:7,9,10
investment 65:22	107:17 120:20	job 121:12 168:7	111:16 130:7	181:22 182:1
invisible 54:19	123:12 126:9	212:21	131:1 143:16	184:14,16 186:19
invite 41:14	130:8 133:12	jobs 121:13	167:14 174:19	187:12,22 188:8
invoke 254:13	136:16 139:6	join 203:20	175:20 186:10	188:21 189:3
involve 14:21 171:8	143:11 174:2,17	joining 4:19	214:3 219:7 223:1	191:21 194:6
involved 26:12	175:13 189:19	Jones 270:11	226:18 227:18	195:4 204:22
194:4 197:10	195:7 227:15	JOSEPH 2:5	239:1 253:11,17	205:17 214:1
200:1	231:8 246:13	Journal 219:11	254:16,21 259:8	217:13 218:12,13
involves 19:7 109:5	249:2 261:5 277:2	judged 24:9 191:7	263:3 284:10	219:17,18,20
in-patient 45:1	item 5:18 42:12	191:7 218:17	289:8 290:18,20	220:2 224:13,16
55:3,7,11,13	133:1 199:11	judging 180:17	292:19	225:2,9,12,14
205:14	255:15 263:16	judgment 176:17	kindly 37:17	228:3,6,12,15,22
ipso 226:6	T	judgmental 248:8	kinds 54:17,18	229:3,4 230:1,14
ischemic 165:3	$\frac{\mathbf{J}}{\mathbf{I}_{20},\mathbf{I}_{100},\mathbf{I}_{7}}$	291:7	55:12 95:11	231:15 237:6,12
issuance 42:5	J 30:1 108:17	June 1:7 207:18	139:18 141:18	237:22 238:13,18
issue 17:14 20:6,16	109:11,15 110:1,8	justified 30:10	186:6 220:20	238:19,20,22
22:1,4 23:2,8,22	Jack 1:17,22 19:17		226:17 227:14,20	239:12,13,18,22
25:3 27:15 30:21	23:6 38:3 50:14	<u> </u>	260:9	240:18 241:22

242.2 14 242.9 17	lantan 207.16	longth 4.15 05.2 4	limitations 160.0	long town 79,19
242:3,14 243:8,17	laptop 287:16	length 4:15 95:3,4	limitations 168:8	long-term 78:18
243:22 244:4,5,6	large 31:3,21 32:9	less-than-optimal	line 71:9 202:4	look 17:10,10 42:5
244:6,9,14,16,17	55:19 60:15 86:3	245:14	203:22 281:17	48:9 51:16 52:11
244:18 246:2,3	89:2 109:8 137:2	letting 39:3	282:2 292:22	54:5 65:14 77:20
248:10,13,14,14	139:8 140:4	let's 8:9 13:12 16:7	link 62:1	78:21,22 79:7,20
250:11,16,18,20	143:18 184:14	36:18 39:9 46:18	linked 167:13	91:14,17 100:1
251:2,3 253:8	185:8 188:13	101:22 118:3,20	259:14,16	102:11,15 105:13
255:22 256:16	270:18	118:22 120:14	linking 92:2	108:21 123:1
257:13,15,20	largely 87:15 144:3	126:9 158:15	Lisa 1:19 111:20	126:9 127:16
258:8,15 259:15	larger 65:13	159:11 166:3,6,7	list 88:9 93:14 94:4	130:22 138:3
259:21 260:10	104:10 121:17,19	189:22 206:22	94:14 116:22	139:12 145:19
261:4,5,11,17	122:11	210:13 216:18	125:9,11 140:4	146:6,16 154:9
262:8 269:6,10,12	largest 32:5	220:5 221:19	142:16 262:5	163:3 166:4,6,7
269:14 270:20	Laughter 9:1,7,11	235:22 256:2	264:3	167:20,20 168:12
272:2,12 274:11	16:19 36:22 40:22	262:18 266:20	listed 13:7 83:21	170:4 183:14
274:18 275:2,2,3	41:8 63:13 71:15	272:17 278:20	85:7,20 86:15	190:1 193:8 224:5
275:5 276:3,9,12	112:3 126:20	280:5	87:4 88:4 89:12	238:8 247:12
283:12,21 284:5,6	132:14 134:2	level 27:12,14 49:8	94:21	262:4 276:21
284:7,13,22 285:4	140:17 162:7,10	52:8 54:6,7 56:7	listened 128:13	looked 64:8 78:19
285:10,10 286:2	170:11 189:12	60:17 64:4 65:14	literature 81:21	82:19 93:8 94:2
286:18,21 287:4	198:1 202:22	66:12 81:4,8,9	82:1	107:15 115:5
287:17,21 288:1,6	207:6 217:12	88:22 100:9	little 44:5 70:9	119:7 138:16
288:8,9,15 290:8	221:21 226:22	133:12 136:11,14	91:16 94:15 100:8	140:5 146:2
290:20 292:21	251:14 261:22	138:4 144:10	115:4,9 123:16	150:22 154:11
knowing 29:6	264:4 266:22	151:6 179:11	131:10 143:4	163:4 180:4
105:4 179:9	273:10 277:21	205:3 225:13	146:11,21 168:3	187:11 188:9,16
knowledge 246:9	280:13 282:22	226:4 229:14,14	169:2 186:5	188:18,20 190:15
271:22	283:3 289:13	236:19 238:4	196:16 209:17,19	238:12
known 39:7 291:14	291:8 292:6	240:10 269:4,4	222:13 248:19	looking 14:2 17:7
knows 22:8	LAURALEI 2:11	271:3 274:10	251:21 256:7	52:7,16 57:22
KNUDSON 2:17	lays 73:16	275:6 287:22	257:4 279:1	61:12 66:4 68:2
27:9 30:11 32:1	lead 92:22 292:12	292:21	287:17	75:10 79:1 80:4
42:8	leading 170:21	leveling 56:18	live 121:14 283:13	88:21 91:22 99:20
	197:2	levels 48:22 138:8	lives 14:6,6,12	100:12 117:4
L	Leapfrog 2:5	146:18,18 238:2	LLP 1:10	130:18 136:11
L 280:14	learned 290:19	240:2	local 35:9 162:14	139:2 142:21,21
lab 228:10	leave 37:22 43:10	leverage 203:9	locally 33:8 36:4	142:22 172:2
labeled 232:18	45:3 158:15	license 182:5 185:6	logged 43:17	173:9 180:10
284:14	160:15 211:9	licensed 244:8	logic 10:11 66:7	187:10 188:4
labels 136:18,21	293:4	licensing 70:22	168:2	193:20 205:4,6
labs 251:21 275:2	leaving 162:13	lies 61:11	long 18:16 19:12	206:6 212:16
lack 40:13,18 41:10	Lee 2:18 77:10,11	lieu 254:15	38:13,22 60:14	219:8 241:16
81:21 114:4 191:3	79:15 100:4	liked 88:6	78:1 125:9 136:2	256:9 259:9,22
229:22	116:18 119:4	likelihood 105:17	159:8 186:8,14	looks 20:19 22:11
lacks 232:10	left 36:16 116:5	Likewise 284:12	189:5 288:4	36:2 110:11
language 22:18	206:16	limit 168:13 170:10	longer 20:21 133:1	165:17 186:11
170:14	legal 22:19	limitation 50:21	165:10 255:10	221:13 240:5

270:5 271:1	154:5 156:16	managed 26:3,13	mathematically	34:6,10,16,18,21
Los 1:22	221:12	26:19 92:15 103:5	189:3	34:22 35:3,7,19
lose 40:14 130:11	lows 129:9 176:6	105:19	mathematics	35:22 36:5 38:19
lost 189:16	lucky 292:5	management 3:10	169:17	39:5 40:2,12
lot 17:6 30:13	lumbar 240:4,17	60:12 62:4 64:22	matter 132:1	41:20 42:14,21
45:17 60:1 64:17	lumping 106:6	64:22 65:6 77:21	167:18 201:11	43:1 44:8,10 45:4
67:12 71:1 73:4	lumps 106:15	80:17,18 94:12	224:15 293:18	46:1,3,19 47:22
85:20,22 86:8	lunch 198:12,14	98:1 102:20	matters 149:6	48:1,7,16 52:19
91:6 94:17 105:4	199:3,5 201:11	105:16	157:9	54:8,9 55:6 59:6
106:16 116:4	262:2	manager 18:5,12	ma'am 60:6	60:19 61:13 62:15
120:20 121:6,19	Lynn 2:18 135:5,5	21:6	MBA 1:15,23	62:18 63:10 64:15
122:1,7 123:8	135:19,20 142:12	managers 17:18	MD 1:14,17,20,23	66:2 71:22 72:1,9
129:9 130:8	148:10 150:19	18:19 19:9 21:6	1:24 2:2,4,10	73:6,17 76:1,3,6
139:12,14 141:17	151:7,15 152:8	managing 92:21	mean 21:1 22:2	77:5,15,20 78:9
144:2 145:14	154:6,11 155:16	mandatory 58:22	26:17 58:15 65:4	79:12,19 80:13,15
156:10,13 159:18	157:19 158:19	59:8	65:18 70:14 96:10	81:3,5,6,10 82:4
160:16 162:1,2	160:11 162:16,20	manner 57:16	114:11 124:21	82:10,22 83:20
175:10 188:8	163:10,18 164:5	manual 75:7	125:1 130:7	84:11,18 87:19,20
211:19 214:11	164:10 165:12	map 183:19	132:22 152:2	88:13,17,20 93:10
221:14 235:14,15	167:3,16 169:5	mapped 141:15	160:21 166:2	95:8 98:14 105:1
255:10 264:21	170:2,4,9 172:4	maps 181:22	167:18 175:4	107:15,20 109:3
284:8,9 286:21	173:21 174:13	marginal 242:14	178:22 179:20	112:22 123:4,7
288:8	186:13 189:9,13	243:9	182:14,19 184:7	125:18 129:14
lots 31:2 124:1	198:15,19 199:2,6	marked 148:14	184:13 223:12	130:5 131:10
160:18		marker 188:17,18	231:6 234:13	133:21 135:2
love 252:2	M	188:22	247:20 250:22	138:17,18 147:3
low 8:13 10:7,18	MA 2:13	markers 136:8	251:11 252:13	147:16 149:8,10
11:8,16 15:7 24:5	magically 255:8	173:22 187:5,6,7	253:2,5,13 256:18	154:19 160:9
37:3,6,22 39:12	main 59:22 93:2	187:14 188:16,19	263:12 271:6	164:18 171:22
39:21 60:5 69:9	203:11	237:5,7,9	288:2,15 289:14	176:7 183:14
75:19 87:14 126:1	maintained 10:9	market 98:4 246:4	290:2,11	185:4 187:19
126:17,18 127:9	55:21 278:5	260:8	meaningful 9:18	192:9 193:7,18
127:12 128:6	maintenance 7:20	markets 27:5	73:6 88:16 144:6	202:13 203:15,17
131:4 141:10	268:14	251:16 260:8	144:11 245:12	204:13,18,20,22
157:4 190:2	major 17:4 171:9	MarketScan	247:1 273:2	205:2,9,18 207:8
192:18,20 208:14	178:13 274:21	104:13	means 7:12 17:9	207:9 209:8,14
216:20 217:9,11	majority 117:22	Mary 1:23 21:18	182:13 264:6	210:1 211:22
221:5 224:5 225:2	147:13	26:15 36:19 64:12	265:11 279:12	214:9,20 215:5
234:1 235:10,17	making 27:20 33:15 68:7 74:3	97:18 185:11	meant 15:19	217:7,16 219:13
236:2 242:1 245:4	158:3 188:6	250:3 251:8	211:22	219:16 220:4,10
247:15,16,19,22	211:15 249:4	match 78:10	measure 4:10 5:3	221:8,9 223:4,13
262:20 265:15	273:22 289:1	170:19 213:1	7:1,9,9,18 9:17	224:1,18 225:4,16
266:8 267:2,11,13	290:11	214:18	10:10 11:15 12:5	226:2 227:19
272:19 277:17	malignant 241:7	matches 163:6	12:8 13:4,6 15:1,1	228:7,13,21 229:7
278:22 280:16	manage 102:4	matching 152:10	17:8 28:15 29:4	231:14,15,19
lower 63:6 84:9	201:7	materials 56:12	30:12 31:1,14	233:13 234:18
108:20 144:2	201.7	283:18 292:2,14	32:10,16 33:15	235:18 237:17
	l	l	I	

	1	l	1	1
242:15 243:3,8,10	83:14 87:18 92:3	medium 58:14	mentioning 111:8	116:15 126:16
245:10,20 247:9	92:9 97:12 100:6	81:13 87:14	merits 47:8 67:7	220:7 223:7
248:20 250:12	108:15 114:13	127:12 129:11	meshed 92:9	231:13 266:21
254:4 258:14,16	116:3 122:22	131:3,4 141:9	met 1:10 90:16	267:7
258:19 259:5,15	124:13,14 140:1	mediums 82:8	137:16 159:16	mindful 99:16
260:1,12 265:21	146:12 161:1,2	Medstat 146:3	254:12	minimized 24:11
266:15 267:17	170:20,20,22	meet 208:6	metallics 8:20	minimizes 124:15
268:11,21 269:18	171:3 172:3 175:9	meeting 13:20	metformin 96:5,15	minimum 49:18
274:4,19 276:1,2	177:11 178:2,3,12	116:12 134:20	method 18:21 55:8	88:18 149:2,3,12
276:3,7,21 278:5	178:17 179:3	143:1 147:7 149:5	86:17,18 120:9	149:19 153:4
279:7,14,19	180:3 181:5,6,8	195:1 218:14	148:15,16,17,22	158:1 211:16
280:22 281:4,8	181:16 182:4	228:2 283:12,13	149:9 153:16,17	215:21 222:20
291:1	194:2,7 203:6	283:13 285:19	153:17 162:17	223:1 229:5
measured 38:16	205:11,13,22	292:13,19 293:15	163:11 166:11	Minneapolis 31:10
141:5 150:22	206:10 212:6	meetings 134:10	211:20 242:7	31:13,22 32:3
177:6 183:2,7	217:15,17 218:5	162:4,6	263:22 264:1	Minnesota 31:2
205:19 232:6	219:7,8,12 223:20	MEG 146:3	methodologies	32:3,19 33:7,10
273:1 275:7	224:17 229:12	mega 130:11	160:10 244:7	minute 36:21 128:9
measurement	258:7 274:17	member 148:13,18	methodology 44:9	minutes 7:2 193:4
10:12 23:14 24:8	275:6 279:6	159:11 186:20	45:6 48:17 53:14	285:20
27:13 33:10,12	280:19 281:6	205:3	53:20 74:21 88:4	miscommunicati
37:8 54:8 80:1,5	289:15	members 28:8	113:12 114:14	5:11
80:20,21 108:6	measuring 38:22	33:19 49:18 52:15	125:12 135:22	misrepresentation
153:7 176:12	50:22 51:11,13	64:20 66:11,12	136:1 146:10,17	71:7
183:3 207:22	52:1,17,19 56:13	119:20 137:19	150:2 151:11,12	missed 48:18,19
208:4 220:13	149:11,18 166:4	159:3 163:20	155:22 158:18,20	98:11
231:19 243:21	166:14	175:11 204:14	159:1 179:18	missing 88:8 89:8
246:2 248:1 253:5	meat 45:21	205:17 206:19	195:14 206:3	93:22 94:1 97:22
276:13 289:21	Medicaid 65:16	208:17 215:1	235:5 252:21,21	98:9,21 105:15
measurements	185:9	member's 237:11	263:11,13 288:19	179:20 228:9
32:13 138:9	medical 1:21,25	member/per 17:16	methods 87:10	270:22
253:22	36:7 135:20 174:9 185:5 228:4 229:4	21:8 Mambar/Dublia	146:5 148:20	missingness 100:10
measures 1:4 4:17		Member/Public 3:16	245:9	mistake 131:21
4:22 5:2,19 6:5,20 11:2 12:2 18:15	241:5 260:1 Medicare 55:18	Memphis 31:10,21	metric 31:6 metrics 138:6	misunderstanding 179:17
18:17 19:13 30:16	60:2 65:15 112:18	35:11	mic 16:16	mitigated 174:8
33:3,5 34:12,16	112:20 113:4,6	Memphis-Minne	Michigan 2:5	mitigating 27:20
35:16 40:11 41:13	243:18	251:12	161:22	mix 206:7 217:17
41:15 43:2 44:4	medication 111:12	mental 16:22 38:12	Microsoft 283:13	237:12 242:12,15
44:11,17 48:2,9	111:16	38:19 173:19,19	middle 126:5 148:4	243:3,10
48:10 49:11 50:20	medications 84:5	174:1,3,3 210:4	156:5	mixed 175:20
54:15,15,19 55:14	96:1,3,8,9 110:6	227:10,12 228:9	Mid-Atlantic 2:2	mode 212:11
56:13 57:4,14,15	111:7,11	230:10,11,16	migraine 187:20	model 61:11
59:11 60:16 61:15	medicine 1:18	mention 110:18	million 99:4	110:11 114:4
62:3 68:8 69:2	273:12,14	142:15,20	millions 242:22	117:10,13,16
70:3 78:11,12	medicine/family	mentioned 93:17	mind 51:2 54:21	122:5,6,7 123:17
79:17 80:1 82:11	259:18	110:22 232:2,12	77:14 110:19	123:20 124:5
L	1	1	1	1

