NATIONAL QUALITY FORUM

+ + + + +

MEASURE APPLICATIONS PARTNERSHIP HOSPITAL WORKGROUP

+ + + + +

TUESDAY DECEMBER 11, 2018

+ + + + +

The Workgroup met at the National Quality Forum, 9th Floor Conference Room, 1030 15th Street, N.W., Washington, D.C., at 9:00 a.m., Cristie Upshaw Travis and Ron Walters, Co-Chairs, presiding. WORKGROUP CHAIRS CRISTIE UPSHAW TRAVIS, MSHHA RONALD S. WALTERS, MD, MBA, MHA, MS ORGANIZATIONAL REPRESENTATIVES KEITH BELLOVICH, MD, Kidney Care Partners ANNA LEGREID DOPP, PharmD, Pharmacy Quality Alliance NANCY FOSTER, American Hospital Association FRANK GHINASSI, PhD, ABPP, National Association of Psychiatric Health Systems KIMBERLY GLASSMAN, PhD, RN, Nursing Alliance for Quality Care MARYELLEN GUINAN, America's Essential Hospitals MARTIN HATLIE, JD, Project Patient Care GAYLE LEE, Association of American Medical Colleges MARSHA MANNING, MLIR, BSN, RN, University of Michigan* LISA McGIFFERT, Mothers Against Medical Error R. SEAN MORRISON, MD, National Coalition for Hospice and Palliative Care SARAH NOLAN, Service Employees International Union

```
SHANNON PHILLIPS, MD, MPH, Intermountain
      Healthcare
AISHA PITTMAN, MPH, Premier, Inc.
KAREN SHEHADE, MBA, Medtronic-Minimally Invasive
      Therapy Group
SALLY TURBYVILLE, DrPH, MS, MA, Children's
      Hospital Association
MARISA VALDES, RN, MSN, Baylor Scott & White
      Health
DEBORAH WHEELER, Molina Healthcare
INDIVIDUAL SUBJECT MATTER EXPERTS
ANDREEA BALAN-COHEN, PhD
LEE FLEISHER, MD
JACK JORDAN
ANN MARIE SULLIVAN, MD
LINDSEY WISHAM, BA, MPA
FEDERAL GOVERNMENT LIAISONS
REENA DUSEJA, MD, Centers for Medicare &
      Medicaid Services (CMS)
PAM OWENS, PhD, Agency for Healthcare Research
      and Quality (AHRQ)*
DAN POLLOCK, MD, Centers for Disease Control and
      Prevention (CDC)
NQF STAFF:
TAROON AMIN, MPH, PhD, Senior Director
AMEERA CHAUDHRY, Project Analyst
KAREN JOHNSON, MS, Senior Director, Performance
      Measures
MADISON JUNG, Project Manager
MELISSA MARINELARENA, RN, MPA, CPHQ, Senior
      Director, Quality Measurement
ELISA MUNTHALI, MPH, Senior Vice President,
      Quality Measurement
DESMIRRA (DESI) QUINNONEZ, Project Analyst
ERIN O'ROURKE, Senior Director
```

Neal R. Gross and Co., Inc.

ALSO PRESENT:

CORINNA ANDIEL, Alliance of Dedicated Cancer Centers*

SUSANNAH BERNHEIM, MD, MHS, Yale CORE KRISTEN MCNIFF, MPH, Alliance of Dedicated

Cancer Centers

ROBERT MORGAN, Hospital IQR and VBP Programs, CMS

IRA MOSCOVICE, PhD, MAP Rural Health Workgroup Co-Chair*

GIGI RANEY, LCSW, Health Insurance Specialist, CMS*

TOM ROSS, MS, PCHQR Program Lead, VIQR Outreach and Education Support Contractor*

MICHELLE SCHREIBER, MD, QMVIG Group Director,

CMS

*Present via telephone

CONTENTS

Welcome
Introductions and Disclosures 9
Disclosure of Interests 9
CMS Opening Remarks By Michelle Schreiber, M.D
Overview of 2017-2018 MAP Rural Health Project
Overview of Pre-Rulemaking Approach
Discussion on Addressing Pain Management through Quality Measurement
Overview of the Hospital Inpatient Quality Reporting (IQR) Program and Medicare and Medicaid Promoting Interoperability Program for Eligible Hospitals and Critical Access Hospitals (CAHs) 105
Pre-Rulemaking Input for Hospital IQR Program and Medicare and Medicaid Promoting Interoperability Program for Eligible Hospitals and CAHs
Overview of Prospective Payment System (PPS)-Exempt Cancer Hospital Quality Reporting (PCHQR) Program
Opportunity for Public Comment on Measures Under Consideration for PCHQR
Pre-Rulemaking Input for PCHQR
Opportunity for Public Comment
Adjourn

1	
1	P-R-O-C-E-E-D-I-N-G-S
2	9:01 a.m.
3	CHAIR WALTERS: Good morning. Thank you
4	all for coming. I wanted to my name is Ron
5	Walters. Cristie and I are the co-chairs. I'll
6	let her speak in just a second. I wanted to say
7	a couple of things first because we really do
8	appreciate all of you coming to the meeting.
9	We know that the thought has probably
10	crossed more than one mind around the room, why
11	am I coming all this way, possibly through some
12	bad weather, to talk about four measures? And
13	for people who have been on this group for a
14	while, we all remember the two-day marathons
15	with, I don't remember where we peaked, but it
16	was somewhere in the 40 measures.
17	This is, again, part of the patients
18	over paperwork trend, part of trying to trim down
19	to the ones that are most meaningful and worth
20	the time and hassle to collect since many places
21	cannot spit these out automatically, as
22	automatically as they want to. It certainly

affects the hospital program tremendously, as 1 2 Nancy has pointed out since the very first And we, of course, never really know 3 meeting. until December 1st or within 24 hours of that day 4 5 how many measures there are going to be, so when they book everybody's appointments and everything 6 7 and travel and hotels, they're, at best, only a 8 feeling of, well, it's not going to be two dozen 9 measures or even one dozen measures and we never know the exact number. 10

11 So congratulations to staff. There was 12 a lot of last -- the version you're seeing of the 13 agenda is probably about the fifth or sixth one, 14 as usual, and they have to also change the plan as it goes along and they get exactly what we're 15 16 going to be doing on December 1st. So, again, a 17 big congratulations to staff and to everyone for 18 showing the dedication to come here in what could 19 have been really nasty travel. I know for some 20 of you it still was. 21

21 But we have to, we literally have to do 22 this. We commit to doing it as our

responsibility to give feedback to CMS about the 1 2 MUC list and about any other measure, actually, existing measures or ideas for measures. 3 And I 4 think, as Michelle will say later on, CMS really 5 does appreciate that feedback and taking into consideration. This is an important meeting to 6 try to go to all odds to get to, and there was a 7 8 time where we thought those were going to be 9 considerable odds over the last few days and still were for some people. 10 11 Cristie, do you want to say anything? 12 CO-CHAIR UPSHAW TRAVIS: Well, I will

13 just say ditto to all of that. And in our 14 efforts to be efficient, I won't repeat them. But just to give my personal thanks to all the 15 16 work you have to do in advance, as well as the 17 work that we will be doing here today, so thank 18 you for being here. This is a big group of 19 I don't remember actually it being this people. 20 big in the past, so we're filling every seat. 21 This is wonderful. But thank you for all of 22 that, as well.

1CHAIR WALTERS: Have we stalled long2enough that you're ready, or would you like a few3jokes or magic or something?

4 MS. MARINELARENA: We can do an 5 icebreaker, okay? Good morning, everyone. My 6 name is Melissa Marinelarena, and I'm the Senior Director -- they're working on my badge outside -7 8 - for those of you that don't me, but I think 9 mostly everybody does. I'd like to welcome you 10 to the MAP Hospital Workgroup, although we have a 11 small number of measures compared to the number 12 that we've had in the past. I think it will 13 still be an exciting and productive day, so thank 14 you very much. And I believe on the 15 CHAIR WALTERS: 16 phone do we have Marsha and Pam yet? 17 MEMBER MANNING: Marsha Manning is here. 18 CHAIR WALTERS: Thank you for calling 19 in. Pam? 20 MEMBER OWENS: This is Pam Owens from 21 AHRQ. So I think 22 CHAIR WALTERS: Good.

that's, we'll see, I think that's everybody 1 2 almost. Good. Remember that, as we work our way through this, we're going to go over that the 3 4 process has changed just a little bit, but the 5 underlying process hasn't. Raise your tent cards if you have something to say. 6 Restrooms are in 7 the hallway. Please mute your cell phones and 8 speak directly into the microphone with it turned 9 on and then try to remember to promptly turn your microphone off when you're done so that we don't 10 11 look around the room and see 20 people talking 12 when only one person does. And as we say every 13 year, your input is very important. We want you 14 to say what you need to say and give the input that you came here for, but the co-chairs tried 15 16 to also make sure we get through the agenda and 17 we don't get terribly duplicative in our 18 conversations repeating what others have said. 19 So anything else? I think we're ready 20 to roll on to disclosures. 21 MS. MUNTHALI: Thank you, Ron and Cristie and Melissa. Good morning, everyone. 22 My

1	name is Elisa Munthali. I'm the Senior Vice
2	President of Quality Measurement at NQF, so I
3	would like to welcome you, as well, and to thank
4	you so much for serving on the Committee.
5	So what we'll do today is to combine
6	introductions with your disclosures of interest.
7	We're going to do it in two parts because there
8	are two types of committee workgroup members:
9	there are organizational representatives and
10	subject matter experts.
11	We're going to start with the
12	organizational representatives, and you'll
13	remember you received a form. It was an
14	abbreviated form. We just asked you about your
15	financial interest if it exceeded, it was \$10,000
16	or more. So what we're going to do is start with
17	the organizational representatives in the room
18	first. We're going to ask you to introduce
19	yourself, tell us who you're with, and let us
20	know if you have any disclosures. Once we do
21	that, then we'll go to the organizational reps on
22	the phone and then we'll go to our subject matter

1	experts in the room and those on the phone.
2	So I think we're starting with Frank,
3	who is to my left. Yes.
4	MEMBER GHINASSI: So good morning.
5	Frank Ghinassi. I'm at Rutgers University, and
6	I'm representing the National Association for
7	Behavioral Health. I have nothing to disclose.
8	MEMBER McGIFFERT: Good morning. I'm
9	Lisa McGiffert. I am subbing for Helen Haskell
10	today for Mothers Against Medical Errors. I'm
11	also a patient advocate with the Patient Safety
12	Action Network, and I directed the Consumer
13	Reports Safe Patient Project for about 15 years,
14	and I also serve on the Patient Safety Committee
15	for NQF.
16	MEMBER GLASSMAN: Kim Glassman with the
17	National Nursing Alliance for Quality Care.
18	Nothing to disclose.
19	MEMBER McGIFFERT: I don't have anything
20	to disclose. Sorry.
21	MEMBER VALDES: Good morning. Marisa
22	Valdes from Baylor Scott & White Health. Nothing

to disclose.

2	MEMBER SHEHADE: Hi. Karen Shehade with
3	Medtronic's Minimally Invasive Therapies group.
4	I'm a physician assistant and work in our health
5	economics and health policy and reimbursement,
6	and I do have disclosure of more than \$10,000 in
7	stock.
8	MEMBER BELLOVICH: I'm Keith Bellovich
9	representing Kidney Care Partners. I'm a
10	nephrologist from Detroit, Michigan. And my
11	disclosures, I'm a medical director with DaVita
12	Corporation and a joint venture partner.
13	MS. MUNTHALI: Thank you, Keith. I'm
14	just going to pause briefly. Just to remind
15	those who are on the phone if you could please
16	mute your lines if you're not speaking. Thank
17	you.
18	MEMBER HATLIE: I'm Marty Hatlie. Good
19	morning, everybody. I'm the CEO of Project
20	Patient Care. We're an improvement coalition in
21	Chicago, non-profit improvement coalition, and
22	it's nice to be here. And I have nothing to

disclose.

2	MEMBER MORRISON: Sean Morrison. NQF
3	has found me out. I am no longer a content
4	matter expert, but I'm now representing the
5	National Coalition of Hospice and Palliative
6	Care.
7	MS. MUNTHALI: Sean?
8	MEMBER MORRISON: I have to disclose no
9	disclosures.
10	MEMBER WHEELER: Debbie Wheeler. I'm
11	representing Molina Healthcare, and I have no
12	disclosures.
13	MEMBER GUINAN: Morning, everyone.
14	Maryellen Guinan with America's Essential
15	Hospitals, and I have nothing to disclose.
16	MS. MUNTHALI: So let me tell you who
17	the subject matter experts. So right now
18	everyone with the exception of Andreea, Lee,
19	Jack, Ann Marie and Lindsey.
20	MEMBER PHILLIPS: Good morning. My name
21	is Shannon Phillips. I am a pediatric
22	hospitalist. I'm the Chief Patient Experience

Officer at Intermountain Healthcare and I lead
 safety, quality, and experience for our health
 system. Have no disclosures. However, as
 relevant to today's discussion, our organization
 has participated in the pressure ulcer work with
 Mathematica but, otherwise, nothing.

MEMBER LEE: I'm Gayle Lee. I'm with
the Association of American Medical Colleges.
I'm subbing today for Janis Orlowski, and I have
no disclosures.

11 MEMBER DOPP: Morning. I'm Anna Legreid 12 I'm a pharmacist. I'm the Director of Dopp. 13 Clinical Guidelines and Quality Improvement with 14 the American Society of Health System Pharmacists. However, today we're representing 15 16 the Pharmacy Quality Alliance on the MAP, so I'm 17 really thankful to be here. I have nothing to 18 disclose.

MEMBER FOSTER: Good morning. I'm Nancy
Foster. I'm the Vice President for Quality and
Patient Safety Policy at the American Hospital
Association, and I have nothing to disclose.

MEMBER BALAN-COHEN: I'm Andreea Balan-1 2 Cohen. I'm a research leader with the Center for Health Solutions. I'm also the chair of the 3 4 Quality and Value Group at Academy Health, and I 5 have nothing to disclose. MEMBER NOLAN: I'm Sarah Nolan from the 6 7 Service Employees International Union, SEIU. 8 Nothing to disclose. 9 MS. MUNTHALI: So thank you to everyone 10 in the room. Now we'll go to Marsha Manning from 11 the University of Michigan. 12 MEMBER MANNING: Good morning. 13 MS. MUNTHALI: Hello. 14 MEMBER MANNING: Good morning. This is 15 Marsha Manning, Manager of Medical Benefits from 16 the University of Michigan, and I have nothing to 17 disclose. 18 MS. MUNTHALI: Thank you very much. So 19 thank you to all of our organizational 20 representatives, and so now we'll do the 21 disclosures for the subject matter experts. And for those of you that completed the form, you 22

know it was a lengthy form. We asked you about 1 2 your activities as they're related to the work in front of us. A couple of reminders. 3 We wanted 4 you to know that you sit on this committee as an 5 individual. You do not represent the interest of your employer or anyone who may have nominated 6 you for the Committee. We're interested in 7 8 hearing any relevant work, not just that that is 9 paid but also unpaid. And I think this is a most important reminder. Just because you disclose it 10 11 does not mean you have a conflict. We do this in 12 the interest of openness and transparency. And so I'll start with your co-chairs. 13

14 Ron and Cristie are both subject matter experts. 15 I'll start with Ron and then go to Cristie, and 16 then we'll go to, I think Andreea, you did yours 17 already, we'll go to Lee, Jack, Ann Marie, and 18 Lindsey.

19 CHAIR WALTERS: Ron Walters. I'm a 20 medical oncologist at MD Anderson. I have two 21 affiliations. One is I'm on the board of NCCN, 22 which is the National Comprehensive Cancer

They are not a measure developer. 1 Network. I'm 2 not sure what they're doing, but they're definitely not developing measures. They use the 3 4 word endorse. They don't really know what that 5 And I'm also on the board of the TMF, means. Texas Medical Foundation, QIN-QIO organization, 6 7 and it has about six states that it oversees and 8 numerous contacts with CMS. They are also not a 9 developer, they are an implementer of a lot of 10 things that go on.

When we get to later this afternoon, I'm going to kind of recuse myself from the cancer discussion, although I am not a part of that measure development. You'll hear from the measure developer for that. I was kind of the idea generator, I guess.

17 CO-CHAIR UPSHAW TRAVIS: Good morning. 18 I'm Cristie Upshaw Travis, and I'm the CEO of the 19 Memphis Business Group on Health. I have just a 20 couple of disclosures. I do serve on the Board 21 of Directors as Vice Chair of the Leapfrog Group 22 which does put together measures related to

(202) 234-4433

hospital quality and safety, and I do have stock
 ownership in healthcare-related stock of more
 than \$10,000.

I'm Lee Fleisher. 4 MEMBER FLEISHER: I'm 5 the Chair of Anesthesiology at the University of Pennsylvania. I do have grant funding from the 6 7 NIH with Jeff Silber on measure methodology. Ι 8 also chair the Leapfrog's Ambulatory Surgery 9 Group, as well as I am the affiliations with the American Society of Anesthesiologists in the 10 No other financial. 11 AAMC.

12 MEMBER JORDAN: I'm Jack Jordan. I'm 13 the Director of Quality at Henry Ford Hospital in 14 Detroit. I do also consult with Impact 15 International as a provider with CMS on the HINN 16 contract.

17 MS. MUNTHALI: Thank you. 18 MEMBER SULLIVAN: Hi. I'm Ann Sullivan. 19 I'm the Commissioner of the New York State Office 20 of Mental Health and on the faculty of the Mt. 21 Sinai School of Medicine and a psychiatrist. 22 MEMBER WISHAM: Good morning. I'm

1	Lindsey Wisham. I here as a health informatics
2	expert. I would like to disclose that my
3	employer, Telligen, does have contracts with CMS.
4	I'm also the patient representative for a macro
5	measure development and some DoD reviews.
6	MS. MUNTHALI: Thank you.
7	MEMBER FLEISHER: And just to add, I'm
8	a paid consultant to Yale CORE for the
9	development of some of the hospital mortality
10	measures.
11	MS. MUNTHALI: Thank you very much. So
12	that concludes our disclosures for the subject
13	matter experts. We also have federal liaisons
14	that are on the workgroup. They're non-voting
15	members of the workgroup, and I'd like them to
16	introduce themselves. We have colleagues from
17	CMS and Dan is here from CDC and I understand Pam
18	Owens is here from AHRQ on the phone. So we'll
19	start with Michelle and Reena and Dan and then go
20	to the phone to Pam.
21	DR. SCHREIBER: So good morning. I'm
22	Michelle Schreiber. I am one month into my new

role as the Director of QMVIG, the Quality 1 Measures and Value-Based Incentives Group, and 2 you'll hear a little bit more from me later. 3 Ι 4 have nothing to disclose.

MEMBER DUSEJA: Good morning. My name is Reena Duseja. I'm the Chief Medical Officer Looking forward to the discussion of QMVIG. Thanks. And nothing to disclose. today.

9 MEMBER POLLOCK: Dan Pollock. I'm a medical epidemiologist at Centers for Disease 10 11 Control and Prevention. My day job there is to 12 provide oversight to the National Healthcare 13 Safety Network, which is a surveillance system 14 that's used widely for quality measure purposes.

MS. MUNTHALI:

Thank you. MEMBER OWENS: 16 Good morning. My name is 17 Pam Owens. I'm an epidemiologist, and I co-lead 18 the AHRQ quality indicators. I'm with the Agency 19 for Healthcare, Research, and Quality, and I have 20 nothing to disclose.

Pam?

21 MS. MUNTHALI: Thank you very much. Now 22 that you've heard all of the disclosures, I just

> Neal R. Gross and Co., Inc. Washington DC

5

6

7

8

wanted to remind you if, at any time, you 1 2 remember you have a conflict, we want you to speak up. You can do so in real-time, or you can 3 4 approach any one of us in the front and on the 5 side. These are our colleagues all over here and the co-chairs. Likewise, if you believe that 6 7 anyone on the Committee is acting in a biased 8 way, we want you to speak up. 9 If you have any questions of me, please do ask them. But thank you and have a good 10 11 meeting. 12 CO-CHAIR UPSHAW TRAVIS: So we do want 13 to be sure that we have an opportunity to 14 introduce our team from NQF that is supporting our work. You've already met Melissa, and I'd 15 16 like to introduce Madison. And you can, if you 17 want to, say a few words and maybe introduce your 18 colleagues. 19 My name is Madison MS. JUNG: Sure. 20 I'm the Project Manager for this project. Jung. 21 You've probably received a lot of emails from me, but thank you for joining us today. 22

Neal R. Gross and Co., Inc. Washington DC

www.nealrgross.com

1	MS. QUINNONEZ: And I'm Desmirra
2	Quinnonez, Desi. And I'm the project analyst on
3	this project, and I'm happy to work with this
4	workgroup.
5	CO-CHAIR UPSHAW TRAVIS: Okay.
6	MS. O'ROURKE: I'm Erin O'Rourke. I'm
7	one of the Senior Directors supporting the
8	Coordinating Committee.
9	DR. AMIN: Taroon Amin. I'm a
10	consultant to NQF supporting the MAP Coordinating
11	Committee, as well.
12	CO-CHAIR UPSHAW TRAVIS: Hi. Well, this
13	is the team behind the curtain, although they're
14	not very much behind the curtain, so thank you
15	all so much for all of your work today.
16	You see before you kind of an outline of
17	what our agenda is. We do have a mixture of some
18	updates and some reports, as well as working,
19	obviously, on the measures under consideration.
20	And so we are really respectful of the time that
21	we have here and we want to be sure that we are
22	using it to really further the work that we have

as a workgroup but also to provide CMS with some comments along the way and our thoughts for their use. So we do plan to be out of here no later than 3:00 and, hopefully, that will be good for all of your travel arrangements.

So if we want to go to the next. 6 Obviously, our meeting objectives are to review 7 8 and provide input on the measures under 9 consideration for the applicable federal hospital 10 quality programs that are under our purview and 11 also, as we do every year, to help identify gaps 12 in measures for these programs, really trying to 13 take a systematic view, if you will, of the 14 portfolio of the measures that are put together, and our recommendations or at least thoughts to 15 16 CMS on what's missing and where we would like to 17 see those portfolios go.

18 Next slide. So it is my pleasure,
19 Michelle has already introduced herself, but I
20 would like to turn it over to Michelle so that
21 she could give us some opening remarks.

DR. SCHREIBER: Thank you, Cristie. I

Neal R. Gross and Co., Inc. Washington DC

22

1

2

3

4

appreciate it. As you heard, I'm Michelle 1 2 Schreiber, a grand total of one month into this new job. But on behalf of CMS, I would truly 3 4 like to welcome you to the Hospital MAP and 5 sincerely thank you for your participation. Welcome to all the hospital types represented. 6 7 It's actually very interesting. I've been on the 8 hospital side for a long time, but we have rural 9 hospitals, we have cancer hospitals, we have inpatient psych hospitals, and so thank you for 10 11 that wide representation.

You know, your input really is extremely 12 13 valuable, as Ron eluded to before. In the short 14 time that I've been there, I have really 15 witnessed how CMS takes these comments to heart 16 and it does affect policy and it affects what 17 goes forward into the federal programs. So your 18 comments really are extremely appreciated and 19 Thank you also to NQF for convening helpful. 20 this work and as well as our CMS partners, our 21 contractors, who are here today to help support 22 us.

The Measure Application Partnership is 1 2 an important annual process, you all know this, frankly probably better than I do, where NOF 3 really convenes multiple stakeholders. 4 And my 5 computer doesn't want to work. That was not But it convenes multiple stakeholders to 6 qood. provide input on these measures that will go into 7 8 federal rulemaking that starts really almost as 9 soon as these meetings are over.

10 The Committee also helps provide 11 guidance on future direction and helps us 12 identify gaps in measure opportunities, as well. 13 There's also the important opportunity for public 14 comments, so we look forward to any comments from 15 the public either in person here or on the phone.

16 The Quality Measures and Value-Based 17 Incentives Group, QMVIG, that we're representing 18 today is the group responsible for developing and 19 stewarding measures and for those programs that I 20 know you all love, including the hospital stars; 21 the hospital value-based programs; MIPS; 22 meaningful use, also known as promoting

interoperability; post-acute care programs; inpatient psyche; ESRD. And so this really is the whole host of programs, so that what you say can affect not just hospitals but really all of the programs that CMS has to offer.

By way of background introduction, 6 7 actually it turns out I know you. I trained one 8 of you, surprisingly enough. I'm a primary --9 it's hard to believe. I'm a primary care general internist by background and training, and I've 10 11 worked both inpatient and outpatient. I've been 12 in the healthcare quality space really for many 13 years both in quality and as a practitioner, 14 mainly in Detroit but elsewhere. Most recently, I was the Chief Quality Officer at the Henry Ford 15 16 Health Systems, so Jack and I do know each other And I was the lead clinician for their 17 well. 18 Epic implementation, so my particular interest is 19 actually the intersection of quality and electronic medical records, and I have a 20 21 tremendous amount of experience in implementing these systems. 22

1

2

3

4

I really chose to come to CMS to be on the other side, to see the policy side and the development of it, and it's been an amazing transition filled really with wonderful people at 4 CMS who truly are committed to making it better, and we all look forward really to working with you today.

8 I know that you have heard presentations 9 on Meaningful Measures. CMS is an important initiative around making sure that we have only 10 the most essential Meaningful Measures and to 11 12 reduce burden, as well. But let me just touch on 13 a few things for you to keep in mind as you 14 consider the measures before you today.

15 So Meaningful Measures was just launched 16 last year, and it was to improve outcomes for 17 patients and caregivers by empowering them with 18 information that's meaningful to them to make 19 decisions. But additionally, Meaningful Measures 20 is also about reducing burden to clinicians 21 because we recognize, and I've lived it, that 22 clinicians in healthcare organizations sometimes

1

2

3

5

6

find some of this work difficult and onerous, and 1 2 so CMS is actually committed to reducing that burden and to promote patients over paperwork. 3 With this in mind, actually, we narrowed 4 5 down the initial 184 measures that were originally the MUC list to a very parsimonious 6 7 list, so you're not seeing that many measures 8 come to you today. Part of that was intentional. 9 We recognize that really quality measurements and reporting isn't a perfect 10 It hasn't been. I don't know that it 11 science. 12 ever will be. But we're all trying to make it 13 better and that the programs have opportunity for 14 refinement. As I said, I've lived for many years on 15 16 the receiving end of these programs, but, being 17 at CMS, there is ongoing and continued work for 18 improvement around both the programs and the 19 measures to provide better care for all patients. 20 And I think that's what we all have to keep in 21 mind that that's our primary goal. 22 As part of the effort to reduce burden,

last year Meaningful Measures removed 79 measures 1 2 from the various programs and saved over \$100 million in expense while continuing to align 3 measures across multiple programs so that we're 4 5 not duplicative. Meaningful Measures is a commitment to infusing the principles of value, 6 7 innovation, and flexibility and following CMS's quality strategy goals to remind us all making 8 9 care safer, strengthening the person and family engagement, promoting effective care 10 11 communication and coordination, promoting 12 effective prevention and treatment of chronic 13 disease, working with communities to promote best 14 practices of healthy living, and, of course, making care affordable. 15

Meaningful Measures is not just about burden removal, however. The work also calls for identifying and filling in gaps where there's a lack of important measures, and we know that there's many areas like that, and focusing more on outcomes measures, although process measures are still important, I want to be clear about

(202) 234-4433

1

that, and patient-reported measures.

2	We'll also continue to align measures
3	across all programs and payers, and I'm really
4	particularly excited about the re-initiated work
5	that NQF, AHIP, America's Health Insurance Plans,
6	and CMS are jointly leading about the Core
7	Quality Measures Collaborative, in other words
8	trying to align measures not only across CMS but
9	across all payers in the United States as much as
10	we can so that we reduce burden with multiple
11	programs having multiple measures. So this is
12	really very exciting work, and we thank NQF for
13	that, as well.
14	Finally, we recognize that we must lower
15	the burden of measurement systems, including
16	making quality measures more real-time so that
17	they're more actionable. There's a great deal of
18	work going on with ongoing and multiple
19	registries and significant thought to electronic
20	quality measures.
21	So please think about these areas as you
22	

make your recommendations today: One, are we

Neal R. Gross and Co., Inc. Washington DC

addressing high-impact areas? Do these make a 1 2 difference? Are they meaningful? Are the measures meaningful to patients and caregivers 3 and include the patient voice? Is this an 4 5 outcome versus a process measure? Both have a What's the burden of the measure? 6 role. Are 7 there burdens or unintended consequences of 8 including the measure into a value-based program? 9 Is there a significant opportunity for improvement or are these measures really just 10 11 topped out? And does the measure fit a 12 population-based payment or alternative payment 13 model and align with other programs and payers? 14 Finally, I would encourage everybody to think about equity and to think about advancing 15 16 interoperability within electronic health records. 17 18 So thank you all again for your time, 19 your dedication. And on behalf of CMS, thank you 20 for your participation. We all look forward to

CO-CHAIR UPSHAW TRAVIS: Thank you.

Thank you.

Neal R. Gross and Co., Inc. Washington DC

working with you.

21

Thank you very much. I'm going to turn it over 1 2 to Ron, but, before I do, I do think we have a couple of more disclosures that we probably need 3 And just in case this is a disclosure I 4 to make. 5 should have made before, I do sit on the steering committee for the Core Quality Measure 6 7 Collaborative, so thank you for bringing that up. 8 MS. MUNTHALI: Thanks, Cristie. And 9 Aisha and Sally just walked in, and so if you can let us know, introduce yourself and let us know 10 11 who you're with and let us know if you have any 12 disclosures. Thanks. 13 MEMBER TURBYVILLE: Good morning. My 14 name is Sally Turbyville. I'm here representing the Children's Hospital Association. 15 I have no 16 conflicts of interest to disclose. 17 MEMBER PITTMAN: Hi, good morning. 18 Aisha Pittman with Premier. No conflicts or 19 disclosures. 20 CO-CHAIR UPSHAW TRAVIS: Sorry. We want 21 to just be sure we had all the disclosures out, 22 but thank you so much, Michelle, for your opening

1	remarks. It was very helpful to me. I wrote
2	them all down right at the end there about what
3	you were encouraging us to kind of keep in mind
4	as we go through our work.
5	We do have a few minutes if there are
6	some questions or discussion with Michelle before
7	we move on to our next agenda item. Well, it
8	says here, it says ask if the workgroup has any
9	questions.
10	CHAIR WALTERS: We're all friends here.
11	CO-CHAIR UPSHAW TRAVIS: And remember
12	this is her first time and we want her back. So
13	Nancy.
14	MEMBER FOSTER: Was that directed at me?
15	I actually want to thank CMS for its focus on the
16	Meaningful Measures initiative. The opportunity
17	to really hone down the list of measures to those
18	that are most meaningful to making a difference
19	for patients is really going to help drive
20	quality forward in ways that we all want to see
21	happen and kudos to you for making that happen,
22	to all of CMS for making that happen. It's

really an extraordinary opportunity because one 1 2 of the things you didn't mention, Michelle, but I know you know from your previous experience is 3 4 that what that does is free up the time of the quality improvement staff to really re-focus 5 their attention on making improvement happen, 6 7 rather than just measuring what's happening, and 8 that's truly important.

9 I don't know if this is the appropriate Cristie, I'll leave that up to you. But I 10 time. 11 am curious as to why the one psychiatric measure 12 that was initially listed has disappeared off the list and if we can understand because CMS in its 13 14 rulemaking has said, has acknowledged that it needs more good psychiatric measures. 15 So just 16 curious about that.

DR. SCHREIBER: I actually am happy to take that one. I have tremendous interest, actually, in the psychiatric hospitals, having worked with them through Henry Ford and other places. We did a lot of deliberation around the psychiatric measures. One had actually already

been passed through, and that's why you're not 1 2 seeing it, and the other one was on medication reconciliation, which we actually thought was too 3 4 burdensome, had become much more of like a 5 checkbox-y thing than a meaningful measure, and we pulled it. 6 CO-CHAIR UPSHAW TRAVIS: Thank you for 7 8 that, and I actually did mean to mention that 9 earlier. So thank you for bringing that up, 10 Nancy. 11 Can you show us your card? Sorry. It's 12 hard to tell. Shannon. 13 MEMBER PHILLIPS: In the spirit of if 14 you remember something say something, I am a member, a senior fellow in the Society for 15 16 Hospital Medicine and I sit on the Public 17 Measures and Reporting Committee and we do 18 regular feedback to measures that come up as it 19 relates to hospitalists. So thank you for the 20 opportunity to add. 21 CO-CHAIR UPSHAW TRAVIS: Thank you. Ι had my own opportunity, so thank you for that. 22

Are there other thoughts that we'd like to share 1 2 with Michelle or questions? All right. Well, hearing none, we will move on to our next agenda 3 item, which is an overview of the MAP Rural 4 5 Health project. And Ameera, I'm going to let you say your last name, will be walking us through 6 So thank you, Ameera. 7 that.