		I		
125:5 143:14	252:7 264:21	151:10	163:15 171:13,17	204:20
145:13 154:3	monitored 24:11	N	173:2 185:18	non-insulin 111:15
158:12 169:15	monkey 202:20,20		189:8,10,14 210:2	non-trivial 264:22
186:18 187:16	month 17:17 21:8	name 119:11	226:20 230:13	non-user 27:11
188:3,19,21 237:6	148:1,5 206:2	135:19 204:9	231:2 284:12	non-users 27:13
243:15,20 244:2,3	months 102:2,19	naming 283:20	291:3 293:10	norm 246:22
244:8,18 248:22	103:1,2 147:15	narrowly 161:3	needs 30:5 66:1	normal 169:2
modeled 188:12,15	151:14	national 1:1,3 7:19	73:5 211:11	279:2
modeling 65:2	morning 4:20 5:10	31:5,15 33:3 34:8	253:11	normally 96:1
models 8:2 28:16	6:22 44:3 77:9,13	57:8 268:12	negative 128:12	Northern 2:4
60:15 113:14	motion 197:13,20	nationally 34:7	192:6	note 72:7 116:10
117:2,3,9,20	198:9	nature 35:2 175:13	negotiated 51:14	193:21 219:18
124:22 162:3,13	move 13:12 34:3	NCOs 185:8	neighborhoods	243:15 258:13
163:9 169:16	36:16 38:7 39:9	NCQA 2:16 3:6	240:5	notebook 212:17
187:8,9 189:6,9	40:16 42:12 67:14	42:14 44:5 46:1	neither 111:9,11	noted 41:4 117:18
214:4 239:20,20	83:8 140:20 177:1	48:3 62:6 65:8	neoplasm 241:7	137:11 265:1
241:19 242:2,9	192:22 194:10	69:22 70:15,16	nervous 115:9	notes 80:14 160:15
244:16 268:16,18	210:14 211:4	71:22 73:9,10	net 99:3 188:17	179:1 195:1
moderate 8:13 9:16	220:6 265:11	74:7 122:12 153:3	never 162:5 232:5	203:10 207:14,19
10:6,18 11:7,15	268:3	164:17 180:3,4	232:5	209:20 211:13
15:7 16:9 24:4	moved 128:22	224:18 253:1	new 10:3 27:6	212:12 266:6
37:3,6,21 39:12	197:15 199:17	NCQA's 54:6	61:13 80:22 85:15	280:1
39:21 69:9,15	268:6	necessarily 130:3	85:15 101:22	notice 16:4 97:21
71:21 75:19,22	moving 9:17 10:8	144:16 240:9	102:5,8,18 122:17	noticed 57:21
127:2,6,18 128:6	11:18 16:10 24:6	249:17 258:18	123:13 210:10	notion 23:21 63:4
131:15 190:2	37:7 39:2,4 47:18	necessary 53:12	219:11 264:17	nowadays 96:3
192:18,20 208:14	50:22 54:14	need 5:7 7:15 10:3	newly 101:19 107:4	NQF 2:9 3:16 5:15
208:18 209:5,9,15	133:21 208:19	17:9 18:18,20	nine 9:15 41:11	5:16 12:1 40:12
209:18 210:3	209:6,10 216:21	33:4 40:1 51:17	46:14,15 123:2	42:9 134:14
216:20 217:6,8	221:6 234:2 245:5	54:16 64:7 74:8	127:12,17 192:19	177:15 222:19
221:5 234:1 236:2	262:8 272:22	77:21 92:8 99:16	217:5 236:1 267:2	263:19 277:9
245:4 262:20	278:2	121:9,12 122:19	267:18	289:16
265:15 267:1,11	MPA 2:1	182:4 183:3	noise 105:4 106:13	NQF's 5:11
267:13 272:19	MPH 1:19,20,24	194:12 196:18	106:18 108:1	ns 121:19
277:17 278:22	2:6,10,13	197:12 198:11	non 106:20 264:5	number 14:5 44:14
280:9,16	MSN 1:21	200:1 219:19	265:10 291:6	46:8 55:16 65:9
moderately 58:19	MSSW 2:5	236:10 237:16	noncommercial	66:20,22 71:5
194:8	multiple 49:17 89:9	242:21 291:21	14:9	78:16 89:4 93:16
Moderates 9:5	92:17 144:18	needed 39:18 73:16	nonspecific 99:22	96:12 99:11
modest 60:4	152:16 172:12	82:10 85:10 87:4	non-A 279:4	101:10 103:16
modified 243:17	230:15 265:4	88:11	non-applicable	108:20 127:15
moment 21:19	284:15,15	Needleman 1:22	144:21 263:1	135:1 136:16
46:18 60:9 94:5	multi-specialty	16:17 20:5,13	279:11	144:1,16 149:12
158:16 251:11	121:9,11	21:4 50:15 53:3,5	non-condition 3:12	149:19 150:10,12
274:16	multi-year 44:16	54:13 71:20 93:7	207:8	150:14 152:1,6
money 65:4 107:6,8	murder 162:6	94:16 103:21	non-condition-sp	153:1,2,20,21
184:6 191:11	mute 150:20	123:14 162:21	6:20 202:12	154:12 157:10,13
L				

			1	
158:1 159:6,7,8,9	official 202:19	271:15 272:17,21	28:14,18 29:13	outreach 29:5
181:4 185:18	offline 200:15	275:16 277:15,16	36:12 177:2	outs 22:5 38:6
202:8 240:1	201:6	277:22 278:21	208:21 263:10	227:20
246:16 247:15,16	oh 8:16 47:2 59:17	280:4,12 281:14	282:19 290:9	outside 186:16
247:19,22 248:9	89:18 127:20	282:1,10 284:18	opposed 81:5 102:8	187:10 188:4,11
248:10,13 268:3	154:6 193:1 198:3	293:2	121:2 187:3,13	241:21 290:22
284:1,4	198:3,21 210:17	old 188:15 253:15	198:7 225:20	outstrip 64:7
numbers 73:10	221:19 245:7	253:18 277:5	opposite 161:18	ovarian 96:6,11
99:18 100:3 175:4	253:12 260:22	older 188:15	opt 22:16	ovary 95:14
247:5 251:20	261:20 271:17	once 5:1 7:11 55:10	opted 125:6	overall 11:6,8,14
284:14,15	275:18	73:3 105:2 136:6	option 38:11 228:5	12:5 39:13,17
numerator 73:21	Ohio 229:17	149:12 211:8	options 18:8 160:7	40:2 47:14 76:1,4
205:21 224:10,12	okay 6:11 7:3 8:11	236:8 237:11,15	191:6 251:6	90:4 93:1 131:14
237:17	8:19 9:12 12:19	253:20 281:2	oral 84:4 109:1,12	147:9 187:3,19
numerators 205:11	15:17,18,20 16:6	291:13	109:14,17 110:6	190:12 191:10
numerous 127:15	20:8,14,17 23:19	ones 97:22 114:18	111:6,11	193:18 194:20
208:8	24:5 29:21 39:9	124:6 130:20	order 32:13 42:20	203:17 206:8
nurse 51:6	43:15 44:1 47:2	183:22 218:1	44:3 45:12 91:13	211:3 217:7 226:4
nutritionists 51:7	47:17,20 69:13	289:8	95:21 182:5	237:3,13 245:14
N.W 1:11	71:10,16 72:21	one-year 3:8 78:13	196:12 197:22	264:7,10 265:12
N/A 190:4	75:19 76:21 83:13	80:17	organization 27:2	265:15 267:4,8,10
0	90:2 93:3 97:18	ongoing 193:15	54:8 73:13 74:12	267:11,15,16
$\frac{0}{11 + 260}$	103:19 110:1	open 13:6,9,10 43:8	228:18 276:17	279:13 280:2,6,8
object 268:6	115:20 118:19	47:9 50:9,12	organizations	280:15 281:7
objection 11:17	119:6,7,7,12,13	71:17 93:3 134:5	22:15 185:8	overarching 290:3
objective 209:7	119:14 122:13	158:16 182:3	259:22	290:5,18
276:13	125:13 126:7	223:13 255:14,17	organized 28:19	overestimates
observable 239:21 observation 175:2	132:10 133:18	255:17 265:6	organizing 284:11	125:22
observe 218:12	140:16 142:19	281:17,22	original 118:10	overfitting 124:10
276:5	151:7 155:9,14,20	opening 43:12	153:3	overlaps 33:22
observed 126:1,2	164:8,14 169:22	open-ended 249:5	Ortho-McNeill-J	overlooked 180:13
136:9,12 236:17	170:6 171:11	operate 28:3	2:1	overutilization
239:1,5	174:15 182:9	operational 20:1	ought 54:20,22	238:9
observed-to-expe	184:22 189:16	23:15 37:9,12	72:10 123:6	overview 135:14
156:3	191:14 192:11	133:19	outcome 9:22	204:13
obviously 22:4	196:9 197:16	Operator 281:16	30:16	O'NEILL 1:23
68:21 138:21	198:5,7 199:2,6	281:21	outcomes 28:7	22:2 26:16 34:4
142:9 165:14	200:20,22 201:8	ophthalmologist	30:15 33:19	64:13 97:19
173:10 191:21	203:1 204:7,12,21	120:18 161:14	outlier 157:11	185:12 221:13
228:15 288:11	208:15 211:2 213:18 216:8,18	166:14 183:17	225:7,13,20,20,22 235:5,17	222:9 235:9
occasionally 70:9	,	ophthalmology 2:4 165:6,6	outliers 125:19	237:21 240:3,13 243:14 250:6
291:5	217:6 220:5,9 221:19 222:2	opinion 43:5	225:9 235:10,14	243:14 230:0
occur 96:22 141:18	226:13 231:20	149:20 166:11	269:13	271:1,8,10,14
occurred 105:5	233:21 235:19,22	opportunities 11:3	outline 150:2	290:1
occurs 169:12	236:3 238:17	291:10	outpatient 192:1	<i>2</i> /0.1
offer 43:5	265:9,16,17 268:9	opportunity 28:4	outputs 92:5	Р
	203.7,10,17 200.7	Pportunity 20.7	Juiput 72.3	
	I	I	I	I

Page	316

				5
P 113:20	partial 148:21	33:19 51:6 62:4	PDF 255:14 257:3	120:17 126:1,2
package 118:7	PARTICIPANT	77:4 80:18,22	284:20 285:2	156:4,8,8 159:9
181:8 285:2	264:8	85:12,17 89:1,4	Pearse 2:19 135:6	159:17 213:1
packet 255:4,15	participated	90:2,22 93:12	pediatrics 259:19	273:15
page 109:18 110:9	174:21	94:9,18 95:21	peer 153:10 232:21	percentage 89:3
110:9 151:13	participating	96:8,10,17 100:16	254:22 255:20	100:18 109:8
158:12 255:12	283:11	100:22 101:21	256:13,14,15	150:11,13 151:2,4
256:3,3,22 257:2	participation 52:6	109:8,21 111:10	257:11 268:22	154:4,13 157:21
257:3 270:7	particular 13:11	120:22 121:18,21	274:12 275:21	163:22 240:7
paid 17:17 21:7	15:6 36:7 43:11	141:19 144:14	276:9	percentages 27:4
pain 16:18 19:2	46:1 84:4 86:9	147:14 173:6	peers 255:8 256:2,5	perfect 46:12
240:10,16	87:1 89:16 95:8	218:22 219:4,5	256:12,17 258:4	108:10
paired 82:11	119:21 120:13,16	225:7,13,21,22	258:11 276:15	perform 108:15
Palo 1:15	121:22 122:2	230:15 235:4	PENSON 1:24	157:3 217:17
Panel 207:11	139:19 140:2	236:9 238:7	114:6 115:22	242:2,20
paper 217:22	145:4 147:10	239:13 247:22	119:19 120:5	performance 1:4
218:12 219:10	163:11 165:17	248:9 271:7 274:3	people 3:5 13:15	7:18 9:18,21
255:12	175:19 178:11	patient's 107:7	19:4 24:20 25:9	30:18 117:8,20
paradox 170:21	193:5 221:15	236:16	25:14,14,18 34:8	177:7 245:13,15
paragraph 232:16	252:20 254:11	patient-based	34:19 35:9 39:4	255:1 268:11
Pardon 74:19	263:16	226:2	42:13 44:15 46:15	269:15,17 270:17
129:1	particularly 59:11	Paul 1:15 8:20	48:16 58:3,14,18	270:17 273:1
parse 106:13 211:9	78:3 145:21	24:13 57:20 71:11	60:1 63:1,2 80:19	performs 218:2
241:14	161:10	122:19 123:15	82:9 86:2,8 87:13	242:8
parsimonious	partly 116:9 180:8	132:21 164:11	88:15 98:22	period 3:8 42:4
113:15 117:17	partner 28:5	217:21 233:6	100:19,21 101:10	52:11 77:5,22
125:7	partners 29:8 40:6	240:22 276:18	101:18 104:3,3	78:8,14 79:20,22
parsimony 123:20	53:22 249:13	277:10	101:10 104:5,5	80:5,17 81:7
124:12,16	261:1	pause 5:20 10:5,16	111:9 122:14	147:10,13 148:1,5
part 12:1,3 26:18	parts 169:6	11:10 24:2 37:4	134:4 143:6 144:1	206:2 288:1
45:20,21 46:16	parts 109.0 pass 45:16 127:10	39:10,14,20 41:5	145:20 152:4	permanent 259:17
49:3,11,15 67:22	passed 127:7	46:22 67:11 69:12	161:3 175:16	person 17:20 77:21
68:14 86:9 90:9	passes 47:2	75:20 76:7 83:6	177:19 181:20,20	78:7 90:16 107:1
94:11 102:21	patient 18:10 19:1	132:6 222:5	183:2,22 184:7	112:2 169:2,13
104:11 119:17	30:5,9,16 31:3,9	pay 51:15 269:15	190:14 191:11	200:1 203:19
121:22 142:7	32:12 61:21 62:4	payer 185:3	196:21 202:19	292:5
151:10 152:1	92:14,22 102:4	payers 162:2 272:7	229:8 230:4	personally 105:8
164:13 165:14	115:10 120:13,19	paying 18:12 19:8	235:15 240:8	106:2 249:11
167:2,4,4 169:7	142:1 143:18	payment 21:8	241:20 244:15	286:1
169:11 171:16	146:14 148:3	272:6	252:4 253:14,18	perspective 22:3,14
173:13,15 193:9	165:4 168:13	payments 243:18	253:20 261:15	pertaining 164:22
193:22 225:3,7	225:18 226:4	payor 49:5	271:6 278:19	PETER 1:25 68:19
231:17 233:9	234:19,21 235:1,3	PBM 104:3,11	291:5	101:8 102:11
240:19 246:11	235:5 238:11	290:14	percent 31:12,20	256:21 270:1,15
247:2 257:12	273:17	PBMs 22:5	90:15,17,21	271:3,9,12,15
258:8 259:12	patients 3:7 25:20	PCOS 96:18	108:20 109:10	286:17
275:14 290:13	26:12 28:8 32:9	PCP 163:2,5	115:7 118:13	Pharmaceutical
		,-		
	I	I	I	I

	1		1	1
2:1	191:6,8 230:14	plug 53:18	241:11 243:19	predefined 44:14
pharmacy 17:3,9	247:10 257:21	plus 102:19	276:8	predict 117:14,15
17:12,18,22 18:4	259:16 269:3,10	PMPM 3:4	populations 32:5,7	predictive 65:2
18:12,19,22 19:8	pick 117:10 160:9	pocket 34:20	227:9 238:3	prefer 124:3
21:5 38:12 55:22	161:6,7 263:21	point 11:21 12:16	273:17	161:21
97:12 99:18	picked 161:3 163:3	19:19 40:21 50:2	population-based	preferable 155:2
137:19,22 138:1	picking 100:15	53:6 60:8 61:7	204:17 214:10	preference 34:1
173:4 210:3 227:2	124:5	74:3 91:18 108:17	219:13 224:17	106:1
227:3,4,5 228:8	picture 191:10	113:8 131:16	portion 67:9	preference-sensit
229:6,22 230:9,10	192:3	149:3 154:3,16	140:21	65:2
232:22 256:1	piece 32:21 45:10	168:9 182:18,19	pose 122:14	preferred 248:16
290:10	45:19 115:3,6	183:21 185:17,17	posed 106:9 163:17	preliminary 114:19
phase 1:4 80:18	pilot 131:8	192:16 193:12,14	252:16	premise 28:3 34:6
PhD 1:15,22,25 2:2	place 85:19 168:4	193:16 194:11	posing 223:11	premium 21:8
2:5,5	178:15 179:17	196:12 197:9	positive 17:20	prepared 34:3 67:8
PHILLIPS 2:1	249:9 286:12	219:14 225:6	46:21	75:16 176:17
91:20 182:14,17	places 65:20 240:6	228:1 237:16	possibility 71:8	208:12 292:20
207:2	250:21	249:20,21 250:15	174:8	PRESBURY 2:12
philosophical 61:6	plan 21:9,10 22:17	260:4 274:2	possible 4:5 24:15	prescribed 97:13
philosophy 166:20	24:21 27:12,14	275:20 279:7	247:4 266:16	prescription
phone 1:21 2:15,18	49:6,8,9,15,21	pointed 158:6	possibly 27:6	103:22
2:18,19,19,21,22	52:3,3,15,21	points 35:3 71:2,8	229:11 249:9	prescriptions 56:2
43:13 77:6 128:17	53:16 54:12 68:21	181:2 194:17	263:1	presence 232:22
135:4,10 197:8	72:14,17,18 73:12	195:2 196:6	post 74:17,20 286:1	237:1
213:22 214:1	73:13 136:13	203:11 204:5	posted 75:7 253:1	present 1:13 2:14
252:15 287:7	148:4 163:2	287:16 288:15,20	286:4	166:3 171:2
293:1	229:14 254:11	policy 193:22	potential 12:11	202:15 203:16
PHQ 149:11	270:6 271:2,3,7	290:20	28:18 170:21	204:15 205:8
phrase 270:16	plans 17:6 18:17	poll 283:14,15	potentially 171:5	210:8 269:11
physician 49:12	21:14 49:20 51:4	291:11	228:20 289:20	presentation
51:17 88:22 89:16	52:22 53:22 56:13	polling 283:9	potentials 99:5	110:19 203:16
99:10 100:9	62:12 72:4,12	polls 291:11,19	power 35:16	presented 144:9
103:10,13 107:5	73:8 122:11	polycystic 95:14	powerful 34:15	148:17,22 149:9
133:12 136:12,12	152:16,19 175:17	96:6,11	35:8 252:8	158:22 178:5
144:10 150:9,10	180:17 184:9,13	pool 230:19	practical 145:15	187:1 190:11
150:22 151:1,3,6	230:15	poorly 242:2	practically 245:12	220:12,14
151:19,20 152:18	platform 8:17	population 30:9	practice 33:8	presiding 1:12
159:6 164:1	play 27:14 223:3	31:3,10 32:4	161:22 219:1	presumably 242:10
183:10 229:16,19	226:3 236:21	44:15,20 45:3,6,7	229:13 259:18	pretty 50:10 59:21
229:20,20 230:20	playing 185:12	46:5,7 49:2,19	practices 64:16	68:1 126:8 145:2
248:1 250:21	please 4:7 5:12 9:3	59:2,12 60:2 65:6	65:11 121:9	145:13 174:16
256:1 276:16	9:5 11:9 13:16	66:10,16 86:12	precise 18:1 83:16	234:12 241:15
physicians 85:8	15:11 36:17 37:3	87:3 89:2 90:7	87:5 141:5 216:14	242:11 243:4
88:22 89:5 122:9	67:17 176:3 204:9	105:3 109:21	precisely 86:15	258:1 283:22
144:14,17 150:13	204:9,14 215:2	110:7 113:1,2	103:8	prevalence 46:4
150:14 152:10,13	293:4	139:1,3 142:1	precision 19:14	239:14
159:3 163:19,21	plenty 131:18	143:18 205:3	216:10 220:4	prevent 97:2

			-	
prevents 66:16	150:15 167:17	268:13	156:2 159:10	put 35:22 37:17
previous 80:6	174:5 244:14	progressed 279:9	163:13 182:20	65:7 69:1 91:8
101:1 105:10	252:12 273:15	progression 138:7	185:8 192:1 218:9	118:22 138:19
196:7	problem 7:4 86:7	project 123:22,22	218:16 246:20	165:22 166:20
pre-work 282:14	92:18 114:22	279:8	247:18 255:7	178:14 183:11
price 13:21 14:4	142:4 208:3 227:4	projected 132:16	258:10 271:5,13	270:10 271:21
44:12 56:4,8 57:8	241:13 253:19	promote 29:5	providers 25:9,15	274:15 285:13
57:10,13 112:10	problematic 39:7	proper 24:11	25:17 26:11 29:2	286:12
112:19 113:1	problems 25:19	properties 141:6	60:17 64:5 90:3	puts 40:12
prices 18:4 44:12	81:16 94:6 100:14	prophecies 75:10	92:17 143:19	putting 136:3
48:6 51:15 53:18	100:16 114:14	proportion 32:9	180:17 183:7	214:21 277:1
56:18 57:16	139:7 150:8 165:5	66:10 85:17 104:6	217:19 257:21	P-R-O-C-E-E-D
price-to 254:5	178:5 208:20	104:9 121:17	260:3,3 271:9	4:1
pricing 18:3 35:1,5	226:17 230:21	191:22	providing 65:13	p.m 201:9 202:2
35:17,18 48:17	231:1,3,4 249:4	proposed 225:10	281:12	293:17
51:18 55:3,4,8,11	276:20	proposing 160:7	proxy 149:13	
55:18 56:6,16	procedure 93:9	208:7	psychosis 173:15	Q
206:12 231:11	142:17 167:21,22	proposition 63:6	public 1:22 7:19	qualities 219:16
246:17 250:7,10	procedures 45:2	proprietary 6:5	8:1 9:20 68:9,22	quality 1:1 10:2
250:13 251:15,18	104:20 187:13	12:2 13:21 37:16	74:16 177:14,16	32:11 33:4 44:17
252:3,11,17,20,22	238:5 241:17	56:19 143:14	182:3,8 268:12,16	48:9,10 61:18,19
254:13,14,17	proceed 8:4 206:20	175:13 182:4	269:7,19 270:3,4	61:22 62:2 63:22
260:19 262:10,14	proceeded 77:19	194:1	270:7,12,16,18,21	68:8,9,10 78:11
263:4,9,11,13	proceedings 201:10	protests 4:7	271:6 273:4	78:11 82:11 92:3
264:13 281:1	293:17	protocol 85:12 86:9	281:18	92:9 170:20,22
primarily 49:1,1	process 12:3,5	87:1 98:12 143:10	publicly 12:18	171:3 219:15
56:1 59:1 79:6	30:15 60:16 70:8	provide 12:9 25:21	68:20 177:7	273:5
183:4 212:6	70:21 71:2 78:1,3	26:10 42:22 43:3	181:10,11,12	queried 113:9
primary 25:5,7,8	113:19,22 114:19	43:14 87:20 133:8	190:18,20 271:11	question 10:20
25:11,14,17,22	116:19,21 117:11	155:17 196:5	272:9	16:14,15 19:16
26:5,7 27:4 28:2,3	215:22 226:15	212:12 219:21	publish 56:5	20:7 23:5,6,7
28:9 29:10 30:3	232:12 283:8,10	233:16 281:18	published 56:22	50:15,19 55:1
31:4,19 35:12	291:4	282:19	152:4 153:18	58:8 61:1 66:3
36:10 90:13 91:11	processed 205:21	provided 13:3 14:4	268:22	74:15 77:20 79:6
104:6 121:3,20	206:2	25:6 81:17 87:9	pull 98:17 160:2	82:20 83:1 85:14
161:11 163:12,20	producer 72:1	88:19 143:7 149:5	165:21 166:1	92:1 93:7 95:13
163:22 166:5	product 185:6	211:18 214:14	212:7,13	98:3,11 99:6,7
246:21 255:22	242:11,17 255:21	215:12 216:11	pulled 155:3	101:8 103:22
261:19	261:9	221:11 222:13	166:16 288:18	106:9,10 109:2
prime 21:21	profile 269:3	232:15 250:16	pulls 166:18	110:2,4,10 112:17
prior 41:9 80:20	profiling 156:2	251:5	purpose 82:7	114:8,9 119:19
102:12,15 196:7	Program 146:3	provider 24:21	139:22 208:3	120:11 131:2
280:21	programmers	25:5,7,11 26:1,7,9	209:7 220:15	137:12 139:5
probably 29:1 53:3	180:5	30:3 78:15 79:9,9	243:22 246:5	151:8,16 152:8,21
64:7 79:18 84:15	programs 7:19	81:4 90:4,13,14	purposes 118:20	152:22 154:7
90:21 94:21	37:10 52:4,4,5,12	91:1,3 100:10	243:21 257:10	162:21 163:16
107:15 123:11	52:14 185:9	108:3 115:7 150:6	pushed 11:11	164:2,6,12 165:13

				rage JI
168:19 172:3	R 138:8,9 212:3	20:22 26:18 91:15	242:1 243:1 252:2	recommendation
173:1,3 174:14	218:5	113:11 168:3	256:6 263:16	41:3 46:20 128:20
198:16 199:22	race 266:3 277:7	170:14 180:6	265:8 281:10	130:14 229:2
203:18 214:17	racial 81:18 266:9	223:17 242:19	287:4 289:2,6,7	258:9 281:8
215:14 223:11,16	raise 9:3,5 33:14	267:6	289:21 292:11	recommended
223:16 226:6,11	170:18 220:21	reading 13:2	realm 32:12 61:14	41:15
228:16 230:5	226:21 234:8,14	114:20 118:22	reason 36:9 95:15	record 16:12
234:8,19 236:6	236:6	232:11	124:6 145:19	recorded 181:10
237:21 238:17	raised 38:3 40:8	readminissions	246:11 279:16	203:2
245:18 248:2	42:7 87:7 89:16	64:10	280:21 289:14	records 214:18
252:15 255:12	94:7 120:8 122:1	readmissions 60:12	reasonable 18:21	241:3
258:5,22 259:4	130:9 148:3	ready 8:16,18	106:22 162:13	redefine 288:5
265:2 268:20	213:13 220:20	10:14 16:6 69:6	219:19 250:17	REDFEARN 2:2
270:2 273:20	226:18 236:7	71:18 75:22 134:3	reasonably 218:20	145:9 155:21
274:11 275:14,22	265:2	135:1 182:13	reasons 68:12	160:14 217:21
276:12 282:3,6	raises 14:14 230:5	189:18,21 192:16	244:15	rediscuss 196:16
questions 5:15 8:3	ran 22:6 188:19	196:4 208:14	recall 27:18 66:6	reduce 70:18 71:6
57:18 60:6,10	251:15	211:1 279:13	67:9 70:12 93:21	reduction 30:8
67:6 71:17 75:13	RAND 153:18	286:3	101:5 104:22	redundant 64:2
83:4 97:18 116:4	random 99:21	real 35:17 51:8	126:15 176:10	reference 218:6
119:18 122:15	range 129:11	89:11 100:14	189:22 216:9	referral 29:8
148:2 150:1	154:12	226:2 230:21	277:15	referring 267:8
171:18 181:20	rank 62:12	231:1 250:8 252:5	recap 3:2 4:4 211:6	refers 235:9
204:5 206:19	ranked 60:5 126:16	261:9 278:14	211:8	reflect 19:15
211:15,19 212:5	126:17 127:9	292:3	recapitulate 249:17	reflecting 28:12
213:13 214:2	rate 15:6 47:14	reality 123:5	recapitulating	32:22 147:22
216:16 221:17	73:22 187:2	183:10	248:19	reflection 110:15
237:20 243:6	279:13	realizing 207:15	recapitulation	reflective 78:9
244:21 266:18	rated 58:18 219:6	really 18:16 23:5	267:20	reflects 147:9
269:22 273:6	rates 260:10	23:16 28:4,7	recapping 211:10	221:10 223:20
274:11 275:10	rating 58:14 123:4	32:18 33:18 35:2	receive 116:13	refund 134:11
278:9 281:10	179:12 207:12,21	44:18 47:22 59:3	received 68:1	regard 32:17 91:19
quick 44:6 103:21	267:9,12	60:20 62:14 63:5	193:12	114:10 116:1
138:13 168:19	ratings 43:21	63:9,19,20 64:5	receiving 26:3	regarding 29:2
263:2 278:14	127:15,17,19	64:16 65:9 69:22	recertified 70:21	regards 116:11
279:15	131:14 141:13	73:6 75:3 78:14	recessed 134:20	region 31:2 162:15
quickly 4:17,22	176:4	78:19 81:7 92:14	201:11	regional 31:15
6:22,22 190:6	ratio 156:4	92:21 95:6 107:5	recognition 107:11	regions 139:15
266:6	rationale 46:2 87:2	108:2 119:6 127:4	recognize 169:17	regression 124:4
quite 6:19 69:20	87:15,20 88:9	129:14 131:19	292:14	regression-based
73:22 96:5 118:21	rationalization	136:19 147:8	recognized 78:1	123:18
208:8 247:4 249:1	84:2	149:6,14 155:11	138:17	rehash 292:19
249:10 292:14	RCA 44:10	161:9 167:13,17	recognizing 78:2	reinforce 156:17
quote 187:4	RDI 3:6	177:9,10 180:18	78:13,15 169:16	Reinhardt 63:1
quoted 118:15	reach 29:9 41:18	194:11 196:17	recollection 94:4	reinvestigating
	66:13 196:20	211:10 225:13	220:17 222:6	59:6
R	read 13:15 14:2	233:15 241:22	recommend 266:14	reiterate 111:2
	I	I	I	I

107.0	241.0		004 11 045 15	070 16 075 11
197:9	241:9	reports 54:21 69:1	234:11 246:16	272:16 275:11
relate 79:2 233:2	remarks 109:4	273:16,19	247:9,13 254:6	277:14 282:4,9
related 4:13 24:8	remember 51:2	represent 254:20	261:1 278:5	responses 281:12
37:12 48:6 70:7	58:21 66:21	representation	289:21	responsibility
75:6 85:21 86:11	100:13 126:10	258:14	resources 10:10	166:6
93:19 94:7 105:18	154:19 197:2	representative	16:21 17:4 51:3,8	responsible 151:20
107:17 108:2	212:10,18 213:20	82:15 209:13	51:8 55:15,17	169:9 256:14
110:10 117:2	214:7 260:19	represented 209:14	57:2 78:14,18	rest 19:17 77:1
120:11,20 139:6	remembered 112:1	representing 215:3	80:20 103:2	141:9 243:3
142:5 192:1 205:4	remembers 213:22	request 15:6	191:13,22 205:10	288:13
247:21 258:5,5	remind 16:3 24:15	154:18 212:2	205:11 221:10	result 10:9 24:4
263:3 269:17	99:14 160:3	requested 12:7	242:3 266:10	73:7 125:19
270:6	203:11 206:11	84:8 177:14,15	290:16	177:18 219:2
relates 28:15 38:5	reminder 222:18	requesting 134:11	resource-based	results 7:18 9:18
63:22 74:7 231:13	remote 8:7,10	require 86:18	18:17 19:12	24:4 30:12 32:10
231:17 254:22	removed 199:17	121:6	resource-used	52:13 61:22 62:12
276:13	removing 56:19	required 15:2	20:12	66:17 68:22 73:11
relating 219:12	renal 83:19 93:18	16:10,13 84:2	respect 81:9 82:4,6	74:11 87:11 177:7
relationship 72:19	165:9 172:15	85:2 87:1 153:4	86:1,5,14,22	213:2,4 217:1
106:6 145:3	render 230:12	177:16 210:4	87:12 90:5 122:9	230:7 233:14
223:13	rendition 177:4	requirement	138:20 141:4,20	237:1 255:1 257:1
relationships	rep 178:21	149:10	142:2 144:2	266:2 268:11
107:13	repeat 194:18	requires 54:10	175:18,19 177:6	269:12,19 270:18
relative 3:5 42:12	195:16 217:18	requiring 131:8	177:18 178:15	272:8 273:2
44:8 55:15 224:22	repeatable 217:1	rerating 47:15	190:9,15,20 191:8	274:15 278:4
239:5	repeating 178:18	research 55:19	191:10 249:14	retinal 120:14
relatively 100:17	report 19:14 41:17	119:21 130:6	respectful 112:7	retinopathy 166:15
137:11 192:2	41:17 48:4 62:11	resides 65:19 250:1	respond 27:8 40:6	166:22 167:3,7,8
relevant 6:8 20:19	63:16 118:22	resolved 152:13	41:21 119:5	return 281:5
59:12 87:19	153:10 183:11,11	resource 1:4 3:5,9	124:20 136:15	Reuters 104:5,12
103:11 105:13	222:19 255:4,16	3:13 10:22 42:13	204:4 212:8	review 7:20 14:20
106:17 174:10	256:22 257:2	44:8,11 50:22	214:22 215:19	45:9 91:22 92:1
266:10	258:8,17	54:16 79:21 80:4	responded 84:11	116:13 118:4
reliabilities 129:18	reported 7:18 8:1	80:16 81:3,15	213:14	141:1 175:3,20
reliability 86:1	45:1 49:11,14	82:4,13 86:6,14	responding 270:13	190:6 232:13
126:14,18 127:7	68:21,22 70:18	92:4,6,20 102:3	response 13:5 42:6	233:16 268:14,15
127:11,18 129:7	177:8 181:11,12	104:21 121:6	108:8,10 140:10	278:12
131:2 141:21,22	190:18,21 255:2	129:10 135:2	149:4 182:11	reviewed 44:10
175:1 212:17,20	258:15 268:11,16	139:2,7,14 140:4	198:8 206:21	79:17 84:22
212:22 213:2	268:19 271:5	142:4,10 149:11	210:12 212:13	100:13 118:1
216:22 217:7,20	reporting 8:2 9:20	153:3 170:19	215:3 216:17	268:22
219:7,20 232:18	37:10 61:18 68:10	171:3 191:9 192:3	219:22 221:18	reviewer 50:4
233:3,10 267:10	88:18 177:16	199:12 200:18	223:16 232:7	68:18 71:11 91:11
280:8	195:8 248:10	202:12 205:4,6	233:20 234:9	reviewing 90:11
reliable 9:9 114:1	268:13 269:7,19	208:2,20 209:8,11	235:21 244:22	revised 264:18
reliance 72:3	270:3,5,13,16,22	209:22 210:6	262:17 266:19	Rich 2:2,4 30:1,21
rely 48:4 73:18	273:4	224:6 232:20	268:8 271:20,21	108:17 109:11,15