8 MS. CHAUDRY: Thank you. Good morning, 9 My name is Ameera Chaudry. everyone. I'm the 10 project analyst on the MAP Rural Health project. 11 I'm joined by Karen Johnson. She's the senior 12 director on the project, as well as Ira 13 Moscovice. I believe he is on the phone. so, 14 Ira, if you're there, if you can just say hello. Hello. 15 DR. MOSCOVICE: I'm here. 16 MS. CHAUDRY: Hello. Good morning. 17 Thank you. So next slide, please. So just a 18 quick agenda here. I'm going to provide a brief overview of previous NQF work followed by a 19 20 presentation by Dr. Moscovice on the 2018 21 recommendations made by the MAP Rural Health Workgroup. And then, last, we'll discuss some of 22
the current work, next steps, followed by a short discussion.

So in 2015, the Rural Health Project 3 identified four key issues faced by rural 4 providers and patients. Those four issues were 5 geographic isolation, small practice size, 6 7 heterogeneity, and low case volume. Based on 8 these issues, an overarching recommendation was 9 made to allow a phased approach towards mandatory participation of rural providers in CMS quality 10 measurement and quality improvement programs. 11 12 Supporting recommendations addressed 13 guiding the selection of quality measures 14 relevant to rural providers, using a core set of 15 measures, and creating a MAP workgroup, a rural 16 workgroup, to advise CMS on the selection of 17 rural measures. 18 Next slide, please. So in 2017, the MAP 19 Rural Health Workgroup was assembled to ensure 20 that the rural providers selected was represented 21 on MAP. The workgroup is comprised -- clearly, 22 I'm a little nervous -- of 18 organizational

> Neal R. Gross and Co., Inc. Washington DC

1

2

members, seven subject matter experts, and three federal liaisons. Key activities of that workgroup included identifying a core set of rural relevant measures to address the needs of the rural population, identifying rural relevant gaps in measurement, and making recommendations on access to care.

8 So with that, I'll turn it over to Ira 9 on the phone. He's the co-chair of the MAP Rural 10 Workgroup and the Director of the University of 11 Minnesota Rural Health Research Center.

DR. MOSCOVICE: Okay. Thank you. So what I've done with the other workgroups is spend about 15 minutes describing what we've been doing in the MAP Rural Health Workgroup and that means that I'll give an overview of the activities, but we won't go into a lot --

MS. CHAUDRY: Ira?

19 DR. MOSCOVICE: Yes?

20 MS. CHAUDRY: Would you mind talking 21 either a little closer to the phone or a little 22 louder? It's just difficult to hear you in the

1

2

3

4

5

6

7

room.

1

2

3

DR. MOSCOVICE: Okay. Can you hear me

4 MS. CHAUDRY: Better. Okay. Thank you. DR. MOSCOVICE: Okay. So I have worked, 5 made this presentation with the other NQF 6 7 workgroups and it takes about 15 minutes, and 8 we're going to give a broad overview of what 9 we've done. I won't go into excruciating detail 10 on any of the specific measures, but I'd feel 11 free to answer any questions you might have about 12 them.

But, basically, in 2017 through '18, the 13 14 MAP Rural Health Workgroup had a couple of key The first was to identify a core set 15 activities. 16 with the best available rural relevant measures 17 and, you know, the motivation here is that many 18 of the measures that have been approved by NQF or 19 by other groups really aren't relevant in the It could be because of low 20 rural environment. 21 case volume, etcetera. And so the workgroup 22 really tried to figure out what kinds of measures

1

are particularly relevant for rural.

2 The second activity was to identify gaps in measurement and provide recommendations on the 3 alignment and coordination of measurement 4 5 efforts, and the third was to make recommendations regarding measuring and improving 6 access to care for the rural population. 7 So 8 we'll talk a little bit about the work we did in 9 identifying gaps in measures and why we focused 10 on access to care. 11 And so if we look at the core set, we 12 had 20 measures in the core set that we 13 identified. Nine measures were for the hospital 14 setting at the facility level of analysis, and 11 measures were for the ambulatory setting at the 15 16 clinician level of analysis. And what we decided 17 up-front was to use four criteria to help with 18 identifying these measures. 19 The first is that they had to be 20 endorsed by NOF. The second is that they would 21 be cross-cutting measures ideally, i.e. not

simply focused on a specific diagnosis, and that

(202) 234-4433

22

would help with the third criteria which is being resistant to low case volume. So the notion was if we could look at cross-cutting measures, when possible, that would be helpful.

And then, finally, the fourth criteria 5 was to address transitions in care. 6 And the 7 feeling here was that this whole issue of care coordination and transitions from rural 8 9 environments to secondary and tertiary care environments was a really important activity for 10 11 rural health professionals and something we 12 should look at.

13 And so, just briefly, the nine measures 14 for the hospital setting, two of them focused on infection-related measures, one related to CAUTI, 15 16 and the other related to CDI. We had a measure 17 from HCAHPS because we really wanted, we felt it 18 was important to get the patient viewpoints here. 19 Another measure related to falls with injury, and 20 that was particularly relevant for the elderly 21 population. The emergency transfer communication measure which tried to measure the 22

> Neal R. Gross and Co., Inc. Washington DC

1

2

3

appropriateness of communication between patients who were in emergency rooms in rural hospitals and then get transferred out to secondary and tertiary hospitals. A measure related to VTE, 4 prophylaxis, really felt it was very important across all environments.

7 And then we had an interesting 8 discussion about including a measure, and this 9 was on cesarean birth rate. And although the debate went, well, there are lots of smaller 10 11 rural hospitals that don't have, don't do deliveries any longer, despite that, the overall 12 committee voted that it would be important to 13 14 include the cesarean birth rate in the measure set because it's such an important issue for the 15 16 rural population.

17 A real interest in also including 18 measures that are related to substance abuse. And for the hospital setting, the focus was on 19 20 alcohol use screening. And then, finally, self-21 comparisons could be made with other hospitals 22 directly. We introduced a measure on hospital-

> Neal R. Gross and Co., Inc. Washington DC

1

2

3

5

wide all-cause unplanned readmission measure. So those are basically the nine measures for the hospital setting.

The 11 measures for the ambulatory care 4 5 setting, once again, included a CAHPS clinician and group surveys for adults and kids, so it was 6 7 getting input, once again, from patients. Α 8 whole set of prevention and screening measures, 9 one related to tobacco use screening and cessation intervention, one was related to 10 influenza immunization, and another is related to 11 12 screening for clinical depression and follow-up 13 plan. Another related to BMI screening follow-14 And then, finally, another preventive care up. screening measure related to unhealthy alcohol 15 16 use for screening and brief counseling.

In addition, there was a focus on
diabetes. Although we wanted cross-cutting
measures, diabetes has become such an important
issue, both in terms of obesity-related and other
kinds of comorbidities. As a result, we included
two measures. One was hemoglobin Alc poor

Neal R. Gross and Co., Inc. Washington DC

1

2

control and the other was optimal diabetes care.

2 Then a couple of the other measures in the ambulatory care setting. 3 One was for medication reconciliation post discharge, which 4 was a big issue out in the rural hospitals. 5 The Committee felt strongly that we should include a 6 7 measure on advanced care planning, and we had an 8 interesting discussion on that. And then the 9 last ambulatory care setting measure was on depression readmission six months and a strong 10 11 belief that we needed to have mental health 12 substance abuse measures in this overall set, and we tried to do our best on that. 13

14 And then, finally, seven additional measures were identified for the ambulatory 15 16 setting, but they're currently endorsed with NQF 17 for the health planning integrated delivery 18 system level analysis. And we went back and 19 forth on the committee and decided to identify 20 these measures but to say we would really like to see them endorsed at the clinician level if we're 21 22 going to use them.

(202) 234-4433

1

1And those measures, several were for2cancer screening. There was a feeling we need3some cancer screening measures here. One was4cervical cancer screening. Another was5colorectal cancer screening, and the last was6breast cancer screening.

7 In addition to those measures of controlling high blood pressure, a measure 8 9 related to weight assessment and counseling for nutrition and physical activity for children and 10 adolescents, a measure on childhood immunization 11 12 status, and, finally a measure on contraceptive 13 care for the most and moderately effective 14 methods.

And so those were the measures that were 15 16 identified by the group. We believe they apply 17 to a majority of rural patients and providers because of the criteria we used. They include 18 19 both process and outcome measures. They include 20 measures based on patient reporting, as we said, 21 and the majority are already used at quality programs, which was important to us. 22

So that's a summary of the measure set. 1 2 In addition, the committee was charged with looking at where are the measurement gaps for the 3 rural environment, and there were five areas we 4 5 discussed. One was access to care; the second was transitions in care; third was the whole cost 6 7 arena; the fourth were specifically focused on substance use measures, particularly with a focus 8 9 on alcohol and opioids; and then, finally, 10 outcome measures and particularly patient-11 reported outcomes.

12 Because of the importance of access to 13 care in the rural environment, that's the one 14 area that we thought there was a gap in that we did some work on, and we identified the facets of 15 16 access that are particularly relevant to rural 17 residents, documented the key challenges to 18 access to care measurement, identified ways to 19 try to address those challenges.

20 And we looked at this from three
21 perspectives in terms of access to care. The
22 first was availability, the second was

(202) 234-4433

Neal R. Gross and Co., Inc. Washington DC

www.nealrgross.com

accessibility, and the third was affordability. That really built on some of the previous NQF work in this arena.

4 On the availability area, you know, key 5 items, we're focusing on specialty care, 6 appointment availability in terms of timeliness, 7 and we discussed strategies for addressing it in 8 terms of workforce policy, team-based care and 9 practicing the top of the license, use of 10 telehealth, improving referral relationships.

11 On the accessibility side, a key issue 12 that came up was the whole issue on 13 accessibility, both transportation, which 14 geography basically brings to the table key issues in terms of transportation and the lack of 15 16 public transportation, etcetera, out in the rural 17 environments, but also accessibility to health 18 information, which relates to health literacy, 19 accessibility to language interpretations, 20 etcetera. And we discussed strategy to address 21 this via tele-access to interpreters, building community partnerships, and use of remote 22

> Neal R. Gross and Co., Inc. Washington DC

1

2

technology, and improving clinician-patient communication.

And then a final dimension on the access 3 4 to care we looked at related to affordability. 5 Out-of-pocket costs, which are an issue, clearly, for everybody but, clearly, play out in the rural 6 environment population. And delaying care due to 7 8 those out-of-pocket costs. And we talked here 9 about strategies in terms of policy insurance expansion, strategies for protecting the safety 10 11 net, and the issue got raised here also the notion of how important it is to appropriately 12 13 risk adjust any measures we're looking at in this 14 arena.

And key aspects of the discussion that 15 16 we had at the workgroup on the access issue is, 17 you know, we noted how difficult it is to 18 separate or de-link access and quality. We had a 19 vibrant discussion on this notion of what can we 20 expect clinicians to be accountable for and what 21 should we expect higher-level accountability for. 22 And where we came down on that in the end was,

1

2

yes, there are some variables that are out of the 1 2 individual clinician's control, but clinicians can have a major impact in terms of decisions 3 4 their patients make and we felt it was important 5 to include these kinds of measures even if clinicians don't have total control of all of the 6 7 levers, so to speak, in terms of improving access 8 to care.

9 And then, finally, you know, we mentioned that telehealth can address several of 10 11 the barriers to access, but there still are 12 limitations to its use. We know the majority of 13 states now do have policies on reimbursing telehealth services, but there still are about a 14 15 third of the states that don't. And so starting 16 with payment but there are other issues also that 17 need to be addressed if telehealth is going to be 18 more fully used.

And so that, I guess, will conclude my comments on this end. I'll turn it back to my colleague at NQF and then we can open up for questions.

(202) 234-4433

1	MS. CHAUDRY: All right. Thank you,
2	Ira. So I think the next slide, I believe, yes.
3	Go back. All right. So, yes, I guess the final
4	recommendation from the MAP Rural Health
5	Workgroup is listed here: that CMS should
6	continue to fund the workgroup's work, view the
7	current core set as a starter set, and, over
8	time, you know, being open to the opportunity to
9	refine that core set and involve the rural
10	perspective in various topics moving forward.
11	Next slide, please. Oh, yes?
12	MEMBER PHILLIPS: Shannon Phillips,
13	Intermountain. The use of the CAHPS survey in
14	the ambulatory setting for children, I think that
15	would be a first requirement, right? Is there
16	another program that requires child CAHPS? I
17	mean, I think that little piece is a big change
18	potentially, so a lot of children centers are
19	doing their own surveys. They have some
20	flexibility. So I want to call that out. If
21	this went in, that would be a major change, and
22	is that the intent?

And the interested in what the 1 2 discussion might have been around the fact that the end sizes are tiny, right? So I did hear the 3 comment about risk adjustment, but in any rural 4 5 hospital the numbers of patients that would fall into any one of these measures might be one or 6 none or a handful. And was there discussion 7 8 about how to approach that? Really important to 9 measure and we need to be careful if there's transparency, if this is public, the end sizes 10 11 will be very small. The other thing is if you 12 set them up and say we're not going to show them 13 if they're less than X patients, there's going to 14 be a lot of blank slots around the country and so 15 just if there was discussion with the group on 16 that. I'll take the first one 17 DR. MOSCOVICE: 18 and try to deal with the second one and see if my

10 and try to deal with the second one and see II my 19 colleagues want to add to that. But, basically, 20 we really felt it was important to have input 21 both in terms of HCAHPS and CAHPS, and I'd be 22 interested in, I'm not a child health expert, but

the group felt that we did want to get input both 1 2 on the adult and the child side of things. And one thing about using these surveys is that they 3 4 are cross-cutting, and so the experience has been 5 that some hospitals, some rural hospitals, are 6 able to provide enough surveys, others provide more limited surveys, but we felt it was 7 8 important to include this and to try to, you 9 know, build the work in that area. But I am interested, if there are child health experts in 10 11 the group, if they felt it was, it would be 12 useful and important from a policy perspective to 13 include that.

14 In terms of the overall volume issue, we know some of the measures, we know we do have 15 16 enough sample size. Some we know right now we 17 don't. And the feeling was that we would 18 include, you can't come up with a rural health 19 core set of measures right now that have for sure 20 enough sample size for every hospital, every 21 rural hospital in the country. And what we tried 22 to do was to balance ones that we know we have,

> Neal R. Gross and Co., Inc. Washington DC

(202) 234-4433

and there are some where it's close. We ruled 1 2 out measures where we felt there wouldn't, you know, be any volume whatsoever. And we need to 3 start some place, and the feeling is these 4 5 measures can both be used for internal quality improvement, as well as external, for external 6 7 comparisons. And we played that back and forth 8 and got a variety of information in terms of the 9 volume related to many of these measures and took 10 some out, left some in, even though they're sort 11 of on the cusp, so to speak.

12 So there's no easy answer to that. 13 What's happening now is NQF has a working panel 14 of statistical experts who are trying to address 15 this issue and come up with some recommendations 16 in terms of how the low volume issue can be 17 handled in general, and that should be done over 18 the next six months or so.

So no easy answer to that question, we
recognize it and try to put together a set that
would be as useful as possible.

MS. RANEY: This is Gigi Raney from the

Neal R. Gross and Co., Inc. Washington DC

Center for Medicare and Medicaid Services. 1 Ι 2 work on the child core sets, and I think one of your questions was about whether similar measures 3 are used in other spaces. So I just wanted to 4 5 let you know that we do have a CAHPS health plan survey child version on the child core sets. 6 Ι 7 know that if ours is collected at a state level, 8 our end is obviously very different from what 9 you're working at here, but we did have 40 states that said that they reported using the child 10 CAHPS for FY17 reporting, just for a frame of 11 12 reference for other states that are using those 13 core sets. 14 CHAIR WALTERS: Who's actually chairing

MEMBER McGIFFERT: I'm wondering if you discussed the idea of combining years of care, looking at over time to address the small numbers. As consumers, we're looking at old information often, but if you, if you could stretch it out and take a couple of years, two or three years maybe at a time, did you have any

But Lisa, go ahead.

Neal R. Gross and Co., Inc. Washington DC

15

this now?

discussions about that? And I know there's, you know, issues about the hospital changing, but I think that there might be some way to address the historical care that the hospital might give or an ambulatory setting.

DR. MOSCOVICE: So the committee 6 7 discussed that very little, I would say. I can 8 say from my own work in this area previously 9 combining years of care does tend to help improve obviously the volume consideration. 10 But if 11 you're really going to try to make it relevant 12 from a policy perspective, particularly a payment 13 perspective, we haven't gotten a lot of positive feedback in terms of let's use two or three 14 years' worth of claims to try to deal with, you 15 16 know, any kind of value-based payments or any 17 other kinds of programs like that.

So it's tricky. I think you're right.
On the one hand, we certainly can increase volume
by using more than one year. I think we need to
be considered from a policy, that's from a
statistically perspective but from a policy

Neal R. Gross and Co., Inc. Washington DC

1

2

3

4

5

www.nealrgross.com

perspective would be able to use that in terms of 1 2 payment updates for instance, etcetera, etcetera. And I haven't heard any good evidence that that 3 4 would be helpful to CMS, to be honest. 5 CHAIR WALTERS: Nancy. 6 MEMBER FOSTER: Thanks, Ron. Hi, Ira. 7 Nancy Foster. As I look at this list of measures 8 and think about what the committee went through, 9 it seems to me that there is sort of an 10 interesting blend of measures that you've There are some, in fact the 11 recommended here. 12 ones that I'm looking at on the screen right now 13 where I would say clearly the action is the 14 hospitals and/or the hospital and its clinicians. There are others that I think are absolutely 15 16 worth measuring in a rural setting but more 17 likely to be good fodder for discussions among 18 policymakers and others who care about rural 19 health in general and the huge transitions that 20 are going on in rural health right now, and so 21 even if CMS or others who might pick up this 22 rural health core set and try to implement it

decide that some of these aren't direct or 1 2 appropriate for hospitals or other sets of providers, I quess I'm standing up in support of 3 measuring some of these things and thinking about 4 5 how they're best used, including holding communities and insurers and others accountable 6 7 for making sure that we're working to achieve the 8 goal here, which is health in that rural 9 community.

So did your committee have discussions 10 11 about other potential uses of these measures? 12 DR. MOSCOVICE: Not that much. I don't 13 know if my NQF colleagues have anything to add on 14 But I agree with what you're saying, that. Nancy, but we didn't really talk in detail about 15 16 that. What we raised is, the biggest discussion 17 we had is are we really going to hold clinicians 18 responsible for all of the ambulatory care 19 setting measures we laid out there, even though 20 they don't control, as I said, all of the 21 resources or levers to make sure that, you know, 22 patients follow recommendations, etcetera,

And there was certainly a discussion 1 etcetera. 2 on both sides in terms of people who felt strongly shouldn't all the clinicians be 3 4 accountable, but the majority felt that we should 5 but make it clear in the report that makes it clear that we recognize they don't control, the 6 individual clinicians don't control all the 7 8 levers but they have such a potential for 9 impacting these decisions that we really need to be involved. 10

11 So that was the discussion more so than 12 holding a higher level responsible, although we 13 did identify seven measures in the ambulatory 14 care setting that have been approved at the 15 health integrated delivery system level now, so it related to that for sure in terms of the 16 17 cancer screening, controlling high blood 18 pressure.

So there was some discussion in that vein, but not so much, I think, above and beyond what you're suggesting. But I think it's a relevant comment. CHAIR WALTERS: Lee?

1

2 MEMBER FLEISHER: Thank you again. And you just mentioned the health system level, and I 3 think about some of these measures and whether or 4 5 not patients really are willing to go outside of the rural local community hospital and the 6 That's a really interesting 7 transfer issues. I wonder if 8 question about health systems. 9 there's, you know, looking at whether these large health systems, which have a tertiary care sort 10 11 of center and how that is affected by some of these either readmission or emergency transfer 12 13 because I would think, in some ways, I'd hold 14 them to a higher standard because they're supposed to be integrated or at least look at it 15 16 in that sort of manner than stratified by whether 17 or not they are a system or they're not a system 18 because that would give us information from a 19 policy perspective of whether it's useful to 20 allow some of these mergers or aggregations. 21 DR. MOSCOVICE: I definitely agree with 22 the sentiment of your comments. And we have a

couple of measures, as you pointed out, the 1 2 emergency transfer communication measure and the cause on planned re-admissions, but, to be 3 honest, I was a little disappointed because up-4 5 front we had everybody acknowledge that this notion of transition through care and care 6 7 coordination is really important, but, in the 8 end, we came up with just one or two measures at 9 this point. As it was mentioned earlier, this is 10 going to be an ongoing effort that, you know, 11 this isn't the one and only. Certainly, things 12 change over time.

But I was a little bit disappointed that 13 14 we didn't get more there, but the committee as a whole didn't come down to the final set to add 15 16 additional care coordination transition measures. But I think the comments made are important ones. 17 18 CHAIR WALTERS: So this is a new 19 program, and this is the opportunity for the 20 members of this group to give feedback about what 21 they've heard. I'll ask the team in just a 22 little bit if they have felt they've gotten

enough feedback. I think common themes that we 1 2 talk about in every session were brought up. Is there anybody else that would like to give the 3 rural health team some feedback? 4 5 CO-CHAIR UPSHAW TRAVIS: I just want to echo what Lee was saying about, you know, about 6 7 systems. I think it's important to measure at 8 both the individual hospital where we can, but 9 the at the system level, as well. The other aspect, which I think was 10 referred to but perhaps not said out loud is the 11 12 number of facilities that are closing. And so 13 although it certainly impacts access, geographic 14 access, I think we do need to be sensitive to the fact that these systems, especially if they're 15 16 operating in systems, the infrastructure may be 17 there to actually get the telehealth and get the 18 other pieces of some of the core work that was 19 said here out into the different geographies. 20 And this is an impossible request, but 21 I'm going to make it anyway. There are several

22

Neal R. Gross and Co., Inc. Washington DC

other parts of the federal government that work

www.nealrgross.com

with rural health, and I think it is really 1 2 important to think about how rural health is addressed across the federal continuum because 3 4 there are even probably some places where it's 5 not pushing for the same things and could be sending contradictory messages down into rural 6 7 America. Tennessee is a major rural state. My 8 other heart is in Mississippi, which is another 9 rural state. So we're very sensitive to it, and I think that sometimes the federal government is 10 11 not sending the same set of messages and wherever 12 that could be aligned I think would be helpful, 13 as well.

14 DR. MOSCOVICE: So I think that's an important comment, and the creation of a federal 15 16 officer of rural health policy is a couple of 17 decades almost now, I think it was an important 18 step in that direction because I think different 19 parts of government were really considering or 20 not considering rural in many different ways. And I think the federal officer of rural health 21 22 policy in its efforts have really helped improve

this whole issue of making sure that the notion of is what we're doing relevant in a rural environment, that that's really being considered more and more in a variety of CMS programs and 4 CMS recently introduced, you know, their rural health strategy and we need some more details as time goes on now.

8 But I think more and more of 9 governmental entities and bodies really are thinking, at least, as they develop new policies 10 and measures and you name it that, you know, is 11 12 this going to work out in the rural environment? 13 And, you know, going back to just the 14 implementation of DRGs many years ago, there really wasn't much thought up-front about how 15 16 this was going to play out in a small volume 17 environment, and it continues as we go through 18 the pay-for-value environment and the comments 19 that were raised today in terms of are we going 20 to have enough sample size to look at things? 21 From my perspective, what's most 22 important is we need to get out of the ball game

> Neal R. Gross and Co., Inc. Washington DC

1

2

3

5

6

of having asterisks in lots of tables, whether 1 2 it's measures or whatever else, and saying not applicable or just not enough volume here because 3 when people see asterisks in the table related to 4 5 rural environments, they take that as a negative, not just it wasn't applicable or they can't even 6 7 do it. And I think the efforts of our group and the continuing efforts of CMS and other groups is 8 9 to really try to see: can we make sure that the policies we're developing can really play out in 10 You know, we have a little 11 all environments? 12 under 20 percent of the population living in 13 rural areas now. We need to make sure that they 14 are, whether it's through Medicare or other 15 public programs, that they are getting access to 16 as high quality of care as possible. And that's 17 why I think this effort is a starting point, not 18 an end point, and I think it's important because of that because we need to really try to pay 19 20 attention, as has just been said, to make sure 21 that, A, we're doing something in this arena and 22 it's been coordinated across governmental

agencies and, hopefully, with the private sector also.

3 CHAIR WALTERS: Thank you. Michelle 4 would like to respond and then Jack, and then 5 we'll go to some of the questions that Madison 6 has teed up on the screen.

7 DR. SCHREIBER: Thank you. I would like to just really echo what was said on the phone 8 9 that the administrator, Seema Verma, this is of particular interest to her, and that she's done a 10 11 tremendous amount of work and is bringing 12 agencies across CMS for focusing together on rural health and I think is doing that for all 13 14 government agencies. So I think this really is the beginning of a lot of new opportunities to 15 16 consider rural health and the health of rural 17 citizens together in a unified way.

18 MEMBER JORDAN: I think one comment to 19 make, too, is that sometimes we overly focus on 20 wanting to think about what we can do with the 21 data drilled down to its deepest point, but I 22 think, actually, with the rural health, just

> Neal R. Gross and Co., Inc. Washington DC

1

2

www.nealrgross.com

filling in so many of the holes, you may get a 1 2 lot of insight into kind of regional or group differences that may give you some actionable 3 4 things to move forward on this. Even when you 5 get down to a single hospital or a single physician, you know, it's just too sparse. 6 But I 7 think you'll see patterns in this, and I think 8 there's great, you know, gains to be made by kind 9 of filling in all the missing data spots so you can kind of get some of those insights with this 10 and not get overly hung up on it has to be 11 12 something you can drill down to the individual 13 level to be your only actionables in place.

14 CHAIR WALTERS: Okay. Just hold a 15 second. Madison teed up some questions for 16 everybody just in case. You want to read them 17 off just in case not everybody can see them?

MS. JUNG: Sure. So on the screen, we just have some questions addressing the topics that we discussed related to core set gaps and access to care. Specifically for core set, some questions for the workgroup from the macro health

team is: do you agree with the overall topic 1 2 areas that were covered? Was there anything Do you have any particular concerns or 3 missing? 4 questions about any specific measures for gaps? 5 What are your initial thoughts on the identified 6 gaps for access to care? What did you think of the approach? Do the three domains seem like the 7 8 right ones to focus on? Was there anything 9 particularly surprising or intriguing? And was there anything missed? 10 11 So if there are any slides we want to 12 toggle back to, just let me know. 13 CHAIR WALTERS: Andreea? 14 MEMBER BALAN-COHEN: So I just wanted to 15 follow up on the comment about, like, the gaps in 16 the data and also the asterisks. And I think 17 that just to second that and say, like, how 18 important that is because a little bit of a 19 concern and, again, like, knowing the 20 difficulties about, like, the low volume, but 21 when I look at the sets of measures, like one of the things that strikes me is that in the attempt 22

to try to make sure that we have all the right information before we have all of these measures, there's likely to be a lot less variation in terms of, like, hospitals as a result of using this specific set of measures, so they get a little bit more diluted.

7 When I look at those measures, they are 8 probably only like one or two for which they are 9 likely to be, like, big meaningful differences in terms of hospitals. Like, for some of the other 10 ones, they are likely to get, like, topped off, 11 12 like, relatively early. So that's why I just wanted to second that it's important to try to 13 14 maybe get some of this information, even if it's 15 imperfect at first, and then, like, try to build 16 up on it and then try to get some meaningful 17 measures that can get to some of these, like, 18 true differences, even if there are for a 19 specific region, when you try to fill in some of 20 the gaps. 21 CHAIR WALTERS: Thank you. 22 DR. MOSCOVICE: Let me just offer one

> Neal R. Gross and Co., Inc. Washington DC

1

2

3

4

5

comment in response. I think it's an important 1 2 I'm never surprised at how much variation issue. exists out in the rural environment, and, in 3 4 general, if I had to generalize it, I'd say 5 there's more variation within rural environments, across rural environments, as there is compared 6 7 to looking overall at rural providers versus 8 urban providers.

9 So there is substantial, in general there's substantial variation in a lot of these 10 11 measures. That may be surprising, but that's the 12 reality. And that points out that you can do 13 well on many of these measures, and there's 14 really no excuse not to be doing well. And this notion of best practices and finding out how 15 16 people are achieving some of these results 17 they're doing out in rural environments, that's 18 really important. There's been a variety of 19 technical assistance and health information 20 resources. RHIhub is one that has a lot of 21 information that is in this area. But it never ceases to amaze me how much variation there is 22

across rural hospitals and small rural hospitals
 in many of these measures.

3 CHAIR WALTERS: Okay. Lee. 4 MEMBER FLEISHER: Just a quick comment 5 to CMS in that, yes, volume does matter and low volume we acknowledge in these hospitals, but 6 7 there's low volume and there's very, very low 8 So I wonder if having more transparency volume. 9 to say this hospital only does two a year, should 10 they be doing any, versus they do ten to twenty, 11 acknowledging that they can't get to fifty for 12 some procedures may be of some value to patients. 13 So just something to think about. 14 Thank you. Do -- sorry. CHAIR WALTERS: 15 Ira. 16 DR. MOSCOVICE: No, I was just going to 17 say I really agree with that notion and, you 18 know, one of the important decisions, I think, 19 from a hospital's perspective is to say: should 20 we be doing whatever the procedure is we're 21 talking about, or should we not be doing

something? And, you know, for some of the

Neal R. Gross and Co., Inc. Washington DC

22

www.nealrgross.com

measurers here in terms of screening, you know, I 1 2 think we want all facilities to be doing screening for a variety of ambulatory care 3 settings, but I think all these smaller 4 5 facilities particularly need to really think should they be doing something? If it's not an 6 7 emergency and they can't transport out quickly, 8 should they be doing very low volume as was just 9 pointed out. I think that's an excellent point.

CHAIR WALTERS: Frank.

There are three 11 MEMBER GHINASSI: 12 measures on alcohol screening and use and one on 13 tobacco, and in the notes I think there's a 14 mention of other substances, as well. Is that going to make it into this set, or will the focus 15 16 solely be on alcohol? I think you're missing a 17 large segment of the population who may be in 18 jeopardy of either with prescription medication 19 or illicit use of other substances, especially 20 given events of the last couple of years. 21 DR. MOSCOVICE: I think it's a valid

point. The set that we proposed is what you're

Neal R. Gross and Co., Inc. Washington DC

22

seeing and, as we said, in terms of the treatment 1 2 gaps, the measure gaps that were identified, the use of opioids and other drugs is something that 3 The committee shared we need further work on. 4 your sentiment, but in the context of trying to 5 have a manageable number of items, decided on the 6 7 ones that are here right now. 8 CHAIR WALTERS: Nancy. 9 So just a couple of MEMBER FOSTER: quick points. One is I think that there might be 10 11 use, it might be a good step forward in advancing 12 these measures if there were what I will refer to 13 as a collaborative organized where you collected 14 the data for a period, you brought people together who were in those rural hospitals and 15 16 said, okay, here's what we're seeing from the 17 data, what does that mean to you? I've been 18 impressed over the years where I look at some of 19 the data we're publicly collecting and think, oh, 20 there's something wrong with the practice here at 21 that hospital, let me call them up and see, and I learn that there's just something unique abut 22
that hospital. And as we explore this territory 1 2 where we haven't measured a lot and haven't played with the data a lot, there might be a real 3 4 value in thinking about bringing together that kind of collaborative, either under Ira's 5 direction or some other, but really just learning 6 7 from the data first before deciding it's 8 appropriate for public accountability as a sort 9 of one-two phasing. 10 Secondly, Ira, I wanted to ask, I saw the admission, re-admissions measures on there. 11 12 I know there was talk about the mortality 13 measures and so forth. Those measures are, I 14 would say, exquisitely sensitive to sample size by the way they are constructed, and I was 15 16 curious as to whether the group thought about 17 that. They're important things to measure. I'm 18 sure the public would like to know about them, 19 but not sure the way the measure is constructed

21 22

20

And then, third, there was sort of this

will get people the information they actually

Neal R. Gross and Co., Inc. Washington DC

think they're getting.

casual mention of telehealth in the things that 1 2 you could look at in the set of measures that you thought were worth CMS looking at further. 3 То me, telehealth is a great national experiment. 4 There are lots and lots of things that are going 5 on with telehealth, and lots and lots of plans 6 for more to go on with telehealth, and it helps 7 8 solve that access problem. But I think we don't 9 really understand yet: how is telehealth as it is delivered comparable to the in-person, or what 10 are the bonuses for telehealth, what are the 11 12 deficits from telehealth in each kind of 13 encounter?

14 So I think measuring telehealth itself 15 and learning from that would be extremely helpful 16 as we move the nation forward on telehealth, not 17 just rural. But there you go.