		1	1	
110:1,8 113:7	199:3,4,8 202:7	RN 1:21	124:18 125:13	76:15,20 80:12
118:15 125:17	203:1 204:8,18	road 170:19 171:10	126:7 127:3,20,22	83:13 89:8,18,22
130:16 149:22	206:22 207:7	Robert's 197:21	128:7 129:1,4,16	93:15 94:8 95:17
151:4,9,22 183:9	209:3 210:13	robust 26:20	130:22 131:17	100:12 109:6,7,13
184:3 195:5,17,20	218:7 221:3	110:12	132:8,11 133:3	109:19 110:3,20
197:12,15 214:6	222:10,12,16	robustness 65:16	134:18,22 135:7	111:3,14 120:6
247:7 249:20	232:3,11 233:5,7	rock 157:2	135:12 138:12	121:15 128:21
261:8 269:2 272:5	234:5 240:13	role 28:8 236:21	140:7,16 145:5	129:2,6,19 130:15
273:8 274:5	251:3 253:6 255:3	roll 48:17 53:21	148:8 149:21	132:7,10 135:11
275:13 287:2,8,9	259:12 260:22	130:10 131:1	150:17 154:2	138:15 140:14
287:12	261:21 264:5	rolled 34:7 130:2	155:7,10,20 157:8	141:3 142:19
richer 230:19	265:3,5,9 266:13	rolling 106:7 130:3	158:8 160:5,20	147:4 175:6
Rich's 114:20	268:7 271:4,4,8	room 1:10 134:9	164:3,7,11,15	176:14 177:5
ride 186:8,14 189:6	271:14,14 274:5	208:18	168:18 169:22	190:8,19 191:1,16
ridiculous 99:3	275:21 278:1,3	rooms 134:13	170:3,6,12 171:11	190:3,19 191:1,10
right 6:12 7:5 8:8	280:3,14 281:2	Rosenthal 1:12,14	170:3,0,12 171:11	200:6
8:10 9:10 11:4,18	280.3,14 281.2 283:1,14 289:22	3:2,20 15:9,12,17	174:12,15 175:21	rough 156:9
12:22 13:11 14:9	rises 14:11	20:18 23:4 42:11	174.12,15 175.21	round 122:18,18
14:16 15:18 19:11	risk 21:9 27:18	44:2 45:8 46:11	178:19 179:7,14	route 242:11
20:13 28:12 31:17	52:22 64:1 88:1,2	46:17 47:5 48:13	182:9,16 183:8,20	routinely 15:2,13
32:1 47:21 48:15	88:7,13 97:5	49:7,13,22 50:8	182.9,10 185.8,20	264:21
	,	, ,		royal 16:17
49:8,13 50:22	110:11 113:12	51:20 53:2,6	185:11,16 189:15	•
51:22 64:6 67:18	114:10,22 116:1	57:17 58:7,11,16	190:17,22 191:14	RSQ 88:9
68:16 69:3,16	120:12 124:10,17	59:13 60:3 62:13	191:18 192:4,11	RUDOLPH 2:5
75:15 76:10 80:8	125:10,20 143:12	64:12 66:1,19	192:14,21 194:16	184:12,20 185:2
82:17 89:6 91:5	143:14 144:3	67:2,5,15,20	195:12,18,22	277:4
94:5 97:14,17,17	146:10,13,14,19	68:15 69:3,10,13	196:9,11 197:14	rule 25:4 98:22
101:6 102:10	147:1 150:1	69:16 70:11 71:10	197:16,19 198:13	99:2 135:21 253:8
106:12 108:13	151:11,12 168:19	71:16 72:21 74:2	198:17,21 199:4,7	rules 111:20
112:11 118:17,21	169:1,4 171:1	74:6,14,19 75:2	200:8 201:4 223:2	197:21 223:3
119:14 124:17	173:13,15,17	75:12 76:2,10,13	226:5 229:10	run 18:16 114:14
126:5 131:17	175:14 176:8	76:14,17,22 77:8	230:22 231:5	133:14 174:16
132:5 133:2	205:15,18,19,19	77:13 80:8 82:17	245:18 246:7	252:5
134:18,22 135:7	206:2,3,8,9,9	83:10 89:6 91:5	248:18 249:22	running 260:20
135:12 138:12	211:20 213:7,7,11	93:3 95:12,18	252:10 253:3,7	
140:7 145:5	214:4,5 215:10,17	96:19 97:10,17	254:8 256:8	<u>S</u>
149:15,16 155:7	224:21,22 226:4	98:2,13,18 101:6	260:14,17 269:6	sake 128:8
157:20 160:2,11	227:7,11 228:5	101:15 102:6	278:10 283:4	salient 181:2
162:19 164:3,10	231:3 236:4,8,14	103:6,19 104:14	286:16 288:10	Sally 2:13 5:5
164:14 165:11	237:4,7,9,13,15	106:4 108:9	Rosenzweig 2:19	14:10 26:18 42:18
169:5 170:9	238:7 239:4,16,20	110:17 111:1,13	6:13,15,16,18 7:4	50:4 133:17 134:6
173:22 174:12	240:2,12,15 241:6	111:19 112:6,13	7:7 42:15 43:15	154:10 203:10
175:21 176:22	241:19 242:2	113:3 114:5	44:1 45:22 46:13	222:16 291:5
178:19 184:13	277:5,6 288:19	115:19 116:6	47:11,17,20 48:21	salvation 63:3
185:1 189:15	risks 237:3	118:2,14,19	49:10,14 58:9,12	sample 49:18 88:18
190:3 192:21	risk-adjustment	119:12 120:3	59:14,17,18,20	125:4 144:9,13
195:1 198:13	114:4 123:17	121:8 122:13	67:18,21 69:19	152:3 154:20

	1			
156:18 157:9	scope 63:18 171:21	156:18 171:9,21	172:11,19 220:7	217:5,8 221:5
219:3,19 220:3	score 39:17 88:1	175:5 180:11	259:20 285:3	262:20 267:10
248:16 255:4,16	131:3,4 175:14	182:5 183:16	separately 115:20	Seventeen 47:4,5
257:1	182:21 194:7	187:2 194:4	126:11 166:19	severe 240:10
Sarah 2:12 5:16	213:11 221:9	200:21 216:13	259:19 268:5	severely 120:22
8:15 13:18 16:5	223:20 232:6	217:14,19 219:9	274:9	severity 136:7,11
satisfaction 61:21	237:14,16 238:7	224:17 252:3,4,6	sequelae 107:3	136:14 137:4
62:5	239:10,16 240:12	256:2,11 257:4	165:19 166:8	138:4,7 139:18
Satisfied 239:7	240:15 255:16	259:22 260:18	sequence 93:5	141:13 169:15
saving 191:11	279:17,17 280:15	281:17 283:8	135:17	173:22 187:18
saw 12:17 92:11	scored 279:18,19	290:21 291:13	serious 25:19	213:8 236:20
93:4 193:6	280:2	seeing 64:9 121:17	serve 32:8	share 66:7 76:22
saying 40:3 61:2	scores 57:22 68:13	261:9	service 29:16 44:14	140:22 194:13
72:8 119:9 155:8	140:12 144:2	seen 30:8 84:13	44:21,22 45:2	281:5
156:18 229:19	174:22 175:11	114:12 116:3	48:5,6 52:8 53:19	shared 90:2 207:21
263:18	190:1 213:8	121:2,4 148:6,7	65:14 82:14 203:1	SharePoint 286:10
says 4:3 108:18	scoring 8:5 126:10	150:7 163:4	205:12 208:7	286:11,18
109:17 119:10	239:4 245:9	242:19	209:11,22 229:5	shares 281:3
152:5 161:6	265:22	segmenting 32:16	234:20	sharing 290:13
202:10 223:18	screen 13:2 37:17	select 117:15	services 16:22 30:9	shifted 21:9
232:6 255:12	140:13 175:5	263:11	51:5,8 53:13 54:2	ship 27:5
256:21 257:3,4	255:9	selected 88:3,10,21	54:17 57:9 93:8	short 77:17 196:18
270:3,16,21	screening 167:1,4	117:12 125:5	141:14 173:19	shorter 268:1
Scan 98:4	seat 202:7	selection 113:21,22	205:7 228:4 229:1	show 53:22 134:12
schedule 55:19	second 26:17 80:14	selections 84:3	231:16 235:16	138:5 149:7 176:5
193:9,12 281:4,11	102:13 108:2	self 22:15	251:19	showing 5:9 138:6
scheduled 134:1	110:2,10 124:22	sell 253:12,14	serving 207:10	208:22 219:1
schedules 56:20	151:16 152:22	send 13:20 30:5	230:15	shown 97:4 232:7
scheme 66:8	173:2 185:13	118:8 201:1	SES 266:8 276:4	258:7
School 1:18,22	197:17,18 236:22	284:21,22 285:6,7	277:8	shows 78:8 238:1
science 91:19	274:16 275:17	286:8	set 44:3 48:1 78:5,5	255:6
scientific 4:10 7:10	278:16	sending 67:13	81:5 88:18 95:8	side 5:12 14:7 30:2
40:8 45:11,21	secondly 150:5	285:3	95:22 98:14,22	60:14 61:19 62:7
47:7 50:4,5,12	181:17	sense 36:14 44:20	99:2,15,17 102:22	225:10 229:2
66:3 67:7,9 83:4,8	seconds 283:5	53:7 81:14 83:16	104:2 124:22	273:12,14
91:12 112:11	section 41:16 47:18	85:9 87:8 102:14	129:14 137:2,2,13	Sigma 157:11
113:10 123:2,6	56:11 68:2 82:12	108:4 120:8 131:2	149:2 171:1 230:4	sign 200:6
126:12,15 127:10	107:2 129:3,10	145:16 146:7,8	238:5,6 246:13	signal 43:12 67:13
128:22 129:3	145:4 160:3,6	150:15,20 167:9	249:17 253:8	106:13,19 108:1
132:5 135:16	178:14 288:16	170:17 189:20	261:5	significance 149:13
140:21 141:1	see 12:13 13:6 28:8	191:17 207:20	sets 39:6 99:20	149:18 220:1
145:7 171:16	28:20 30:14 36:8	214:11 251:4	137:10	247:18 248:4
176:17 196:16	40:18 48:14 52:12	sent 62:19 118:7,9	setting 24:18 35:9	256:19 257:5
202:16 203:13	74:2 75:17 102:15	118:11 199:15	settings 94:22	significant 88:16
210:14 211:4	102:16 113:9	sentiments 207:22	seven 9:16 10:17	92:18 96:12 98:1
212:9,14 265:19	120:19 121:20	separate 166:17	11:15 75:22	113:22 114:2
267:4,8,15,17	124:3 125:8 128:5	169:10,21 172:8	107:14 127:12,18	144:6 149:7 152:2
	I	l	l	

152:7 153:8,11,13	skill 123:8	73:18	29:10	specify 248:3
154:1,14 155:13	skin 125.8 skin 106:15	sorry 70:15 71:19	specialists 25:20	252:20 257:19
154.1,14 155.15	skip 289:12	76:21 115:18	28:6 29:6 36:8	spend 242:22
158:6 188:20	slide 98:14,15	126:21 150:19	specialties 25:15,16	spending 107:6
245:11 256:6	100:13 104:2	151:10,18 170:10	specialty 257:16,22	128:9 252:6
243.11 230.0	108:18,19	193:1 195:17	275:3	spends 65:5
significantly 95:5	slides 43:20 98:4	198:22 205:16	specific 3:12 41:16	spent 57:1 107:9
256:17	slightly 33:13	210:17 226:1	52:8,10,12,17	131:19
similar 11:2 33:11	66:22 91:1 186:8	245:7 259:4	58:21 61:20 65:6	spikes 66:17
44:9,17 79:16,18	256:3	261:20 270:1	66:14 84:3 87:2	spirit 123:14,15
154:18 186:11,18	small 66:10,16 89:3	271:18 278:17	93:22 94:10 99:21	spit 74:10
187:7,9 188:1	100:17 124:7	280:15	104:17 112:22	split 21:1 209:16
218:17 224:16	125:4 137:11	sort 26:11 27:4	146:13 147:12	219:3
237:5 239:19	153:21 157:10	33:17 56:18 65:7	161:1,2 172:3	spot 117:9 277:1
248:6	193:21 137:10	90:6,11,13 92:3	177:10 178:1,5	spread 92:16
similarly 125:6	smaller 137:10	93:20 94:17 106:6	187:2,16,17 188:3	sprint 202:4
simpler 14:3 180:9	157:13	115:4,11 131:22	190:10 207:9	squared 138:10
242:9	Smith 270:11	149:15 152:11	247:16 249:1	218:5
simply 54:18	smoking 26:6	158:4,17 160:15	specifically 14:8	squareds 138:8
simulating 10:3	smooth 28:6 29:9	161:3,17 166:13	56:11 82:22 95:16	212:3
single 123:4 197:9	77:1	171:15 175:2,15	112:20 113:12	stable 77:22
sir 10:15 11:12	smoothly 76:16,18	187:19 188:16	147:2 171:1	staff 2:9 9:8 42:9
sit 34:14 136:4	76:18	189:5 194:7	214:15 247:19	113:9 200:9
site 56:9 249:6	snapshot 52:10	205:16 217:19	specification 130:6	203:10 287:3
286:18	SNF 62:19,20	218:14 237:9	225:8 228:3,12	288:22 292:2
sitting 34:13	SOA 218:6	241:2 249:6	231:17 251:7	stage 165:9 171:8
249:13	Society 217:22	254:15 256:18	254:3 257:13	stages 78:4
situation 237:22	242:18	257:4 275:3	259:13 265:21	stake 65:7
situations 92:12	socioeconomic	sorts 165:15 285:20	specifications	stakeholders 54:4
95:6 96:4 168:11	139:17	sought 130:19	47:22 83:15 86:6	stand 16:6
six 10:17 11:15	socio-economic	sound 86:3	86:10 129:9 141:4	standard 35:1
37:5 82:8 102:1	81:20	sounds 82:18	141:5,11 142:3,7	145:11 250:10,13
102:19 103:1,2	software 181:8	116:14	176:8 216:11,15	254:5 260:22
113:14 124:22	sold 261:10	source 131:9	220:11	262:10 290:13,21
157:11 183:15	solution 241:16	144:20 240:22	specificity 188:2	standardization
192:20 220:7	solve 249:4	sources 16:12	249:1,4	112:10
234:1 245:3	somebody 21:16,20	19:22 21:1 89:9	specifics 56:20	standardize 53:1
267:18 272:19	41:7 135:3 157:11	144:19 185:21	70:12 146:19	56:4 112:19
277:17	161:5 163:2 165:2	265:4	specified 49:5	263:20
size 14:5 33:16	168:21 179:21	Southwestern 1:21	84:10 112:18	standardized 18:3
49:18 88:18 128:5	253:4 265:2	speak 4:8 111:21	141:9 192:13	35:5,18 44:11,12
144:9,13 154:20	somewhat 6:8	198:2 282:17	220:15 245:10	44:13 48:5,17
156:18 157:9 219:19 220:3	32:17 103:11 120:10 243:19	speaking 30:1 59:15	247:17 248:4	51:18 55:4,7,17
248:16	246:8	spec 254:7	252:11 253:10,11 253:17 260:18,21	56:6,8,16,18 57:7 57:13 66:11 113:1
sizes 125:4	sooner 202:4,5	special 26:13	274:20	117:3 124:3
sizes 123.4 skewing 66:17	sophisticated 53:21	specialist 26:8	specifies 234:18	206:12 231:11
shewing 00.17	sopilisicated 33.21	specialist 20.0	specifies 234.10	200.12 231.11
			l	