DR. MOSCOVICE: Those are certainly good comments. The notion of, I'm trying to remember, you said the notion of the collaborative and what's learned from the data before we start using it publicly I think is a terrific comment,

and we'll see how NQF responds to that. 1 2 I can say, in terms of the last comment on the re-admission measure, I was just looking 3 at our notes and it basically says, you know, 4 commenters noted that the majority of critical 5 access hospitals meet the threshold number of 6 7 cases for this measure. So we need to check that 8 if that's not the case. 9 And another part of this was that if a hospital didn't have enough volume to report the 10 11 measure, then it would not be assessed with this 12 measure or otherwise penalized with inability to 13 report the measure. 14 So those are the two, just looking at 15 our notes, we had related to your comments. And 16 so there are some hospitals clearly that aren't 17 going to have enough sample size, but it's not 18 the numerator, remember, that we're concerned 19 about; it's the denominator obviously. And maybe we can talk afterwards about this in terms of the 20 21 data you have in terms of how many smaller hospitals would be involved. 22

Those are the two comments you had on 1 2 You had one other point raised. Oh, the that. telehealth stuff. Hey, I agree with you. 3 You 4 know, the federal health policy is funding a 5 telehealth research center down at the University of Iowa is the lead on it, and Marcia Ward is on 6 7 that, and they are in right now developing new 8 measures trying to see how telehealth is being 9 used, trying to identify the pros and cons of it, 10 etcetera, etcetera.

11 So I agree with you. We're sort of in 12 an experimental stage, and we see new articles 13 every day. I just saw one this morning about 14 how, although it's much greater use of telehealth than we've ever had, there's still the majority 15 16 of providers don't use telehealth at all or maybe 17 very little. So we had a lot of ways to go. And 18 they haven't been great measures in terms of 19 quality of telehealth care. And that field is 20 just starting really to be developed, so it's 21 going to take a little while.

22

CHAIR WALTERS: Okay. Let's go to Ann

1	and then Sally. And then I'm going to give our
2	members on the phone a chance if they want to say
3	anything and then public comments. So Ann.
4	MEMBER SULLIVAN: Yes, hi. Just in
5	terms of, you mentioned insurance coverage, and
6	I'm not sure if you're really going to be looking
7	into that or not. But if you should, I would
8	just emphasize that you think about parity for
9	mental health and substance abuse and to look at
10	that kind of specifically because that tends to
11	be a real access issue across the country.
12	Despite a lot of the parity legislation, that the
13	insurance is still not following on those rules.
14	So if you are going to look into insurance, I
15	would just keep parity on the list of what you
16	look at.
17	DR. MOSCOVICE: Okay.
18	CHAIR WALTERS: Sally.
19	MEMBER TURBYVILLE: Good morning. This
20	is Sally with the Children's Hospital
21	Association. Really great and important work and
22	lots of really great insights so far today.

I

You know, we share with Children's 1 2 Hospital something in common with rural health, and that's real challenges with comparative 3 performance measurement, whether that's 4 5 comparative performance over time or to peer And I just wondered from those who 6 groups. 7 worked on this how much discussion was given to alternative approaches to measurement. 8 It's 9 become very clear in pediatrics that condition-by condition measurement for children, especially 10 11 acute inpatient care but even ambulatory 12 specialty care, is very problematic and so been 13 pushing the envelope. At what point is the 14 perfect, the enemy in this case, not having the perfect, you know, so looking at measures that 15 16 have worked very well in the adult healthcare 17 system condition by condition and any kind of 18 emerging new ways to measure, whether it's 19 through patient-reported outcomes, really 20 focusing on what matters to them or otherwise. 21 I'm just curious what you all learned in those deliberations. 22

Yes, I think that 1 DR. MOSCOVICE: 2 influenced the work of our group a lot. In fact, you really only see one or two measures that are 3 4 diagnostic-specific just because of that. We 5 didn't have enough time or resources honestly to start mapping out alternative strategies, so we 6 7 did start with the notion that any measure we 8 were going to look at had to be NQF endorsed, and 9 we had a thousand measures or so just within that 10 rubric. And so it was a pretty big framework to 11 start.

12 We didn't really spend a lot of time on 13 alternative strategies for measurement, and I 14 don't know if NQF has any thoughts about the 15 future work in that area. But I agree with your 16 comment there. On the one hand, it's hard to 17 compare, to make comparisons, as you said, just 18 the relevant peer groups, sample size, etcetera. But if you use alternative strategies for 19 20 measurement, then the issue is how are they going 21 to get integrated into the existing measurement world that's out there now. And I think that 22

> Neal R. Gross and Co., Inc. Washington DC

www.nealrgross.com

shouldn't stop work on alternative strategies for 1 2 measurement, particularly low volume environments. But we didn't, at least, have the 3 4 time in this workgroup to deal with that. 5 Okay. Sometimes we do CHAIR WALTERS: remember that there is committee members on the 6 7 phone. Marsha, Pam, did you have anything you 8 want to say? 9 MEMBER MANNING: I do not. Thank you. 10 Other than I appreciate the comments about 11 thinking across the federal government when we 12 think about the rural issues. I think that's 13 absolutely true. 14 Thank you very much. CHAIR WALTERS: And we didn't specifically have a time slot for 15 16 public comment, but I would like to open up the 17 lines if we can for any. Let's go to comments in 18 the room first. I see none in the room. Any 19 public comment? 20 Okay. At this time, if you **OPERATOR:** 21 would like to make a public comment, please press star then the number one. 22

1	CHAIR WALTERS: Okay. I'll turn it back
2	over to Madison for some next steps, and then
3	we'll move on to the next agenda item.
4	MS. JUNG: Great. Thank you. Just
5	toggling back to our slides. So I'll be
6	reviewing the pre-rulemaking approach, and then
7	we'll be getting into some of the semantics and
8	logistics regarding the new updated voting
9	process.
10	CHAIR WALTERS: Oh, next steps on
11	there's a slide there somewhere.
12	MS. JOHNSON: Go back two from the
13	discussion, and I'll just, Ira already noticed or
14	talked about these. Do one more. We have done
15	quite a bit of work with the work that came out
16	of the Rural Health Workgroup, including setting
17	up a Capitol Hill briefing that went very, very
18	well. Rural is very, it's a topic of interest to
19	our leadership in Congress, so that went well. A
20	couple of folks did a healthcare blog, so that
21	was a nice way to kind of publicize the work.
22	In terms of what the Rural Health Group

is doing right now and in the future, again, 1 2 sharing our recommendations to each of the three MAP workgroups so you know what we're doing and 3 4 what we're thinking. Tomorrow, at the clinician 5 MAP workgroup meeting, Ira is actually going to be here to give the rural perspective on the 6 7 clinician MUC list. So we had a call yesterday 8 and got some really interesting feedback from our 9 rural group on those measures, so we weren't able to do that this time around with you guys to give 10 11 you the rural perspective, but we think that 12 might be coming, and it's a way to get the rural 13 perspective into this pre-rulemaking process. So 14 we're very excited about that.

15 And then, as Ira mentioned, we have 16 convened a five-person technical expert panel, 17 most of them Ph.D. statisticians, to help us 18 think through this low-case volume problem and 19 what do you do about it, and to go back to the 20 question about, you know, even doing, adding over 21 time. It's an idea, but there are very complex 22 statistical ways that you could approach doing

even more than that, and they're talking about 1 2 those things, but we're talking about future work in measurement because it's so complicated. 3 But I think it's a really interesting little project, 4 5 and we will have a report out, if you're interested, in mid-January going out for comment. 6 So if you're interested in seeing what our 7 8 statisticians think about this low-case volume 9 problem and what might be some of the next steps, 10 stay tuned for that. Thank you. 11 CHAIR WALTERS: Thank you all for your 12 feedback. I think the group got some very good 13 feedback. All right. Melissa and Madison, 14 moving forward into the pre-rulemaking process. 15 MS. JUNG: Okav. Now we will be going 16 over the rulemaking approach. So I'll just be 17 giving an overview of our process and some of the 18 updates and our approach for this meeting. 19 The approach for this meeting, as in 20 other years, is to provide, we'll start off by

22

21

Neal R. Gross and Co., Inc. Washington DC

providing a program overview, then reviewing the

current measure, and then evaluating the MUC for

what they should add to the program set. So that's the lens through which we'll be looking through things.

4 So the MAP workgroups must reach a 5 decision about every measure under consideration. The decision categories are standardized for 6 7 consistency. We have had some updates to 8 decision categories this year, and we'll be 9 reviewing them on the next slides. But each decision should be accompanied by one or more 10 11 statements of rationale that explains why each 12 decision was reached.

13 To facilitate the voting process, we 14 have conducted a preliminary analysis for you. That was included in your meeting materials in 15 16 the discussion quide. The preliminary analysis 17 follows an algorithm that was based on the MAP 18 measure selection criteria. This measure 19 selection criteria was approved by the MAP Coordinating Committee, and it's intended to 20 21 provide MAP members with a synced profile of each 22 measure and to serve as a starting point for MAP

> Neal R. Gross and Co., Inc. Washington DC

1

2

3

discussions.

1

2	This is just a list of the MAP measure
3	selection criteria. I won't read these in
4	detail. And then these are the decision
5	categories for 2018 and 2019. Of note, we have
6	added the do not support for rulemaking with
7	potential for mitigation. This was added to
8	excuse me. I dropped my notes. This was added
9	to preserve MAP's ability to show support for a
10	measure concept but clarify that MAP does not
11	think it's ready for implementation as it's
12	currently specified.
13	So to reiterate, the four decision
14	categories are support for rulemaking,
15	conditional support for rulemaking, do not
16	support for rulemaking with potential for
17	mitigation, and do not support for rulemaking.
18	I'll turn it over to Erin and Melissa to
19	add any maybe comments or coloring to that.
20	MS. O'ROURKE: Sure. I can start. Just
21	to add a bit on the do not support with potential
22	for mitigation, as Madison said, we used this to

replace the refine and resubmit because I think 1 2 last year we heard from everyone there was some confusion about how to operationalize that and 3 4 where the line was between conditional support and refine and resubmit, and the confusion that 5 the MAP process only really requires MAP to 6 So by having this 7 review a measure once. 8 resubmit language, we were making an ask that's 9 not really within the scope of what MAP can 10 control.

11 So based on input from you all and other 12 MAP members, we are trying this new category this 13 year. And, again, we'd always welcome feedback 14 if this is an improvement, but hopefully this makes it a little bit clearer where the dividing 15 16 line is with two categories essentially saying 17 you think the measure is ready for implementation 18 to saying it's not ready for implementation at 19 this time.

20 MS. JUNG: Did we have any questions 21 about the decision categories? Otherwise, we can 22 review the voting instructions. Okay.

MEMBER HATLIE: I'll just make a comment 1 2 that I think it is clearer. Having seen the process get reinvented every year since I've been 3 4 on it, I think this is an improvement. We'll 5 I'm with Cristie. We'll see as it plays see. 6 out. 7 MS. MARINELARENA: So the voting process 8 has changed as well. The text in red is what is 9 different. They share from previous years. Quorum is defined as 66 percent of the voting 10 11 members of the Committee that is present in 12 person or on the phone, so we establish that 13 before we actually start the voting. 14 And then we have also established a consensus threshold of greater than or equal to 15 16 60 percent of voting participants voting 17 positively, and a minimum of 60 percent of the 18 quorum figure voting positively. And abstentions 19 do not count in the denominator. 20 And then different from other years, 21 we've had the consent calendar in the past. We

22

(202) 234-4433

Neal R. Gross and Co., Inc. Washington DC

no longer have that. We also only have four

www.nealrgross.com

measures, so it's kind of a moot point. 1 But 2 every measure will receive a decision from the MAP, and, again, staff is going to, you know, 3 4 we're going to go over this process. And then 5 we'll provide some introductions from staff as to how we reached a decision and then the lead 6 discussants will also provide their review of the 7 8 measure, and then we'll open up the discussion to 9 the group. And then you can provide clarifying 10 questions, we can respond as to the NQF part of 11 it, and then the lead discussants can provide the additional information about the measure or any 12 clarifications before we move on. 13

And then, again, the preliminary staff analysis is based off of the algorithm that has been approved by the Coordinating Committee.

17 So the procedures are, so the staff, 18 again, did the preliminary analysis for each MUC 19 based off of the algorithm. We will present the 20 measures. The co-chairs will ask if there are 21 any clarifying questions, so, again, we've done 22 away with any motions this year. Everybody will

just have the opportunity to ask for any 1 2 clarifying questions, and then the developers will also be able to respond to any clarifying 3 4 questions about the measure specification, so 5 they're either here in person or on the phone. Staff will provide any clarifying questions about 6 7 the preliminary analysis itself, how we reached 8 it, or if there's any other information that may 9 be confusing to you that NQF can clarify. And then the lead discussants will also dive into the 10 11 measure.

12 The voting is going to be, the first 13 vote will be based on the acceptance of the staff 14 preliminary analysis. That will be a yes/no If that doesn't pass, then the co-chairs 15 vote. 16 will be taking down any questions or any 17 clarifying issues. If the staff recommendation 18 doesn't pass, then we can either start with each 19 category or the co-chairs also have the 20 discretion to see, you know, if the group is 21 leaning towards one way or another. If we don't 22 need to go through all four categories, then we

can start there. But if there is any dissenting opinion, then we can just go through all of them so that everybody's voice is heard.

And, again, we need 60 percent or
greater for each of, for it to pass, for a
decision to past. If none of them are reached,
none of the categories reached 60 percent or
greater, the default is the staff recommendation.
Correct? Yes.

10 MS. O'ROURKE: Correct. But at that 11 point, we would also like to pause and get some 12 input on why people feel so split so that we can 13 pass your reasoning, the results of the staff PA, 14 and then any comments and flag this all for the Coordinating Committee to take a special look at 15 16 as a place where the group was having trouble 17 coming to a consensus.

MS. MARINELARENA: And, again, we'll be capturing everyone's comments because I know in the past CMS has really valued that, so we want to capture all of your comments and your concerns and recommendations as long as, in addition to

> Neal R. Gross and Co., Inc. Washington DC

1

2

3

1 the votes.

2	So we talked about the discussion of
3	voting on the MUC. Ron and Cristie will be
4	leading that, and we've got it all ironed out, of
5	course, as we always do. And I think I already
6	went through all of this. You know, they'll
7	determine what decision category we're going to
8	start at, and they will put the vote forward.
9	And I went through this, right? Yes. And then
10	tally the vote.
11	Again, if no decision category archives
12	greater than 60 percent to overturn the
13	preliminary analysis, then the preliminary
14	analysis will stand, unless we, you know, can
15	come to another decision, but we can continue the
16	discussion. Again, we have four measures, so
17	feel free to discuss.
18	Commenting guidelines do not change.
19	Comments from the early public comment period
20	have been incorporated into the discussion, into
21	the discussion guide, so they were there. I know
22	that we updated the discussion guide so you've

had the opportunity to look at those. We will 1 2 also ask the public to provide any comments here as well. We ask you to limit your comments to 3 4 two minutes. 5 And then the public comment on your recommendations will run from the 21st through 6 7 January 10th. And then your recommendations will 8 go to the Coordinating Committee. And this is 9 just, you've seen this before, but it is an overview of the time line. 10 11 And Desmirra is going to do a test vote. 12 Since we have new voting software, rather than 13 the clickers or the hands, so we're going to go 14 through that. So this is exciting. 15 MS. OUINNONEZ: Ι 16 just want to make sure that, at this time, I want 17 to make sure that everyone is logged in and has 18 had assistance or you've received your 19 instructions that were on the table of how to log 20 into Poll Everywhere. At this moment, if there's 21 anyone who has not logged in, if you could raise your hand. Well, this should be great. 22

1	So we're going to read our first test
2	slide, and, as we do, usually we'll read through
3	the voting question just to make sure that we're
4	clear about what you're voting on. And you will
5	actually be able to enter your vote, and we will
6	be able to calculate those votes real-time.
7	So at this time, we're going to open
8	voting for our test voting, and please input yes
9	to cast your vote. So if you'll notice on the
10	right-hand side, you'll see the percentage.
11	You'll see at the bottom where you can toggle to
12	see the total results of how many people are
13	actually voting at this time. Right now, we have
14	a total of 25 results. Okay. And what I'll also
15	do is give you so we have 100 percent, which
16	is 25 people voting yes. So at this time, it
17	looks like everything is working wonderfully.
18	What I will ask that you do is refrain
19	from casting your vote until we open voting, so
20	that I don't have to lock the slides on you. But
21	we will vote after we finish the discussion.
22	We'll announce voting and then voting will

1

commence.	Thank	you.
-----------	-------	------

2	Yes, they are voting online. Marsha,
3	Pam, have you all Pam is not voting. But
4	Marsha, have you been able to enter your vote?
5	MEMBER MANNING: Yes.
6	MS. QUINNONEZ: Awesome. Thanks so
7	much.
8	CHAIR WALTERS: It's going to be fine;
9	I know. I would like to echo again the process
10	which is, again, I agree that every year it's
11	changed a little bit. I think, as I was
12	reflecting on this, what becomes even more
13	important for, because Cristie and I are
14	listening for what to do with a second vote,
15	okay? If both the lead discussants and any other
16	people who enter in the discussion, we started
17	this actually at the beginning, but it's had some
18	improvements over the years, please state exactly
19	which of the four categories that you are in
20	support of. And what we can do is if, for any
21	reason, the staff recommendation is not the
22	consensus of the group, it gives us a numerical

1	way, I guess more than anything else, to try to
2	move to the appropriate one that we think
3	reflects the majority of the group, rather than
4	leaving it up to us and rather than just leaving
5	it up to our opinion of what we hear.
6	So that would help an awful lot, I
7	think. The default is, of course, as you heard
8	working our way right on down the list from
9	support to conditional support to do not support,
10	etcetera, the old refine and resubmit. We can do
11	that. It will just take a little more time to do
12	that.
13	But I hope, again, to try to give your
14	rationales and then a very specific which one of
15	the categories you support. I think that will
16	help us out.
17	CO-CHAIR UPSHAW TRAVIS: I'll just add
18	one other piece. Because we have four measures
19	and lots of people sitting around this table,
20	you'll notice that our lead discussant list is
21	very long. So, you know, I think what would be
22	helpful probably to the whole group is to build

on each other's comments versus feeling an 1 2 obligation to repeat them. You know, certainly, if you have a differing opinion, please be sure 3 4 and articulate that so that we can all, you know, 5 understand. If it's consistent, you can certainly say that, too, but maybe not feel like 6 7 you have to go into the same level of detail as others that may have gone before you. 8

9 But we do appreciate the additional time 10 that each of you took on your measure that you are a lead discussant, so we want to be sure to 11 12 capture what you wanted to say just as much as we can be kind of efficient and build on it. 13 It 14 will help us all, I think, be a little bit clearer in our own minds as to where you are. 15 So thank you for that. 16 Marty.

MEMBER HATLIE: I have a quick question. I'm looking at our voting system, and it's got my name on it, and I can't remember whether in the past we have tracked who has voted how and whether that becomes a part of the record. Was it an anonymous voting process in the past, and

is it this year, or are we being tracked and
 becoming part of the record.

CHAIR WALTERS: I think it's a fair
statement. It is not anonymous, but it is not
tracked. How is that?

MS. O'ROURKE: So it is tagged to your 6 7 name. We can't see how you voted. It's just to 8 make sure that the right people are voting and 9 that only the workgroup members are voting. In the past, I know we just kind of assigned. 10 In 11 the past, you had a clicker, so we didn't know 12 that Marty was clicker number 24. But when you -- Desi doesn't have that information of who voted 13 14 yes, who voted no. It just, all we see is, like, 15 20 yes, 5 no.

16 MEMBER HATLIE: Right. Okay. Well, I 17 wouldn't be opposed to actually going on record 18 with our votes. So maybe we'll think about that in the future, but thank you for the 19 20 clarification. I appreciate it. CHAIR WALTERS: We're talking about --21

22 yes?

A quick question. 1 MEMBER GUINAN: 2 Maryellen here. Given that I don't have a math background, so that's full disclosure, but I'm 3 4 wondering, I do appreciate that it will have a 5 further discussion because I could imagine that 6 if staff recommendation is to support and we have 50/50 in the two do not support categories, then 7 8 that's fairly meaningful. And so I think I hope that doesn't occur but would welcome the 9 additional discussion. 10

11 Oh, we all can remember CHAIR WALTERS: 12 55 to 45. I wish I could promise you that wasn't 13 going to occur. So I think we're going to shift 14 the agenda up a little bit. Okay. And we talked about this ahead of time. Since we went over the 15 16 voting process and the whole thing and then we 17 took a break to talk about pain, and you kind of 18 said why did they go through all that, we're 19 going to switch those up and Michelle is fine 20 with doing the pain management through quality 21 measurement after we do the IQR. And we're going to take a ten-minute break first. So let's start 22

1 at 11. Is that okay? 2 CO-CHAIR UPSHAW TRAVIS: Great. Thank 3 you all. 4 CHAIR WALTERS: 11:00, and you get to 5 vote soon. (Whereupon, the above-entitled matter 6 7 went off the record at 10:48 a.m. and resumed at 8 11:02 a.m.) 9 CHAIR WALTERS: So for those of you that are here for the first time, the general order is 10 we go through the details of the program, and 11 then we see if there's any questions about that. 12 13 And then we work our way into the first 14 measure and work our way through the measures for 15 that program. 16 So who's going to do the over --17 Melissa? Okay. 18 MS. JUNG: Just providing this slide as 19 a reminder of the programs that are considered by 20 the Hospital Work Group. We have nine programs 21 in total. 22 But, as this table displays, only two of

the programs have measures under consideration 1 2 It's the Hospital IQR Program, Inpatient today. Quality Reporting Program, and Medicare and 3 Medicaid Promoting Interoperability Program for 4 5 Eligible Hospitals and Critical Access Hospitals. So there are three measures in total 6 7 being considered today. And then the other 8 program is Prospective Payment System Exempt 9 Cancer Hospital Quality Reporting Program. And we have one measure under consideration today. 10 11 MS. MARINELARENA: Okay. Before we get 12 started, I just want to do a quick overview of 13 the Hospital IQR Program. 14 Again, this is -- you've seen this before, we went over it during the web meeting. 15 16 But this is a pay for reporting and public -- a 17 pay for reporting and pubic reporting program. 18 Hospitals that do not participate or meet the 19 program requirements receive a one-fourth 20 reduction in their Annual Payment Update. 21 And the goals of the Program are to 22 progress toward paying providers based on quality

rather than quantity of care that they give 1 2 patients, and interoperability between EHRs and CMS data collection, and, again, to provide 3 4 consumers information about hospital quality so they can make informed choices about their care. 5 We presented this on the webinar as 6 7 well. As Michelle discussed earlier about the 8 meaningful measures incentive at CMS, the updates 9 on the right include all of the measures that have -- that were finalized for removal. 10 And we 11 included the fiscal years. 12 So these are the updates that are going 13 to -- these are all the measures that are going 14 to be removed out of Hospital IQR. 15 We can -- you have that. And we're not 16 going to go through all of these. There were a 17 lot of them. Keep going, and there's more. 18 And then this is what is left after 19 those measures are removed. So the IQR Program 20 is quite smaller now. And then we have the NOF 21 status to the right. And you have seen this 22 before. And you have copies of this as well.

1	We talked about this on the webinar as
2	well, the high priority domains for Hospital IQR
3	that CMS identified, which included strengthening
4	person and family engagement as partners in their
5	care; promoting effective communication and
6	coordination of care; promoting effective
7	prevention and treatment of chronic disease; and
8	making care safer.
9	CHAIR WALTERS: The first thing we do
10	each kind of after we went through all the
11	measures in the program, we'll do at the start
12	now, is to open up the lines for public comment.
13	Let's do the anybody on the telephone first.
14	And then we'll do the people in the room.
15	So could we have the lines open for
16	public comment?
17	OPERATOR: Okay. At this time if you
18	would like to make a comment, please press star
19	then the number one.
20	There are no public comments from the
21	phone lines at this time.
22	CHAIR WALTERS: Thank you very much.
•	

1 We'll open it up to the people in the room for 2 public -- for their comments about any of the measures in the IOR MUC list. 3 Seeing none, we'll move ahead 4 Okav. 5 with the -- these are the three measures that 6 we'll talk about. Hopefully they're in the same order I have them. Yes, they are. That's always 7 8 good. C-section birth first. 9 Then the 10 hospital harm pressure injury. And then the 11 hospital harm hypoglycemia. 12 Lead discussants, this is a good time to 13 start getting ready. Okay. Starting with 14 Cesarean birth. 15 MS. MARINELARENA: Yes. So since the 16 staff is going to provide the introduction, I 17 think since we have a small amount of measures 18 and a lot of lead discussants, staff will 19 initially just go over the preliminary analysis 20 result and the summary of it. And then we'll have the lead discussants 21 22 go over. And then we --

Hold on just a second. 1 CHAIR WALTERS: 2 Nancy, do you want to say something? MEMBER FOSTER: I just have a question. 3 4 We talked about this as the IQR Program. But 5 it's my impression at least, some of these measures are for the Electronic Clinical Quality 6 7 Measures reporting program. 8 They do get publicly displayed or could 9 get publicly displayed, but are not yet for eCOM, 10 as I recall. But there's a penalty for not 11 reporting them. So I'm just -- I'm trying to 12 understand with clarity here, are these three 13 being proposed for IQR? For eCQM? For both? 14 What? Reena or Michelle? 15 CHAIR WALTERS: Ι 16 know that came up in my mind, too. 17 MR. MORGAN: This is Robert Morgan. I'm 18 the CMS measures lead for hospital -- oh, great. 19 Okay. Sorry. 20 So I'm the CMS measures lead for the hospital inpatient quality reporting program and 21 22 the hospital value-based purchasing program.

(202) 234-4433

1

5

6

7

8

Neal R. Gross and Co., Inc. Washington DC

www.nealrgross.com

9 hospital IQR program, facility is allowed to report one quarter of self-selected data for four 10 11 eCQMs of their choosing among the broader eCQM 12 measure set. And that would be true for these 13 14 measures as well if we maintain that requirement. The C-section 15 MS. MARINELARENA: Okay. 16 measure. The staff analysis was -- preliminary 17 analysis was do not support for rulemaking. 18 And the summary was -- this is because 19 -- this is a fully developed outcome measure. It 20 is the eCQM version of the existing chart-21 abstracted version. 22 The chart-abstracted version is NQF

2 included in the hospital IQR program and the PI 3 program.

4 Historically those two measure sets have been aligned. Particularly with this last one -where we removed the ED-3 measure from the PI program hospital measure list.

And you are correct that for the

With respect to these eCQMs, yes, they're

The 0471 was supported by MAP for 1 0471. 2 inclusion in IQR back in 2014. This is the first time you're seeing the 3 4 eCOM version of the measure. The eCOM version of 5 the measure was submitted to NOF in the fall of 2017 for endorsement. 6 It was reviewed by the new Scientific 7 8 Methods Panel for the scientific acceptability of 9 the measure, and they determined that it did not demonstrate sufficient reliability and validity. 10 11 Therefore, it did not move forward for 12 the rest of the endorsement process. NQF, the 13 preliminary analysis summary recommendation is 14 that the eCQM should be resubmitted to NQF for evaluation and endorsement. 15 16 So then I will turn it over to the lead 17 discussants. 18 CHAIR WALTERS: All right, Karen? Would 19 you like to say anything about that process? 20 Just briefly. Because this is going to come up. 21 This is the first time it has come up before this Committee. And, you know, Melissa 22

explained how it was arrived at a do not support 1 2 rulemaking, but the Scientific Methods Panel process leading to that is the first time they've 3 4 seen that. 5 MS. JOHNSON: I'd be happy to. Sure. And Ron is one of our Scientific Methods 6 panelists. So I'm sure he could do a great job 7 8 on this just as much as I can. 9 We implemented our Scientific Methods 10 Panel just over a year ago. And the idea is that 11 the statistical questions about reliability and 12 validity is sometimes a little bit out of reach 13 of many of our standing committee members. 14 So we wanted to have experts who really know what they're doing look at these measures. 15 16 And we don't have them look at all of the 17 measures, just a selected set of measures that we 18 call complex measures, usually outcome measures, 19 composite measures, measures based on 20 instruments. Those kinds of things. 21 When we first started the process, we set it up in kind of like journal editors do, 22

1	where you have kind of blinded reviewers if you
2	will. And that worked fair. But we have
3	recently changed that. So now it's a little bit
4	we still have them do things in subgroups.
5	But we allow some discussion. We allow
6	more participation by the public and the
7	developers in being able to listen to the
8	conversations, that sort of thing. So that's one
9	of the things that's a little bit different about
10	this particular measure. This one was looked at
11	by the Methods Panel.
12	I believe it was in the first cycle that
13	we did. So that Panel was brand new then. And
14	we have changed the process then.
15	So we don't really have details that we
16	can share with you about what they saw with that
17	particular measure. Going forward we might be
18	able to provide those kinds of things.
19	I'm not sure if that got to what you
20	were thinking, Ron.
21	CHAIR WALTERS: That's exactly what I
22	wanted you to say, rather than me. That may
1 happen for -- as a measure comes up for 2 maintenance. It can also happen, and you'll see a couple of examples again, where that happened 3 4 when a new measure was coming up for initial 5 endorsement. And so the general theme is that if a 6 7 group of people who are experts in the assessment 8 of reliability and validity could not come to 9 consensus agreement about a measure that it 10 should not go to the panels. And I know that was 11 the subject of a lot of discussion. That's why 12 you'll see a do not support for rulemaking. I've 13 said that now. I'll move into the lead discussant list. 14 And, again, please in a couple of minutes 15 16 summarize your -- your recommendations, and with 17 a specific opinion about which of the four 18 categories it should be in. 19 Anna? Or sorry --20 MEMBER DOPP: Lisa was ahead of me. 21 CHAIR WALTERS: Lisa? 22 MEMBER McGIFFERT: No, I had a question

1	about because I think I read that one of the
2	reasons that the Panel didn't recommend it was
3	that the data elements were not present in many
4	of the test sites, or whatever.
5	That hospitals didn't use the data
6	elements. That's what it sounded like, that it
7	was something that was missing in a lot of the
8	information.
9	Is that am I understanding that
10	correctly? And if so, my experience, which is
11	somewhat limited, but pretty broad in this area,
12	is that kind of, you know, if you require a
13	measure and put some validity to it, then the
14	data elements will follow.
15	And we saw that clearly happening when
16	infection reporting started. And unless, you
17	know, hospitals have a lot of things to do, and
18	unless they're required to submit certain data
19	elements, they're not probably going to do it.
20	So I want to clarify in my mind if that's the
21	issue.
22	CHAIR WALTERS: Well, that was certainly
_	

the discussion in the early meetings of the 1 2 group, is that they had to go with the assessment of reliability and validity for the data elements 3 that were built into the measure specs. 4 5 And if those data elements were not present for whatever reason or unclear for the 6 7 group, they could not make an adequate 8 determination of the reliability and validity for 9 that measure. 10 Fair statement? Okay. Let's move on 11 now to Anna. 12 MEMBER DOPP: So I'm listed first in the 13 list of lead discussants. I'm a pharmacist. Ι 14 mentioned that earlier. So this is -- the topic is a little out of scope, quite a bit out of 15 16 scope for my background. 17 But our group did meet by email on 18 Friday night. And we -- some of us were able to meet yesterday. And so I think we have a good 19 20 understanding of what the thoughts are with this 21 measure. So I have a question, and then I'll 22

defer to the rest of the group. Because I -- it 1 2 was very valuable discussion over email and over our meeting yesterday, brief meeting yesterday. 3 4 So they have good information to share. 5 But under the voting procedures there was a step that was going to allow for the 6 measure developer to respond. 7 Is anyone from 8 Joint Commission present to react to the staff 9 analysis? Or -- or not. MS. O'ROURKE: Correct me if I'm wrong, 10 11 but I don't think we have anyone from the Joint 12 Commission who was able to join us. 13 MR. MORGAN: Well, this is Robert. Ι 14 can speak on their behalf as I have spoken with them about this measure. This is a Joint 15 16 Commission measure. And -- CMS is no longer 17 maintaining this under one of our contracts. 18 What I will say is that through their 19 testing, they did find that, I believe, 20 approximately 68 percent of the data elements 21 currently are captured in discrete fields. 22 And in the near future, within two

years, approximately 90 percent. But with that 1 2 said, you know, CMS we agree with the need to resubmit this measure for NQF endorsement. 3 And we have implored the agency to do 4 So we're looking forward to that. 5 so. Thank you. I'll defer to 6 MEMBER DOPP: 7 the rest of the group. 8 And I wasn't explicit, CHAIR WALTERS: 9 but, again, your recommendation can be any of the four categories that you want to recommend. 10 And that is worthwhile information back to CMS also. 11 12 The Scientific Methods Panel process is 13 a process related to this process, but this is a 14 separate process, so please feel free to give 15 your recommendations. Okay. Nancy? 16 MEMBER FOSTER: So thanks, Ron. In the 17 spirit that you and Cristie outlined where we're 18 going to build on each other's comments, I'm going to focus on the sort of a conceptual issue 19 20 around the measure first. Which is -- and let my 21 colleagues talk about some of the specifics of 22 the measure, the specifications and so forth.

1	The conceptual issue I have right now
2	is, as you would think about including this
3	measure in a program, there are two main issues
4	that I'm aware of that hospitals are working on
5	very hard.
6	One is to eliminate early elective
7	deliveries. And we've made great progress in
8	that regard. But we're not where we need to be.
9	And the second is more has come to attention
10	more recently, and that's maternal mortality.
11	To the extent this measure would be
12	related to maternal mortality, it might be
13	important to include. But as I understand the
14	issues around maternal mortality, this is not the
15	first issue that would be addressed.
16	And so in my mind one of the issues that
17	wouldn't have been addressed by the Scientific
18	Methods Panel is that we really want to stay
19	focused on those two critical issues right now as
20	we move things forward.
21	And I worry that adding this measure any
22	time soon, even if it were scientifically

I

superior, would distract from the need to focus 1 2 on getting those two things right as we work towards better reliability in healthcare. 3 CHAIR WALTERS: And I think you -- yeah? 4 MEMBER FOSTER: I was just going to say, 5 and I support the staff recommendation. 6 7 CHAIR WALTERS: I think you pointed out 8 one of the -- many -- criteria. So there are 9 other criteria other then reliability and 10 validity, and your comment was very pertinent. 11 Gail? 12 MEMBER LEE: Thanks. So I think that as 13 well, I support the staff recommendation of do 14 not support at this time for a couple reasons. Ι think -- I was hoping to find out a little bit 15 more information about what the Scientific 16 Methods Panel had discussed. 17 18 And so we tried to find that report. 19 But we couldn't, I guess. But, looking at it, I 20 think that there were a lot of questions that 21 were raised about the variability of the rates of C-sections. 22

1	And that, I think, raised for me
2	questions about risk adjustment and whether
3	there's adequate it says there's no risk
4	adjustment for this measure at this time.
5	And so I think that's something that NQF
6	needs to really take a closer look at. Also
7	questions about just the overlap that this
8	measure has with the elective delivery measure
9	that already exists in the denominator piece.
10	And also the last point is whether there
11	are would be any unintended consequences
12	associated with this measure due to some of the
13	pressure that may occur in the delivery room to
14	meet certain criteria or certain ratios.
15	And so, you know, there's a lot at risk
16	when you're dealing with both the mother and
17	the baby. And so that was also a concern and I
18	think something that needs to be looked at more
19	closely.
20	CHAIR WALTERS: Thank you. And I think,
21	again, as this continues, it is helpful to hear
22	some of the other criteria that fail. And you

1	brought redundancy into play. And you brought
2	unintended consequences into play.
3	So the whole criteria set's
4	important. Okay. All right. Sally?
5	MEMBER TURBYVILLE: Thank you. I agree
6	with my fellow lead discussants. Only to add
7	that I also am inclined, as Nancy is, to question
8	whether this is the right focus at the right
9	time.
10	I do I'm probably a little bit more
11	open in thinking that the high performance
12	variability found might actually be real.
13	But that maternal outcomes is a real
14	issue we know. As well as the outcomes of the
15	infant, being from the Children's Hospital
16	Association, is of great importance.
17	And the impact of the delivery, care
18	delivery. So not much else to add other then
19	agreement.
20	CHAIR WALTERS: Okay. Thank you. Lisa?
21	MEMBER McGIFFERT: I do not agree with
22	my fellow discussants. I think that this measure

1

should move forward.

2	C-sections are one of the most common
3	procedures in the hospital, and there is
4	substantial overuse in this procedure, and I
5	personally, as a consumer advocate, have been
6	involved in trying to get public reporting on
7	this for decades, beginning in Texas.
8	It does create a significant risk for
9	adverse outcomes for mothers like infections,
10	blood clots, length of stay, and maternal
11	mortality is probably one of those issues, and
12	for babies, respiratory problems and the
13	likelihood of some chronic childhood conditions.
14	The cost is about 50 percent higher to
15	Medicaid and Medicare. It triggers subsequent C-
16	sections nine and ten, despite best evidence that
17	this is not appropriate way to provide care.
18	Professional societies support it. It
19	is and I think that generally this population
20	is highly attuned to getting information about
21	quality.
22	This measure is, my understanding, is an

1	electronic medical record measure. Which I
2	understand is the way we want to go.
3	The chart review measure has been
4	endorsed. It's been out there. A lot of
5	hospitals are using it. It is not publicly
6	reported. I think there are some states that
7	publicly report it. But it's spotty. You know,
8	it's not all over the country.
9	And I as I expressed before, not
10	knowing exact I understand the reliability
11	could not be established. But I think this is
12	one of those situations where you have to get out
13	there and do it.
14	And I'm kind of, you know, if there are
15	some states that have been publishing this
16	information, then we could start with them and
17	try to see what kind of electronic health records
18	they have.
19	But I personally believe we have to
20	really push hospitals to get on board with
21	electronic measurements so that we can reduce the
22	paperwork and focus on the patients. So I would

1

recommend that this go forward.

2	Another comment about risk adjustment,
3	from my reading, it is my understanding that risk
4	adjustment for age was removed from the chart
5	review version of this.
6	And I don't exactly know why, but I'm
7	assuming it's because this population is well
8	defined as, you know, women who are giving their
9	first birth, and so it's a and not high risk.
10	So it's a narrow enough population for
11	us to look at on this measure. And I believe
12	that this is an extremely important measure for
13	us to move forward after so many decades of
14	talking about it.
15	CHAIR WALTERS: So your recommendation
16	would be support or conditional support?
17	MEMBER McGIFFERT: Support.
18	CHAIR WALTERS: Okay. Deborah?
19	MEMBER WHEELER: I agree with the
20	majority of the lead discussants, where I do not
21	support the measure due to the lack of validity
22	and reliability.

1 Many of us -- we've had many comments so 2 far related to the measure. But one that I want to bring up is related to the comparability of 3 4 data collection processes, whether it's this 5 measure or measures related to chart review. Has there been, or can there be work to 6 7 focus on, you know, if a hospital collects data 8 in one system using the same specifications, is 9 that process comparable to another hospital that looks at the measure? 10 11 So I think there should be more work in 12 that area. 13 CHAIR WALTERS: Okay. As we continue to 14 work with the new -- thank you very much. That gives us very explicit direction exactly how the 15 16 lead discussants feel. 17 So now we're going to turn it over to 18 the measure stewards and have them comment --19 comment and/or reply to some of the consideration 20 they heard from the lead discussants. 21 Then we'll go back to open it up to the 22 entire committee. Then if we need to, we'll go

back to the lead discussants to respond to the 1 2 entire committee points. And then we'll have a vote. 3 So, yes, sir? 4 5 MR. MORGAN: So this is Ronald Morgan I'll say one, with respect to risk 6 again. 7 adjustment that was brought up earlier, age was 8 previously included in the chart version but was 9 removed prior to -- submission of the measure for NQF endorsement. And it was subsequently 10 11 endorsed, and that's because the correlation 12 between age and body mass index cancelled out the 13 defect, and BMI isn't regularly captured, so it couldn't be included. 14 15 And so therefore, the lack of risk 16 adjustment in this electronically specified 17 version of the measure is in fact to align with 18 the chart version of the measure, which was NQF 19 endorsed. 20 I also note that in terms of, you know, 21 the PC-01 was brought up quite a bit. And early in the slides, you had listed the various 22

removals for the hospital IQR program.

1

2

3

4

5

6

Among them was the electronically specified version of PC-01, the early elective delivery measure. Which, to get at someone's earlier point, does capture a different population then PC-02.

That same measure is also moved from the 7 8 hospital value-based purchasing program, but was 9 retained in chart form in the hospital IQR program. And for those who rated close to the FY 10 11 2019 VS rule, you'll note that that reason was 12 really because we recognize the importance of 13 capturing maternal health in the program in some 14 way or form.

And that was the only measure through which we can get at that at this point in time. However, that measure is of course -- the performance of the measure is topped out.

So that's a measure we're looking very
closely at and monitoring in the future to see
whether or not that topped out performance
continues.

1	So in bringing this measure before the
2	MAP, what we're really looking for, really trying
3	to convey is our intent to look at more
4	meaningful measures related to maternal health.
5	Although it may not directly get a
6	maternal mortality, which we agree is an
7	important issue. This is more related to
8	surgical complications if you think about the
9	ultimate outcome.
10	So to that end, that's really what we're
11	looking at. But we do welcome, if you have any
12	sort of feedback related to what risk adjustment
13	variables we might need to incorporate for CMS
14	consideration and for feedback to TJC since they
15	support this measure.
16	And also where you see this measure and
17	the IQR program relative to PC-01. Because this
18	is a measure where you do see variation in
19	performance, unlike the PC-01 measure, which is
20	topped out.
21	CO-CHAIR UPSHAW TRAVIS: I'm going to
22	ask you to tell remind me what PC-01 is.

MR. MORGAN: I believe it's early 1 2 elective delivery prior to 37 weeks gestation, or 39 weeks. One of the two. 3 4 CO-CHAIR UPSHAW TRAVIS: Thank you. Ι 5 just am probably not as familiar with the numbers and letters that get associated with things. 6 So, 7 thank you. 8 CHAIR WALTERS: I'll open it now to 9 everybody else on the committee and their comments. And that was a hard thing to see. 10 Lee? 11 12 MEMBER FLEISHER: With regard to risk 13 adjustment, I'm just wondering in the way it's 14 constructed, eclampsia or preeclampsia, which is one of the major risk factors for increased 15 16 maternal mortality, is or is not included? 17 And if it's not, then we're -- and 18 having a C-section addresses eclampsia. Then we 19 have unintended consequences of this measure. 20 Do you know the answer? 21 MR. MORGAN: So in terms of measure exclusions, abnormal presentations are excluded. 22

But there is no risk adjustment for the measure. 1 2 MEMBER FLEISHER: So -- but you don't exclude patients with eclampsia or preeclampsia? 3 4 MR. MORGAN: I don't believe so, no. So getting to Nancy's 5 MEMBER FLEISHER: comment, you know, I can -- I understand from a 6 consumer perspective, we want to do the right 7 8 thing. 9 But this actually goes against potentially optimal treatment of a patient with -10 - who is at increased risk for maternal 11 12 mortality. 13 So I think before I would be willing to 14 endorse it, I'd have to see that adjustment. 15 CHAIR WALTERS: Lindsev? 16 MEMBER WISHAM: Yeah. I don't know at 17 this point that I have an additional suggestion 18 to the status. 19 However, I do have a question. I think 20 it's interesting, this was the measure that we 21 received additional information on. 22 And the testing results that we received

indicate May and June of 2018. Yet the 1 2 Scientific Review Panel addressed this measure in 2017. 3 So I'm curious to know if this measure 4 5 has been updated to address any of those concerns? Or if that was additional testing? 6 7 Because this current status still reads 8 as in field testing. 9 MR. MORGAN: Yes. So this measure is 10 now fully tested. And so that's why, you know, 11 CMS is looking forward to TJC resubmitting the 12 measure for NQF endorsement. 13 We feel pretty positively about with 14 this additional data, its ability to obtain NQF 15 endorsement. 16 MEMBER WISHAM: Thank you. 17 CHAIR WALTERS: Jack? 18 MEMBER JORDAN: I think one of the 19 things to remember though is that CMS putting something out there can fix documentation. 20 You 21 know, we saw that when we first had, you know, 22 beta blocker kind of issues.

And the documenting that there was a 1 2 contraindication was terrible. And that was all the misses. And within a year or two, we got 3 4 reliable at documenting the contraindications. 5 And the same kind of thing here. I don't think we should be held back on 6 7 a measure because we have some, you know, missing 8 documentation things. Because if you're missing 9 BMI, and that's important in the severity 10 adjustment here, you turn this on, that will get 11 fixed incredibly quickly. 12 And that's one of the things that I think CMS can be a forcing function. And the 13 14 other comment with this is I don't know how many 15 states are like my own. But the private insurers 16 are -- we're going to do this. 17 So in some sense it's not going to go 18 I mean, does Medicaid, you know, care away. 19 around this? But the private insurers do. It's 20 going to be there. Hospitals are going to deal with it if CMS does or doesn't. 21 22 So, I think, you know, being on there to

help with it be as good as it can be, is probably 1 2 better for us then to cause kind of the challenge of, you know, not endorsing it might. 3 4 CHAIR WALTERS: Marty? 5 MEMBER HATLIE: I looked at the comments for this measure, and there was a really striking 6 comment from Lamaze International about how this 7 8 fills a data gap. 9 And I think Lisa spoke to it. And I think Jack just spoke to it as well. 10 If support 11 for this would help -- and Lamaze's comment was 12 it would fill a data gap for both consumers and 13 for perinatal professionals, people who are 14 working in this field. And it sounds like we do 15 have a data gap and that this measure could 16 perhaps help us close it. I'm liking what I just heard Jack say in 17 18 terms of using this as a way to drive better data 19 reporting. And I'm also wondering, Lisa, you 20 mentioned professional groups supporting it. 21 I don't know if there's anyone besides 22 Lamaze. I was surprised that there were only

three comments on this measure. 1 2 Are there other groups, Lisa, that you know of that you could tell us about? 3 4 MEMBER McGIFFERT: Well, I think A -- I 5 want to say ACOG has supported this measure for a 6 long time. 7 I did hear back from several people who 8 really weren't aware that this was coming up. 9 There's a group in California that's been working on these issues. 10 11 And I've talked to some of those people. 12 And they're very supportive. Let me see if I can 13 find -- give me a second if there are other 14 comments, and I'll find the list because I think 15 I have it. 16 MEMBER HATLIE: Thank you. 17 CHAIR WALTERS: Are there other comments 18 and feedback you'd like to give to the --- to 19 CMS? Cristie, sorry. 20 CO-CHAIR UPSHAW TRAVIS: That's all 21 right. 22 CHAIR WALTERS: It's hard to see

sideways.

1

2	CO-CHAIR UPSHAW TRAVIS: I know.
3	MEMBER McGIFFERT: Okay. I just found
4	the list and, you know, it's like the Leapfrog
5	Group has it as voluntary measure.
6	It's part of the Medicaid Child Core
7	Set. It's the Joint Commission, of course the
8	National Quality Forum, multiple state level
9	perinatal quality collaborative use this.
10	Over 100 hospitals in California are
11	participating. Healthy People 2020 included this
12	as an indicator of a national goal.
13	And then mention of NQF measures. Which
14	we already know.
15	CO-CHAIR UPSHAW TRAVIS: Well thank you.
16	I probably don't have any way to really add to
17	that long list.
18	You know
19	MEMBER McGIFFERT: Oops, I found a few
20	more.
21	CO-CHAIR UPSHAW TRAVIS: Oh. Go on.
22	MEMBER McGIFFERT: The Alliance for

not
1
my
ng
you
7
9
f 5

1

in other pieces.

2 And I know just in looking at the Leapfrog data, which I'm glad you mentioned. 3 And 4 just to remind you, I serve on the Leapfrog 5 board. There is -- there's significant variation in this across the country. 6 7 And trying to think about how we could make this part of maternal health, an important 8 9 improvement I think is valid. All that said, I think we need to be really looking at maternal 10 11 mortality and how we can advance it. 12 This is probably one piece of the 13 solution. I think the elective early deliveries 14 is another piece. But I don't think that by putting this 15 16 in it means that we're not going to continue to 17 look at the bigger picture for maternal health. 18 CHAIR WALTERS: Okay. Andreea? 19 MEMBER BALAN-COHEN: Just adding to some 20 of the comments to say that this is definitely an 21 area where there's been some experimentation. 22 And there is definitely a lot of

evidence like coming from California and from
 Massachusetts that reporting on this issue can
 have significant and relatively rapid
 consequences in the sense that the declines like
 in C-sections have been rapid after some of this
 reporting has been implemented.

7 So that's something to keep in mind. So 8 even though this might not be, and again, it's 9 just like a smaller component of the larger issue 10 regarding maternal mortality. But it could be 11 one first important step. And we all probably 12 have to start somewhere.

And the other point is that I like the fact that it has a little bit like the cost component like implicitly built up on it. And then there is also the relationship with some of the efforts potentially around like maternity bundles, and there are like some other considerations as well.

20 So I think it could be an important step 21 like by filling the data gap from that point of 22 view as well.

1 CHAIR WALTERS: Okay. Nancy? 2 MEMBER FOSTER: Thanks. I just wanted to provide a point of clarification, which is 3 this measure is not NOF endorsed. 4 This measure 5 is not on the NOF list. Its predecessor, the chart abstracted 6 measure is. Or was. I don't know if it still 7 8 is. 9 But part of what you're seeing here, part of what you're seeing in the Scientific 10 11 Methods Panel comments is that people are 12 struggling to find the data in an electronic 13 capture. Right? 14 And it's -- I can tell you how vehemently our members have said we want to be 15 16 able to measure most of this electronically and 17 accurately. 18 And we've tried valiantly on a number of 19 measures. We haven't gotten to accurate yet. So 20 what you're seeing here is them saying this is --21 you can get some information. It will not be accurate. 22

1 And they said the differences that they 2 could see, as I understand it, were related to the patient population rather than to actual 3 performance when they looked at the data. 4 5 So it's a struggle here. It's not -please understand me, I'm not saying this a bad 6 concept. I have prioritization issues. But it's 7 8 not that the concept is bad. It is that the 9 execution is not where you need it to be to provide useful information. 10 11 And to date, the history has been that 12 wishing we could capture things electronically 13 has not resulted in actual accuracy. 14 CHAIR WALTERS: I'm trying to get all of 15 them to respond to. Marty? 16 MEMBER HATLIE: I want to mention one 17 thing that hasn't been mentioned yet, and that is 18 the importance of information like this. 19 So this is kind of conceptual, Nancy, but it's information like this to share decision-20 21 making. 22 I mean, this is an area where, I mean,

the core to the CMS policy on quality and the PFE 1 2 component of it is this focus on shared decisionmaking. And this is the kind of information that 3 4 I think really, really advances that dialog between potential mother and provider. 5 So conceptually I'm for it. And then, 6 7 Nancy, where I always kind of feel like I part 8 ways with you, even though I like you so very 9 much and we go way back, is, you know, we have to drive data and to make it better. So I think I'm 10 11 agreeing with Jack here. 12 Sometimes setting -- if the data is 13 crappy and we've been waiting for a long time, how do we drive it to make it better? 14 And if -- and sometimes putting out a 15 16 requirement that forces whoever is in charge to 17 kind of make the data better, needs to be done. 18 And that's kind of where I fall here. 19 It's not like I'm comfortable waiting for the 20 data to get better. I want to drive something 21 that makes the data get better. 22 And I'm not a measurement person. So I

know that was a pretty sloppy thing. But I am an 1 2 advocate, and that's what I'm really looking for here is just ways to drive the -- I'm so tired of 3 4 hearing about how we have systems full of bad 5 data. We've got to figure out a way to create 6 7 the drivers and make that data better. Thank 8 you. 9 CHAIR WALTERS: So I think I have Sean, and then Ann. And then I think it was Lindsey. 10 And then it was over here to Sarah and 11 12 -- so anyway, Sean? 13 MEMBER MORRISON: Yeah. Thanks Ron. 14 You know, I'm hearing this, and this happens 15 almost every year, the tension between what we 16 think needs to happen, and the way to make it 17 happen. 18 And I completely agree that this is a 19 very important issue. And yet lousy data, Marty, 20 are lousy data. 21 And we shouldn't be putting people or 22 trying to drive quality by saying well, we should

just go out and measure it. Because we don't
 know what we're measuring.

And we could easily be measuring rates from hospitals which bear no resemblance to reality. And that's not fair to our patients. It's not fair to our families. And it's not fair to our hospitals.

8 So yes, it is important, you're right, 9 we should be driving data collection. But 10 driving it through this particular process is --11 is not the way to do it.

12 There are other ways of approaching 13 this. And I'd like to see this come back when 14 it's NQF endorsed and when I can see that what's 15 being reported is truly, A, valid, which is we 16 are reporting what's actually happening, and, B, 17 reliable, that if we continue to report it, we're 18 getting the same results every single time.

19 That is what we owe our patients and our 20 families. We owe them that degree of 21 responsibility in my opinion. And so I 22 completely agree with the staff's recommendation

2 CHAIR WALTERS: Ann? MEMBER SULLIVAN: 3 Yes. I just need 4 clarification. When we say this long list of 5 groups that have endorsed it, have they endorsed this electronic measure or did they endorse the 6 7 older measure? 8 The other measure --MEMBER McGIFFERT: 9 MEMBER SULLIVAN: The other measure. That this is based 10 MEMBER McGIFFERT: 11 on. 12 MEMBER SULLIVAN: So I think that makes 13 perfect sense that there's a kind of a consensus 14 that this is an important thing to measure. I think the question is kind of what 15 we're here for, is how you measure it.

not to move this forward yet.

1

16 we're here for, is how you measure it. And I 17 tend to agree with the previous speaker that you 18 have to be cautious about the data that you put 19 out there from hospitals and from this.

And I'm not saying at all that it's not a good measure. And agreeing with all the people who endorsed the chart review.

I assume we want to go to electronic 1 2 because it will make it easier. And we'll get more people to do it. 3 4 But, if we're not ready yet to really do 5 it that way, then I would have serious concerns about going forward with this measure. 6 CHAIR WALTERS: 7 Lindsey? 8 Turn on your mic. 9 MEMBER WISHAM: -- that the measure that the Scientific Panel probably reviewed in 2017 10 11 was not a measure that was specified using the 12 clinical quality language. 13 The clinical quality language is the new expression model used for eCQMs. Which did allow 14 15 for a -- for much more expressivity in the 16 measures, including in the description of 17 gestational age. 18 So knowing that that's an element in this measure, I know the Joint Commission is here 19 20 to speak to the details of it, but the measure 21 has changed. 22 The measure specifications that we were

1	provided is specified using the clinical quality
2	language. Which would have been a different
3	version than what the Scientific Panel had
4	reviewed.
5	And so I do think it is, as stated
6	before, that the measure would be coming back
7	through NQF for additional review for
8	endorsement.
9	But I do think it's worth note that
10	again, the reliability of how that data is
11	captured electronically, very much has changed as
12	the expression model has been updated.
13	CHAIR WALTERS: Dan?
14	MEMBER POLLOCK: Yeah, another comment
15	about the use of quality measures to drive
16	changes in documentation. The flip side is, is
17	that quality measures can have unintended
18	consequences with respect to documentation.
19	Which actually can deteriorate the
20	record keeping rather than improve it. And I
21	think we all have to be very cognizant of that
22	and not let data quality improvement be a

principal driver of quality measurement. 1 2 CHAIR WALTERS: Sally? It's really more of 3 MEMBER TURBYVILLE: 4 a question, and it might not be answerable given 5 that the Joint Commission is not here. But given that it is a Joint Commission 6 measure, which is a well-known measure steward 7 8 who has their own products, do we know if they 9 plan to continue to gain more experience with this measure and bring it back to NQF for 10 11 endorsement? 12 And so that there's -- this is not the 13 one and done kind of killing of the measure's 14 prospect? 15 Did they --16 CHAIR WALTERS: Sure. 17 MEMBER TURBYVILLE: Do we have any sense 18 of --19 MS. MUNTHALI: We haven't -- this is 20 NQF, Elisa. We haven't heard anything from the 21 Joint Commission directly. But perhaps from CMS? 22 MR. MORGAN: So this is Robert again.

From what I've heard, they are considering that. 1 2 But they haven't made a decision yet on that point. 3 4 I'll also add that we agree that the 5 industry is in a state of transition. Right, that's something we've heard. 6 That's something we've seen in the data. 7 8 And that's really partly why we have the 9 fairly lenient program requirements that we have. Where you can voluntarily report the data 10 and that data will not be publicly reported. 11 And really the primary driving reason 12 13 for that is, you know, one we're still -- we 14 still have some improvement to go in terms of data quality for all of our extant measures. 15 16 But, two, we want to give hospitals and 17 implementers an opportunity to become accustomed 18 with submitting EHR-based data, and not be 19 punished for that. 20 CHAIR WALTERS: Aisha and then Marsha on 21 the phone. Aisha? 22 MEMBER PITTMAN: So my point is
following along that. In that we know that just
 adding a measure doesn't actually improve the
 data.

So there have been lots of eCQMs that
have taken them out of the programs because they
don't continue to work. So just adding it isn't
going to help drive the data.

8 We know that's not the issues. There's 9 far more far reaching issues with trying to get 10 to the electronic capture. So just putting it in 11 a program doesn't necessarily help.

12 CHAIR WALTERS: Okay. Marsha, you're on 13 the phone.

MEMBER MANNING: Thank you. I just
perhaps a question related to clarification after
listening to this, you know, very robust
discussion.

When I look at the decision definitions,
I'm actually just a little bit confused as to how
the preliminary analysis came to the do not
support for rulemaking decision.

I believe this is a very important

Neal R. Gross and Co., Inc. Washington DC

concept for a measure. And I've heard that from several other committee members.

When I look at the criteria that's used 3 for -- for the decision categories, I quess my 4 point of confusion is Item Number Three, which is 5 does the measure address a quality challenge? 6 The answer to this question from the 7 preliminary analysis is no. But what I'm hearing 8 9 is, is that it's -- that our -- that data issues 10 are driving this analysis, and not the importance of the measure to address a quality challenge, 11 12 perhaps conceptually. So I'm just a little bit confused about 13 14 that. And if anybody can provide some clarity, I would really appreciate it. 15 16 Because it does -- I'm hearing and my 17 perspective on this is that addressing --18 providing data related to Caesarian rates does 19 address a quality challenge. And there may be another decision 20 21 category that's more appropriate if we're really

22

1

2

Neal R. Gross and Co., Inc. Washington DC

looking at significant data issues.

www.nealrgross.com

So if

(202) 234-4433

I	-	T,
1	there's any clarity that can be shared, I would	
2	appreciate that.	
3	CHAIR WALTERS: I'll try to get that.	
4	Anna and then Lee, and then Shannon. And then	
5	Reena.	
6	MEMBER DOPP: I'm thinking about how	
7	much this discussion reminds me of last year when	
8	we had the ORARE measure, the opioid-induced	
9	adverse respiratory event. And everyone in the	
10	room felt like it was compelling and met an	
11	important need.	
12	And then and we went against our	
13	purview, I think, and said to refine and	
14	resubmit.	
15	But that's that's how I view this.	
16	It's just not ready. And it seems to go against	
17	the real intention from CMS to with the	
18	meaningful measures and reducing burden to people	
19	to show they're not going to just put a measure	
20	out there that's not ready to be met.	
21	CHAIR WALTERS: Okay. Lee?	
22	MEMBER FLEISHER: Yeah. In listening	

and trying to read the materials, and this is a 1 2 common both for CMS and NQF, it's interesting that this is an endorsed measure in the old 3 world. 4 Do we have data, and I don't have it in 5 my packet and maybe I'm not finding it, on how 6 that old measure had done? 7 Because -- both from unintended 8 9 consequences and achieving its goal. Because 10 we're actually arguing around conversion to an emeasure and the scientific acceptability or the 11 12 methodology without actually asking the question 13 of did the original measure achieve its goal? 14 Even if not nationally, we're looking at Utah where we're seeing that C-section rates came 15 16 down. A few years later, maternal mortality is 17 going up. 18 So my question is, give us more data to 19 judge both issues, scientific acceptability and 20 relevancy if you have a previous measure. 21 CHAIR WALTERS: Shannon? I'm not far off of 22 MEMBER PHILLIPS:

1	that. I guess I would say part of what would be
2	compelling is to look at the, I think somebody
3	said 40, but many states that are using this
4	measure, ours included.
5	And let's see what that's shown. Right?
6	So why wouldn't, you know, so really echoing what
7	Lee said.
8	But that data would be impactful to
9	understand if the burden of the measure is worth
10	it. Or is it really an issue of risk adjustment?
11	Right?
12	So to the point of eclampsia and other
13	things, maybe it is completely a great measure.
14	But not it would explain why infant or
15	maternal mortality is going up.
16	And it's an interesting measure to
17	potentially place next to an outcome measure of
18	interest. So if this process measure may be risk
19	adjusted, we do see helps.
20	Put it next to infant mortality or
21	maternal mortality so that we can see the process
22	and the outcome together. Because that speaks to

clinicians, and I would think would speak to 1 2 patients powerfully as well. CHAIR WALTERS: 3 Reena? 4 MEMBER DUSEJA: So first I just want to 5 thank everyone for their comments. I mean, as always it is so delightful to be here and to hear 6 7 the variety of comments, particularly with this 8 measure. 9 I just wanted to just have some framing comments from CMS's perspective as we think about 10 11 this as it relates to meaningful measures. And I 12 heard a comment, well this doesn't really 13 translate to meaningful measures. 14 And I want to first point out is, we do believe -- we wouldn't bring this to the MAP if 15 16 we didn't feel like it was meeting a gap. We do 17 feel like this is addressing an area of variation 18 in care. 19 We have data to at least point that there has been variation in rates in terms of C-20 21 sections from 20 to 50 percent. And so we do 22 think that there is room to improve.

1	We also think there is a link if we
2	measure this measure in terms of improving
3	morbidity for mothers as well as for children.
4	So I just wanted to specifically say that in
5	terms of that link.
6	Now as far as this measure being put
7	into a program, just to remind the work group,
8	this is voluntary. So hospitals can report on
9	this measure.
10	I think one of the advantages,
11	especially with some of these concerns about the
12	data science, and are we there in being able to
13	report this?
14	Is if you allow it to be voluntary,
15	perhaps we can actually get those hospitals that
16	are at the forefront in being able to report on
17	this. And other hospitals can learn from them.
18	Right?
19	So, and how they're able to successfully
20	capture this data. So we have to start
21	somewhere. We I think that from our
22	perspective, at least from our group, we believe

that you know, measures can drive some of this 1 2 data collection. So those are some of our thoughts from 3 4 bringing this for the discussion today. But if 5 there's anything else you would like to add, okay. That's it. 6 7 CHAIR WALTERS: Lisa and then Aisha. 8 And then I think we'll be about ready. 9 MEMBER McGIFFERT: Just real quickly, kind of to follow up on those comments, is I 10 11 don't know why the chart review has not been put 12 through this process since it's endorsed by so 13 many groups and has been around for so long, and 14 lots of states are using it. 15 But set that aside, from the consumer 16 perspective, we really need public reporting. We 17 do not have public reporting on this measure. 18 And it, again, I mean, this was like the 19 first thing I did on quality back in 1989 or '93, or somewhere around there. And we still weren't 20 21 -- we still are not getting public reporting on this across the board. 22

And so I think that is a compelling 1 2 argument to move this forward, that the public deserves to see these results. 3 4 And again, I don't know why the chart 5 review has never been put forward to the IOR. Maybe that's a good question. 6 MS. MARINELARENA: 7 This is Melissa. So 8 just some clarification. The chart-abstracted 9 version has been through MAP. MAP did recommend it, I believe, with some conditions back in 2014. 10 Now I don't know if it was -- ever went through 11 12 rule or not. But it did come through MAP. CHAIR WALTERS: Aisha. And then I think 13 14 we're going to move into voting. I guess just to Reena's 15 MEMBER PITTMAN: 16 point about it being voluntary. So, yeah, while 17 eCQMs are voluntary, CMS could change that policy at any time and say, all eCQMs are mandatory, 18 19 which was the case. 20 And they've switched going back and 21 forth with how many measures are voluntary. So I 22 think that's just a point for the group to be

1 aware of.

If it goes into the program, it can be
mandatory at any time, and that decision doesn't
come back to the MAP.

5 CHAIR WALTERS: Okay. I'm going to have 6 staff review the four categories again and make 7 sure everybody's clear on the criteria. And to 8 remind everybody that first we'll vote on the 9 staff recommendation.

MS. MARINELARENA: Okay. So as a
reminder, support for rulemaking, you absolutely
support it with no conditions.

13 Conditional support for rulemaking, you 14 would include any conditions that you want to add 15 to this measure. Some common conditions are NQF 16 endorsement.

17Do not support for rulemaking with18potential mitigation, it's kind of the opposite19of that, you don't support it because there's20some things that are wrong with it, usually the21specifications so we would include that as well.22And then do not support for rulemaking,

which is the staff recommendation, was you just 1 2 don't support it at all for inclusion in the 3 program. 4 MEMBER McGIFFERT: So are we voting on 5 the staff recommendation? CHAIR WALTERS: That's the first thing 6 7 we vote on. That's correct. 8 MS. MARINELARENA: The first thing. So 9 it will be --MEMBER McGIFFERT: And that's what we 10 11 mean by the work group recommendation? MS. O'ROURKE: So the first vote would 12 13 be if you -- sorry. If you want the staff 14 recommendation to become the work group recommendation. 15 16 If -- yes. And just a caveat. If you 17 want to keep discussing, vote no here, even if 18 you think you may eventually agree with the staff 19 recommendation. 20 If you think there's a need for further discussion, vote no. Because that would be the 21 22 end of voting if that reaches 60 percent.