246:17 250:7	153:22 154:14	236:3 237:19	strengthen 61:17	284:13
251:15,17 252:3	155:12 156:6	238:15 239:7	strengthening	submissions 283:22
252:11,17,20,22	157:12 158:5	240:11,18 243:5	61:19	285:16
254:13,14,17	188:20 245:11	243:12 244:20	stretch 64:3	submit 73:9 116:10
260:18 262:14	257:8	245:6,16 247:6	striking 90:20	218:5 246:10
263:3,9,11,13	statistician's	250:2 251:8 257:9	strong 28:11	submitted 70:15,16
264:13	113:17 114:21	258:20 259:7	strongest 60:20	73:15 104:5,12
standardizing	117:7	261:7 262:15	strongly 46:20	117:19 177:9
124:13	statistics 138:3	264:2,9,14 265:1	struck 130:21	178:1 207:9 217:8
STANDARDS 1:3	215:13	265:5,10,16	structure 14:22	233:12 248:6
standpoint 35:11	stay 95:4,4 246:7	266:17 267:3,14	36:7 260:8	254:7 270:2
80:4	steering 1:4,10	267:19 268:2,20	structures 61:11	subsequently
stands 200:12	7:11 11:8 19:17	269:21 271:17	struggle 284:6	236:10
240:21	42:9 43:9,9 46:14	272:4,14,21 273:6	struggled 160:22	substantial 46:6
start 9:14 10:15	46:18 47:14 82:3	275:9,16 276:18	stuck 117:9	116:10
11:9 39:19 61:8	118:8 142:16,20	277:3,13,19 278:1	studies 97:3	substantially
61:10 99:4 103:1	193:5 206:18	278:8,17 279:3	study 218:6 242:19	128:12
122:16 135:14	207:10,13 208:17	280:3,5,20 283:1	stuff 34:18 106:16	substantively
180:17 200:12	214:2 279:22	291:2 292:7 293:2	118:18 197:5	130:13
202:5	280:18 281:3,12	293:14	243:2 284:9	sub-criterion 36:17
started 98:5 199:19	281:19 282:3,7	step 205:16 228:2	style 219:1	sub-folder 13:5
218:14	290:7	236:15,20,22	subcontractor	successful 122:10
starting 9:13 43:9	Steinwald 1:12,15	STEPHANSKY	21:11	successfully 42:21
50:2	3:2,20 4:3 6:1,11	2:5 161:21 162:19	subcontractors	151:19
starts 107:18 136:1	6:14,17,18 7:5,8	197:18	21:12	sudden 214:6
148:6	8:3,8,15 9:12	steps 3:18 227:20	subcriteria 6:6	suddenly 35:1
state 84:19 155:1	11:17 13:12 14:15	236:15 282:16	7:13 11:20 14:19	115:14
184:16 185:9	16:4,15 20:15	Steve 2:1 91:13	15:7,22 39:16	SUE 2:17
229:14 230:2	23:20 24:13 26:14	Steve 2:1 51:15 Stewards 57:15	47:15 127:16,17	sufficient 138:22
242:1 246:4 247:7	27:7 29:21 30:20	sticking 292:16	127:18,19 203:5	195:4
249:10 250:6,11	33:20 36:13,20	stop 26:5 189:13	207:12 216:4	sufficiently 89:5
250:14 254:3	38:1 39:8,22	straight 283:19	220:7 268:5	152:12
stated 38:14 39:1,5	40:17 41:1 42:2	284:5 289:5	279:20	suggest 83:2
41:9 247:14	104:18 198:11	strategy 10:1 23:14	subcriterion 12:14	287:19
statement 134:12	199:21 200:11	37:8 105:2 117:18	208:12,19 209:6	suggested 8:20
223:3,8	202:3 204:3,7,12	161:8 269:15	265:18	160:17 248:12
states 184:17 185:3	202:3 204:3,7,12	stratification 89:10	subgroup 190:14	suggesting 19:10
190:13	207:4 208:11	89:12 122:5 266:1	subject 24:16	195:13,13
statistical 117:4	209:2 210:15,18	stratified 145:1	226:17	suggestion 82:2
130:19 149:13,18	210:22 211:7	stratify 32:12	submission 12:10	288:21
153:16 155:1,6	213:12,18 216:3,7	129:15 137:21	81:17 116:20	summarize 43:21
220:1 247:17	216:16 217:3	174:2 276:8	125:8 154:22	48:14
248:4,15 256:19	220:5,16 221:16	277:10	180:11 208:5	summarized
257:5	222:2,5 226:13	stratifying 173:5	213:4 217:20	195:15
statistically 88:16	229:9 231:20	232:21	224:9 232:18	summarizes 145:3
144:6 149:7 152:2	232:3 233:18	straw 291:11,19	236:14 255:4	summarizing 195:1
152:7 153:8,11,12	234:5 235:7,11,19	Street 1:11	270:7,21 284:1,4	summary 44:6
			,,,	······································
	I	I	I	1

77:15 138:13	169:8,9 238:21	89:1 116:9 132:12	135:10 136:16	145:20 146:4
140:2 175:3 196:5	240:8	134:7 137:18	137:15 138:14	157:3 174:22
222:8 287:20	surgical 240:6	150:12 166:21	140:12 141:1	181:17 186:11
summed 127:20,21	surprising 90:21	168:12 185:14	142:15 143:1.9	190:17 227:4
summing 172:19	surrogate 251:16	198:10,12 202:6,7	147:7 149:4,5	243:10 244:4
sums 226:7	surveys 152:3	209:2 220:2	174:18,22 175:11	255:1 258:4
Super 46:17	susceptibilities	227:21 228:2	177:4,13 179:15	274:19 276:15
supply 78:19	20:3 37:2	274:8,9 281:14	190:1 192:8 193:1	290:15 291:4
support 46:15	susceptibility 23:12	293:6	203:4 207:3,5,17	terrific 135:13
49:21 64:20	24:7 70:5	taken 161:18	279:18,19 280:1	test 155:1 158:4
138:22 215:10	sway 41:21	169:14 265:12	292:18	232:10,13 248:5
219:20 220:12	switched 291:15	291:12,12	TAP's 57:22	248:15
243:18 270:4	symmetrical	takes 164:18	130:14	tested 12:12 86:3
276:9	277:20	183:14 285:22	target 86:12 87:3	112:22 113:14
supported 234:3,4	synthesize 211:14	talk 5:7 23:11,18	262:8	112:22 113:14
supporting 62:8	system 1:16 30:14	155:3 158:17	Taroon 2:10	testing 37:11 86:2
supporting 02.8 supposed 4:4 84:12	35:22 63:4 93:2	173:14 193:4	214:16	87:8,10,10 88:8
112:9 128:3	122:2 166:5	200:14 251:10	task 43:20 133:13	114:1,19 116:4,11
196:14 210:21	185:20 187:4	288:3	222:19	129:7,11 131:8,12
233:9 253:15	241:22 264:19	talked 82:20 92:7	team 13:4	129.7,11 131.8,12
sure 4:21 5:12 8:9		100:11 161:10	teams 22:19	143:3,6 212:22
13:15 14:20 16:3	systematically 266:13	171:19 173:3		213:3 216:22
	· -		tease 167:11,19 technical 50:3	217:20 218:7
18:20 21:2 26:21	systems 30:13 33:9	230:6 246:14		
27:9 36:4 43:11	64:17	248:20 261:6	106:20 108:1	221:7 222:8,19
43:12,17,18 45:22	S-E-S-S-I-O-N	266:8 286:19	113:16 207:11	223:18 231:22
50:16,17 58:14	202:1	talking 16:21 22:22	technically 106:21	232:19 233:10
62:13 63:17 77:10	S12 255:15	46:3 58:9 100:19	technique 120:1	tests 220:1
80:12 85:12 92:4	S8 160:4	144:12 184:6	206:13	Texas 1:20
95:15 103:9	T	195:21 204:17	technology 181:18 291:22	text 85:1 139:9
116:18 118:13,15	$\frac{1}{\mathbf{T} 117:4\ 240:21}$	287:17 288:1	-/	142:6
119:3,8 122:16	280:11	talks 15:13 265:3	telephone 4:19	thank 5:8 6:17 7:6
138:15 140:14	table 3:1 13:21	tally 211:3	tell 8:18 36:6 101:4	29:21 33:20 36:12
150:20 152:17	23:21 36:19 56:6	TAP 4:18 7:12 43:6	102:13 143:2	42:3,7,8 44:7 49:8
158:3,4 163:14	66:13 193:17	45:9,19 46:20	153:14 186:4	59:13 76:12,13,14
171:7 186:7 188:6	195:9 197:13,20	47:8,16 50:3	227:18 250:4	80:9 82:18 89:7
199:12 200:16	,	57:19 58:5,5 59:2	257:10	91:6 96:20 101:7
204:6,16 211:8,16	233:8,13 tabled 198:20	67:16 68:1 69:18	tells 186:19	103:6,19 104:14
215:8 228:14		69:20 80:10 81:16	template 54:10	111:13,19 119:14
238:10,14 243:14	tables 55:18 56:16	81:20 82:19 83:12	258:18	125:14 134:19
244:2 257:12,18	57:2 232:19 233:2	84:2,17 85:1 88:2	tempted 217:10	135:8,19 145:6
272:13 275:19	tabulated 47:1	88:6,6 91:21 93:8	tenor 130:14	171:11 174:15
276:11 282:18	tabulating 132:9	98:8 110:13,15	tens 123:21	175:22 178:20
289:17	tags 106:15	113:9 114:8 115:3	term 19:12	189:8,14 197:21
surgeon 115:14,15	tail 117:14	116:12 118:8	terms 27:20 28:1	200:7 201:3,8
161:13	take 5:20 8:9 17:16	119:20 120:8	29:12 55:3 72:5	204:3,21 233:6
Surgeons 2:3	25:9 35:21 37:18	126:9 128:12,19	97:8 108:2,7	237:19 245:7
surgery 84:1 93:20	45:13 46:18 59:5	130:2 131:3 132:2	117:1 124:16	258:20 281:14,21

٦

282:12,12 286:20	290:14,17,18	175:14 176:15	thorough 91:10	30:18 47:2,6
286:22 287:1,3	291:3,21	177:17 178:13	132:3 178:20	48:12 52:11,18,20
292:1,10,17,22	think 4:8 9:10	179:14 180:15	288:12	75:17 76:3 77:22
thanks 8:11 26:14	11:11,13 16:20	181:3 184:2	thoroughly 126:8	78:7,8 86:11 98:6
64:11 101:15	19:5,18 22:4 23:1	186:13,15,22	131:20	107:13 111:21
110:1 133:5	23:4,6,10 27:11	187:5,8,15 188:2	thought 12:12,17	131:19 132:3
134:17 220:10	27:15 30:22 31:1	189:18,18 190:9	42:18 55:4 79:7	139:11 147:7
287:12 293:3	33:21 34:2,4 35:7	192:14,16 193:14	81:12,12 89:14	163:22 169:14
thereof 229:22	35:21 38:7 40:4,5	193:16 197:11	93:4 106:8 109:3	200:21 211:15
thiazolidinedione	40:15 41:22 42:11	199:15,22 212:10	110:21 126:21	219:17,17 241:9
96:15	44:2 47:6 50:10	213:1,16,20	127:3,5 141:8	268:1,13,14
thing 4:6 28:22	50:20 51:9 53:2	214:15 215:13	182:16 189:16	279:11 280:17
35:6 40:9 45:21	54:9,14 59:21	219:18 224:9	192:8 194:2	288:1 289:20
63:15,16 70:22	60:9,22 61:1,16	225:5 229:10	195:20 212:20	292:3
83:4 89:10,13	62:6,16,19 63:7,8	230:5 231:5,7,10	259:7 291:4	times 72:2 78:2
110:3 111:22	63:14 64:7,19	231:13 234:11	thoughts 282:19	99:8 104:19
114:11 115:1,2	66:4 67:8 68:12	236:14 237:4	thousands 123:21	128:16 168:16
118:15 125:17	68:17,19 69:2,6	240:19 241:8	three 9:14 10:18	250:4
130:16 142:14	71:12,18,22 72:4	242:21 244:14	11:16 44:4 58:19	timing 37:13
145:10 153:6	72:9,10 73:2 75:2	245:21 249:8,18	69:11 75:18 82:8	285:21
155:8 158:3	75:5,15,22 76:18	250:16,18 253:17	90:14 122:22	title 84:18 204:22
165:17 166:13	81:22 82:18 89:16	254:2,8 255:2	137:8 192:20	today 130:19
167:14 170:13	92:12,19 93:2	257:1,5,6 258:1	195:3 196:7 197:8	134:17 195:13
180:4 195:19	94:6 95:2,20	258:12 261:5,8	209:5 262:21	199:19 216:10
196:13,17 214:10	96:19 97:20 98:19	262:2,10 263:4,6	265:15 267:13	263:18 281:13
217:14 248:19	103:10 105:22	272:1 274:10	272:18 277:17,17	Todd 2:18 77:11,17
250:8 252:8,12	106:12 108:9,10	275:8,19 276:22	277:17 286:4	79:13 99:13 100:2
283:17 288:16	108:21,22 110:12	281:9 282:16	threshold 24:19	116:8,16
289:4 292:1,20	110:18,20,21	283:10 284:4	62:10 113:20	told 105:11 125:11
things 17:1 34:17	115:4 117:20	285:1 288:22	144:10 159:17	253:19 279:7
51:16 53:8 56:4	119:2 122:13,17	289:19,22 290:3	211:16 222:20	tolerance 62:10
59:3 64:18 88:8	123:1,5,6,7,11	290:18 291:10,11	225:17	Tom 1:12,14 2:18
90:10,19 93:13,16	126:8 128:7	291:19	thresholds 248:7	4:6 115:18 135:5
93:20 94:13,17	129:16,19,22	thinking 15:4	threw 106:14,16	135:20 150:17
95:11 106:7,14	130:2,7,11,12,20	39:15 64:4 91:9	thumb 13:3	154:3 155:4
139:19 152:3	131:5,12,18,19	105:9 120:4	THURSDAY 1:6	156:17 158:16
164:21 165:22,22	132:1,3,18 133:19	122:21 123:15	tie 159:20,21	195:6 196:3 229:9
166:1,20 169:6	140:3,11 143:1	158:14 180:4	263:14	245:16 278:9
171:2,4 176:11	145:2 146:6,7	184:14 218:21	tiebreaker 159:22	283:2 291:19
183:18 214:15	148:2,8 150:17,20	231:6 256:11	160:1 168:2	Tom's 260:4
218:20 225:3	152:21 153:5,15	263:17,19	tied 258:18 263:6	ton 288:22
239:20 262:6,9	155:8 157:19,20	thinks 210:10	tier 90:18	ton-plus 289:2
263:21 276:6	158:11,19 159:18	third 25:13 90:18	tiered 90:12	tool 184:8 272:8
284:5,15,19 285:2	162:11 164:16	152:1 159:22	tiering 272:7	tooling 134:7
285:6,11,11,20	167:14,16 168:7	Thirteen 209:4	tightened 85:11	tools 12:11 183:2
286:1 287:21	168:10 171:12	Thomas 152:5,5	time 7:20 8:9 10:22	top 43:2,4 110:9
288:19 290:4,5,10	174:16 175:4,7,12	Thomson 104:5,12	11:4 13:2 18:13	127:11 154:7
			l	l