1 CHAIR WALTERS: You want to tee up the 2 voting? So the staff recommendation, again, was do not support for rulemaking. 3 4 MS. QUINNONEZ: Okay. We are now voting 5 for MUC2018-52. And the question reads, do you vote to support the preliminary analysis as the 6 7 work group recommendation. 8 So that's do you accept what the staff's 9 recommendation is? Option one is yes. Option 10 two is no. 11 Can you refresh your browser? It should 12 be unlocked now. Sorry. 13 (Laughter.) 14 MS. OUINNONEZ: You're not in trouble. I promise. 15 16 (Laughter.) 17 CHAIR WALTERS: No, but showing the 18 results while we're voting. But, none of the --19 it's a different MAP. 20 So we talked about the days of when we 21 could hit close votes. And -- we're waiting for 22 one vote to come in, right?

1	MS. O'ROURKE: We yes, most of the
2	numbers work out to a percentage point. So we
3	rounded, I believe, always up to count for the
4	next whole person.
5	MS. QUINNONEZ: I'll read it. You want
6	me to read it out loud?
7	CHAIR WALTERS: Yes.
8	MS. QUINNONEZ: Okay. So the results of
9	the voting were 14 individuals who voted yes, and
10	that is 11 individuals who voted no.
11	Which that actually puts us, we do not
12	move forward. So this goes down at this point.
13	So we'll have to vote on the sections after this
14	individually.
15	CHAIR WALTERS: Now this is where we
16	kind of jot around, and Cristie and I have been
17	talking.
18	We think we heard, if not the staff
19	recommendation, the next category that got a lot
20	of discussion was something in the realm of
21	conditional support.
22	Is that correct? And that condition

almost certainly was NQF endorsement. Is that 1 2 assessment correct or not? Is there anybody in the room who would 3 like to say that they do not believe conditional 4 5 support was the next thing to vote for? We certainly could vote for support if 6 7 you wanted to although I think we're going to run 8 into some problems there with endorsement. 9 So speak up. Yes, Lee? I would propose do not 10 MEMBER FLEISHER: 11 support for rulemaking with potential for 12 mitigation is the next thing if there was -- if 13 we were very close to the -- I think there is 14 uniform interest in this measure and getting it 15 right. 16 And what I heard was that it may be a 17 little further from getting it right. Or more 18 data to get it right. 19 So I would propose we vote on that next. 20 CO-CHAIR UPSHAW TRAVIS: Could staff 21 once again kind of give us your suggestion on how to differentiate between conditional support and 22

do not support with potential for mitigation? 1 2 MS. MARINELARENA: Sure. So the do not support with potential for mitigation would mean 3 that the measure -- there needs to be changes to 4 5 the specifications. You know, and the Methods Panel, based 6 7 on what they looked at, said there were issues 8 with the measure. Right? There were issues with 9 the data. 10 If that's the way you want to go, you could provide some recommendations as to what 11 12 issues you have. Is it risk adjustments? Are there other issues with the measure 13 14 specifications? And then of course, you can 15 include the NQF endorsement. 16 The difference with conditional support 17 for rulemaking could be that the measure as 18 specified is fine, it just has to go through NQF 19 endorsement. 20 CO-CHAIR UPSHAW TRAVIS: But I hate to 21 muddy up the waters, but you know, personally I don't know that I have enough information to say 22

whether the specifications are right or wrong. 1 2 So if I have to make a decision, which I do, between those two categories, if you're 3 4 unclear about the need for it to be re-specified, what do you do? And I'm not telling -- I'm not 5 asking you to tell me how to vote. I'll make 6 that clear. 7 But I'm just trying to weigh it. 8 9 Because I don't really know, you know, since it -- and I don't know whether, you know, I'm 10 thinking of Lindsey's comments. 11 12 It may already have been done. But it 13 hasn't been reviewed by the Methods Panel under 14 its current, you know, specifications even if they have changed. 15 16 So, I'm just -- and does it really -- I 17 mean, I hate to ask it this way, but, is -- tell 18 us the implications of conditional. 19 Because in the past conditional meant 20 that if the -- if the condition is met, it can 21 automatically be put into the program. I mean, our recommendation is that it would 22

automatically. 1 2 Does that still work? 3 MS. O'ROURKE: Sure. Do you want me to 4 try to take some of that? 5 CO-CHAIR UPSHAW TRAVIS: Yes. Please. MS. O'ROURKE: So I think first to start 6 7 with your last point. I would emphasize that MAP 8 is an advisory body to CMS. 9 So nothing would automatically go into 10 the program. That's --11 CO-CHAIR UPSHAW TRAVIS: Right. Okay. 12 MS. O'ROURKE: Again, I think what we 13 were trying to do with these changes, were say 14 that the conditional support, you're ready for the measure to go forward with some changes. 15 16 The do not support is, as you see it 17 currently specified, you're not comfortable with 18 it being implemented. 19 And again, we know there's a lot of gray 20 in between there. So it's probably, you know, to 21 everyone to vote how they feel it's best. 22 We did use it yesterday in the PAC to

capture some concerns about coding, risk 1 2 adjustment exclusion, those types of issues. But in the past we have also used conditional support 3 4 to capture those. 5 And we do pass this feedback on to CMS, to the measure developers, to the Standing 6 Committees that will review the measure for 7 8 endorsement. We don't necessarily need to come 9 up with the full list of change specifications 10 today. 11 But I think just getting a broad flavor 12 of the concerns. And just to make sure that 13 people know we passed that all along and it goes 14 in the report. And we have channels to make sure that 15 16 it's acted upon. 17 CHAIR WALTERS: So we have two choices 18 for voting realistically. Conditional support 19 for rulemaking, and do not support for rulemaking 20 with potential for mitigation. 21 The steward is on the phone, but we're 22 deep in the process now.

1One way to handle this is to march down2the list. You can decide which of the two3categories you want.

If you're not in favor of conditional
support for rulemaking, then I would certainly
suggest a no for that. And then we'll vote for
do not support for rulemaking with potential for
mitigation after that.

9 If you are in support of conditional 10 support for rulemaking, vote yes. And if 60 11 percent of the people support that, then we will 12 not vote on do not support for rulemaking with 13 potential for mitigation.

14 So just as we said, in your minds you 15 have to decide which of those -- since we've 16 eliminated two of the categories, there's only 17 two.

18 Choose which one you like the most. And 19 what we'll do first is vote for the conditional 20 support for rulemaking, just because it's higher 21 up in the list. No special reason on that. 22 MS. QUINNONEZ: Okay. We are going to

1	vote for MUC2018-52. The question reads, do you
2	vote conditional support? And this is for
3	MUC2018-52. Do you vote conditional support?
4	Option A is yes. Option B is no. Okay.
5	CHAIR WALTERS: Results?
6	MS. QUINNONEZ: So it looks like give
7	me one second. So nine individuals voted yes,
8	and 16 individuals voted no.
9	So for percentages, we are at 36 percent
10	voted yes, and 64 percent voted no.
11	CHAIR WALTERS: So now we move on to the
12	next on the list, which is do not support for
13	rulemaking with potential for mitigation.
14	And please don't make me sorry we did
15	this.
16	MS. QUINNONEZ: Okay. We're now voting
17	for MUC2018-52. The question reads, do you vote
18	is your vote do not support for rulemaking
19	with potential for mitigation?
20	Option A is yes. Option B is no. I'll
21	give you a couple more moments to enter your
22	votes. Okay.

Ten seconds and I'm going to lock the 1 2 vote so no one changes. Okay. It looks like all the votes are in. Voting is closed. 3 So for -- it looks like 88 percent voted 4 5 yes, and 12 percent voted no, and those specific counts are we have 22 individuals who voted yes 6 and three individuals who voted no. 7 8 So for those of you that CHAIR WALTERS: 9 have been on the committee for a while, remember when we used to vote on all four measures at 10 11 once? And we've been through all various 12 permutations of this I think you can possibly 13 have. 14 Let us know how you thought, not only for this, but for the rest of the day, how this 15 16 process worked. But the sequential voting on 17 category by category according to the feel of the 18 group is we thought would simplify and shorten 19 the process. 20 Break? 21 CO-CHAIR UPSHAW TRAVIS: Yeah. Oh --22 MS. O'ROURKE: Before I just want to

make sure that we've captured the mitigating
 factors correctly.

3 So from what I was hearing, it sounds
4 like first and foremost making sure the EHR
5 measure can be operationalized and it's feasible.
6 And then asking the measure to be resubmitted for
7 NQF endorsement.

8 And passing along to the Standing 9 Committee to pay close attention to the potential 10 need for risk adjustment or additional exclusions 11 to address some of the concerns that MAP raised.

12 MEMBER McGIFFERT: I'd add to that the 13 issue of eclampsia and preeclampsia that was 14 brought up.

MS. O'ROURKE: Yes. We can highlight
with a particular attention to how to handle
eclampsia and preeclampsia.

18 MEMBER McGIFFERT: And what about 19 getting the Science Panel to review the current 20 data? 21 CHAIR WALTERS: Sure.

MEMBER PHILLIPS: And I was going to

Neal R. Gross and Co., Inc. Washington DC

say, can we add looking at the data that exists 1 2 today from all the states that are doing this? CHAIR WALTERS: 3 Sure. 4 MEMBER NOLAN: And I would say not only 5 the states, but Medicaid as well. I mean, that's more than half the burden in the country. 6 And 7 they do have some kind of measure. 8 CHAIR WALTERS: Nancy? 9 MEMBER FOSTER: So just to expand on the 10 preeclampsia. I mean, the data Lee was quoting 11 were not about preeclampsia although his point 12 was about preeclampsia. 13 But the unintended consequences, I'd never before heard that data. 14 The unintended consequences of the increasing maternal mortality 15 16 are concerning. I would like to make sure they 17 look at that in the available data as well. 18 CHAIR WALTERS: Anna then --19 MEMBER DOPP: One of the other comments, 20 or it was from Shay, didn't believe that this 21 fell under the healthcare associated infections. I don't know if that is a point of consideration 22

to make either.

2	MS. O'ROURKE: We can certainly
3	highlight it that it might be closer related to
4	other meaningful measure areas than infections.
5	CHAIR WALTERS: Okay. Let's take a
6	lunch break. And thank you all for helping us
7	pilot
8	MS. MARINELARENA: Let me just confirm
9	really quickly.
10	CHAIR WALTERS: the voting process.
11	MS. MARINELARENA: So you want you
12	want the measure developer to provide data from
13	the chart abstracted version of the measure? To
14	compare?
15	MEMBER FOSTER: I'm sorry, I'm not sure
16	that it's the measure developer. We were asking
17	for organizations currently collecting the chart
18	abstracted measure to be asked to provide that
19	data.
20	Right? Because Joint Commission may or
21	may not have that.
22	MEMBER PHILLIPS: So in Utah we're

required to report this to the state. There are
 other states that do that. Medicaid, great
 point.

We should look at that data to inform. And have a balancing measure of maternal mortality, infant mortality to make sure that we're assessing that there's not an unintended consequence to the measure.

9 MS. MARINELARENA: Okay. I know the 10 chart-abstracted version is going to be up for 11 review within a year or so. I'm looking at Kate.

12 So we can make that recommendation for 13 that measure. And then we can make the 14 recommendation from the MAP for both different 15 measures as they go through the committee, that 16 you have talked about balancing measures as well, 17 including maternal mortality.

18

Does that satisfy?

19 MEMBER FLEISHER: Well, I think there's 20 a lot of support for a measure that works 21 correctly to reduce C-section rates. So to wait 22 for a year for the review, I mean, it would be great if CMS comes back within the next year with
 this data.

So that we can get a robust measure for 3 public reporting that reduces C-section rates in 4 5 the right population that doesn't increase maternal mortality. That's what I would like. 6 7 And I'm hearing at least people surrounding me say that would be an ideal thing. 8 9 And if we can do it in an electronic measure that's fantastic. 10 11 CHAIR WALTERS: Okay. Okay, go --12 MEMBER BALAN-COHEN: And just one quick 13 comment about like the maternal mortality. So 14 just making sure that the maternal mortality though is for the right population. 15 16 I mean, there are so many other drivers 17 of maternal mortality. I mean, like maternal 18 mortality has been increasing like independently. 19 So just like just putting the data side 20 by side, like an increase in C-section and an 21 increase in maternal mortality, I mean, just making sure that we're looking at the right data. 22

2	So if you're looking at like decreasing
3	C-sections and then like maternal mortality for
4	that specific population, where we've examined
5	the C-section rates.
6	CHAIR WALTERS: Okay. We've got three
7	more measures and lunch. I mean, and the
8	presentation after lunch. So
9	MS. O'ROURKE: Lunch is ready, yeah. Do
10	you want to let people take a lunch? Would
11	people maybe be okay with a working lunch?
12	CHAIR WALTERS: Okay.
13	MS. O'ROURKE: And with the you know,
14	maybe we could take 15 minutes. Get our lunch.
15	Take a little
16	CHAIR WALTERS: Start a working lunch
17	kind of at about 12:30?
18	MS. O'ROURKE: Stretch your legs and
19	then take a little bit of a working lunch.
20	CHAIR WALTERS: Okay. Thank you.
21	(Whereupon, the above-entitled matter
22	went off the record at 12:14 p.m. and resumed at

12:30 p.m.)

ee is
hat's
his
ke
R and
go
tal
nking
nking gest

1	vote, whether it's with a first vote or
2	sequential votes to get to that category and yet,
3	make all the points you want to in support of
4	your recommendation.
5	Let's see who our lead discussants are
6	okay. Want to go over pressure injury?
7	MS. MARINELARENA: Okay, the next
8	measure up for discussion is the pressure injury
9	electronic measure.
10	The staff's preliminary analysis result
11	was conditional support for rulemaking. And the
12	reason for that is this measure is not fully
13	our recommendations are that this measure is not
14	fully tested and it should be submitted to NQF
15	for review and endorsement once testing is
16	complete.
17	The difference between this one and the
18	C-section measure in the recommendations is
19	because NQF has not seen the testing results. We
20	don't know if there's any issues with it at all.
21	Again, just looking at how it fits in the program
22	the recommendation was conditional report and,

again, that it gets submitted to NQF. So that's 1 2 the difference between the two recommendations. So I will turn it over to Ron. 3 4 CHAIR WALTERS: So we'll go through the 5 lead discussants and then, as I did on the last measure, then we'll turn it over to the measure 6 7 stewards to respond to -- public comment -- I'm 8 sorry, we'll go to public comment, then we'll 9 turn it over to the measure developers to respond 10 to any concerns the lead discussants had, then 11 we'll open it up to the committee to express 12 their feedback, and then we'll go back to the stewards and/or CMS in this circumstance to kind 13 14 of wrap everything up as best we can. So the first thing -- we did public 15 16 comment for the IQR at the beginning of the IQR session for all measures. 17 18 Kimberly. 19 MEMBER GLASSMAN: Okay, I'm very excited 20 that after three years I finally get a measure I 21 know something about. 22 (Laughter.)

MEMBER GLASSMAN: So that's exciting. 1 2 So this measure for hospital-acquired pressure injury is being proposed for an eMeasure. 3 The reporting of a hospital-acquired pressure injury 4 5 currently exists, I believe, in the HAC program. So these are already being reported stage 3, 6 stage 4, primarily. 7

8 This now adds stage 2, along with deep 9 tissue pressure injury and unstageable. So, it 10 has the full range of the five descriptors of how 11 we would note someone with a pressure injury.

12 It continues the theme that we would need to note this for all patients who are 13 14 admitted to the hospital and we have a 24-hour period to identify a pressure injury for a 15 16 patient that is coming from another setting, so 17 either being admitted from home or a nursing 18 home. We have to do careful assessment and note if the patient is coming in with something and if 19 20 we don't do that, then we own it.

It's an outcome measure. It's an
important measure for patients and the staff

recommendation was, as Melissa said, conditional support.

I am inclined to support the staff's 3 4 recommendation with a comment and that is, deep 5 tissue pressure injury sometimes can take longer than 24 hours to develop. 6 It can appear as a The bruise could be small visually and 7 bruise. 8 have potentially injury to the tissue down below. 9 So many of the comments on this measure noted that the ability to have a wider window of time 10 11 with which to see if this deep tissue injury is, 12 in fact, real and is going to progress or if it's 13 going to go away might be something to be 14 considered. So because this has not gone through 15 16 testing, as was noted, I guess I have a question, 17 if I'm allowed to ask a question, which is can 18 the testing also include the ability to look more 19 closely at that one particular stage. Two, 20 three, four, and unstageable are quite clear in

21 the definitions. This is the one that there is 22 just a little bit of question around.

1

2

CHAIR WALTERS: So as I understand it, 1 2 the question your asking is is that a substantive 3 change. 4 MEMBER GLASSMAN: Yes, I'm asking if 5 under conditional approval, where the condition is this has to go through more testing, can we 6 7 also add something to be looked at in testing. 8 CHAIR WALTERS: Got it. Okay, well-9 understood. 10 Marty. 11 MEMBER HATLIE: I support the staff 12 recommendation for many of the comments that were 13 just made. The only thing I guess I would add is that there were several comments made. 14 I think there were nine in total and there was just broad 15 16 support from a wide variety of organizations for 17 this measure. 18 CHAIR WALTERS: Jack. 19 MEMBER JORDAN: I also have a fair 20 amount of experience with this in building an 21 internal ECQM on it. So I have three things, 22 actually, to add to the list for them to be

1

looking at as well.

2 One of the things we found in validating measure was that you could not rely on the 3 our nurse checking the box present on admission and 4 we actually used did they start documenting on 5 the injury within 24 hours was a much more 6 7 reliable thing when we were validating it. And 8 at least in the definition you gave us, we 9 couldn't really see that level of discernment in detail. 10

11 The other one is I have mixed feelings 12 on the stage 2 in that should it actually be 13 separated as a separate measure. I think there's 14 wide variation across the country about incontinence-associated dermatitis being 15 16 documented versus stage 2 and I think you get into some issues with inter rater reliability 17 18 kind of challenges there that go away if you 19 either carve out stage 2 as its own thing or 20 exclude it from the measure altogether. And I 21 think looking at that topic is important.

22

And then the other one that happened

Neal R. Gross and Co., Inc. Washington DC

with the billing measure that they have now in 1 2 the HAC penalty is guidance was given to billers, I don't know about 18 months ago, that if a 3 patient came in with an unstageable, there was 4 debridement, and then it's a three or a four, 5 their guidance in the billing was to put that as 6 7 a three or a four not present on admission when, in reality, it was present on admission in 8 9 different from and that actually caused a huge jump in the HAC kind of thing. 10 11 I think it's important here that, and I 12 know I'm thinking in my own electronic record, 13 these are a flowsheet row that that injury should 14 probably be defined as the final stage in its course for the thing versus having that whole 15 16 issue of it changed. 17 And I know at one time they had a 18 measure, it's been dropped now, that was looking 19 at pressure ulcers that did progress and that is 20 extremely difficult to do with an ECOM and I see 21 it's dropped. And the reason is if you put the

staging as a flowsheet row, then the nurses have

Neal R. Gross and Co., Inc. Washington DC

variability in what they document and that drives you nuts. And if you put it as a header row, then it's very difficult to find that change in staging because you don't have kind of a time stamp of it changing. So I know there's some real challenges with this.

7 But that said, I'm wholeheartedly in 8 agreement we need an ECQM on this. I think it's 9 an important thing to do. And so I want to endorse that we move forward with it but make 10 11 sure that we're really trying to fix some of 12 these things and you may have some tweaks in the definition that really can do that. But with 13 14 that said, I wholly support going about it. The developers will get 15 CHAIR WALTERS: 16 to respond in just a little bit. 17 Sean. 18 MEMBER MORRISON: Just I support the 19 staff and nothing to add that hasn't already been

20 said, Ron.

21

1

2

3

4

5

6

CHAIR WALTERS: Thank you.

22 And Lindsey.
So I also agree with 1 MEMBER WISHAM: 2 staff's recommendation and obviously have wise lead discussants -- or fellow lead discussants. 3 4 So I won't cover what they've covered. I do 5 agree that this is best suited for ECOM due to the large population. 6 Okay, I'm going to turn 7 CHAIR WALTERS: 8 this over to either CMS or the Yale people in the 9 room to respond to some of the measure spec changes that might be considered. 10 11 Hi, this is Susannah DR. BERNHEIM: Bernheim from the Yale CORE. I see some future 12 TEP members in our room. 13 14 (Laughter.) DR. BERNHEIM: So thank you for the good 15 16 comments. I'm going to be very brief. 17 I just want to actually update this 18 committee to let you know that we are now just 19 completing two rounds of testing of these 20 So I'm going to consult my notes so I measures. 21 get it right. 22 We do enhanced alpha testing, which is

to say that we do an early stage testing, where 1 2 we have a clinical adjudication to ensure that the harms that are identified are confirmed by 3 4 clinicians looking at the chart and then we do 5 second round of that. For this pressure injury measure, we've now done that in three health 6 7 systems with different EHRs at a total of 25 8 hospitals and we are finding, as we'd hoped, that 9 they are quite feasible, that people are finding them, except for the issue exactly as you 10 11 identified, of being sure that we could track 12 from one location, the same location, the 13 worsening issue, which as you know that we 14 dropped because the testing confirmed exactly what we noted, but that, otherwise, we're finding 15 16 high degree of positive predictive value for what 17 we're finding in the EHR compared to a chart. 18 And we did look at some high-risk 19 patients to ensure that we weren't missing and 20 also found that that was extremely rare.

21 So the measure testing is supporting 22 what you're saying and there's some great things

I	-
1	for us to go back and look in a little more
2	detail at here.
3	CHAIR WALTERS: Okay, other committee
4	comments? Time to raise your cards.
5	MEMBER PHILLIPS: So I had disclosed at
6	the beginning that we are one of the
7	participating organizations in this and when I
8	asked our team about that, just a couple of
9	comments had come up.
10	One, patients can have multiple skin
11	issues, each with varying stages, which I think
12	makes a flowsheet pull or an eMeasure quite
13	challenging.
14	And the measure, I guess some of the
15	technical specification is difficult because the
16	documentation requirements or the specs say every
17	time something is charted by nursing about the
18	ulcer that matters and it is, they thought very
19	cumbersome.
20	So an incredibly important topic in
21	hospital care and their sense was technically not
22	ready for prime time yet for entirely the reason

we're all doing this but thought it was very hard
to do.
CHAIR WALTERS: What is your
recommendation for a category?
MEMBER PHILLIPS: Oh, sorry. I would
support the staff recommendation.
CHAIR WALTERS: And did you have your
card up?
MEMBER GUINAN: Thanks. So a couple of
comments just on the risk adjustment aspect of
the measure. I fully support this being an
important issue to track. I think speaking from
the essential hospitals or safety-net providers
in terms of the complexity of the patients that
they see, both clinically and socially, just
things to consider in terms of a lot of our
members are academic medical centers and have a
lot of folks in the ICU. There is a lot of
complex clinical issues that they're dealing with
that may want to look at whether this measure,
when you're looking between teaching status/non-
teaching status has any unintended consequences,

just based on the number of patients that are in that condition.

The social aspect may be not as direct 3 but frailty comes into play when talking about 4 5 pressure injury. Also nutrition comes into play, so very aware of food and security being an issue 6 7 for a lot of our members in terms of how the patient comes to the hospital. 8 9 And so I just wanted to put that out there in terms of the risk adjustment 10 11 conversation. 12 So my vote would be to not support with 13 potential for mitigating. 14 CHAIR WALTERS: Nancy. I'd actually like to ask 15 MEMBER FOSTER: 16 Jack a question, since you've built your own electronic version of this. It's not the exact 17 18 same measure, I assume, but very close. 19 One of the benefits that has been 20 supposed about the capture of this information in 21 that rapid format is that it will foster greater 22 opportunities for quality improvement and I would

(202) 234-4433

1

2

Neal R. Gross and Co., Inc. Washington DC

www.nealrgross.com

like to know if that's been your experience sort of really addressing issues that appear in the moment.

4 MEMBER JORDAN: Yes, it has been. You know we did have kind of an unreliable process, as you know, filling out an incident report you know when you had a thing. And yes, we find them There's never a miss from that. all now.

9 A number of us in our hospital, we get an email every day with any of these 22 --10 11 they're running you know. So you know yesterday 12 someone documented in a flowsheet a new pressure 13 ulcer and so our wound ostomy nurses can use that 14 every day so that they're on it very quickly. They actually have a report they can run inside 15 16 the record as well for that but they tend to much 17 prefer having the ding, go look at these kind of 18 process.

19 So it has been very helpful in tying up 20 the -- in making things very fast. And then 21 also, you never have any issues of oh, well that was two weeks ago. This got billed and I don't 22

> Neal R. Gross and Co., Inc. Washington DC

1

2

3

5

6

7

remember the patient. You know they are there 1 2 right then and there so you know they're still present. So it has been I think very helpful to 3 really close the loop on those things. 4 5 Is there anybody else CHAIR WALTERS: 6 that would like to comment? Maybe we should have 7 all the measures after lunch. 8 Gayle. 9 MEMBER LEE: I just wanted to ask a question for clarification between the 10 11 categories. So we have the same concerns about 12 the time frame, the 24-hour window and the fact 13 that a pressure ulcer might not immediately show 14 up. 15 So if we were to vote conditional 16 support, would that be something that would be 17 addressed or does it have to be the do not 18 support with the -- you know the other category, 19 I guess. 20 CHAIR WALTERS: Yes and that's why I 21 brought up the substantive change things. It depends on what data they submit and how it's 22

analyzed.

1

2	So if the measure is rewritten and then
3	analytics is supported to substantiate those
4	changes, it could fall in either category but it
5	might be possible to get by as conditional
6	support.
7	I can't tell you because those are
8	decisions made actually at a sub-regulatory
9	level.
10	MS. O'ROURKE: And I obviously can't
11	speak for CMS but when we were designing this
12	category, we tried to align with the CDP around
13	the language for substantive change. But again,
14	the categories aren't meant to be binding and the
15	group has the freedom to vote the way you think
16	it is if you think it's a significant change or
17	if it's something that you'd be okay having it
18	addressed and the measure move forward.
19	Again, it's not always clear and it's to
20	your discretion of what you like the better.
21	DR. BERNHEIM: the way the measure is
22	set up this is just a brief clarification so

that I'm sure people are understanding the way the measure is designed.

Because we're not using claims, we're 3 4 using the electronic record, we are not counting 5 something as a new pressure injury unless the first time that it's documented is after 24 6 So I wasn't sure if there -- I mean there 7 hours. 8 was a lot of discussion with our TEP and in 9 public comment about what the window should be 10 but the general sense was that any pressure 11 injury that is present on admission should be 12 documented within the first 24 hours and so that 13 then it will only kind of be things that show up 14 for the first time after that, you should be 15 largely capturing things that are new. 16 MEMBER FOSTER: So just for

17 clarification, and since you're here, Susannah, 18 did you think about the issues of the academic 19 medical centers that may have more patients who 20 either can't be moved or there is an extreme 21 danger in moving them, those kind of patients who 22 would be perhaps more susceptible to pressure

1

1 ulcers but reasonably so?

2 DR. BERNHEIM: Yes, this was a discussion with our technical expert panel as 3 4 well, and a thoughtful discussion. We spent some 5 time thinking about it. The general sense was that most pressure injuries can and should be 6 7 avoided and that the measure was simpler to 8 implement, which is part of what we're trying to 9 balance here bringing forth these measures and would be supporting the right kind of 10 11 improvements to not complicate it with trying to 12 risk adjust, given the sense from our Technical 13 Expert Panel that these greater stage pressure 14 injuries should be avoided in inpatient 15 hospitals. 16 CHAIR WALTERS: Jack. 17 MEMBER JORDAN: You did bring up a 18 recommended exclusion that made me think of this, 19 Nancy, and that would be ECMO patients are an 20 order of magnitude at more risk. And if you do 21 want to compare hospitals that have some penalty 22 program on it, it would be an unfair disadvantage

to hospitals if you didn't have an exclusion for 1 2 ECMO. If you're just looking for improvement, 3 it's one thing. If you're going to actually do 4 5 comparison, the ECMO is a whole other animal. CO-CHAIR UPSHAW TRAUS: I hate to ask 6 7 this but what is ECMO? 8 Extracorporeal membrane MEMBER JORDAN: 9 oxygenation. CO-CHAIR UPSHAW TRAUS: I knew I would 10 11 regret that. 12 (Laughter.) 13 CHAIR WALTERS: Nancy. 14 MEMBER JORDAN: Yes, it's expanding more 15 and more the uses for it but it's essentially getting oxygen to put back into your blood, other 16 than your lungs. 17 Is that an okay --TEP is never big enough, 18 CHAIR WALTERS: 19 is it? 20 Maryellen. 21 MEMBER GUINAN: I have question more on process in terms of the mitigating category. 22

Last year I know we spoke about sending a measure
 back through the Disparities Committee for review
 as part of kind of the risk adjustment
 conversation. Would that then come under the
 purview of do not support with potential
 mitigating factors?

MS. O'ROURKE: I think that's one you could make that a condition or you could make it a mitigating factor, depending on your comfort with what's in front of you. Yes, it's another one that you could use that type of a caveat either way.

MEMBER GUINAN: Okay. I'm sorry,
follow-up.

So, in that case, then if I made it a 15 16 condition, then it would be a support with the 17 condition of going back to the Disparities 18 Committee but then that could be taken up by CMS 19 as-is, regardless of the decision. Whereas, if 20 it's a do not support with the mitigating 21 component of going through the Disparities Committee, then it's not to CMS. 22

(202) 234-4433

1 MS. O'ROURKE: That's a good way to put 2 it, yes.

You know, at least what we're trying to 3 4 say from the MAP point of view is that you would 5 not want CMS to use the measure as-is without doing that. Again, just to emphasize that the 6 7 input is advisory and not binding in any way but 8 that is the -- you know it's to try to clarify 9 what the recommendations are saying from the MAP 10 perspective. 11 CHAIR WALTERS: Nancy. 12 MEMBER FOSTER: Thank you, Maryellen, because you reminded me of my question, which was 13 14 if we were to recommend that it be conditional support -- if we recommended a condition that was 15 16 CMS look at whether there is an unfair and an 17 inappropriate kind of publication to the public 18 about performance for hospitals that have a lot of ECMO or other patients of that nature, do we 19 20 -- is that a mitigate? Is that -- where are we 21 on that? 22

MS. O'ROURKE: Again, I think you could

probably do it either way. Again, this came up 1 2 in PAC a little bit, so just to give you the history of yesterday, so it's not a great sample 3 4 but they -- when they looked at some of the 5 transfer of health information to the patient, the group had some input for CMS which was a 6 little bit maybe broader than a strict condition 7 8 of how that list would look, and what information 9 would be useful to patients, how you would communicate it. And it was some guidance on 10 11 being very clear about how information gets 12 reported out that I think would be in the domain of what MAP could talk about under the 13 14 conditional support. 15 CHAIR WALTERS: Shannon. 16 MEMBER PHILLIPS: Really questions for 17 nursing colleagues. I think of two things and I 18 think it was touched on a little bit but the expertise for trying to stage pressure ulcers is 19 20 significant and I wonder about bias in that 21 against hospitals who are not part of large health systems or don't physically have on-the-22

ground people who really have certification and 1 2 expertise in this and was there any look at that. And then the second is the opportunity, 3 4 which I, again, have learned about over time, 5 that one notices skin issues and it ends up ultimately being maybe a vascular issue rather 6 7 than a deep tissue injury. And does this measure 8 take into account the fact that this -- what you 9 see from one day to the next or one week to the next may give you a better sense of what the 10 11 underlying cause was and to have that, again, not 12 get in the way. 13

But my nursing colleagues probably could speak to this better but curious about that as it relates to measuring performance in hospitals.

16 CHAIR WALTERS: Yes. So reliability 17 comes up in every Scientific Methods Panel 18 discussion about exactly issues like that and it 19 would be noticed.

20When humans report things, how do you21know that humans are reporting things

22 consistently?

Okay, I'm going to turn it over to 1 2 measure developer to see if there's any other comments they want to make in response to this. 3 Lee, did you flip yours up? 4 MEMBER FLEISHER: I'm just wondering as 5 we talk about it, because in working with the 6 7 Yale CORE, one of the nice things is they were 8 able to get albumin in some of the data sets. 9 Kaisers were working on some of the measures. And some of the future risk adjustments, and 10 that's really the robustness of ECQMs is how do 11 12 we sort of give advice, which may be by me 13 stating this now, that it would be great for you 14 to start looking in subsets of data, where we could even more robustly risk adjust these and, 15 16 therefore, it would be an even better measure. 17 MS. O'ROURKE: Ron, could I make one 18 process concern that --19 CHAIR WALTERS: Yes. 20 MS. O'ROURKE: Or, not concern, but that 21 Lee's question just triggered. I did want to 22 highlight to everyone that the spreadsheet of

decisions is only one deliverable we report out from the MAP conversations. There is also a whole written report that has all of -- a summary of this whole conversation and all of the context that goes along with the group's discussion and how they came to that decision.

So to highlight that you have the
opportunity to make comments like that that might
go outside of the strict recommendation
categories, and that we capture that, and we pass
it along to CMS and to the field broadly.

12 CHAIR WALTERS: Yes. Any last comments? 13 In one form or fashion, then, whether it 14 be with conditions that we're not sure whether they'll go through or not but at least listen to, 15 16 or through conditions that should be added, the 17 staff recommendation, the preliminary analysis 18 recommendation was conditional support for 19 rulemaking. Cristie and I heard that that was 20 generally there were some questions about what 21 conditions could and could not be but, generally, the discussion flavor that we had with outside 22

> Neal R. Gross and Co., Inc. Washington DC

1

2

3

4

5

1 chance that if that -- or I shouldn't say that --2 with the chance that if that does not go through, it might be the category below that, the do not 3 4 support with potential for mitigation. 5 So I believe we'll take a vote on the preliminary analysis of conditional support 6 7 first. 8 MS. QUINNONEZ: Yes, thank you. 9 Voting is now open for MUC2018-107 and 10 the question reads: Do you vote support the 11 preliminary analysis as the workgroup 12 recommendation? And this is for conditional support for 13 14 rulemaking for MUC2018-107. Option A is yes; 15 option B is no. 16 It looks like a couple more votes are 17 coming through. Do you need to reconnect to the 18 WI-FI? Just waiting for one more vote. 19 20 CHAIR WALTERS: Okay, Marty votes yes. 21 MS. QUINNONEZ: Okay, we're going to close the vote. 22

1	On the screen you'll see 87 percent of
2	individuals voted yes so this will be a little
3	higher, and 13 percent of individuals voted no
4	but we will add Marty's vote in there and get our
5	total count.
6	And our count for this measure is 20
7	individuals actually 21 individuals, with
8	Marty's vote, voted yes and three individuals
9	voted no.
10	CHAIR WALTERS: Thank you very much.
11	That was very good feedback given to the measure
12	developer and thank you for your participation.
13	All right, having tested the process,
14	now I'm going to turn it over to Cristie for
15	hypoglycemia.
16	DR. SCHREIBER: Do we have clarity on
17	what the conditions are?
18	CHAIR WALTERS: Tabulate the list there.
19	MS. O'ROURKE: So the one that staff put
20	forward was NQF endorsement. Also hearing some
21	particular concerns that perhaps the Disparities
22	Committee could take a look at this measure.

1 CHAIR WALTERS: ECMO patients. 2 MS. O'ROURKE: ECMO patients. The timing of the 3 CHAIR WALTERS: 4 sequential assessments. 5 MS. O'ROURKE: Sequential assessments. For the record, that's multiple ulcers at the 6 7 same time and how that's handled. 8 I thought this was MEMBER GLASSMAN: 9 tissue injury. 10 MS. O'ROURKE: And a focus on deep 11 tissue injury. 12 CHAIR WALTERS: There was something in 13 there also about competence assessment but I 14 think that might be a whole different measure, 15 actually. I don't know. It's going to come up 16 in our other committee, I know that. 17 Michelle. 18 DR. SCHREIBER: May I just ask the group 19 another point of clarity because Jack raised this as an issue? Is everybody comfortable with it 20 21 including stage 2 pressure ulcers? It's a big 22 change from prior pressure ulcer measures.

That was the first thing 1 CHAIR WALTERS: 2 that was brought up. 3 Sally. 4 MEMBER TURBYVILLE: I just wanted to --5 I voted no because I was going to go for the mitigation but mainly because there were so many 6 7 conditions that were uncovered that some of them 8 may imply specification changes and further field 9 testing and that regardless, supporting the group's decision and deferring to the majority, 10 11 that it's not just about NQF endorsement, that 12 it's actually looking at these conditions and 13 whether or not the measure currently meets them 14 and if not, what changes would have to happen regardless of that kind of committee's decision 15 16 that reviews it for endorsement? They're just 17 too important, the conditions being listed by my 18 colleagues. 19 CHAIR WALTERS: Keith. 20 MEMBER BELLOVICH: I just wanted to 21 offer another additional diagnostic group, being 22 the ESRD with calciphylaxis as another group with

horrible skin conditions that sometimes are 1 2 misinterpreted as decubitus ulceration and is not. 3 4 CHAIR WALTERS: I believe you could 5 stratify this by a whole bunch of things. Have fun. 6 7 CO-CHAIR UPSHAW TRAUS: Okay, well thank 8 you all. 9 Our next measure is MUC2018-109, Hospital Harm for Hypoglycemia. 10 11 This is Madison, for those on MS. JUNG: 12 the phone. I will be giving the overview. So for this measure, the staff's 13 14 preliminary analysis result was conditional 15 support for rulemaking with the rationale that 16 while this measure addresses a gap, it does not 17 address the concerns of the previous MAP 18 Workgroup. This measure was submitted to the MAP 19 Workgroup back in 2013. The previous workgroup 20 had expressed concerns that electronically-21 specified measures -- that this measure is only electronically specified. The concern was 22

because many hospitals still face significant barriers in reporting eCQMs and using them to drive quality improvement.

4 Of note, this measure is based on NQF 5 2363, which is endorsed but this measure here has 6 been re-specified. The re-specified measure is 7 not fully tested and should be submitted to NQF 8 for review and endorsement once testing is 9 completed. And I believe it is due for 10 maintenance in 2019.

11 CO-CHAIR UPSHAW TRAUS: Okay, just one 12 clarification because I know it may impact our 13 thinking on this. I assume the eMeasure with its 14 re-specifications would go through separately from the other measure that is up for 15 maintenance. Is that correct? Okay, so it gets 16 17 its own independent review. Okay, wonderful.

18 All right, well let's go to our lead19 discussants and we can start with Keith.

20 MEMBER BELLOVICH: Thank you for pulling 21 this fish out of dialysate waters and putting me 22 into hypoglycemia. I'm not sure how that

> Neal R. Gross and Co., Inc. Washington DC

1

2

happened but my sympathies to those that have been in the same situation before.

With regard to our initial analysis, it 3 certainly is an important issue about helping 4 patients and avoiding harm to patients that are 5 hospitalized with hypoglycemia. They certainly 6 7 do happen frequently. It's the most common drug event in the hospital in the range of 2.3 percent 8 9 to 5 percent among hospitalized patients is a real consideration and almost 2 percent of these 10 11 patient in the ICU.

12 But there's three steps in this process 13 that give us cause for concern. One is the 14 patient must receive a hypoglycemic agent within a 24-hour period to be considered as part of the 15 16 numerator, a low blood glucose of less than 40, and then a second lab measurement within five 17 18 minutes of the discovery of that low blood sugar. 19 There seems to be some disparities in terms of 20 that previous presentation back in 2014 as part 21 of the endocrine project in that basically a 22 difference between including hypoglycemic

> Neal R. Gross and Co., Inc. Washington DC

1

episodes versus one patient over that entire hospitalization.

1

2

So it seems to be that there is a little 3 disparity between what was initially approved by 4 5 NOF and what is now in this MAP measure. We just need clarification as to making sure that it is 6 7 one patient per hospitalization but out of 8 concern would be the concept that one patient 9 could have multiple episodes and, in fact, they are at higher risk of having adverse events 10 mainly by having one hypoglycemic episode. 11 12 Secondly, the actual value of less than 13 40 is a concern. In fact, the American Diabetes 14 Association has even made recommendations that hypoglycemia as low as 50 or even less than 70 is 15 16 concerning. So even the 40 we're curious as to 17 why we went so low and there's probably some 18 adverse events that are happening that aren't 19 being discovered as well.

20 And then lastly, this second lab 21 measurement within five minutes, I don't know 22 about you around the table, but that seems to be

1	a very complicated process to identify a second
2	measurement while you're supposed to be first
3	addressing the needs of your patient initially.
4	So for these reasons that overall our
5	impressions were to not support this measure.
6	CO-CHAIR UPSHAW TRAUS: Thank you.
7	Richard Knight. He's not here. I
8	didn't think so.
9	Maryellen.
10	MEMBER GUINAN: Great. Full disclosure,
11	I'm an attorney by trade so I'm really out of
12	water here but we'll just go with this.
13	A few things in terms of the measure.
14	One just general comment in terms of eCQMs and
15	resource allocation I think is a concern for a
16	lot of our members because they do operate on low
17	margins. And so kind of where we're signaling to
18	the medical community where to dedicate those
19	resources in terms of having that kind of boost
20	in infrastructure that's really needed for eCQMs
21	is something to kind of take into consideration
22	in terms of this measure specifically.

(202) 234-4433

Also just the range of folks' adoption of eCQMs and their ability to work with vendors and being varied nationally.

The other issue was, to your point, 4 5 Keith, in terms of the kind of multi-step, it was interesting to see the glucometer is usually the 6 7 point of care kind of diagnostic use. And so the 8 switch to then include lab testing seemed to go 9 or run counter to what is currently probably the more cost-effective avenue and actually at the 10 point of care and not adding that what could be 11 12 burdensome or more complicated in terms of the measure itself. 13

14 So and I do also caution in terms of -and again, out of my wheelhouse here, but the 15 16 standard of care being that there could be an 17 unintended consequence that we're causing 18 hyperglycemia by trying to control for 19 hypoglycemia. So just those kind of adverse effects I think we should think more carefully in 20 21 terms of the mitigating side.

And so ultimately, that led me to a not

Neal R. Gross and Co., Inc. Washington DC

22

1

2

support with potential for mitigation for those 1 2 conditions. 3 CO-CHAIR UPSHAW TRAUS: Thank you very 4 much. 5 Shannon. I absolutely won't 6 MEMBER PHILLIPS: 7 repeat but it clinically happens to me regularly. 8 So I guess different from my colleagues, I do see 9 You know narcotics, anticoagulants, and this. antihyperglycemics are the most risky drugs we 10 11 prescribe in hospitals and so I appreciate the 12 fact that there is attention to figuring this 13 out. 14 Forty feels comfortable to me because 70 would have a lot of noise. Maybe 50 would be 15 16 different but what we have to be careful about is 17 if we measure people on something we need to be 18 really sure it's abnormal. And so I appreciate 19 that. 20 As was stated, five minutes after 21 identifying it, you should be tending to a 22 patient and repeat tests might be done to verify

that it is low but you're not stopping to do 1 2 You're actually taking care of the patient that. and so the timing on this measure feels very off. 3 And in fact, if we really want to 4 5 understand the burden of this risk in healthcare, simply saying one event and one admission per 6 patient completely misses the boat on looking at 7 8 safety around these drugs in healthcare. 9 So all that said, I would not support it and I think there are mitigating factors. 10 Ι 11 think it's important to do this. It's just not 12 ready yet. 13 CO-CHAIR UPSHAW TRAUS: So just to be 14 sure I write it down right, do not support with potential for mitigation. Okay, thank you. 15 16 Aisha. 17 MEMBER PITTMAN: I'll be quick. I think 18 I'm aligned with the other lead discussants of 19 not supporting it with mitigating factors. 20 It just wasn't clear to me if it was 21 intended to just solely be lab tests or was 22 including glucometer readings. It says lab tests

1	but not seeing the full specifications. So can
2	the measure developers comment on that?
3	CO-CHAIR UPSHAW TRAUS: Let's finish up
4	with our last lead discussant and then we'll go
5	to the developers.
6	Ann Marie.
7	MEMBER SULLIVAN: I basically agree with
8	everything that's been said. And I think what
9	was most troublesome was the five minutes I think
10	that even timing that becomes a little bit crazy.
11	So I think that that kind of requirement on
12	staff, when you have that, that's particularly
13	difficult. And I agree with everything else
14	that's been said.
15	So basically with the mitigation.
16	CO-CHAIR UPSHAW TRAUS: Thank you.
17	Okay, we'll kind of look to the
18	developers to maybe address some of these issues
19	and I wrote down a few but if you don't address
20	them I'll remind you what they were. So you can
21	go.
22	DR. BERNHEIM: Prefect, thank you. I

wrote them down but I appreciate you keeping me online.

Thank you for the comments. 3 I will say 4 just two -- a few brief things about the status 5 of this measure and some of the concerns. I hope that in better explaining the measure we may be 6 mitigating some of your concerns already. 7 8 So again, this measure was selected 9 because our Technical Expert Panel and patient group felt that it was both important and 10 11 meaningful for patients and that it would be 12 feasible. And our aim is always not to add 13 anything to clinical workflow. So I'm going to 14 start with that five-minute piece because I think 15 it was misinterpreted and I want to be really 16 clear.

What this measure does is it looks at
among patients who have been given
antihyperglycemic medications, or dealing with a
group of patients who are risk of hypoglycemia
based on our actions in the hospital, it
identifies whether a patient's blood sugar goes

1

1 below 40.

2	And you're exactly right, the reason we
3	choose a lower number than some of the guidelines
4	is to make sure that we're really identifying
5	serious hypoglycemia and not spurious events.
6	And the issue of spurious events is
7	where that five minutes come in. This measure
8	does not require you to recheck blood sugar. It
9	simply says if we see in your lab values that you
10	rechecked it in five minutes and it was over 80,
11	then we believe that 40 was spurious. So it's
12	just to prevent us from counting something as
13	serious hypoglycemia when it was not but there's
14	no requirement of a recheck at all.
15	It does bring in both lab values and
16	point of care values. Many of these are done at
17	point of care. So both of those are read.
18	And what we're learning is that this is
19	these labs I mean now I'm using the term
20	lab value which I think is confusing you these
21	blood test results, whether they are done at the
22	point of care or from the lab are the things that

are among the most feasible for hospitals to
 extract, including timestamps. The timestamps
 seem to be pretty good.

So it is not -- there is no work for that five minutes. There is only an opportunity to prevent us from counting something as having been hypoglycemic when it wasn't. So I think those are the most important clarifications.

9 Stay tuned on the concern of a balancing
10 measure. We'll see you next year.

(Laughter.)

4

5

6

7

8

11

12 DR. BERNHEIM: And then the one other 13 thing is that this is, at this point, specified 14 as a one event per patient, either the event occurred or not. And I hear -- and we thought 15 16 about it and we tried to balance the question of 17 sort of do you look for multiple events. The 18 advantage of a single event, if you think that 19 this something that we should try to avoid in all 20 cases, is that there's less data to be extracted once you see that there has been a severe 21 22 hypoglycemic event and there was not an immediate

1 improvement based on suggesting a spurious lab 2 value, you found that event. In some of these measures, we look for numbers of events and I 3 4 think you could argue either way but we did that 5 to keep it as simple as possible. Did I get them all, Cristie? 6 7 CO-CHAIR UPSHAW TRAUS: You got the ones 8 I wrote down. 9 I will say, like the DR. BERNHEIM: other measure, this is now done with two rounds 10 11 of testing with very high positive predicted 12 value and good reliability in those results and 13 it will be going to NQF in January. 14 CO-CHAIR UPSHAW TRAUS: So just to remind everybody, the staff's recommendation was 15 16 conditional support for rulemaking. 17 What we heard from the vast majority of 18 our lead discussants was to not support with 19 mitigating factors and a couple of do not support at all. 20 21 So hopefully this clarification at least gets us on a common foundation in terms of what 22

this measure is and what it is not.

1

7

Are there any additional questions or clarifications? And I probably should have started looking earlier but I'm just going to start with Jack and then go around the room this way. So, Jack.

MEMBER JORDAN: Thank you.

Opposite of the others 8 A couple things. 9 here, I think the five minutes is actually too short. Well one, I know my hospital policy is 10 ten but also if you think the glucometer 11 12 something is wrong with it so you're going to go 13 find another one and come back, you'll flag over 14 the five. Though I can tell you looking at over three million glucose readings in my lifetime 15 16 kind of things with that, that rarely really 17 happens where you get the false positive there.

But that said, the other thing with this that can make this a lot easier to build, and anytime you are using drug class kind of things, to avoid making the definition be a list of a bazillion RxNorm codes and instead to say

contains drug class or sub-drug glass. That's
 ten times easier for someone to build the rule
 and it doesn't have to be maintained every year
 that you build a new list every year for your
 definition of the new list of RxNorm codes.

So that's just something whenever you're doing one of these eCQMs with drugs, it makes the world a lot easier to implement for that.

9 And then I agree on kind of switching to
10 the multiple incidents kind of thing. Our rule,
11 we use 15 minutes and if you have a second one,
12 more than 15 minutes apart, then we count it as a
13 second event.

And I think we have actually done some things where we've had resident kind of studies and such where they look at the recidivist patients and see are there things different there and such. So I think they are kind of something interesting to look at multiples.

20 CO-CHAIR UPSHAW TRAUS: So do you mind 21 sharing with us what you're leaning towards in 22 terms of the decision categories?

6

7

8
I guess the challenge is 1 MEMBER JORDAN: 2 always you know what is kind of agree with it and these kind of things or tweaks that don't count, 3 4 which I would be fine with saying that or saying 5 go back and kind of fix the things. To me, if you changed it from five to 6 7 ten minutes, I don't think that's a substantive 8 change that's like saying you have to go back. 9 The drug class kind of thing, again, that's probably a big deal in one way but, in 10 11 reality, it's kind of a trivial change to it. So 12 I would say I would agree to move forward with it but I think those things could be done but I 13 14 think of them as minor changes. 15 CO-CHAIR UPSHAW TRAUS: Okay, so 16 conditional support? 17 MEMBER JORDAN: Conditional support. 18 CO-CHAIR UPSHAW TRAUS: Okay, that 19 sounds great. Thank you, Jack. 20 Keith. 21 MEMBER BELLOVICH: I just wanted a point of clarification. Was there any thought -- I 22

1	don't want to step on the toes of future MAPs
2	but the concept of unintentional hyperglycemia as
3	a result of erring on the side of no therapy?
4	CO-CHAIR UPSHAW TRAUS: Was that your
5	balancing measure or
6	DR. BERNHEIM: I can't speak to CMS'
7	future intentions but yes, a lot of thought about
8	that. We felt like hypoglycemia was a single
9	instance of hypoglycemia is a much more serious
10	event for patients associated with all kinds of
11	morbidity. And so that was our first focus but
12	there is a lot of thought about the importance of
13	balancing measures.
14	CO-CHAIR UPSHAW TRAUS: And I'm sure our
15	comments can incorporate that as well, Keith.
16	Lee.
17	MEMBER FLEISHER: I guess I'll take up
18	my role from the methodology standpoint. So we
19	actually did get funded by the NIH to do a study
20	of the SCIP measures and glucose levels.
21	Unfortunately, it's never been published because
22	CMS did not renew our data use agreement.

(202) 234-4433

Neal R. Gross and Co., Inc. Washington DC

www.nealrgross.com

1	(Laughter.)
2	MEMBER FLEISHER: Yes and we called
3	Patrick.
4	CO-CHAIR UPSHAW TRAUS: So noted.
5	MEMBER FLEISHER: So we went all the way
6	to the top.
7	But the important interesting question
8	is risk adjustment, which we never thought on
9	process measures that you would need it, but what
10	we found in a national sample was that the
11	incidence of CABG at your local hospital and CABG
12	in diabetics at your local hospital. So while I
13	think this is a fabulous and important measure,
14	that that particular subset of how many CABGs you
15	do and how many CABGs with diabetics change
16	whether or not a hospital is great or really
17	quite poor because essentially in that subset of
18	population, you had wilder swings in their
19	glucose levels from the measurement.
20	So I'm just saying that something
21	this is a conditional with do not but
22	mitigating. So I think if you whether you

∠
subset out that population or look at it, if they
are doing less CABGs, they may look better
because of the attempt to control glucose tighter
in that subpopulation.
CO-CHAIR UPSHAW TRAUS: Thank you, Lee.
We're just going to continue to go down,
if that's okay with you all.
Nancy.
MEMBER FOSTER: So just one note related
to the measure but not about the specifications
in the measure, per se, and that is recently the
FDA put out guidance to blood glucose meter
developers, which may mean some of the things we
currently use in hospitals will no longer be
available to us. If that comes to pass in a time
frame when you would launch this measure, it
would cause strange results to occur, perhaps.
So I just offer that up not as a
deterrent to doing the measure, per se, but as a
timing issue around implementation and to watch
what the FDA is doing.
CO-CHAIR UPSHAW TRAUS: Andreea.

MEMBER BALAN-COHEN: And just building 1 2 up on the comment about risk adjustments, just a suggestion. I like the point that was brought up 3 4 about how there hasn't really been made a 5 differentiation between whether this is an episode like for a patient or like multiple or 6 7 like repeated episodes for a given patient. And 8 it seemed to me that underlying reasons for those 9 would be very different. And then maybe one of the suggestions 10 11 you try to see if you need additional risk 12 adjustment is like maybe comparing you know like 13 how would the data change when you do this like 14 separately. Like if you only look at like one 15 incident versus if you look at like the 16 population or have like multiple incidents and 17 that would give you like some additional 18 information on that. 19 CO-CHAIR UPSHAW TRAUS: Great. Thank 20 you. 21 Okay, any final comments, Susannah?

22 Okay.

1	All right. Well why don't we tee this
2	up the way that our process says, which is to
3	first vote on whether or not we support the
4	preliminary analysis as the workgroup
5	recommendation. And the preliminary analysis was
6	for conditional support on the condition that in
7	the staff analysis is NQF endorsement, correct?
8	It's hard for me to look at million things at
9	once. I apologize. Yes, for conditional support
10	but that was the condition that was attached to
11	it.
12	So we can start with voting for whether
13	or not we approve the preliminary analysis as our
14	formal recommendation.
15	MS. QUINNONEZ: Thank you.
16	Voting is now open for MUC2018-109. Do
17	you vote to support the preliminary analysis as
18	the workgroup recommendation and that was the
19	recommendation of conditional support for
20	rulemaking? Option 1, yes; Option 2, no.
21	Votes are coming in. I'm just looking
22	

I

so I'll give you five more seconds. 1 2 All right. Okay, voting is now closed. So right at this time, we have 63 3 4 percent voted yes and 38 percent voted no. Ι 5 will give you the count so you'll have a specific 6 count for that. For the record, 15 individuals voted yes 7 8 and 9 individuals voted no. 9 CHAIR WALTERS: Yes, so I think -- I was saying Cristie, I heard an awful lot of do not 10 11 support with mitigation possible. 12 So I think that the vote reflects 13 exactly some of the discussion that occurred was 14 there's got to be some conditions. And we talked 15 a lot about some of those risk adjustment ones 16 and about there were some things in the specs. Yes, I can start and 17 MS. O'ROURKE: 18 please feel free to chime in if I missed 19 anything. 20 Some guidance for the developer and the 21 Standing Committee that would eventually be 22 looking at this measure for endorsement, take a

look at that threshold of 40, as well as the five-minute time frame. Also some guidance that it would make this measure more feasible if it focused on drug glass, rather than a list of RxNorms.

Also perhaps some bigger picture 6 7 implementation events -- or as some bigger 8 picture illumination, it would be a balancing 9 measure for hyperglycemia, to keep track of what the FDA is doing around blood glucose meter 10 11 development and to not put this measure into 12 effect at the same time that goes into effect to 13 avoid some unintended consequences.

14And Maryellen's point about EHR vendor15issues and national variability and to make sure16CMS is working closely with the EHR vendors to17minimize the burden, especially on facilities18that may not have as many resources as others.19MEMBER McGIFFERT: And then there in the

20 multiple events.

21 MS. O'ROURKE: And the multiple events 22 oh, and also the risk adjustment model.

> Neal R. Gross and Co., Inc. Washington DC

1

2

3

4

1 CO-CHAIR UPSHAW TRAUS: Okay, that seems 2 to have captured for the record. Okay, that sounds great. 3 All right, well thank you all for that. 4 5 Let's go on and move into our next measure, which gets out of IQR and into the Prospective Payment 6 7 System for PPS -- I'm sorry -- PPS - Exempt 8 Cancer Hospital Quality Reporting Program. 9 We're going to have an overview of that program, and then we will go to public comment, 10 and then we will start with our lead discussant 11 12 on the one measure that we have in this program. 13 MS. JUNG: Great, thank you. 14 So this slide is just giving an overview of the PPS - Exempt Cancer Hospital Quality 15 Reporting Program. Again, this was reviewed at 16 17 the web meeting but just to reiterate, the

18 program type is a quality reporting program. The 19 incentive structure is a PCHQR. It's a 20 voluntary quality reporting program. Data is 21 published on Hospital Compare.

The program goals are to provide

22

information about quality of care in cancer 1 2 hospitals, in particular to the 11 cancer hospitals that are exempt from the Inpatient 3 4 Prospective Payment System and the Inpatient 5 Quality Reporting Program. The other goal is to encourage hospitals 6 and clinicians to improve the quality of their 7 8 care, to share information, and to learn from 9 other's experiences and best practices. This slide displays the recent updates, 10 11 the most recent federal rule to the PCHOR 12 programs. 13 MS. O'ROURKE: Sorry, Madison, to 14 interrupt you. Just to note on the public SharePoint site we do have a spreadsheet that has 15 16 all of the measures in the programs. We know 17 this is not the easiest thing to read. 18 MS. JUNG: Yes, and then there's a 19 version of the slides on the public SharePoint as 20 well for reference. But these measures that had 21 recent updates to the program. And this slide just lists the measure 22

1 that are currently still existing or had no 2 changes in the last rule. The high priority domains that were 3 4 noted: communication and care coordination, 5 making care affordable, person and family 6 engagement. 7 CO-CHAIR UPSHAW TRAUS: Okay, we would 8 like to open it up for public comment on this 9 program. And we can start with people in the 10 room. 11 Anybody in the room want to make a 12 comment? Okay, I don't see any. 13 Operator, could you see if anybody on 14 the phone would like to make a comment, please? 15 OPERATOR: Yes, ma'am. 16 At this time, if you would like to make 17 a comment, please press * then the number 1. 18 And there are no public comments at this 19 time. 20 CO-CHAIR UPSHAW TRAUS: Okay, thank you. 21 So we want to go into the measure that 22 we have before us, which just went away on the

screen but I can probably find it over here.
 There are so many things we have to flip between,
 the screen is helpful.

Surgical Treatment Complications for
Localized Prostate Cancer and it's MUC2018-150.
And if the staff will, give us a summary of the
preliminary analysis.

8 MS. JUNG: So the result of the 9 preliminary analysis was we do not support for 10 rulemaking with potential for mitigation, the 11 reason being that this measure should be revised 12 as recommended by the methods panel and 13 resubmitted to NQF for evaluation and 14 endorsement.

15 CO-CHAIR UPSHAW TRAUS: Can you just 16 point out to us or remind us the MAP -- the 17 Methods Panel discussion that was around this so 18 we have that walking in as to understanding where 19 the preliminary analysis landed?

20 MS. MARINELARENA: Sure, this is Melissa 21 for those of you on the phone.

So this measure was submitted to NQF for

Neal R. Gross and Co., Inc. Washington DC

review in the fall of this year, fall of 2018. It went to the Methods Panel because it is an outcome measure. And the Methods Panel did not recommend it because there were some issues not with the concept of the measure but with the actual testing that was provided to them at the time.

8 In your preliminary analysis we did 9 provide the Methods Panel's very specific As Karen explained this 10 recommendations. morning, the MAP -- or the Methods Panel has 11 12 evolved over the past year. So this measure was 13 discussed over a public telephone call and then 14 the measure developer was provided recommendations. There are recommendations that 15 16 the Methods Panel, overall, would like to see but 17 then very specific recommendations that they 18 provided that would meet NQF criteria.

So it was around their reliability and
their validity testing. They have provided some
face validity testing, some data element validity
testing that just did not meet NQF criteria, just

1

2

3

4

5

6

7

giving them some more specifics about if you're going to do face validity, this is what we are going to need if you're going to do data element. And I believe they are on the phone as well and can provide you some more specifics on what we require for data element validity testing.

7 So we did include their very specific 8 recommendations. So that's why this one received 9 the mitigation because they have to tighten up their specs a little tighter. 10 They have received 11 those recommendations and then they can tell you 12 themselves what they plan to do with the measure. 13 So that's why this received the do not support as 14 it is with mitigation.

15 CO-CHAIR UPSHAW TRAUS: Thank you very16 much.

Well, let's go to our lead discussants
first and then we'll give opportunities for the
developers and others to answer questions and
concerns that may have arisen.
So we'll start with Andreea.

MEMBER BALAN-COHEN: Thank you. So to

Neal R. Gross and Co., Inc. Washington DC

22

1

2

3

4

5

begin with, I do -- we do think that this is a very important measure. There are many things to like about it. This surgical treatment complications for localized prostate cancer are certainly very frequent and something that really matters to patients. So something very important from a patient perspective.

8 I had some concerns about in addition to 9 some of the ones from the Method Panel in terms 10 of like both a little bit conceptually and also 11 in terms of the measurement. And I think that's 12 why I would go with the current staff 13 recommendation, which was not supported with 14 potential for mitigation.

And the concerns that I had were around 15 16 -- one was around like the measurement. So it 17 wasn't very clear whether this is something that 18 is going to be separately reported for different 19 types of surgeries. It seems that minimally 20 invasive versus open surgeries would have very 21 different types of complications. So accounting 22 for that would be important.

1	
1	The other issue was around like the time
2	interval, like the one-year time interval and
3	also the types of complications. Again, not my
4	main area of expertise, per se, but I did do some
5	literature review and it seems that a lot of
6	these complications tend to occur over like a
7	longer time frame, so like between two to four
8	years.
9	And also some of these complications
10	tend to sometimes happen in opposite directions.
11	So you have like a higher prevalence of one like
12	might mean that you won't have the other one.
13	And there might be some other complications that
14	weren't necessarily captured in the measure.
15	So this seems to me like it would be
16	like more maybe better suited as a kind of like
17	almost like index of like complications. So
18	that's something that I think would be
19	interesting to address.
20	And also like a little bit in terms of
21	like the risk adjustment, again, there are
22	different patients that have like different risk

and there are certainly like high-risk like 1 2 prostate cancer patients. And then accounting for that, like there didn't seem to be like a way 3 4 to risk adjust. It seems like that would be 5 important as well. And then finally, this is a very 6 7 specific set of hospitals. There aren't that 8 They are in very specific geographies and many. 9 it would be interesting to see if like some kind of adjustment was made when the data and then 10 11 like in terms of the validity of the data to make 12 sure that it pertains like specifically for these 13 specific geographies. 14 And I will turn it over to my fellow 15 discussants. 16 CO-CHAIR UPSHAW TRAUS: Thank you. 17 Frank. 18 MEMBER GHINASSI: Well that was a very 19 thorough set of recommendations. I agree with 20 all of them. 21 Just a couple of small points. I think the concerns around reliability and validity were 22

really well laid out in the comments and they are of concern to me. A lot of this is not clearly specified and it looks like a lot of questions were left in the minds of the individuals who looked at it. I'm assuming that a rigorous NQF process would ferret out that on the basis of scientific acceptability. So I think that's critical for this.

9 The second thing is I was curious. Ι was curious about the age of 66 and I wondered 10 why that was chosen as the cutoff. And so then I 11 12 went to the American Cancer Society page and it does turn out that that is the arithmetic mean 13 14 for onset but that only accounts for, according to the Cancer Society page, at least, it only 15 16 accounts for six out of ten cases, which means 17 four out of ten happen between 40 and 65. And 18 I'm wondering why the measure would leave out 19 those four out of ten cases by choosing 66. 20

20 So those were the questions I had. And 21 I agree with the recommendation of the counsel. 22 CO-CHAIR UPSHAW TRAUS: Thank you.

> Neal R. Gross and Co., Inc. Washington DC

1

2

3

4

5

6

7

Lee.

1

2	MEMBER FLEISHER: I'll start big
3	picture. I'm totally confused by it's in this
4	program, as opposed to the physician program. So
5	for full disclosure, I am an anesthesiologist to
6	many for many of these cases, more in the past
7	than in the current.
8	But as watching these cases, this is
9	entire this is so much more operator-dependent
10	than system-dependent except for two factors.
11	One is did they buy a robot and what generation
12	robot may or may not influence that. And number
13	two, is how young are their surgeons in both
14	extremes. In other words, do they allow a
15	surgeon who is newer at this? They may be better
16	or an older surgeon may be worse. Do they allow
17	them to operate?
18	So there's technology issues which may
10	he something them are talking shout and them are

19 be something they are talking about and there are 20 surgeon issues.

21 Complications after prostate surgery 22 that are not incontinence and erectile

dysfunction I'd say are the systems issues. This
 is the operator issues. So that's why I got
 confused.

So if you wanted to say in-hospital
complication, I, my hospital, the surgeon can
take credit. So that's I think an overarching -so good measure; different program. Put it for
the surgeons.