topic 122:17 255:3	treatments 241:5	15:16,19 16:2,8	251:16 252:7	54:16 55:11 68:5
total 3:4 16:21 17:8	tremendous 125:21	19:16 20:7,14,21	255:5 264:18	117:6 131:20
17:9 20:12 30:17	trepidation 236:6	23:11 24:3 36:18	265:14 267:2,13	140:15 164:19
38:18 48:4,15,18	tried 117:15 136:21	37:1 39:11 41:2	274:10 282:13,20	170:16 180:18
53:10 54:1,1	139:22 189:4	42:17 43:16 47:4	286:3 291:3	183:3 196:1
78:21 93:11 108:5	211:13 222:1	47:13,19 50:6	292:12	233:11 236:8
138:5,9 150:5,11	trigger 97:11 227:6	67:12 69:8,14	two-day 42:4	understandable
150:12,14 159:9	238:11	75:21 76:8 83:7	two-man 31:19	9:19 273:3
204:18 205:9,10	triggered 80:2	127:1,14,21 128:2	two-parter 115:18	understanding
214:20 215:8,12	triggering 239:19	134:8 154:10,16	type 79:3 81:6 84:9	10:13 21:5 28:16
215:18 224:6	239:21	155:9 176:20	84:12,13,19 85:2	32:3,18 34:11
226:7,8,8,13	Triple 28:7 30:12	192:19 194:22	85:6,6,13 109:3,8	61:20 72:11 241:2
243:3 246:15	trivial 75:4 264:16	207:7 208:16	110:5 125:18	243:16 278:7
247:9,12,13	trouble 17:7 124:9	209:4 210:9,17,20	205:12 219:20	understood 50:17
254:10 274:18,21	troubling 248:21	211:2,12 214:13	224:10 235:17	55:5 259:11
275:7	true 157:16	216:6,8,19 217:5	250:22 259:15	under-diagnosed
totally 141:12	truly 63:5	220:9 221:4	260:1 269:15	85:18
249:5	truncate 225:12	222:12,17 233:5	276:2,9	unequivocally 63:6
toto 76:6	truncated 66:15	233:22 234:16,21	types 38:8 139:16	unfairly 254:20
touched 91:21 92:2	truncation 66:6,7	236:1 245:3,7	156:1 251:19	277:1
92:11 115:4	trust 175:18	254:1,19 265:14	275:1	unfortunate 170:13
158:11	try 29:15 43:5	265:17 267:1,16	typically 90:1	unfortunately
tp 14:14	55:10 98:16	267:22 268:10	120:12	119:15 121:13
track 32:10	123:22 149:3	272:18,22 277:16		232:22
tracked 30:18	167:19 168:3,11	277:22 278:3,21	\mathbf{U}	uniformity 97:8
Hackey 30.10	107.17 100.3,11	277.22 270.3,21		uniformity 97.8
traditional 32:2	170:9 171:15	279:5 280:7,11	ultimately 38:7	uniformly 69:22
traditional 32:2 train 189:16	· · · · · ·	,	ultimately 38:7 41:22	uniformly 69:22 unintended 24:16
traditional 32:2 train 189:16 transitions 28:6	170:9 171:15 186:14 279:8 284:19 285:1,1	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6	ultimately 38:7 41:22 unable 195:10	uniformly 69:22 unintended 24:16 24:20 30:2 31:18
traditional 32:2 train 189:16 transitions 28:6 translating 206:8	170:9 171:15 186:14 279:8 284:19 285:1,1 trying 21:1 38:7	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19	ultimately 38:7 41:22 unable 195:10 unbelievably	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5
traditional 32:2 train 189:16 transitions 28:6	170:9 171:15 186:14 279:8 284:19 285:1,1 trying 21:1 38:7 50:1 92:19 99:22	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19 turn 16:16 111:22	ultimately 38:7 41:22 unable 195:10 unbelievably 133:14	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5 Union 1:25
traditional 32:2 train 189:16 transitions 28:6 translating 206:8 237:3 transparency	170:9 171:15 186:14 279:8 284:19 285:1,1 trying 21:1 38:7 50:1 92:19 99:22 101:17 102:4,7	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19 turn 16:16 111:22 174:20	ultimately 38:7 41:22 unable 195:10 unbelievably 133:14 unbilled 51:4	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5 Union 1:25 unit 27:12,15
traditional 32:2 train 189:16 transitions 28:6 translating 206:8 237:3	170:9 171:15 186:14 279:8 284:19 285:1,1 trying 21:1 38:7 50:1 92:19 99:22	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19 turn 16:16 111:22 174:20 Twelve 209:9	ultimately 38:7 41:22 unable 195:10 unbelievably 133:14 unbilled 51:4 unbundle 61:4	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5 Union 1:25
traditional 32:2 train 189:16 transitions 28:6 translating 206:8 237:3 transparency 10:13 72:5,10 182:18 278:6	170:9 171:15 186:14 279:8 284:19 285:1,1 trying 21:1 38:7 50:1 92:19 99:22 101:17 102:4,7 108:13 112:6 122:16 128:10	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19 turn 16:16 111:22 174:20 Twelve 209:9 Twin 36:2	ultimately 38:7 41:22 unable 195:10 unbelievably 133:14 unbilled 51:4 unbundle 61:4 unclear 83:18	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5 Union 1:25 unit 27:12,15 units 48:6 University 1:17,20
traditional 32:2 train 189:16 transitions 28:6 translating 206:8 237:3 transparency 10:13 72:5,10 182:18 278:6 transparent 75:8	170:9 171:15 186:14 279:8 284:19 285:1,1 trying 21:1 38:7 50:1 92:19 99:22 101:17 102:4,7 108:13 112:6 122:16 128:10 131:19 133:10	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19 turn 16:16 111:22 174:20 Twelve 209:9 Twin 36:2 twisted 106:15	ultimately 38:7 41:22 unable 195:10 unbelievably 133:14 unbilled 51:4 unbundle 61:4 unclear 83:18 141:13 142:5	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5 Union 1:25 unit 27:12,15 units 48:6 University 1:17,20 1:22,24
traditional 32:2 train 189:16 transitions 28:6 translating 206:8 237:3 transparency 10:13 72:5,10 182:18 278:6 transparent 75:8 144:4 179:19	170:9 171:15 186:14 279:8 284:19 285:1,1 trying 21:1 38:7 50:1 92:19 99:22 101:17 102:4,7 108:13 112:6 122:16 128:10 131:19 133:10 164:16 170:19	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19 turn 16:16 111:22 174:20 Twelve 209:9 Twin 36:2 twisted 106:15 two 4:14,16 9:14	ultimately 38:7 41:22 unable 195:10 unbelievably 133:14 unbilled 51:4 unbundle 61:4 unclear 83:18 141:13 142:5 143:8 144:15	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5 Union 1:25 unit 27:12,15 units 48:6 University 1:17,20 1:22,24 unofficial 203:3
traditional 32:2 train 189:16 transitions 28:6 translating 206:8 237:3 transparency 10:13 72:5,10 182:18 278:6 transparent 75:8 144:4 179:19 242:9	170:9 171:15 186:14 279:8 284:19 285:1,1 trying 21:1 38:7 50:1 92:19 99:22 101:17 102:4,7 108:13 112:6 122:16 128:10 131:19 133:10 164:16 170:19 171:22 179:10	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19 turn 16:16 111:22 174:20 Twelve 209:9 Twin 36:2 twisted 106:15 two 4:14,16 9:14 11:12 18:8 22:19	ultimately 38:7 41:22 unable 195:10 unbelievably 133:14 unbilled 51:4 unbundle 61:4 unclear 83:18 141:13 142:5 143:8 144:15 223:7	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5 Union 1:25 unit 27:12,15 units 48:6 University 1:17,20 1:22,24 unofficial 203:3 unpleasant 197:10
traditional 32:2 train 189:16 transitions 28:6 translating 206:8 237:3 transparency 10:13 72:5,10 182:18 278:6 transparent 75:8 144:4 179:19 242:9 transplant 157:16	170:9 171:15 186:14 279:8 284:19 285:1,1 trying 21:1 38:7 50:1 92:19 99:22 101:17 102:4,7 108:13 112:6 122:16 128:10 131:19 133:10 164:16 170:19 171:22 179:10 197:3 221:22	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19 turn 16:16 111:22 174:20 Twelve 209:9 Twin 36:2 twisted 106:15 two 4:14,16 9:14 11:12 18:8 22:19 24:15 46:21 59:2	ultimately 38:7 41:22 unable 195:10 unbelievably 133:14 unbilled 51:4 unbundle 61:4 unclear 83:18 141:13 142:5 143:8 144:15 223:7 uncontrolled 94:20	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5 Union 1:25 unit 27:12,15 units 48:6 University 1:17,20 1:22,24 unofficial 203:3 unpleasant 197:10 unrelated 105:6
traditional 32:2 train 189:16 transitions 28:6 translating 206:8 237:3 transparency 10:13 72:5,10 182:18 278:6 transparent 75:8 144:4 179:19 242:9 transplant 157:16 transplantation	170:9 171:15 186:14 279:8 284:19 285:1,1 trying 21:1 38:7 50:1 92:19 99:22 101:17 102:4,7 108:13 112:6 122:16 128:10 131:19 133:10 164:16 170:19 171:22 179:10 197:3 221:22 223:2,11 226:3,10	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19 turn 16:16 111:22 174:20 Twelve 209:9 Twin 36:2 twisted 106:15 two 4:14,16 9:14 11:12 18:8 22:19 24:15 46:21 59:2 67:10 69:10 75:18	ultimately 38:7 41:22 unable 195:10 unbelievably 133:14 unbilled 51:4 unbundle 61:4 unclear 83:18 141:13 142:5 143:8 144:15 223:7 uncontrolled 94:20 underestimate	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5 Union 1:25 unit 27:12,15 units 48:6 University 1:17,20 1:22,24 unofficial 203:3 unpleasant 197:10 unrelated 105:6 untested 63:7
traditional 32:2 train 189:16 transitions 28:6 translating 206:8 237:3 transparency 10:13 72:5,10 182:18 278:6 transparent 75:8 144:4 179:19 242:9 transplant 157:16 transplantation 59:1,9	170:9 171:15 186:14 279:8 284:19 285:1,1 trying 21:1 38:7 50:1 92:19 99:22 101:17 102:4,7 108:13 112:6 122:16 128:10 131:19 133:10 164:16 170:19 171:22 179:10 197:3 221:22 223:2,11 226:3,10 238:14 249:11,14	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19 turn 16:16 111:22 174:20 Twelve 209:9 Twin 36:2 twisted 106:15 two 4:14,16 9:14 11:12 18:8 22:19 24:15 46:21 59:2 67:10 69:10 75:18 83:5 104:9,10	ultimately 38:7 41:22 unable 195:10 unbelievably 133:14 unbilled 51:4 unbundle 61:4 unclear 83:18 141:13 142:5 143:8 144:15 223:7 uncontrolled 94:20 underestimate 53:10,11	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5 Union 1:25 unit 27:12,15 units 48:6 University 1:17,20 1:22,24 unofficial 203:3 unpleasant 197:10 unrelated 105:6 untested 63:7 unveiled 276:1
traditional 32:2 train 189:16 transitions 28:6 translating 206:8 237:3 transparency 10:13 72:5,10 182:18 278:6 transparent 75:8 144:4 179:19 242:9 transplant 157:16 transplantation 59:1,9 treat 96:6,18	170:9 171:15 186:14 279:8 284:19 285:1,1 trying 21:1 38:7 50:1 92:19 99:22 101:17 102:4,7 108:13 112:6 122:16 128:10 131:19 133:10 164:16 170:19 171:22 179:10 197:3 221:22 223:2,11 226:3,10 238:14 249:11,14 260:7 262:7	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19 turn 16:16 111:22 174:20 Twelve 209:9 Twin 36:2 twisted 106:15 two 4:14,16 9:14 11:12 18:8 22:19 24:15 46:21 59:2 67:10 69:10 75:18 83:5 104:9,10 117:9 118:1	ultimately 38:7 41:22 unable 195:10 unbelievably 133:14 unbilled 51:4 unbundle 61:4 unclear 83:18 141:13 142:5 143:8 144:15 223:7 uncontrolled 94:20 underestimate 53:10,11 underestimates	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5 Union 1:25 unit 27:12,15 units 48:6 University 1:17,20 1:22,24 unofficial 203:3 unpleasant 197:10 unrelated 105:6 untested 63:7 unveiled 276:1 update 32:17 59:7
traditional 32:2 train 189:16 transitions 28:6 translating 206:8 237:3 transparency 10:13 72:5,10 182:18 278:6 transparent 75:8 144:4 179:19 242:9 transplant 157:16 transplantation 59:1,9 treat 96:6,18 124:11	170:9 171:15 186:14 279:8 284:19 285:1,1 trying 21:1 38:7 50:1 92:19 99:22 101:17 102:4,7 108:13 112:6 122:16 128:10 131:19 133:10 164:16 170:19 171:22 179:10 197:3 221:22 223:2,11 226:3,10 238:14 249:11,14 260:7 262:7 287:16 288:5	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19 turn 16:16 111:22 174:20 Twelve 209:9 Twin 36:2 twisted 106:15 two 4:14,16 9:14 11:12 18:8 22:19 24:15 46:21 59:2 67:10 69:10 75:18 83:5 104:9,10 117:9 118:1 127:12 140:13	ultimately 38:7 41:22 unable 195:10 unbelievably 133:14 unbilled 51:4 unbundle 61:4 unclear 83:18 141:13 142:5 143:8 144:15 223:7 uncontrolled 94:20 underestimate 53:10,11 underestimates 126:2	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5 Union 1:25 unit 27:12,15 units 48:6 University 1:17,20 1:22,24 unofficial 203:3 unpleasant 197:10 unrelated 105:6 untested 63:7 unveiled 276:1 update 32:17 59:7 118:10 136:21
traditional 32:2 train 189:16 transitions 28:6 translating 206:8 237:3 transparency 10:13 72:5,10 182:18 278:6 transparent 75:8 144:4 179:19 242:9 transplant 157:16 transplantation 59:1,9 treat 96:6,18 124:11 treating 227:14	$\begin{array}{c} 170:9\ 171:15\\ 186:14\ 279:8\\ 284:19\ 285:1,1\\ \textbf{trying}\ 21:1\ 38:7\\ 50:1\ 92:19\ 99:22\\ 101:17\ 102:4,7\\ 108:13\ 112:6\\ 122:16\ 128:10\\ 131:19\ 133:10\\ 164:16\ 170:19\\ 171:22\ 179:10\\ 197:3\ 221:22\\ 223:2,11\ 226:3,10\\ 238:14\ 249:11,14\\ 260:7\ 262:7\\ 287:16\ 288:5\\ 289:4 \end{array}$	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19 turn 16:16 111:22 174:20 Twelve 209:9 Twin 36:2 twisted 106:15 two 4:14,16 9:14 11:12 18:8 22:19 24:15 46:21 59:2 67:10 69:10 75:18 83:5 104:9,10 117:9 118:1 127:12 140:13 146:4 150:4	ultimately 38:7 41:22 unable 195:10 unbelievably 133:14 unbilled 51:4 unbundle 61:4 unclear 83:18 141:13 142:5 143:8 144:15 223:7 uncontrolled 94:20 underestimate 53:10,11 underestimates 126:2 underlying 105:6	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5 Union 1:25 unit 27:12,15 units 48:6 University 1:17,20 1:22,24 unofficial 203:3 unpleasant 197:10 unrelated 105:6 untested 63:7 unveiled 276:1 update 32:17 59:7 118:10 136:21 updated 83:22
traditional 32:2 train 189:16 transitions 28:6 translating 206:8 237:3 transparency 10:13 72:5,10 182:18 278:6 transparent 75:8 144:4 179:19 242:9 transplant 157:16 transplantation 59:1,9 treat 96:6,18 124:11 treating 227:14 treatment 96:2	170:9 171:15 186:14 279:8 284:19 285:1,1 trying 21:1 38:7 50:1 92:19 99:22 101:17 102:4,7 108:13 112:6 122:16 128:10 131:19 133:10 164:16 170:19 171:22 179:10 197:3 221:22 223:2,11 226:3,10 238:14 249:11,14 260:7 262:7 287:16 288:5 289:4 tuned 175:17	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19 turn 16:16 111:22 174:20 Twelve 209:9 Twin 36:2 twisted 106:15 two 4:14,16 9:14 11:12 18:8 22:19 24:15 46:21 59:2 67:10 69:10 75:18 83:5 104:9,10 117:9 118:1 127:12 140:13 146:4 150:4 159:14 169:5,6	ultimately 38:7 41:22 unable 195:10 unbelievably 133:14 unbilled 51:4 unbundle 61:4 unclear 83:18 141:13 142:5 143:8 144:15 223:7 uncontrolled 94:20 underestimate 53:10,11 underestimates 126:2 underlying 105:6 105:14 205:19	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5 Union 1:25 unit 27:12,15 units 48:6 University 1:17,20 1:22,24 unofficial 203:3 unpleasant 197:10 unrelated 105:6 untested 63:7 unveiled 276:1 update 32:17 59:7 118:10 136:21 updated 83:22 143:2
traditional 32:2 train 189:16 transitions 28:6 translating 206:8 237:3 transparency 10:13 72:5,10 182:18 278:6 transparent 75:8 144:4 179:19 242:9 transplant 157:16 transplantation 59:1,9 treat 96:6,18 124:11 treating 227:14 treatment 96:2 135:22 145:11	170:9 171:15 186:14 279:8 284:19 285:1,1 trying 21:1 38:7 50:1 92:19 99:22 101:17 102:4,7 108:13 112:6 122:16 128:10 131:19 133:10 164:16 170:19 171:22 179:10 197:3 221:22 223:2,11 226:3,10 238:14 249:11,14 260:7 262:7 287:16 288:5 289:4 tuned 175:17 Turbyville 2:13	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19 turn 16:16 111:22 174:20 Twelve 209:9 Twin 36:2 twisted 106:15 two 4:14,16 9:14 11:12 18:8 22:19 24:15 46:21 59:2 67:10 69:10 75:18 83:5 104:9,10 117:9 118:1 127:12 140:13 146:4 150:4 159:14 169:5,6 171:17 176:19	ultimately 38:7 41:22 unable 195:10 unbelievably 133:14 unbilled 51:4 unbundle 61:4 unclear 83:18 141:13 142:5 143:8 144:15 223:7 uncontrolled 94:20 underestimate 53:10,11 underestimates 126:2 underlying 105:6 105:14 205:19 underneath 136:20	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5 Union 1:25 unit 27:12,15 units 48:6 University 1:17,20 1:22,24 unofficial 203:3 unpleasant 197:10 unrelated 105:6 untested 63:7 unveiled 276:1 update 32:17 59:7 118:10 136:21 updated 83:22 143:2 Up/Next 3:18
traditional 32:2 train 189:16 transitions 28:6 translating 206:8 237:3 transparency 10:13 72:5,10 182:18 278:6 transparent 75:8 144:4 179:19 242:9 transplant 157:16 transplantation 59:1,9 treat 96:6,18 124:11 treating 227:14 treatment 96:2 135:22 145:11 165:18 174:11	170:9 171:15 186:14 279:8 284:19 285:1,1 trying 21:1 38:7 50:1 92:19 99:22 101:17 102:4,7 108:13 112:6 122:16 128:10 131:19 133:10 164:16 170:19 171:22 179:10 197:3 221:22 223:2,11 226:3,10 238:14 249:11,14 260:7 262:7 287:16 288:5 289:4 tuned 175:17 Turbyville 2:13 3:18 5:8 7:17	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19 turn 16:16 111:22 174:20 Twelve 209:9 Twin 36:2 twisted 106:15 two 4:14,16 9:14 11:12 18:8 22:19 24:15 46:21 59:2 67:10 69:10 75:18 83:5 104:9,10 117:9 118:1 127:12 140:13 146:4 150:4 159:14 169:5,6 171:17 176:19 186:15 189:4	ultimately 38:7 41:22 unable 195:10 unbelievably 133:14 unbilled 51:4 unbundle 61:4 unclear 83:18 141:13 142:5 143:8 144:15 223:7 uncontrolled 94:20 underestimate 53:10,11 underestimates 126:2 underlying 105:6 105:14 205:19 underneath 136:20 understand 4:19	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5 Union 1:25 unit 27:12,15 units 48:6 University 1:17,20 1:22,24 unofficial 203:3 unpleasant 197:10 unrelated 105:6 untested 63:7 unveiled 276:1 update 32:17 59:7 118:10 136:21 updated 83:22 143:2 Up/Next 3:18 urograms 183:17
traditional 32:2 train 189:16 transitions 28:6 translating 206:8 237:3 transparency 10:13 72:5,10 182:18 278:6 transparent 75:8 144:4 179:19 242:9 transplant 157:16 transplantation 59:1,9 treat 96:6,18 124:11 treating 227:14 treatment 96:2 135:22 145:11 165:18 174:11 206:4 238:10	170:9 171:15 186:14 279:8 284:19 285:1,1 trying 21:1 38:7 50:1 92:19 99:22 101:17 102:4,7 108:13 112:6 122:16 128:10 131:19 133:10 164:16 170:19 171:22 179:10 197:3 221:22 223:2,11 226:3,10 238:14 249:11,14 260:7 262:7 287:16 288:5 289:4 tuned 175:17 Turbyville 2:13 3:18 5:8 7:17 8:12 9:2,15 12:20	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19 turn 16:16 111:22 174:20 Twelve 209:9 Twin 36:2 twisted 106:15 two 4:14,16 9:14 11:12 18:8 22:19 24:15 46:21 59:2 67:10 69:10 75:18 83:5 104:9,10 117:9 118:1 127:12 140:13 146:4 150:4 159:14 169:5,6 171:17 176:19 186:15 189:4 197:7 220:9 236:2	ultimately 38:7 41:22 unable 195:10 unbelievably 133:14 unbilled 51:4 unbundle 61:4 unclear 83:18 141:13 142:5 143:8 144:15 223:7 uncontrolled 94:20 underestimate 53:10,11 underestimates 126:2 underlying 105:6 105:14 205:19 underneath 136:20 understand 4:19 5:10 28:10 35:15	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5 Union 1:25 unit 27:12,15 units 48:6 University 1:17,20 1:22,24 unofficial 203:3 unpleasant 197:10 unrelated 105:6 untested 63:7 unveiled 276:1 update 32:17 59:7 118:10 136:21 updated 83:22 143:2 Up/Next 3:18 urograms 183:17 usability 3:13 4:12
traditional 32:2 train 189:16 transitions 28:6 translating 206:8 237:3 transparency 10:13 72:5,10 182:18 278:6 transparent 75:8 144:4 179:19 242:9 transplant 157:16 transplantation 59:1,9 treat 96:6,18 124:11 treating 227:14 treatment 96:2 135:22 145:11 165:18 174:11	170:9 171:15 186:14 279:8 284:19 285:1,1 trying 21:1 38:7 50:1 92:19 99:22 101:17 102:4,7 108:13 112:6 122:16 128:10 131:19 133:10 164:16 170:19 171:22 179:10 197:3 221:22 223:2,11 226:3,10 238:14 249:11,14 260:7 262:7 287:16 288:5 289:4 tuned 175:17 Turbyville 2:13 3:18 5:8 7:17	279:5 280:7,11 281:9 282:11 283:6 284:8 287:6 287:10 289:19 turn 16:16 111:22 174:20 Twelve 209:9 Twin 36:2 twisted 106:15 two 4:14,16 9:14 11:12 18:8 22:19 24:15 46:21 59:2 67:10 69:10 75:18 83:5 104:9,10 117:9 118:1 127:12 140:13 146:4 150:4 159:14 169:5,6 171:17 176:19 186:15 189:4	ultimately 38:7 41:22 unable 195:10 unbelievably 133:14 unbilled 51:4 unbundle 61:4 unclear 83:18 141:13 142:5 143:8 144:15 223:7 uncontrolled 94:20 underestimate 53:10,11 underestimates 126:2 underlying 105:6 105:14 205:19 underneath 136:20 understand 4:19	uniformly 69:22 unintended 24:16 24:20 30:2 31:18 70:5 Union 1:25 unit 27:12,15 units 48:6 University 1:17,20 1:22,24 unofficial 203:3 unpleasant 197:10 unrelated 105:6 untested 63:7 unveiled 276:1 update 32:17 59:7 118:10 136:21 updated 83:22 143:2 Up/Next 3:18 urograms 183:17