9 The second is the number of days. And I find the use of calculating the days out of the 10 year in which somebody experienced this based --11 12 did I get it right -- based upon the claims, is a 13 really surveillance-biased assessment. I mean a 14 yes/no of somebody who is having these problems I could be more comfortable with but because they 15 16 talked about it with one physician who may or may 17 not -- if you have Epic, it's going to carry over 18 to every single encounter, so you're going to get 19 more days than if you are the private doc in the 20 office who is the PMD who might see him one time 21 and mark it down and put it on a code but they 22 might not the next time. So I think that's a

1

very contrived way of assessing.

2 I love days at home. Please change your readmission measures to days at home within 30 3 4 days so you've got it right conceptually. I've 5 been pushing for that. Yes, methodology but this is, I think, the wrong way. 6 7 It's a great measure. Change it. Put 8 it in a different program. So I do not support 9 at all for this program. I don't know if there's a way -- it's a different sort of answer. 10 11 MS. O'ROURKE: I think that that's -- we 12 can capture that all in the report and say that 13 conceptually, the measure is on point and should 14 potentially be put forward for a different program after re-specification to the clinician 15 16 level of analysis. 17 CO-CHAIR UPSHAW TRAUS: Yes and just as 18 a reminder, that is what our job is today is to 19 say whether or not these measures actually work 20 within these programs. So you know they may be 21 good measures and may have value but should it be 22 in this program?

1	So thank you very much for actually
2	bringing this up, Lee.
3	Sarah had to leave early. She let me
4	know. She apologizes.
5	Karen.
6	MEMBER SHEHADE: Yes, the only other
7	point to add I think around refinement would be
8	to look at the open versus MIS versus robotic as
9	three very separate and distinct procedures with
10	different rates of complications. And being able
11	to cull that out I think is important. To
12	cluster all non-open procedures under one header
13	in the old days may have worked but with almost
14	90 percent now being robotic, it may not make
15	sense. So it would be very interesting to see
16	how those pan out.
17	And I agree with the other comments from
18	the lead discussants.
19	CO-CHAIR UPSHAW TRAUS: Which way would
20	lean on the four voting categories?
21	MEMBER SHEHADE: As recommended by NQF.
22	CO-CHAIR UPSHAW TRAUS: Okay, thank you.

Okay, Marisa.

2	MEMBER VALDES: Thank you. So totally
3	out of my element. I never worked in oncology
4	but I haven't read as much about prostate cancer
5	as I did in the last five days.
6	I agree with the NQF assessment. I'm
7	not a statistician. One of the things I like
8	about the methodology is that it works in some
9	scaling that I think it is easier for hospitals
10	to look at. If this were to remain a hospital
11	measure, that is a nice way to look at the
12	methodology, though I'm not a statistician.
13	I don't think this measure, while it's
14	a good measure and obviously this is a very
15	prevalent form of cancer, it doesn't seem to
16	address the gaps in this particular program, as
17	they were on a prior slide.
18	The other thing that I think I agree
19	with all the other comments and the only thing I
20	would add is that in this particular type of
21	complication, maybe patient-reported outcomes
22	would be a better way to get at this particular

So I think the measure developer 1 result. probably should consider. In a lot of the 2 literature reviews that I did to be ready for 3 4 today, talk about that particular method of 5 gathering information about these two 6 complications for patients who have partial 7 prostatectomies. So maybe the measure developer 8 can consider that. 9 And I would agree with the NQF recommendations. 10 11 CO-CHAIR UPSHAW TRAUS: Thank you very 12 much. So we do have with us this afternoon 13 14 Kristen McNiff, who is in the room. And is Tom 15 going to join us by phone? Tom, are you on the 16 line? 17 MS. O'ROURKE: Operator, could you make 18 sure Tom Ross has an open line? His line is open. 19 OPERATOR: 20 MR. ROSS: Good afternoon. CO-CHAIR UPSHAW TRAUS: Oh, hi, Tom. 21 22 MR. ROSS: I'm on the line and also

Corinna Andiel from Memorial Sloan Kettering, 1 2 Chair of the Quality Committee has also joined 3 us. 4 CO-CHAIR UPSHAW TRAUS: Okay, wonderful. 5 So, thank you. I'm going to give you all a few minutes, if you'd like, to kind of give 6 7 an overall response to some of the issues that 8 you've heard. And if for some reason some of 9 them aren't covered, we'll try to bring them back 10 up again. 11 So, thank you. 12 MS. McNIFF: Perfect. Thank you. 13 Again, I'm Kristin McNiff. I'm here today 14 representing the Alliance of Dedicated Cancer Centers, which is a group of the 11 freestanding 15 16 cancer hospitals that are part of PCHQR. So all 17 of the hospitals that report in are part of the 18 Alliance of Dedicated Cancer Centers and that 19 group sponsored development of this measure. 20 And I will get into more of the details 21 but I want to clarify that this measure was developed not specifically only for use within 22

PCHQR and as such, we used national Medicare data 1 2 as the data source for this with SEER, which is based on the Federal Cancer Registry Program 3 4 which is implemented through the states as a 5 testing source and I'll describe why, as we get further into addressing some of your questions. 6 7 So while we are recommending this for 8 use in PCHQR because we think it's important for 9 discriminating outcomes within our own hospitals, 10 there is nothing that would prevent the use of this measure in any other setting, except that we 11 12 tested it at the hospital level. So, I'll put 13 that out there. 14 So we think it's important for us but we do not think by extension that it's not important 15 16 for other providers. 17 So I wish I could go in a logical order 18 but I think I'm going to have to just kind of go 19 backwards from the order of the discussants. And 20 yes, please, keep me honest if I miss anything. 21 So first there was a comment about PRO-22 based measurement maybe being the ideal source

for this measure. We could not agree more. 1 In 2 fact, we are in the midst of a measure-testing project trying to collect this information using 3 PRO-based performance measures. Needless to say, 4 5 there are two barriers to collecting this via One is obviously, the workflow and 6 PRO. implementation challenges of a PRO-based 7 8 performance measure we all know well. And then 9 the second -- which are working to address. The second for this measure specifically 10 is that there is a year between the recommended 11 12 pre-post assessment. So it's a long testing 13 cycle when you have to wait a year even to get 14 your testing data but that is seven, I believe, of our centers currently are working on that 15 16 measure testing projects. We agree that that is 17 ultimately the best way to do this. 18 In the interim, however, using claims in 19 a novel way to try to look at some of these 20 outcomes we think is the way to get us nearer-21 term data that are very useful, we think, and bring no burden associated with its collection. 22

So I'll go backward here. Again, there 1 2 were questions about specifically using the measure for this program and I reiterate that we 3 think it's important for our program but we also 4 5 have tested it in a way that it should be appropriate for any use in any hospital. 6 Aqain, we use the Medicare claims as the data source. 7 8 That's also the reason why age 66 is the cutoff 9 is because Medicare claims is the data source. 10 So there are, obviously, some 11 individuals who are under age 65 who are included 12 in Medicare claims but because they tend to come 13 in because they have ESRD or some other condition 14 that would influence our outcome, we wanted to limit to those who are in Medicare due to age. 15 16 So that's why we have that cutoff. 17 Absolutely, this could be useful to look 18 at in private payer claims as well but that's not 19 the -- you know obviously that's a different 20 specification and testing project. 21 All right, I think I'll keep going and 22 hope I hit them here.

(202) 234-4433

1	There have been several questions about
2	risk adjustment. In this testing, to be clear,
3	one of the things that was really important to us
4	is that we were able to really validate using
5	claims as a data source. Without going into too
6	many details, for oncology it's very challenging
7	to use claims as a data source because there is
8	such limited information in claims related to the
9	cancer itself, the clinical factors that are
10	important for both the prognosis and treatment.
11	So, in claims, there is no information
12	for prostate cancer, for instance, about the
13	stage of disease. There's no information about
14	the grade. All of these things that really are
15	critical for not only the treatment and prognosis
16	but also related to some of these patient-
17	sensitive outcomes as well.
18	So that's why we used a combined SEER-
19	Medicare data set for the testing. SEER, again,
20	comes from the federally mandated and funded
21	Cancer Registry Program, which is implemented
22	through the states. The SEER program collects a

very rich data set of clinical information and 1 2 the federal government provides SEER-Medicare as a linked data set. It's not very identified, 3 which may get to some of the questions that you 4 5 have, but allows you really to look at those combined claims and clinical data at the patient 6 7 level. And as such, we were able to see whether 8 we needed to have clinical richness in order to 9 have a valid measure.

10 So that's why when we were testing we 11 were able to look at things in risk adjustment 12 that really are clinical that aren't usually in 13 claims. If in fact we needed those for risk 14 adjustment, then we would have questioned whether 15 this was a measure that could come from claims 16 alone.

17 It turns out that when we looked at lots 18 of clinically important information for risk 19 adjustment that, actually at the patient level, 20 there were a variety of patient-level factors, 21 covariate, and there were a variety of hospital-22 level covariates that were -- that did

significantly impact outcome but when we tested that at the hospital level, it did not impact. We were very surprised. There actually was no need to risk adjust this measure because the correlation coefficient was 0.96.

And that information was all provided. 6 7 I know it's hard to believe we couldn't -- you 8 know we found it a little challenging but, in 9 fact, that is true that in our data set we did not find the need to risk adjust. 10 So it's not 11 that we didn't test those clinical factors. We 12 did but we didn't need it.

13 I also would like to just make sure that 14 it's clear that we were able, and as part of our validation, we were able to validate that using 15 16 our claims algorithm alone, that we were able to 17 remove almost of all of the advanced prostate 18 cancer patients which we don't want in this measure but that again you can't identify, just 19 based on one ICD-9 or ICD-10 code. 20 So that's 21 included in the testing documentation that 96 or 98 percent of our patients included did in fact 22

> Neal R. Gross and Co., Inc. Washington DC

1

2

3

4

have localized prostate cancer. So we didn't have those advanced stage cancer population included at all.

And then again, beyond that, we did not find that we needed to include stage, grade, or other clinical factors for risk adjustment.

7 Okay, then we had questions about the types of complications. So in the submission 8 materials we included the whole list of the 9 different complications that we tested. We used 10 11 the report ICHOM Localized Prostate Report for 12 the basis for most of the source documentation 13 for this measure. And one of the things that we 14 looked at there is the list of all of the patient outcomes that they included as meaningful. 15

We tested all of them that we could capture in claims. Again, there's quite a long list and the vast majority of the claims that we found were for erectile dysfunction and urinary incontinence. So that really was -- including the rest of them got you a very tiny benefit for a lot of codes that needed to be maintained and

> Neal R. Gross and Co., Inc. Washington DC

1

2

3

4

5

1

that's why we limited it to ED and UI.

2	We also looked at claims days and I'm
3	not sure I want to just make sure that this is
4	clear. You may like or not like this methodology
5	but we looked at the number of claims days that
6	were billed in that time frame prior to the
7	diagnosis and then we looked at the number of
8	claims days that were billed after. So that's
9	the comparison for the numerator so that a
10	patient is really being compared to him or
11	herself.
12	All right. We did not have information
13	about the age of the surgeon. So that is not
14	something that we were able to look at.
15	And then there were a whole variety of
16	questions about the different types of surgery
17	and then I know it came up in our discussion
18	about a recommendation for stratification. So we
19	did look at open versus non-open. I hear the
20	feedback that we may need to refine that further.
21	The data set that we were looking at was
22	2009 to 2013 because that was the most recent

data that was available via using SEER-Medicare as a combined data set. And as this measure moves forward into contemporaneous claims sets, then you could -- I think that's a very good point that we may need to consider breaking it out further.

7 For this measure, again, at the patient level we did see a significant difference between 8 9 type of surgery. When we looked at the hospital 10 level, that difference went away. But we still 11 think for both face validity and for future kind 12 of acceptance and meaningfulness of this measure, that it would be useful information for the 13 14 hospitals who are receiving the data to see their data stratified by surgery type. 15

And so we propose that the measure score that would be used for accountability is the overall score so it's not a true stratification both for the purposes of understanding and being able to find meaning in the measure that actually would be reported broken out by open versus not. So it's not true stratification but it is broken

> Neal R. Gross and Co., Inc. Washington DC

1

2

3

4

5

1	up for the reason of meaningfulness, ultimately,
2	at the point of reporting.
3	Did I miss anything?
4	CO-CHAIR UPSHAW TRAUS: I think you did
5	a pretty good job.
6	MS. McNIFF: Thank you.
7	CO-CHAIR UPSHAW TRAUS: Thank you. It's
8	always difficult to listen and take notes at the
9	same time. So thank you for doing such a good
10	job.
11	Before we move into voting, are there
12	other questions, especially after hearing her
13	response in terms of from the developer's
14	perspective?
15	Dan?
16	MEMBER POLLOCK: Yes, thank you for that
17	great response.
18	I may have missed it but how many
19	patients were included in the sample in which you
20	evaluated potential clinical risk factors?
21	MS. McNIFF: So we started out, again,
22	looking at Medicare claims from 2009 to 2013. At

the highest level, our patient population were 1 2 those with at least two ICD-9 diagnosis codes for prostate cancer and they need to be separated by 3 4 at least 30 days. And we had 347 to 128,000. 5 MEMBER POLLOCK: So those were all the prostate cancer patients that fit the criteria? 6 7 MS. McNIFF: Yes and once we -- so then we added -- and there's -- I don't know what 8 9 documentation you all have but there's the flow Then we looked at those who had 10 diagram. prostate surgery. That did bring the overall 11 12 population down to 25,422. And once we applied, 13 they needed to be 66 and above, survive at least 14 a year, and be continually enrolled in Medicare Fee-for-Service because, of course, we didn't 15 16 have Medicare Advantage in here. We have 15,545 17 patients included. 18 MEMBER POLLOCK: Thank you. 19 CO-CHAIR UPSHAW TRAUS: Shannon.

20 MEMBER PHILLIPS: Thanks. Can I just 21 ask you to clarify again? I appreciated Lee's 22 comment about the difference between is this
really about -- is this a hospital measure or is 1 2 this a measure at the surgeon level? Can you reflect again on why we think 3 4 these complications, which are technical in nature, should be accountable at the hospital 5 level? 6 7 MS. McNIFF: I think one reason is 8 because you are going to have real problems with 9 small ends once you get down to the surgeon I mean, we didn't look at the surgeon 10 level. 11 We looked at the hospital level but even level. so, once you get -- despite me talking about 12 13 looking at Medicare claims, once you are 14 attributing patients to an individual hospital, we set a minimum threshold in order to calculate 15 16 the measure. And at that point, there were --17 and don't hold me to this number and I can get it 18 for you if you'd like to, but maybe 30 percent of 19 the hospitals dropped off because they didn't 20 even have that number of patients. So then if 21 you imagine applying that to a physician instead 22

Neal R. Gross and Co., Inc.

Washington DC

We did look, by the way, at -- I don't 1 2 want to go into it too much but we looked at was there a difference between higher and lower 3 volume hospitals. And actually, there weren't, 4 5 which again, was surprising we didn't see a difference based on volumes, though we felt okay 6 7 about making that distinction of it but I think 8 that's the first challenge is that you wouldn't 9 have sufficient and that for any except the 10 highest volume surgeons.

And then the second is we wanted to -we just wanted to recognize the importance of the team. I mean there may be a whole team involved in providing the support and intervention that prevents these from occurring or minimizes their impact.

17 So since we're counting claims days, if 18 you had one of these -- if you had the issue show 19 up but then it's addressed quickly, that is going 20 to count differently in your numerator than if 21 you have it and it extends and it extends. And 22 we feel that's a reflection of that team. You

1	know it's really a team-based approach.
2	CO-CHAIR UPSHAW TRAUS: Frank.
3	MR. ROSS: Yes, I would like to add from
4	somebody who was a cancer quality director for 24
5	years. Lee had asked the same question. And I'm
6	thinking the hospital investment in the
7	technology, the training, the peer review, you
8	know the medical staff review, the cases all feed
9	into creating the environment, providing the
10	equipment, and the feedback that I do think
11	influences to lend itself as a hospital measure.
12	CO-CHAIR UPSHAW TRAUS: Thank you for
13	that and I'm sorry I didn't hear you earlier.
14	Frank.
15	MEMBER GHINASSI: Just a clarification
16	point. And if you've already answered this,
17	don't feel like you have to answer it again. I'm
18	sure they wrote it down.
19	But since it appears there are a number
20	of different procedures that are being looked at,
21	it mentioned open and closed, it mentions
22	robotic, there is generations of robotic devices,

et cetera, et cetera, is this measure going to be 1 2 looking at those separately or are those all going to be lumped into one measure? 3 So we looked at them as one 4 MS. McNIFF: 5 and then we looked at it as open versus closed. And yes, there are a variety of different 6 surgical types that encodes that MAP up to each 7 8 one of those. 9 Again, since we didn't see hospitallevel difference in the data set we were looking 10 11 at, which is not last year's data set, we 12 recommended that overall measure be reported as one score but then that for informational 13 14 purposes that you are able to see open versus closed. 15 16 I again the feedback that there may need 17 to be additional categories there to be maximally 18 meaningful is important. 19 MEMBER GHINASSI: Yes, the reason I am 20 asking is the purpose of these measures is to 21 increase the likelihood of -- or reduce the 22 likelihood of negative. And so you're wanting

1	this to be actionable.
2	MS. McNIFF: Yes.
3	MEMBER GHINASSI: And if I look at a
4	number that has four, or five, or six procedures
5	in it, I'm not sure I know what to fix.
6	CO-CHAIR UPSHAW TRAUS: Lee.
7	MEMBER FLEISHER: I appreciate it,
8	Michelle, and the CMS team so that I can get some
9	clarity.
10	So if I were to say whether or not Sloan
11	is a good place to go versus I should go to
12	Texas, et cetera, part of that is going to be end
13	up follow-up is how far I'm going to travel. So
14	that's an interesting question about follow-up,
15	which is a further complicating.
16	And I agree that it's the group and it
17	may not be the physician but it's the physician
18	group but if I want to see if Sloan is a good
19	hospital and there is a great surgeon who moved
20	from one hospital to another, that's what's
21	driving this. And maybe it's you have more money
22	to recruit, maybe you don't, but I'm still I

agree with the N and the value of a group of 1 2 I'm still not sure, if CMS is looking surgeons. to measure cancer hospitals, if this is the right 3 4 measure to assess whether cancer hospitals are 5 doing a good job. So what are your goals from the CMS to 6 7 put it into this program? Yes, I don't know if 8 I'm totally clear but I'm fine with rolling it up 9 as a group. 10 DR. SCHREIBER: So I'll give you an opinion. First, as we've heard, it was developed 11 12 by the cancer hospitals because this was 13 something that they felt was important. And my 14 personal answer to your question is it's bull. So I think to use it within the cancer 15 16 hospitals, frankly, to perhaps use it in all 17 hospitals is not unrealistic because hospitals do 18 have some responsibility for this, for their OR 19 staff, for their training, for their training 20 around the da Vinci robots, for their training 21 around their house officers, quite honestly who 22 are doing this. I think there are hospital

1	elements that are very real that play into
2	supporting this being a hospital measure.
3	Do I also think that something like this
4	could be a physician-based measure? Yes, I do
5	but I don't think that necessarily negates it
6	being a hospital measure.
7	CO-CHAIR UPSHAW TRAUS: Thank you for
8	that.
9	Andreea.
10	MEMBER BALAN-COHEN: I was also going to
11	make a plug for having this like perhaps even
12	like in both programs. So certainly I see the
13	appeal of having this like at a physician group
14	level but from the hospital point of view, I
15	think there are like two arguments that have been
16	made. So one is the one that you just mentioned
17	like even for the specific cancer hospitals
18	provide transportation. Maybe not everybody has
19	like specific access to certain types of
20	hospitals. That's one. And also maybe they
21	don't have access to specific physicians and,
22	therefore, having the choice be made at the

1 2 There is also a lot of evidence there is more visibility patients than to choose like 3 hospitals first and sometimes like physicians 4 5 like afterwards, especially for some types of group of patients. Where again, like having some 6 accountability at the hospital level I think 7 8 would be very helpful.

9 The other point there I was going to make is that also making hospitals accountable 10 11 might drive some of these investments. Like I'm 12 sensitive to the point that was made earlier 13 about how maybe it's all moving towards let's 14 like say toward robotic surgery. So maybe all 15 hospitals should be investing in certain types of 16 surgeries and maybe if there is enough evidence 17 that the results really are better for certain 18 types of procedures, then if you see hospitals 19 that are doing better, you are going to try to 20 find out why and make this specific investment. 21 So I think that's an argument in favor of having 22 this at the hospital level.

> Neal R. Gross and Co., Inc. Washington DC

hospital level would be a little bit easier.

1	The other comment I was going to make is
2	about risk adjustment. So one thing that I noted
3	in your comments was about there is a difference
4	at the patient level like in terms of the risk
5	adjustment but not at the hospital level.
6	One thought I had about that one is that
7	it might be driven by selection within hospitals.
8	Maybe certain types of patients are going to
9	specific hospitals and maybe that's why you see
10	some of those effects wash away. It doesn't mean
11	it's not important. Just something to look into.
12	CO-CHAIR UPSHAW TRAUS: Thank you.
13	Lisa.
14	MEMBER McGIFFERT: I just want to
15	reiterate what an important measure this is and
16	to pick up, I can't remember who said it, but the
17	importance of having a patient-reported outcome
18	measure on this and would encourage the
19	developers to create one of those measures to go
20	along with this one. It is probably the number
21	one thing that is feared and experienced by
22	people going through these procedures that really

1 changes their lives.

2 So I think that it's really important. I agree that it does have something to do with 3 the hospital and how the hospital does it 4 5 business but I also would support a physician-6 level measure, too. Thanks. 7 CO-CHAIR UPSHAW TRAUS: Anne Marie. Just to add to that, 8 MEMBER SULLIVAN: 9 I think it's so important as a patient outcome 10 but also as gone over time. And I think that 11 that's very interesting. I think a lot of our 12 measure don't go out that far. Maybe people say 13 it should be more than a year but I think by 14 going to a year, you're getting information you wouldn't get like at two months, or just 15 16 infection rates, or just initial impressions of 17 what's happening post-surgery. 18 So I think that's something important to 19 keep in mind in measures generally that if you're 20 looking -- even if the surgery occurred or the 21 incident, or the hospitalization occurred at a 22 point in time, what are the long-lasting effects

of that? And I think this measure really begins to get into that world of functionality post, not just a few months but actually a year, which I think is really valuable.

5 And then just to say on the issue of hospital versus I think that's a tough one. 6 You 7 know I could say the same thing about caesarians. 8 I could say you know that the doctors -- there 9 are doctors who do lots of caesarians and there's doctors who do very few. You know I think almost 10 11 every procedure, when you're talking about that 12 with surgeons, there's a differential to what 13 surgeons do. And then there's things that happen 14 in the hospital that contribute to the bad 15 effects.

So I think it's good to measure the hospital system, too, because I think that that's where the quality sits and that's where people make their choices about -- you know systems make their choices about what procedures they are going to kind of really have happen or not and who they are going to hire to do things. So I

> Neal R. Gross and Co., Inc. Washington DC

1

2

3

think it's an important hospital measure. 1 2 But I really like the fact that this one went out over time. I think that that's really 3 4 qood. 5 CO-CHAIR UPSHAW TRAUS: Okay. I think everybody with a card up has already spoken. 6 So 7 trying to bring this, I think, to a point now 8 where it's probably time to vote. 9 We'll start where we did before, which was the staff recommendation, which was do not 10 11 support for rulemaking with potential for 12 mitigation. We certainly heard a lot from our lead 13 14 discussants as supporting the staff recommendation. I think we had one that felt 15 16 like perhaps this wasn't the right program for that but I think we have had a discussion around 17 18 that. So clearly thinking about how you want to 19 vote personally, hopefully you found that 20 helpful. So if we want to start with the vote, 21 that would be great. 22

1 MS. QUINNONEZ: Thank you. 2 So we will now be voting for MUC2018-150. And the questions reads: Do you vote to 3 4 support the preliminary analysis as the workgroup 5 recommendation, and that is the recommendation of 6 do not support for rulemaking with potential for mitigation? 7 8 Option A is yes and option B is no. You 9 may enter your votes. 10 Okay, so I will close voting at this 11 time. 12 And the results are 87 percent of 13 individuals agreed yes and 13 percent of 14 individuals voted no. And I will give you a 15 specific count for that. So that is 20 16 individuals who voted yes and three individuals 17 who voted no. 18 CO-CHAIR UPSHAW TRAUS: Okay, that 19 concludes our individual measure work. I want to 20 thank everybody. I think it was very thoughtful. 21 We do owe back after this meeting some feedback on the process that was used. Personally, I 22

1	2
1	thought it was great and much easier than what we
2	tried to navigate last year, in terms of our
3	voting.
4	So I want to thank the team, and the
5	coordinating committee, and whoever else was part
6	of that.
7	MEMBER McGIFFERT: Cristie, before we
8	move on, on this measure, there was a lot of
9	discussion
10	CO-CHAIR UPSHAW TRAUS: Oh, I'm sorry.
11	Thank you for that.
12	MEMBER McGIFFERT: of the major
13	issues and I think while I won't repeat all of
14	them for today, I think there was a robust
15	response from the developer and CMS on this. So
16	we'll make sure to include both the committee
17	discussion and the developer responses to this
18	and make sure that that's relayed to the
19	Coordinating Committee.
20	Because it wasn't, interestingly in this
21	discussion, which was very rich, it wasn't that
22	these were issues that weren't considered. They

were considered and there may be a difference of opinion among how the workgroup considered them vis-a-vis the developer.

CO-CHAIR UPSHAW TRAUS: Thank you. Thank you for that. I appreciate your support in getting that documented as we move forward.

7 So I think what we want to do at this point is we've got two things left to do. We do 8 9 have a public -- actually three -- a public comment period, summarizing what the next steps 10 11 are relative to our work on the measures here, 12 and then we want to circle back on the opioid 13 discussion that we delayed until the end of the 14 meeting. I think it's probably best to do it in that order so that we can kind of close out the 15 16 measure consideration.

17 So I am going to open this up for public 18 comment and would like to see if there's any 19 public comment in the room. None? We used to 20 actually, every now and then, have a little bit. 21 So, Operator, could you see if there's 22 any public comment on the phone, please?

> Neal R. Gross and Co., Inc. Washington DC

1

2

3

4

5

1	OPERATOR: Yes, ma'am.
2	At this time, if you would like to make
3	a comment, please press * then the number 1.
4	And there are no public comments at this
5	time.
6	CO-CHAIR UPSHAW TRAUS: Thank you.
7	I'm going to ask Desi to kind of go
8	through the next steps. We will have one last
9	final opportunity at the end, after our opioid,
10	to be sure we get our thanks in and everything
11	but if you could go through the next steps, at
12	least in terms of the measures.
13	MS. QUINNONEZ: Thank you, Cristie.
14	So the slide that you see before you is
15	just a high-level update of what's going to be to
16	come. So it's not only for hospital but also for
17	PAC/LTC, as well as the Clinician Workgroup. So
18	you'll be able to see things that you can look
19	forward to as we move on.
20	And just to keep this impressed in your
21	mind, PAC had their workgroup meeting yesterday.
22	It was successful. We have almost concluded our

1 Hospital Workgroup meeting. And tomorrow the 2 Clinician Workgroup will be meeting. And just to give you a heads up, in 3 4 January, so that you can keep this on your 5 calendar, the 22nd and 23rd will be the Coordinating Committee meeting. 6 And we will also have to look forward to 7 8 our public commenting period, the second one, and 9 that's going to be, again, on December 21st and it will end on January the 10th. 10 All right, so at this time, I just want 11 to say thank you to Cristie and Ron, our 12 wonderful co-chairs. Thank you for all of our 13 14 workgroup members, and CMS, and all of the 15 developers that have come out and joined us 16 today. 17 And do you want to pause here now to see 18 if you all have anything else to say or do you 19 want to wait for public comment? 20 CO-CHAIR UPSHAW TRAUS: Yes, we're going 21 to go back to the pain but --22 CHAIR WALTERS: Just feel free to let us

know or maybe next year we won't have to make any 1 2 more process changes. Next year might be the first year where we keep the prior year. 3 4 CO-CHAIR UPSHAW TRAUS: Since we're 5 usually the one that finds the fault with the process, I think that maybe this is true. 6 7 CHAIR WALTERS: No, let us know if there 8 is anything that you didn't like or want to see 9 improved upon. CO-CHAIR UPSHAW TRAUS: And of course I 10 would be remiss if I didn't thank the staff for 11 12 all their hard work on the measures, themselves, 13 and getting us to a place where we have the 14 resources we need at our fingertips to actually 15 be ready and prepared for our meetings. So thank 16 you all for that. 17 Okay, I'm going to turn it back over to 18 Michelle for our final presentation. 19 MEMBER WISHAM: So thank you. I know 20 that we've completed the work of looking at the 21 measures and people may have flights and escape early but we did want to take the opportunity to 22

Washington DC

(202) 234-4433

www.nealrgross.com

seek feedback from this committee on what we 1 2 think is now a gap measure, quite honestly, and that's around pain and pain assessment. 3 So there's a slide here, if we can pull 4 it up, please. 5 All of you, obviously, know that we've 6 7 removed the pain questions from HCAPHS because of 8 the concern of the unintended consequences with 9 giving patients opioids and, frankly, leading to 10 an opioid epidemic. And we are considering alternative questions regarding pain to replace 11 12 these, recognizing absolute importance of pain

13 control to patients.

But the question really is before the group components under consideration include addressing sort of a multifaceted approach to pain management because it's obviously not just giving opioids for pain but there are multiple modalities for pain management and a focus on the overall pain management.

21 We'd like to know what other areas CMS 22 should consider or what suggestions and ideas you

I	
1	have. And I do recognize this probably could go
2	on for days and so we'll ask you know to keep us
3	honest with time but we would like feedback
4	really from the group here.
5	CO-CHAIR UPSHAW TRAUS: Okay, are you
6	doing this or me?
7	CHAIR WALTERS: Lee.
8	MEMBER FLEISHER: I'm the
9	anesthesiologist in the room.
10	So it's been very interesting watching
11	what's been happening and, again, we've actually
12	been interviewing patients, a kidney donor and
13	what has happened is they actually are stopping
14	using pain management until post-op day number
15	one because of the opioid crisis. And then when
16	they finally get their relief, they're saying I
17	was really stupid or something to that effect.
18	But they recognize that we're in a difficult
19	situation here.
20	So trying to figure out a balancing
21	measure is going to be really important.
22	The other issue because of my interest

of why I'm coming down next month is the delirium 1 2 issue in hospitalized patients. So what we're doing is we're using multimodal analgesia, things 3 like gabapentin, ketamine, all kinds of other 4 5 drugs which, in the elderly is actually increasing the risk of delirium. 6 In particular 7 ketamine, so that's in my space, increases 8 hallucinations and nightmares, in a large-scale 9 randomized trial.

So I think as you go into this space for 10 the hospital, since we are the Hospital 11 12 Workgroup, I think you should look at delirium 13 and you should look at -- and the hard thing is 14 getting to patient-reported outcomes. The 15 patients are getting -- are not understanding. 16 In fact, we are selling opiate-free care and that 17 may actually be worse than opiate-sparing care.

So I think the right question is did we meet your expectations, which really gets to are hospitals correctly setting their expectations for pain management, not was your pain wellmanaged. So I think that's a huge differentiator

that is really getting to all of Lisa's comments 1 2 about if you want a prom, it's about expectations and then you get both sides of the equation. 3 4 CHAIR WALTERS: Sean. So three quick 5 MEMBER MORRISON: The first is the importance of 6 comments. And there are absolutely no data that 7 language. 8 hospital prescribing of opioids for pain have 9 been associated with quote, unquote, the opioid epidemic in this country. And it's very 10 11 important that that language be A) corrected; and 12 B) CMS does not continue to propagate that 13 because there are absolutely no data on that. 14 And in fact, there are very few data but what we're seeing is you know the unintended 15 16 consequences of that. So that's number one. 17 Number two is the original CMS pain 18 measures actually did not have anything to do 19 There was no recommendation in with opioids. 20 those measures that the appropriate treatment of 21 pain was opioids. That was an interpretation by physicians but there was absolutely nothing --22

1	it's the same as the CDC guidelines that
2	everybody is criticizing. The CDC guidelines say
3	that there is absolutely no reason not to
4	prescribe opioids for people with serious
5	illness, cancer, pain, or who need it.
6	So I think, again, with language in
7	terms of new measures to treat pain, we should be
8	focusing on pain. And linking that to saying oh,
9	these measures led to inappropriate opioid
10	prescribing was a response to hysteria, and a
11	reason to make policy changes, and a quick fix.
12	So again, the second piece around that
13	is language.
14	And the third piece, again, is what is
15	the problem you are trying to fix? If the
16	problem is untreated pain in hospitalized
17	patients, which is what our workgroup is, and we
18	know that untreated pain in hospitalized patients
19	leads to, particularly post-surgery, the
20	development of chronic pain syndromes, it leads
21	to increased sympathetic stress, then A) we
22	should be measuring pain; B) we should be

1

2

3

16

focusing on how it is treated appropriately, rather than simply on the number that it goes down to.