$\begin{array}{ c c c c c c c c c c c c c c c c c c c$
$\begin{array}{ c c c c c c c c c c c c c c c c c c c$
$\begin{array}{c c c c c c c c c c c c c c c c c c c $
$\begin{array}{c c c c c c c c c c c c c c c c c c c $
$\begin{array}{c c c c c c c c c c c c c c c c c c c $
$\begin{array}{c c c c c c c c c c c c c c c c c c c $
$\begin{array}{c c c c c c c c c c c c c c c c c c c $
189:20 190:9259:22 261:1,16212:20 213:4versus 31:10,21233:21 235:22196:14 202:11263:7,15 266:9215:21 220:6,8,20128:6,18 131:4245:2 262:19268:3,4 279:13,17270:21 272:8221:7 222:7,14,20137:7 244:17264:7 265:12,13280:6,10,15278:5 283:15222:21 223:1,4,8253:9 256:2 285:2266:20 268:6usable 18:18289:21 291:22223:18 226:9vetted 215:21277:15 278:12,15190:12 239:21useful 9:19 10:2231:1,14,21 232:7233:17277:15 278:12,1510:22 23:15 28:14user 160:16 206:17233:3,3,12,14,15vice 29:11278:19,20 280:610:22 23:15 28:14user 160:16 206:17233:3,3,12,14,15view 22:10 47:9291:12,1430:13 37:10,12249:6 256:13265:12,15 267:1267:16 91:18voted 41:7 46:14,1538:16 42:13 44:8257:14value 36:1,3 88:9Virginia 2:4209:18 210:244:11,12 48:4users 88:12 181:13value 36:1,3 88:9Virginia 2:4209:18 210:250:22 54:16 55:13194:3 258:15113:20 124:16virtually 157:14217:1155:16 56:10,10,16269:11170:21 214:11vis 115:10votes 41:19 58:668:6,9 79:21 80:456:15 68:21 84:4Vanderbilt 1:2427:16 29:1629:680:16,21 81:3,15143:14 148:16156:21 175:10102:12 103:3voting 46:13 58:1092:4,21 95:22usually 22:19 96:16variable 113:21visit 24:18 90:15283:7 293:596:9,14 104:21153:9 257:14,15variance 243:
$\begin{array}{c c c c c c c c c c c c c c c c c c c $
268:3,4 279:13,17270:21 272:8221:7 222:7,14,20137:7 244:17264:7 265:12,13280:6,10,15278:5 283:15222:21 223:1,4,8253:9 256:2 285:2266:20 268:6usable 18:18289:21 291:22223:18 226:9vetted 215:21272:17 275:12190:12 239:21useful 9:19 10:2231:1,14,21 232:7233:17277:15 278:12,15use 1:4 3:5,9,13 6:9273:3232:10,13,14,18vice 29:11278:19,20 280:610:22 23:15 28:14user 160:16 206:17233:3,3,12,14,15view 22:10 47:9291:12,1430:13 37:10,12249:6 256:13265:12,15 267:1267:16 91:18voted 41:7 46:14,1538:16 42:13 44:8257:14validly 103:14viewed 28:487:13 195:244:11,12 48:4users 88:12 181:13value 36:1,3 88:9Virginia 2:4209:18 210:250:22 54:16 55:13194:3 258:15113:20 124:16virtually 157:14217:1155:16 56:10,10,16269:11170:21 214:11vis 115:10votes 41:19 58:656:17 57:15 62:11uses 12:8 33:12values 117:5vision 230:19129:6 192:6 196:668:6,9 79:21 80:456:15 68:21 84:4Vanderbilt 1:24visit 24:19 25:1,4196:18 267:980:16,21 81:3,15143:14 148:16variability 64:1827:16 29:16291:682:14 86:6,14206:4 250:12156:21 175:10102:12 103:3voting 46:13 58:1092:4,21 95:22usually 22:19 96:16variable 113:21visits 24:18 90:15283:7 293:596:9,14 104:21153:9 257:14,15variance 243:10<
280:6,10,15278:5 283:15222:21 223:1,4,8253:9 256:2 285:2266:20 268:6usable 18:18289:21 291:22223:18 226:9vetted 215:21272:17 275:12190:12 239:21useful 9:19 10:2231:1,14,21 232:7233:17277:15 278:12,15use 1:4 3:5,9,13 6:9273:3232:10,13,14,18vice 29:11278:19,20 280:610:22 23:15 28:14user 160:16 206:17233:3,3,12,14,15vice 29:11278:19,20 280:630:13 37:10,12249:6 256:13265:12,15 267:1267:16 91:18voted 41:7 46:14,1538:16 42:13 44:8257:14validly 103:14viewed 28:487:13 195:244:11,12 48:4users 88:12 181:13value 36:1,3 88:9Virginia 2:4209:18 210:250:22 54:16 55:13194:3 258:15113:20 124:16virtually 157:14217:1155:16 56:10,10,16269:11170:21 214:11vis 115:10votes 41:19 58:656:17 57:15 62:11uses 12:8 33:12values 117:5vision 230:19129:6 192:6 196:668:6,9 79:21 80:456:15 68:21 84:4Vanderbilt 1:24visit 24:19 25:1,4196:18 267:980:16,21 81:3,15143:14 148:16variability 64:1827:16 29:16291:682:14 86:6,14206:4 250:12156:21 175:10102:12 103:3voting 46:13 58:1092:4,21 95:22usually 22:19 96:16variable 113:21visits 24:18 90:15283:7 293:596:9,14 104:21153:9 257:14,15variance 243:1090:17 101:1W120:2 121:6utilization 22:11variances 55:13102:15 120:17<
usable 18:18289:21 291:22223:18 226:9vetted 215:21272:17 275:12190:12 239:21useful 9:19 10:2231:1,14,21 232:7233:17277:15 278:12,15use 1:4 3:5,9,13 6:9273:3232:10,13,14,18vice 29:11278:19,20 280:610:22 23:15 28:14user 160:16 206:17233:3,3,12,14,15view 22:10 47:9291:12,1430:13 37:10,12249:6 256:13265:12,15 267:1267:16 91:18voted 41:7 46:14,1538:16 42:13 44:8257:14validly 103:14viewed 28:487:13 195:244:11,12 48:4users 88:12 181:13value 36:1,3 88:9Virginia 2:4209:18 210:250:22 54:16 55:13194:3 258:15113:20 124:16virtually 157:14217:1155:16 56:10,10,16269:11170:21 214:11vis 115:10votes 41:19 58:656:17 57:15 62:11uses 12:8 33:12values 117:5vision 230:19129:6 192:6 196:668:6,9 79:21 80:456:15 68:21 84:4Vanderbilt 1:24visit 24:19 25:1,4196:18 267:980:16,21 81:3,15143:14 148:16variability 64:1827:16 29:16291:682:14 86:6,14206:4 250:12156:21 175:10102:12 103:3voting 46:13 58:1092:4,21 95:22usually 22:19 96:16variable 113:21visits 24:18 90:15283:7 293:596:9,14 104:21153:9 257:14,15variance 243:1090:17 101:1283:7 293:5120:2 121:6utilization 22:11variances 55:13102:15 120:17W
190:12 239:21useful 9:19 10:2231:1,14,21 232:7233:17277:15 278:12,15use 1:4 3:5,9,13 6:9273:3273:3232:10,13,14,18vice 29:11278:19,20 280:610:22 23:15 28:14user 160:16 206:17233:3,3,12,14,15view 22:10 47:9291:12,1430:13 37:10,12249:6 256:13265:12,15 267:1267:16 91:18voted 41:7 46:14,1538:16 42:13 44:8257:14validly 103:14viewed 28:487:13 195:244:11,12 48:4users 88:12 181:13value 36:1,3 88:9Virginia 2:4209:18 210:250:22 54:16 55:13194:3 258:15113:20 124:16virtually 157:14217:1155:16 56:10,10,16269:11170:21 214:11vis 115:10votes 41:19 58:656:17 57:15 62:11uses 12:8 33:12values 117:5vision 230:19129:6 192:6 196:668:6,9 79:21 80:456:15 68:21 84:4Vanderbilt 1:24visit 24:19 25:1,4196:18 267:980:16,21 81:3,15143:14 148:16variability 64:1827:16 29:16291:692:4,21 95:22usually 22:19 96:16variable 113:21visits 24:18 90:15283:7 293:596:9,14 104:21153:9 257:14,15variance 243:1090:17 101:1283:7 293:5120:2 121:6utilization 22:11variances 55:13102:15 120:17W
use 1:4 3:5,9,13 6:9273:3232:10,13,14,18vice 29:11278:19,20 280:610:22 23:15 28:14user 160:16 206:17233:3,3,12,14,15view 22:10 47:9291:12,1430:13 37:10,12249:6 256:13265:12,15 267:1267:16 91:18voted 41:7 46:14,1538:16 42:13 44:8257:14users 88:12 181:13viewed 28:487:13 195:244:11,12 48:4users 88:12 181:13value 36:1,3 88:9Virginia 2:4209:18 210:250:22 54:16 55:13194:3 258:15113:20 124:16virtually 157:14217:1155:16 56:10,10,16269:11170:21 214:11visi 115:10votes 41:19 58:656:17 57:15 62:11uses 12:8 33:12values 117:5vision 230:19129:6 192:6 196:668:6,9 79:21 80:456:15 68:21 84:4variability 64:1827:16 29:16291:682:14 86:6,14206:4 250:12156:21 175:10102:12 103:3voting 46:13 58:1092:4,21 95:22usually 22:19 96:16156:21 175:10102:12 103:3voting 46:13 58:1092:4,21 95:22usually 22:19 96:16variable 113:21visits 24:18 90:15283:7 293:596:9,14 104:21153:9 257:14,15variance 243:1090:17 101:1283:7 293:5120:2 121:6utilization 22:11variances 55:13102:15 120:17W
10:22 23:15 28:14 30:13 37:10,12user 160:16 206:17 249:6 256:13233:3,3,12,14,15 265:12,15 267:12view 22:10 47:9 67:16 91:18291:12,14 voted 41:7 46:14,1538:16 42:13 44:8 44:11,12 48:4257:14 users 88:12 181:13 194:3 258:15265:12,15 267:12 validly 103:14 value 36:1,3 88:9view 22:10 47:9 67:16 91:18291:12,14 voted 41:7 46:14,1550:22 54:16 55:13 55:16 56:10,10,16 66:6,9 79:21 80:4 80:16,21 81:3,15194:3 258:15 269:11113:20 124:16 170:21 214:11viewed 28:4 virtually 157:14 vist 115:10209:18 210:2 217:1166:6,9 79:21 80:4 80:16,21 81:3,1556:15 68:21 84:4 143:14 148:16 206:4 250:12values 117:5 Vanderbilt 1:24 variability 64:18 156:21 175:10visit 24:19 25:1,4 27:16 29:16129:6 192:6 196:6 102:12 103:392:4,21 95:22 96:9,14 104:21 120:2 121:6usually 22:19 96:16 153:9 257:14,15variable 113:21 variance 243:10 variances 55:13visits 24:18 90:15 90:17 101:1 102:15 120:17283:7 293:5
30:13 37:10,12 38:16 42:13 44:8 44:11,12 48:4 50:22 54:16 55:13249:6 256:13 257:14 users 88:12 181:13 194:3 258:15 269:11265:12,15 267:12 validly 103:14 value 36:1,3 88:9 113:20 124:16 virtually 157:14 visi 15:10voted 41:7 46:14,15 87:13 195:2 209:18 210:2 217:11 votes 41:19 58:6 129:6 192:6 196:6 129:6 192:6 196:630:13 37:10,12 38:16 42:13 44:8 50:22 54:16 55:13249:6 256:13 257:14265:12,15 267:12 validly 103:14 value 36:1,3 88:9 113:20 124:1667:16 91:18 viewed 28:4 Virginia 2:4 virtually 157:14 visi 115:10voted 41:7 46:14,15 87:13 195:2 209:18 210:250:22 54:16 55:13 55:16 56:10,10,16 56:17 57:15 62:11 68:6,9 79:21 80:4 80:16,21 81:3,15194:3 258:15 269:11170:21 214:11 values 117:5 Values 117:5vision 230:19 visit 24:19 25:1,4 27:16 29:16votes 41:19 58:6 192:6 192:6 196:682:14 86:6,14 92:4,21 95:22206:4 250:12 usually 22:19 96:16 153:9 257:14,15variable 113:21 variance 243:10 variance 243:10 variances 55:13visits 24:18 90:15 90:17 101:1 102:15 120:17283:7 293:5
38:16 42:13 44:8 44:11,12 48:4257:14 users 88:12 181:13 194:3 258:15validly 103:14 value 36:1,3 88:9 113:20 124:16viewed 28:4 Virginia 2:4 virtually 157:1487:13 195:2 209:18 210:250:22 54:16 55:13 55:16 56:10,10,16 56:17 57:15 62:11 68:6,9 79:21 80:4 80:16,21 81:3,15194:3 258:15 269:11113:20 124:16 170:21 214:11Viewed 28:4 Virginia 2:4 vist 115:1087:13 195:2 209:18 210:2 217:1168:6,9 79:21 80:4 80:16,21 81:3,1556:15 68:21 84:4 143:14 148:16 206:4 250:12Values 117:5 Vanderbilt 1:24 Variability 64:18 156:21 175:10Vision 230:19 Visit 24:19 25:1,4 27:16 29:16 102:12 103:3129:6 192:6 196:6 129:6 192:6 196:692:4,21 95:22 96:9,14 104:21 120:2 121:6usually 22:19 96:16 153:9 257:14,15 utilization 22:11variable 113:21 Variances 55:13visits 24:18 90:15 90:17 101:1 102:15 120:17283:7 293:5
44:11,12 48:4 50:22 54:16 55:13users 88:12 181:13 194:3 258:15value 36:1,3 88:9 113:20 124:16Virginia 2:4 virtually 157:14209:18 210:2 217:1155:16 56:10,10,16 56:17 57:15 62:11 68:6,9 79:21 80:4 80:16,21 81:3,15194:3 258:15 26:15 68:21 84:4113:20 124:16 170:21 214:11virtually 157:14 vision 230:19209:18 210:2 217:1180:16,21 81:3,15 82:14 86:6,14 92:4,21 95:2256:15 68:21 84:4 206:4 250:12Vanderbilt 1:24 156:21 175:10vision 230:19 visit 24:19 25:1,4196:18 267:9 291:692:4,21 95:22 96:9,14 104:21 120:2 121:6usually 22:19 96:16 153:9 257:14,15variability 64:18 variance 243:10 variances 55:13visits 24:18 90:15 90:17 101:1283:7 293:5W
50:22 54:16 55:13194:3 258:15113:20 124:16virtually 157:14217:1155:16 56:10,10,16269:11170:21 214:11vis 115:10votes 41:19 58:656:17 57:15 62:11uses 12:8 33:12values 117:5vision 230:19129:6 192:6 196:668:6,9 79:21 80:456:15 68:21 84:4Vanderbilt 1:24visit 24:19 25:1,4196:18 267:980:16,21 81:3,15143:14 148:16variability 64:1827:16 29:16291:682:14 86:6,14206:4 250:12156:21 175:10102:12 103:3voting 46:13 58:1092:4,21 95:22usually 22:19 96:16variable 113:21visits 24:18 90:15283:7 293:596:9,14 104:21153:9 257:14,15variance 243:1090:17 101:1W120:2 121:6utilization 22:11variances 55:13102:15 120:17W
55:16 56:10,10,16269:11170:21 214:11vis 115:10votes 41:19 58:656:17 57:15 62:11uses 12:8 33:12values 117:5vision 230:19129:6 192:6 196:668:6,9 79:21 80:456:15 68:21 84:4Vanderbilt 1:24visit 24:19 25:1,4196:18 267:980:16,21 81:3,15143:14 148:16variability 64:1827:16 29:16291:682:14 86:6,14206:4 250:12156:21 175:10102:12 103:3voting 46:13 58:1092:4,21 95:22usually 22:19 96:16variable 113:21visits 24:18 90:15283:7 293:596:9,14 104:21153:9 257:14,15variance 243:1090:17 101:1W120:2 121:6utilization 22:11variances 55:13102:15 120:17W
56:17 57:15 62:11uses 12:8 33:12values 117:5vision 230:19129:6 192:6 196:668:6,9 79:21 80:456:15 68:21 84:4Vanderbilt 1:24visit 24:19 25:1,4196:18 267:980:16,21 81:3,15143:14 148:16variability 64:1827:16 29:16291:682:14 86:6,14206:4 250:12156:21 175:10102:12 103:3voting 46:13 58:1092:4,21 95:22usually 22:19 96:16variable 113:21visits 24:18 90:15283:7 293:596:9,14 104:21153:9 257:14,15variance 243:1090:17 101:1W
68:6,9 79:21 80:456:15 68:21 84:4Vanderbilt 1:24visit 24:19 25:1,4196:18 267:980:16,21 81:3,15143:14 148:16variability 64:1827:16 29:16291:682:14 86:6,14206:4 250:12156:21 175:10102:12 103:3voting 46:13 58:1092:4,21 95:22usually 22:19 96:16variable 113:21visits 24:18 90:15283:7 293:596:9,14 104:21153:9 257:14,15variance 243:1090:17 101:1W120:2 121:6utilization 22:11variances 55:13102:15 120:17W
80:16,21 81:3,15143:14 148:16variability 64:1827:16 29:16291:682:14 86:6,14206:4 250:12156:21 175:10102:12 103:3voting 46:13 58:1092:4,21 95:22usually 22:19 96:16variable 113:21visits 24:18 90:15283:7 293:596:9,14 104:21153:9 257:14,15variance 243:1090:17 101:1W120:2 121:6utilization 22:11variances 55:13102:15 120:17W
82:14 86:6,14 92:4,21 95:22 96:9,14 104:21 120:2 121:6206:4 250:12 usually 22:19 96:16 153:9 257:14,15156:21 175:10 variable 113:21 variance 243:10 variance 55:13102:12 103:3 visits 24:18 90:15 90:17 101:1 102:15 120:17voting 46:13 58:10 283:7 293:582:14 86:6,14 usually 22:19 96:16 96:9,14 104:21 120:2 121:6206:4 250:12 usually 22:19 96:16 usually 22:19 96:16 variance 243:10 variance 55:13102:12 103:3 visits 24:18 90:15 90:17 101:1 102:15 120:17voting 46:13 58:10 283:7 293:5
92:4,21 95:22 96:9,14 104:21 120:2 121:6usually 22:19 96:16 153:9 257:14,15variable 113:21 variance 243:10 variances 55:13visits 24:18 90:15 90:17 101:1 102:15 120:17283:7 293:5 91:4 104:21 120:2 121:6153:9 257:14,15 utilization 22:11variance 243:10 variances 55:1390:17 101:1 102:15 120:17
96:9,14 104:21 120:2 121:6153:9 257:14,15 utilization 22:11variance 243:10 variances 55:1390:17 101:1 102:15 120:17
120:2 121:6 utilization 22:11 variances 55:13 102:15 120:17 W
120.2 121.0 utilization 22.11 variances 55.15 102.15 120.17
varies 150.9 102.17 volumes 55.15
143:13 144:18 153:4 205:13 variety 16:22 VOLUNTARY 286:3
145:14 146:22 224:6 238:2,5,12 100:22 178:16 vote 8:14 9:2 10:14 waiting 286:6 145:14 146:22 100:22 178:16 vote 8:14 9:2 10:14 waiting 286:6
149:12 151:17 239:6 246:22 various 48:22 52:4 11:9 12:21 23:8 Walk 216:6
152:11,20 153:16 251:17,20 252:5 64:20 90:3 98:7 23:10,22 34:3 walkaways 208:10
153:17 155:22 255:7 126:9 139:15 36:17 37:3 39:9 walked 207:19
159:21 160:9 utilize 47:22 141:11 175:11 39:13,19,21 40:2 wall 132:16
170:20 171:3 utilized 34:12 189:19 227:14 40:5 41:2,10 want 4:21 11:19 12:20 12:15 10:6
183:22 184:8 Uwe 63:1 vary 145:20 154:21 45:10,15 46:18 12:20 13:15 19:6
185:3 187:7,14,18 U1.1 270:8 varying 97:3 47:1 66:5 67:8 21:2,3 24:22 27:7
189:4 191:9 192:1 vascular 115:15 69:7 71:18,20 29:8 30:5 36:11
$\frac{V}{192:3\ 202:13} \qquad \frac{V}{100000000000000000000000000000000000$
$\begin{array}{c ccccccccccccccccccccccccccccccccccc$
V Vascular 110110 0011 1110,20 37:18 40:6,14 192:3 202:13 V vast 147:13 75:16 76:1,3,6 37:18 40:6,14 203:10 205:4,6,22 VA 1:15 Venable 1:10 83:3 123:6 126:11 46:10 57:3 62:6 208:2,20 209:8,11 valid 23:6 53:7 VENKATESH 126:12 127:11 63:17 66:10 72:7
V Value Val
V vast 147:13 75:16 76:1,3,6 37:18 40:6,14 192:3 202:13 VA 1:15 vast 147:13 75:16 76:1,3,6 37:18 40:6,14 203:10 205:4,6,22 valid 23:6 53:7 valid 23:6 53:7 132:15 143:17 126:12 127:11 63:17 66:10 72:7 209:22 210:6 152:17 153:16 venture 195:5 132:4,9 133:5 101:21 106:5
V Value Val

٦

		l		
128:17 131:16	172:11 174:5	welcome 3:2 42:14	194:22 200:12	275:13 287:2
134:4 146:22	180:2 181:7 188:7	287:11	203:4 207:4 241:8	Wilson 3:20
147:17 160:9	194:17 206:16,17	wellness 29:16 52:5	248:18 252:6	wind 163:7
161:6,7 166:16	213:1 218:17,21	WellPoint 2:2	255:2,3 256:2	Windsorize 225:11
170:18 174:5	222:7 237:5 241:2	well-defined	261:8 262:7	225:19
179:7 181:21	244:9 246:12	100:15	283:10 286:14,15	wipes 51:18
190:5 193:3 211:5	253:15,18,21	well-established	287:17	Wisconsin 1:17
212:4,11,14	254:18 261:16	71:22	we've 28:19 30:18	33:11 230:2
218:16,18 219:15	274:13 283:12,20	went 13:18 45:4	36:14 50:3 64:8	250:11
220:21 228:15	291:7,19	91:6 108:21	72:2 83:1 92:7	wisely 277:9
230:19 234:16	ways 17:15 51:12	116:18 158:12	114:12 115:4	wish 56:10
238:16 245:19	52:17 54:9 56:17	186:6	116:3 117:18	Women's 2:20
249:7,16 250:5,5	160:16,18 218:2	weren't 42:19	122:17 126:8	wonder 19:19,21
253:15,18,21	218:17 250:17	93:14 129:6	131:18 132:2	91:13 242:7 263:5
254:19 261:16	261:11 290:11	141:17 204:15	137:10 174:21	wondering 38:10
276:14 282:11,18	weakness 53:14	west 273:14	190:3 217:15	110:14 163:3
284:20 285:6,12	web 56:9 75:8	we'll 4:4 5:20 7:3	253:19 254:15	165:1 171:20
291:18 292:1,17	151:13 283:13	11:2,4 14:2,15,19	267:7,20 271:21	173:13 256:13
wanted 12:15 60:8	webinar 43:17	16:2 23:21 42:21	whichever 134:16	263:10
70:2 73:1 74:22	98:17	43:1,19 44:6	wholly 117:10	word 120:2 132:12
88:2 111:21 114:6	website 74:18,21	45:10,10,13,20	wide 188:16	174:19 190:6
114:8,15 115:2	75:11 150:4	47:9 66:4 67:13	widely 145:14	work 33:16,17
116:9,16 133:18	181:18 182:18	98:16 125:16	widely-used 88:5	63:22 77:19 79:5
149:1 206:17	183:1,13 186:7	133:21 134:7	widespread 62:17	91:6 107:10 108:4
232:1 266:5	253:1 270:10	171:15 196:18	181:15	116:21 117:12
271:16 286:20	285:9,13,16 286:2	200:8,9 222:5	WILBON 2:13 8:6	124:15 125:2,11
287:13 292:9,22	286:5	233:21 254:16	8:11 13:17 98:16	126:6 128:1
wanting 211:20	weeks 197:7,8	we're 4:4,15 5:1,4	118:6,17 196:3,10	137:15 152:18
238:9	weigh 128:11	5:21 6:21 8:16	199:15 200:16,20	153:19 154:15
wants 179:22	189:21 285:4	9:13,13 11:5	201:2 212:16	182:20 194:12
Washington 1:11	weighed 234:7	16:21 17:1,7,12	213:15,19 255:14	206:16 214:4
wasn't 129:14	weight 39:16	18:16 24:1 32:16	265:3,6 266:5	228:21 232:2
139:16 148:19	weighted 36:8	38:7,9,21 42:12	267:6 278:13	263:19 279:10
168:21 188:21	141:14	43:12 47:17 51:2	279:15 280:4	287:4 288:22
190:10,13 222:7	weighting 19:7	51:16 52:1,2,9,19	281:16 282:1	289:2 293:8
224:9 233:9	185:20 186:2,12	55:14 56:1,21	284:18 285:14,18	worked 188:10
236:13	251:18	59:6 60:22 61:3	285:21 286:14	211:21
wasted 194:21	weights 186:3	61:12,18 62:22	287:1 292:9 293:3	working 29:2,5
watch 287:4	212:1 213:11	64:9 65:20 67:8	293:6	71:2 135:20
way 4:5 9:9 10:10	WEISS 2:21 77:7	71:2 75:22 78:9	WILLIAM 2:4	188:13 286:14
18:1 22:20 38:10	77:12,16 95:20	78:12 80:3 92:19	149:22 151:4,9,22	292:4
39:1 51:11 54:6	96:22 97:15 98:10	98:21 99:20	183:9 184:3 195:5	works 42:20 63:21
55:9 56:10 61:9	99:13 101:13,17	108:14 117:9,12	195:17,20 197:12	138:4
104:1 109:18	102:10,17 103:17	124:5,6 126:11	197:15 214:6	world 22:8 33:18
122:8 124:13,15	104:8 106:10	132:8 133:20	247:7 249:20	65:13 121:14
147:3,6,18 157:1	112:21 116:8	151:18 170:19	261:8 269:2 272:5	290:12
161:19,20 162:3	124:20	172:2 193:14	273:8 274:5	worried 35:18

				1
242:5	164:21 169:1	0.22 138:10	198:21 199:9	282 3:20
worse 256:17	176:12 218:8,8,14	1	16 208:17 211:3	293 3:22
worst 17:16	218:19,19 235:16	$\frac{1}{12455600526}$	1604 3:4 7:9	299 14:14
worth 57:4 128:8	243:4 255:4	1 24:5 76:9 85:2,6	17 76:8	
248:9 263:20	264:16 282:15	85:13 108:18	18 67:13 83:7	3
wouldn't 15:14	years 12:1 30:19	113:20 192:17	140:18,18 151:13	3 39:21 133:1
133:15 179:1	49:17 55:21 65:9	254:12	199 3:11	3a 7:17 9:3 177:18
188:18 228:17	84:9 131:11	1a 81:9 208:12		190:3 268:10
229:2 239:3	145:13 150:4	1b 47:12 208:19	2	272:19
270:19 271:10,19	157:17 188:14	220:13	2 5:9 47:18 84:9,12	3b 9:17 177:22
wrap 3:14,18	194:1 217:18	1C 209:6	84:13,19 85:6	273:1 275:12
196:14 202:11	255:5 264:18	1D 209:10,21	108:19,22 109:3,8	3c 10:8 178:7 179:8
281:20 282:21	year's 107:1	1.4 98:5 99:4	110:5	192:4 278:2,4
wrapped 207:18	year-long 148:12	1.8X 246:21	2A(1) 216:8	279:17
wrap-up 5:2	yeses 179:21	10 84:18 157:1	2A(2) 217:2	3d 10:19 279:3,5
write 278:15	yesterday 4:4,11	159:11 176:20	2a1 83:14	30 1:7 84:9 90:17
writing 119:5	6:20 8:7,22 13:4	216:19 265:14	2b 58:1 264:10	109:9 121:20
213:16	19:4,6 26:17	267:13 280:8,16	2B(1) 220:10 221:4	144:12,14 149:2,3
written 56:2 85:11	28:13 31:1,8	285:7	233:22	150:6,12 151:1
87:19 214:14	32:11,15 33:1	10:51 134:21	2B(2) 216:21 221:6	152:2,2,6 153:2,4
215:3 253:22	34:15 42:19 44:10	100 126:1 152:5	230:6 231:7,21	154:4 155:4,14
wrong 158:21	45:5 49:5 50:18	158:5	2B(3) 234:2,4	157:1 159:9,17
wrote 117:16 118:4	55:5 62:18 82:21	100th 189:11	2B(4) 236:4 245:1	248:13 283:5
254:20	98:20 99:8 100:11	100,000 66:20	2B(5) 245:8 262:18	300 156:19 158:7
	104:22 127:8	11 16:9 24:4 110:9	2B(6) 245:5 262:22	32 270:7
X	199:16 222:18	110:9 160:6	264:5 265:2	32.78 256:1
X 257:22	230:6 246:14	288:16	2b1 58:10 130:5	33,000 56:2
	249:18 261:6	11:07 134:21	2b2 58:10	
<u> </u>	yesterday's 33:22	12 69:14 147:14,22	2b3 58:1,10	4
Y 257:22 280:12	50:11	148:4 206:1	2C 264:8 265:18	4 3:2 98:15 108:20
Yale 1:17	yes/no 11:7 41:4	12-month 79:20,21	2,000 14:14	133:1 192:17
YANAGIHARA	76:4	80:5 147:12	2:30 198:20 199:13	255:12
2:6 38:5 73:1		12/31/2007 255:5	200:5	4a 14:17,21,22 16:8
74:4,8 75:5 185:5	Z	12:16 201:9	2:32 293:17	4b 16:10,14 19:20
252:19 253:6	zero 140:19	12:45 200:2,13	20 109:9 121:20	23:16,22 24:1
263:2	Zielinski 2:22	12:53 202:2	200 99:8	4c 19:19 23:11 24:6
Yeah 69:19	135:6 181:1,2	13 39:12 132:12,17	200,000 99:5	4d 19:20 20:5,16
year 17:22 25:1	182:22 185:7	135 3:9	2006 100:20 101:9	23:8,9,13,22 37:7
57:2 67:1 70:21	199:10,18 200:3	15 157:1 208:18	2007 255:6	37:15 39:11
71:4 77:5 78:20	200:14,17,22	15-minute 134:19	2008 149:11	40 3:6 121:21
79:4 80:1,7,19,20	201:3,8	1557 3:5 42:12	2011 1:7	400 49:18
80:21 81:7 90:15	Zyban 26:5	76:11	202 3:14	42,000 14:13
101:2,12,20 102:2		1572 3:10 199:16	212,000 98:8 99:9	5
102:9 103:4 107:9	\$	1576 3:7 77:3 80:13	22nd 207:18	
107:14,22 112:1	\$33,000 14:7	159,000 14:13	24 151:13	5 39:12 132:17
115:10 120:13,16	\$50,000 225:15,16	1591 199:17	25 156:8,8	50 121:21 156:4
120:19,21 136:2	0	1599 3:12 198:19	281 3:16	284:21
148:14,19,21	U			50,000 14:6 71:7
	1	1	1	1

				rage 55
		l		I
500,000 14:12,13				
55 90:21				
575 1:11				
5795 3:9 135:1				
585.2 83:19				
585.3 83:19				
585.4 83:20				
6				
6 24:4 69:14				
60 31:11 126:2				
616 119:10				
7				
7 3:4 16:9 39:21				
7th 1:11				
70 90:15 115:7				
120:17				
73 3:8				
75 58:3				
8				
8 39:21 247:4				
8:30 1:12				
8:32 4:2				
80 31:20 257:3				
273:15				
273.13				
9				
9.7 56:12				
99 118:13 213:1				
77 110.15 215.1				
	1	1	1	1

CERTIFICATE

This is to certify that the foregoing transcript

In the matter of: National Voluntary Consensus

Before: NQF

Date: 06-30-11

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.

near A ans f

Court Reporter

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701 332