So I would encourage CMS not only to
begin to reassess pain because it is an important
quality measure but with doing that focusing are
appropriate treatments being implemented.

8 And certainly, as Lee said, what we're 9 seeing now is we're seeing the unintended consequences of that, in terms of high incidence 10 11 of delirium, which has adverse consequences, certainly the high probability of chronic pain 12 13 syndromes in the setting of absolutely no data 14 that hospital prescribing has led to the problems we're seeing with opioids in this country. 15

CHAIR WALTERS: Shannon.

MEMBER PHILLIPS: The comments of bothwere wonderful.

I reflect on yes, we need to treat pain
and I think Sean's described the unintended
consequences of that. I also wonder -- I think
the discussions that have happened with the

removal of the measure and the focus on the 1 2 opioid crisis has been really good at our institution. And I wonder if we ought to be 3 4 focused with patients on did we set good 5 expectations. We need to manage the pain when it's there but maybe getting a little upstream. 6 And were you offered, whether in addition to or 7 8 singularly, other ways to manage and control your 9 pain in the hospital so that that is encouraging the wave of there's -- you know it's multimodal. 10 11 It's not simply the drug or the right choice of 12 category of drug but did we present you with what 13 might work for you in your value system and meet 14 you where you are? So those sorts of things come to mind in 15 16 the discussion but I appreciate the other 17 comments so far. 18 CHAIR WALTERS: Jack. 19 MEMBER JORDAN: I think there's another 20 group that all of us across the country I think 21 really tried to change our practice with the 22 opioid-naive person coming for a procedure and

such and have made see change, things that are kind of -- but there are the people who already have addiction problems that are there and I think there is a lot of room for us on a large scale to kind of think through doing that better, you know to have more people that are effectively know how to wean patients.

8 So I think there are room -- well, that 9 goes kind of outside the hospital to more of an outpatient setting but I think that's the next 10 wave of opportunity for us to improve in this. 11 12 So you know I really want to encourage CMS to 13 really thinking about how they can support that 14 effort because I don't think we have the right 15 people out there. You know the poor primary care 16 docs kind of getting this thrown on their back 17 and in many cases there really aren't adequate 18 kind of addiction specialists to help out with 19 this.

20 So I mean it's going to be suboptimal 21 but I think we can do better than what we're 22 doing and I think CMS helping with that would be

> Neal R. Gross and Co., Inc. Washington DC

1

2

3

4

5

6

really important.

1

2 CHAIR WALTERS: Nancy. MEMBER FOSTER: So I want to second what 3 4 everybody has said and particularly, Jack, 5 picking up on your point, this is obviously a very complex problem with a lot of different 6 7 steps that need to resolve it -- need to happen 8 to resolve it.

9 Maybe the part of the problem is when 10 CMS incorporates a measure into a program, 11 particularly a payment program. It suddenly 12 takes on more emphasis than maybe you intended. 13 And so it may not be the ideal time to be 14 thinking in terms of a measure yet, other than I think the patient expectation measure that Lee 15 16 and others have been talking about makes sense so 17 we all know are we getting it right. And once we 18 know we're getting it right, then the question of well what did we do to get it right and how do we 19 20 measure that becomes natural.

And otherwise, I think there's a -because we're a walking a thin line here between

managing pain and creating an ugly problem. And hospitals, other settings of care, docs are all struggling with that right now.

And Sean, I will disagree with you 4 5 somewhat here. Hospitals today are not just the inpatient setting by far and we have a lot of 6 7 opportunity to be better stewards of opioids and 8 many, many are working on that. Jack shared some 9 information with me a little while ago. There 10 are just some great things going on to be better 11 stewards and we need to learn from all of that 12 and make that happen at the same time we're 13 managing pain. Good luck.

CHAIR WALTERS: Marty.

I want to just pile on 15 MEMBER HATLIE: 16 to the comments already made to say this, to make 17 this point. I mean whether it's monotonic 18 consequences, language, different kinds of 19 patients, I mean I'm involved in the Transforming 20 Clinical Practice Initiative, which is ambulatory 21 and we find patients there who are not prone to addiction or don't have substance use issues but 22

1

2

3

14

are having a hard time getting off of really powerful pain killers that they needed for a reason.

1

2

3

4 So there are different kinds of patients 5 and it underscores for me the importance of 6 bringing patient and family engagement into the 7 measurement development process, just to make 8 sure that those inputs are there, especially on 9 an issue like this, which is really complex and 10 really would benefit from that.

And one of the exciting things about the Meaningful Measures Project is that they are doing that. I mean there is just much more emphasis on PFE across CMS programs but I think especially the measurement area. It's exciting to see.

And I have a suggestion, actually, that might be our last 15 minutes but I'd like to see more in the analysis that we get as MAP members of the level of person and family engagement that went into the measurement development that we consider. I don't ever see that really reflected

in the analysis. CMS has mentioned it several
 times today. The panels they have taken this to
 and the input they've gotten is a valuable input
 but it would help me I think give me another
 dimension on the measurement development process
 that we're seeing.

So thank you.

7

8 CHAIR WALTERS: Maryellen -- oh, is that
9 Ann Marie?

10 MEMBER SULLIVAN: I'd just like to say 11 that I agree a lot with what Marty just said.

I think that you know if you're going to do some personalized care, this is probably the area where you really need to pay attention to that. We need to talk to patients about what pain means to them, what they're afraid of when they leave the hospital.

I agree by and large I don't think the use of it after an acute episode in the hospital has caused the opioid epidemic but at discharge, when you're sending people home with prescriptions, and you're telling them how to use the medication, and why to use the medication, that's where you really have -- and it takes time to talk to people about this. You just don't hand them a bottle of pills and say when you have pain, try this.

6 So I think you've really got to talk to 7 the individual what it means to them. Do they 8 have an addiction history of any sort? It makes 9 them probably more likely, even if they are not 10 addicted right now to get addicted if you give 11 them the wrong thing.

You have to have these discussions I think in detail. Think about the ramifications of what is happening and then be very cautious about what you give at discharge, while recognizing that people can be in a lot of pain.

You know and I think there is still an
ease with which it is given at discharge. I just
know from personal experience and friends who
have been in the hospital that if they think
you're not likely, you get kind of a pretty big
prescription for these pain meds without a lot of

Neal R. Gross and Co., Inc. Washington DC

1

2

3

4

discussion about what -- how else maybe you can deal with it.

3	So I'm just saying real personalized
4	care around this, talking with people, offering
5	them other options if they're reluctant or
6	scared. But if they have a low threshold for
7	pain, maybe they do need them but they need to
8	know how to use them. And maybe you need to
9	check in on them, not say here's something for a
10	month but maybe in a week you call and say how
11	many of these have you been taking and that kind
12	of thing. Give them the smaller prescription but
13	then give it to them if they need it.
14	So I think the devil is in the detail of
15	this and I think we just have to pay a lot more
16	attention to how we're prescribing than we have
17	in the past.
18	CHAIR WALTERS: Lisa.
19	MEMBER McGIFFERT: Well, I support a lot
20	of what has been said and I do think bringing in
21	people patients into the discussion is really
22	important. And I would suggest you know

Neal R. Gross and Co., Inc. Washington DC

1

narrowing that even further with people with chronic pain.

A lot of the people I have worked with who have chronic pain have it due to a medical implant, for example, that is in their bodies and they can't get out. So I think that it's important to bring them in.

8 The other things that the group of 9 patients that I talk to regularly have talked about is that some people are being given more 10 invasive treatments as an alternative that can be 11 12 more damaging. And also just generally, that 13 there needs to be more exploration of other ways 14 to manage pain, that the drug is a quick fix, and our system is pretty keen on quick fixes and it 15 16 takes care of the problem.

17 So I think exploring other ways to 18 handle pain is a really important issue and I 19 think it would be a really interesting measure 20 about discharge instructions and things like 21 that. And boy, we need to include dentists. I 22 just I had a couple teeth pulled and I was sent

> Neal R. Gross and Co., Inc. Washington DC

1

1	home with enough opioids to last me for months
2	and that should never happen.
3	CHAIR WALTERS: Lindsey.
4	DR. SCHREIBER: Obviously, all of the
5	comments about patient-centered care ring true
6	and I think just for future consideration I want
7	to bring up that I word, which is
8	interoperability and the fact that pain does not
9	know a specific care setting. And if we're truly
10	looking at person and patient-centered measures
11	around pain, it carries from setting to setting.
12	So again, as we're looking at
13	development of new measures, I think this would
14	be a perfect opportunity to truly try to develop
15	a measure that, again, maybe it has to be tested
16	across all care settings, but something that can
17	be transferrable because that pain travels with
18	the patient, as they go along their journey.
19	CHAIR WALTERS: Dan.
20	MEMBER POLLOCK: Clearly, this is a very
21	complex problem. No single measure really is
22	going to capture all of it so I think it's better

to try to conceptualize this from a number of
 different perspectives.

And it may be helpful to just perhaps 3 place it in context and refer to overuse of 4 5 antibiotics, where there's some real comparability here, and in fact there is some 6 suggestive data geographically that in many of 7 8 the locations around the country where 9 antibiotics are seemingly overused, there is also overuse of opioids. 10

11 To that effect, stewardship, to use the word Nancy used, is really important and 12 13 underdeveloped. And measuring stewardship I think is another dimension to all of this. 14 Measuring and providing metrics for opioid 15 16 prescriptions, including at the point of 17 discharges Ann mentioned. In fact that is one of 18 the major stewardship targets in antimicrobial 19 use now is patients leaving the hospital with extended courses of antibiotics for which there 20 21 isn't a compelling use.

22

So I would say both the antimicrobial

overuse problem and the opioid overuse problem in 1 2 the therapeutic context, or the multifaceted attention that includes measures of the 3 4 indication for use, includes measure of the 5 infectious disease burden, or the pain burden, but also these other dimensions of what's being 6 done to marshal resources more successfully, 7 8 what's being done to measure and provide feedback 9 on the extent to which those resources are being 10 deployed, particularly at critical milestones in 11 episodes of care. 12 CHAIR WALTERS: Andreea. 13 MEMBER BALAN-COHEN: So piling on the 14 comment it seems to me that this is one situation

15 where like maybe an outcome measure might not be 16 ideal. Like here's where the goal, per se, 17 although it's important as we all recognize, it's 18 more like the unintended consequences of all of 19 the affecting factors and that's why you need 20 like a series of like process measures. 21 So not reducing the level of pain but 22 how do you get there? And you know like are you
doing it for specific patients, in which context, 1 2 and for how long. And you know like how many measures were taken? And I would say like that 3 in particular, like maybe with a goal to 4 5 incentivize like other different types of measure for reducing pain, again, like for certain 6 7 specific types of patients was like physical 8 therapy or whatever is appropriate tried first, 9 or maybe a couple of other of these other options as well. 10 11 And certainly also the importance of 12 care coordination and like extending it like 13 beyond the acute setting. 14 CHAIR WALTERS: Frank. MEMBER McGIFFERT: Just echoing some of 15 16 this but just a small additional point. If you 17 do in fact move forward with this, I would 18 recommend you consider involving behavioral 19 specialists in this as well. 20 I think a great example is when you're 21 working with somebody who has a severe anxiety 22 disorder. If as part of your treatment

anxiolytics are involved and that's not cast as 1 2 one step in a very different treatment plan, and that the anxiolytics are put in the context of 3 the eventual goal, which is a behavioral 4 management of the cognitions and behaviors, but 5 feed that anxiety, there is an enormous 6 difference between patients who are given 7 anxiolytics without that as opposed to ones who 8 9 are. It's more work but I think the output is 10 much better. 11 And I think that if you're going to be looking at something, I would recommend 12

13 technologies around motivational enhancement, MI 14 work, and stages of change models that are part 15 of a conversation and measure that, it's labor 16 but I think it's labor that bears the kind of 17 fruit that you're looking at there.

18

CHAIR WALTERS: Sean.

MEMBER MORRISON: I'm sorry but I didn't want to let this go because I have been deeply involved in this multiple times and actually was at a National Academy of Medicine workshop last -

> Neal R. Gross and Co., Inc. Washington DC

(202) 234-4433

But Dan's comment about 1 - two weeks ago. 2 equating this to antibiotic overuse is one that I actually hadn't heard before and is one that I 3 4 would very strongly encourage us to think about. 5 I mean at least the data that about 15,000 people die of prescription opioid-related deaths in this 6 7 country every year, about 25,000 die of resistant 8 antimicrobial infections.

9 And somehow, you know the opioid quote unquote epidemic has sort of eclipsed that but I 10 think these are two issues that we should be 11 12 thinking about very similarly because they are 13 both around probably inappropriate prescribing in 14 the setting of serious medical issues. And I don't think any of us would say that we shouldn't 15 16 be drawing blood cultures or checking urine cultures because we wouldn't want to be 17 18 prescribing antibiotics if we found those. And 19 if you take the analogy to control of pain, what 20 we're saying is we shouldn't be assessing or 21 measuring pain because we might prescribe an opioid if we found it. 22

1	And they are both, you know when you
2	look at the mortality rates, they are both about
3	the same.
4	CHAIR WALTERS: More blood pressure,
5	anything else?
6	Maryellen, close us out.
7	MEMBER GUINAN: Oh, no, I didn't want
8	you to make me have the last word. So someone
9	else say something eloquent afterwards.
10	I think coming from the Essential
11	Hospitals or the Safety Net, and I tip my hat to
12	Michelle at Henry Ford and whatnot, but we very
13	much deal with a patient population and the
14	opioid epidemic is one that we're facing day-to-
15	day in our hospitals and in various amount of
16	ways.
17	And so I think kind of what I have heard
18	here and what we've heard consistently is there
19	is somewhat of a misalignment of incentives. And
20	I know Nancy touched on it briefly in terms of
21	tying payment to patient experience, tying
22	payment to pain management, insofar as measures

being put into payment programs, puts physicians 1 2 in a somewhat difficult position in terms of where they're focus lies or kind of redirecting 3 where their focus should be. And really what we 4 5 want to do is incent the use of proper prescribing guidelines and that's very much along 6 7 the lines of the AMR world and kind of where 8 stewardship has gone. And so I definitely fully 9 support that.

10 And I think the general kind of takeaway 11 that I at least gain from this is flexibility 12 being key in terms of allowing the provider to 13 kind of meet the patient population where they 14 are in terms of in the hospital who they treat in 15 the best way possible.

So for folks in our membership that have offices of opioid safety, they do things in various ways in terms of prescribing patterns or having dashboards for their physicians to see how they prescribe. Others offer up the non-opioid treatment alternatives and that's a whole separate conversation in terms of cost that needs

to be kind of directed towards those non-opioid treatments.

3	But I think the key takeaway there is
4	just the flexibility to not box people in to
5	directing their program or their improvement
6	activities towards a specific measure and
7	allowing flexibility to kind of develop programs
8	where they see is going to have the most
9	meaningful impact on their patient population.
10	So, thank you.
11	CHAIR WALTERS: Thank you. I agree.
12	This might be the biggest issue diagram you've
13	ever seen in your life but people need to be
14	we need to relieve pain. We need to relieve it
15	appropriately. Don't back down from making
16	people not suffer.
17	And all the points that are made are
18	very appropriate. It's a huge system thing.
19	CO-CHAIR UPSHAW TRAUS: There's been a
20	lot of discussion about having measure sets and
21	measuring systems and you know not thinking about
22	this, as someone mentioned earlier, about a

Neal R. Gross and Co., Inc. Washington DC

1

2

particular setting of care. This may be -- well, 1 2 actually somebody -- and I'm really just repeating what somebody else said now that I 3 realize it. This really maybe the opportunity to 4 5 look at that you know where we can look at the issue, regardless of where the patient is and 6 think about it as a measure set and we're 7 measuring a system, which is pain management, 8 9 that goes across all settings. I know that NQF has done some work 10

around opioid stewardship. So I'm not an expert on that document but I would certainly anticipate that there could be value in there. It was really done right after the antibiotic stewardship document and some work around that.

But the other thing is there is a lot, as you all know, there is so much work being done at the state level that is around this and a lot of it regulatory, a lot of it still struggling to figure out what to do within those states that have particular issues relative to opioid abuse. And I think thinking through how CMS

1	could potentially amplify some of the work that
2	is being done at the state level to think about
3	what are some of the best practices that states
4	are identifying that you could bring into your
5	programs so that there could be alignment because
6	the states are addressing this. Whether or not
7	it is effective, I don't know but they are having
8	to deal with it.
9	CHAIR WALTERS: Well, thank you,
10	everyone, for showing up and providing input.
11	And we got 15 minutes back.
12	DR. SCHREIBER: Ron, can I second the
13	thanks?
14	I'd just like to thank everybody, also,
15	first of all for the feedback on all of the pain
16	discussion that we had and for the really very
17	important feedback that you provided us on all of
18	the measures. It really is taken seriously. It
19	does impact rulemaking and we really appreciate
20	kind of the struggles that everybody went through
21	trying to decide what are the right votes, what
22	are the right categories but it's really the

1

discussion that is so meaningful.

So thank you to each and every one of
you and certainly to our co-chairs and, again, to
NQF. Thank you.

5 I just want to jump in on MS. O'ROURKE: the thank you. Thank you to all of the workgroup 6 members for your very insightful conversation 7 8 today. We really appreciate you making the time. 9 Also to our CMS colleagues for all your help in 10 planning and support, to the measure developers for joining and providing such essential input, 11 12 and especially to our co-chairs, Ron and Cristie, 13 for all your guidance and leadership. We 14 appreciate you getting us through this very packed agenda, even though we only had four 15 16 measures --

17 CO-CHAIR UPSHAW TRAUS: It was painless.
18 MS. O'ROURKE: -- and all of your
19 leadership and prep with us ahead of time.
20 Especially, thank you to the Hospital
21 Workgroup Team for all of their hard work.
22 So we can let everyone go and please

keep your eye out for the draft recommendations
that will be out for public comment. And the
Coordinating Committee will meet to finalize
everything January 22nd and 23rd.
(Whereupon, the above-entitled matter
went off the record at 2:44 p.m.)

Α **a.m** 1:9 5:2 99:7,8 A1c 43:22 AAMC 18:11 abbreviated 10:14 ability 85:9 127:14 176:10.18 207:2 able 52:6 56:1 82:9 89:3 93:5,6 94:4 108:7,18 111:18 112:12 135:16 151:12,16,19 196:8 238:10 245:4 246:7 246:11 247:14,15,16 249:14 250:20 256:14 268:18 abnormal 125:22 208:18 above-entitled 99:6 171:21 298:5 **ABPP** 1:15 absolute 271:12 absolutely 56:15 80:13 154:11 172:4 208:6 244:17 274:7,13,22 275:3 276:13 abstentions 87:18 abstracted 105:21 135:6 168:13,18 abuse 42:18 44:12 77:9 295:21 abut 72:22 academic 184:17 189:18 Academy 15:4 290:22 accept 156:8 acceptability 106:8 148:11.19 234:7 acceptance 89:13 250:12 access 4:12 38:7 40:7 40:10 46:5,12,16,18 46:21 48:3,16,18 49:7 49:11 61:13,14 64:15 66:21 67:6 74:8 75:6 77:11 100:5 259:19 259:21 accessibility 47:1,11 47:13,17,19 accompanied 84:10 account 195:8 accountability 48:21 73:8 250:17 260:7 accountable 48:20 57:6 58:4 253:5 260:10 accounting 231:21 233:2 accounts 234:14,16 accuracy 136:13

accurate 135:19.22 accurately 135:17 accustomed 144:17 achieve 57:7 148:13 achieving 69:16 148:9 acknowledge 60:5 70:6 acknowledged 34:14 acknowledging 70:11 ACOG 130:5 132:2 acted 162:16 acting 21:7 action 11:12 56:13 actionable 30:17 66:3 257:1 actionables 66:13 actions 211:21 activities 16:2 38:2,16 39:15 294:6 activity 40:2 41:10 45:10 actual 136:3,13 205:12 229:6 acute 78:11 282:19 289:13 add 19:7 35:20 51:19 57:13 60:15 84:1 85:19.21 95:17 117:6 117:18 131:16 144:4 152:5 154:14 166:12 167:1 177:7,13,22 180:19 199:4 211:12 238:7 239:20 255:3 262:8 added 85:6,7,8 197:16 252:8 addicted 283:10,10 addiction 278:3,18 280:22 283:8 adding 82:20 114:21 133:19 145:2,6 207:11 addition 43:17 45:7 46:2 90:22 231:8 277:7 additional 44:14 60:16 88:12 96:9 98:10 126:17,21 127:6,14 142:7 166:10 201:21 215:2 221:11,17 256:17 289:16 additionally 27:19 address 38:4 41:6 46:19 47:20 49:10 53:14 54:18 55:3 127:5 132:13 146:6 146:11,19 166:11 202:17 210:18,19 232:19 239:16 243:9

addressed 37:12 49:17 62:3 114:15,17 127:2 187:17 188:18 254:19 addresses 125:18 202:16 addressing 4:9 31:1 47:7 66:19 146:17 150:17 186:2 206:3 242:6 271:16 296:6 adds 175:8 adequate 111:7 116:3 278:17 Adjourn 4:22 adjudication 182:2 adjust 48:13 190:12 196:15 233:4 247:4 247:10 adjusted 149:19 adjustment 51:4 116:2 116:4 120:2,4 122:7 122:16 124:12 125:13 126:1,14 128:10 149:10 162:2 166:10 184:10 185:10 192:3 219:8 221:12 223:15 224:22 232:21 233:10 245:2 246:11,14,19 248:6 261:2,5 adjustments 159:12 196:10 221:2 administrator 65:9 admission 73:11 178:4 179:7,8 189:11 209:6 admitted 175:14,17 adolescents 45:11 adoption 207:1 adult 52:2 78:16 adults 43:6 advance 7:16 133:11 advanced 44:7 247:17 248.2 advances 137:4 advancing 31:15 72:11 advantage 213:18 252:16 advantages 151:10 adverse 118:9 147:9 205:10,18 207:19 276:11 advice 196:12 advise 37:16 advisory 161:8 193:7 advocate 11:11 118:5 138:2 affect 24:16 26:4 affiliations 16:21 18:9 affordability 47:1 48:4 affordable 29:15 227:5

afraid 282:16 afternoon 17:11 240:13 240:20 age 120:4 122:7,12 141:17 234:10 244:8 244:11,15 249:13 agencies 65:1,12,14 agency 2:11 20:18 113:4 agenda 6:13 9:16 22:17 33:7 36:3,18 81:3 98:14 297:15 agent 204:14 aggregations 59:20 ago 63:14 107:10 179:3 186:22 280:9 291:1 agree 57:14 59:21 67:1 70:17 76:3,11 79:15 94:10 113:2 117:5,21 120:19 124:6 132:9 138:18 139:22 140:17 144:4 155:18 181:1,5 210:7,13 216:9 217:2 217:12 233:19 234:21 238:17 239:6,18 240:9 243:1.16 257:16 258:1 262:3 282:11,18 294:11 agreed 265:13 agreeing 137:11 140:21 agreement 109:9 117:19 180:8 218:22 ahead 54:15 98:15 103:4 109:20 172:15 297:19 AHIP 30:5 AHRQ 2:12 8:21 19:18 20:18 aim 211:12 Aisha 2:2 32:9,18 144:20,21 152:7 153:13 209:16 albumin 196:8 alcohol 42:20 43:15 46:9 71:12,16 algorithm 84:17 88:15 88:19 247:16 align 29:3 30:2,8 31:13 122:17 188:12 aligned 62:12 105:5 209:18 aligning 172:22 alignment 40:4 296:5 all-cause 43:1 Alliance 1:14,16 3:4,7 11:17 14:16 131:22 241:14,18 allocate 132:21,22

allocation 206:15 allow 37:9 59:20 108:5 108:5 112:6 141:14 151:14 235:14.16 allowed 105:9 176:17 allowing 293:12 294:7 allows 246:5 alpha 181:22 alternative 31:12 78:8 79:6,13,19 80:1 271:11 285:11 alternatives 293:21 altogether 178:20 amaze 69:22 amazing 27:3 ambulatory 18:8 40:15 43:4 44:3,9,15 50:14 55:5 57:18 58:13 71:3 78:11 280:20 Ameera 2:15 36:5,7,9 **America** 62:7 America's 1:17 13:14 30:5 American 1:14,18 14:8 14:14.21 18:10 132:3 205:13 234:12 Amin 2:14 22:9.9 amount 26:21 65:11 103:17 177:20 292:15 **amplify** 296:1 AMR 293:7 analgesia 273:3 analogy 291:19 analysis 40:14,16 44:18 84:14,16 88:15,18 89:7,14 91:13,14 103:19 105:16,17 106:13 112:9 145:20 146:8,10 156:6 173:10 197:17 198:6 198:11 202:14 204:3 222:4,5,7,13,17 228:7 228:9,19 229:8 237:16 265:4 281:19 282:1 analyst 2:15,21 22:2 36:10 analytics 188:3 analyzed 188:1 and/or 56:14 121:19 174:13 Anderson 16:20 Andiel 3:4 241:1 Andreea 2:7 13:18 15:1 16:16 67:13 133:18 220:22 230:21 259:9 288:12 anesthesiologist 235:5

272:9 Anesthesiologists 18:10 Anesthesiology 18:5 animal 191:5 Ann 2:8 13:19 16:17 18:18 76:22 77:3 138:10 140:2 210:6 282:9 287:17 Anna 1:13 14:11 109:19 111:11 147:4 167:18 Anne 262:7 announce 93:22 annual 25:2 100:20 anonymous 96:22 97:4 answer 39:11 53:12,19 125:20 146:7 230:19 237:10 255:17 258:14 answerable 143:4 answered 255:16 antibiotic 291:2 295:14 antibiotics 287:5,9,20 291:18 anticipate 295:12 anticoagulants 208:9 antihyperglycemic 211:19 antihyperglycemics 208:10 antimicrobial 287:18 287:22 291:8 anxiety 289:21 290:6 anxiolytics 290:1,3,8 anybody 61:3 102:13 146:14 158:3 187:5 227:11.13 anytime 215:20 anyway 61:21 138:12 apart 216:12 apologize 222:9 apologizes 238:4 appeal 259:13 **appear** 176:6 186:2 appears 255:19 applicable 23:9 64:3,6 Application 25:1 **APPLICATIONS** 1:3 applied 252:12 apply 45:16 applying 253:21 appointment 47:6 appointments 6:6 appreciate 5:8 7:5 24:1 80:10 96:9 97:20 98:4 146:15 147:2 208:11 208:18 211:1 257:7 267:5 277:16 296:19 297:8,14

appreciated 24:18 252:21 approach 4:8 21:4 37:9 51:8 67:7 81:6 82:22 83:16,18,19 255:1 271:16 approaches 78:8 approaching 139:12 appropriate 34:9 57:2 73:8 95:2 118:17 146:21 172:6 244:6 274:20 276:7 289:8 294:18 appropriately 48:12 132:19 276:1 294:15 appropriateness 42:1 approval 177:5 approve 222:13 approved 39:18 58:14 84:19 88:16 205:4 approximately 112:20 113:1 archives 91:11 area 46:14 47:4 52:9 55:8 69:21 79:15 110:11 121:12 133:21 136:22 150:17 232:4 281:15 282:14 areas 29:20 30:21 31:1 46:4 64:13 67:2 168:4 271:21 arena 46:7 47:3 48:14 64:21 argue 214:4 arguing 148:10 argument 153:2 260:21 arguments 259:15 arisen 230:20 arithmetic 234:13 arrangements 23:5 arrived 107:1 articles 76:12 articulate 96:4 as-is 192:19 193:5 aside 152:15 asked 10:14 16:1 168:18 183:8 255:5 asking 148:12 160:6 166:6 168:16 177:2,4 256:20 aspect 61:10 184:10 185:3 aspects 48:15 assembled 37:19 **assess** 258:4 assessed 75:11 assessing 169:7 237:1 291:20

assessment 45:9 109:7 111:2 158:2 175:18 200:13 236:13 239:6 243:12 271:3 assessments 200:4,5 assigned 97:10 assistance 69:19 92:18 assistant 12:4 associated 116:12 125:6 167:21 218:10 243:22 274:9 **Association** 1:14,15,18 2:4 11:6 14:8,22 32:15 77:21 117:16 205:14 assume 141:1 185:18 203:13 assuming 120:7 234:5 asterisks 64:1,4 67:16 attached 222:10 attempt 67:22 220:3 attention 34:6 64:20 114:9 166:9,16 208:12 282:14 284:16 288:3 attorney 206:11 attributing 253:14 attuned 118:20 automatically 5:21,22 160:21 161:1.9 availability 46:22 47:4,6 available 39:16 167:17 220:15 250:1 avenue 207:10 avoid 213:19 215:21 224:13 avoided 190:7,14 avoiding 204:5 aware 114:4 130:8 154:1 185:6 **Awesome** 94:6 awful 95:6 223:10 В **B** 139:16 164:4,20 198:15 265:8 274:12 275:22

B 139:16 164:4,20 198:15 265:8 274:12 275:22 BA 2:9 babies 118:12 baby 116:17 back 33:12 44:18 49:20 50:3 53:7 63:13 67:12 81:1,5,12 82:19 106:2 113:11 121:21 122:1 128:6 130:7 137:9 139:13 142:6 143:10 152:19 153:10,20 154:4 170:1 172:6

174:12 183:1 191:16 192:2,17 202:19 204:20 215:13 217:5 217:8 241:9 265:21 267:12 269:21 270:17 278:16 294:15 296:11 background 26:6,10 98:3 111:16 backward 244:1 backwards 242:19 bad 5:12 136:6,8 138:4 263:14 badge 8:7 Balan- 15:1 BALAN-COHEN 2:7 15:1 67:14 133:19 170:12 221:1 230:22 259:10 288:13 balance 52:22 190:9 213:16 **balancing** 169:5,16 213:9 218:5,13 224:8 272:20 ball 63:22 **barriers** 49:11 203:2 243:5 based 37:7 45:20 84:17 86:11 88:15,19 89:13 100:22 107:19 140:10 159:6 185:1 203:4 211:21 214:1 236:11 236:12 242:3,22 247:20 254:6 **basically** 39:13 43:2 47:14 51:19 75:4 204:21 210:7,15 **basis** 234:6 248:12 Baylor 2:4 11:22 bazillion 215:22 bear 139:4 bears 290:16 becoming 97:2 beginning 65:15 94:17 118:7 174:16 183:6 begins 263:1 behalf 24:3 31:19 112:14 behavioral 11:7 289:18 290:4 behaviors 290:5 **belief** 44:11 believe 8:15 21:6 26:9 36:13 45:16 50:2 108:12 112:19 119:19 120:11 125:1 126:4 145:22 150:15 151:22 153:10 157:3 158:4 167:20 175:5 198:5

202:4 203:9 212:11 230:4 243:14 247:7 **Bellovich** 1:13 12:8,8 201:20 203:20 217:21 benefit 248:21 281:10 benefits 15:15 185:19 Bernheim 3:6 181:11 181:12,15 188:21 190:2 210:22 213:12 214:9 218:6 best 6:7 29:13 39:16 44:13 57:5 69:15 118:16 161:21 174:14 181:5 226:9 243:17 267:14 293:15 296:3 beta 127:22 better 25:3 27:5 28:13 28:19 39:4 115:3 129:2,18 137:10,14 137:17,20,21 138:7 188:20 195:10,14 196:16 211:6 220:2 232:16 235:15 239:22 260:17,19 278:5,21 280:7,10 286:22 290:10 beyond 58:20 248:4 289:13 bias 194:20 biased 21:7 **big** 6:17 7:18,20 44:5 50:17 68:9 79:10 191:18 200:21 217:10 235:2 283:21 **bigger** 133:17 224:6,7 biggest 57:16 294:12 **billed** 186:22 249:6,8 **billers** 179:2 **billing** 179:1,6 **binding** 188:14 193:7 **birth** 42:9,14 103:9,14 120:9 132:12 bit 9:4 20:3 40:8 60:13 60:22 67:18 68:6 81:15 85:21 86:15 94:11 96:14 98:14 107:12 108:3,9 111:15 115:15 117:10 122:21 134:14 145:19 146:13 171:19 176:22 180:16 194:2,7,18 210:10 231:10 232:20 260:1 267:20 blank 51:14 blend 56:10 blinded 108:1 blocker 127:22 **blog** 81:20

blood 45:8 58:17 118:10 191:16 204:16 204:18 211:22 212:8 212:21 220:12 224:10 291:16 292:4 BMI 43:13 122:13 128:9 board 16:21 17:5,20 119:20 133:5 152:22 boat 209:7 bodies 63:9 285:5 **body** 122:12 161:8 **bonuses** 74:11 **book** 6:6 boost 206:19 **bottle** 283:4 bottom 93:11 **box** 178:4 294:4 **boy** 285:21 brand 108:13 break 98:17,22 165:20 168:6 breaking 250:5 breast 45:6 brief 36:18 43:16 112:3 181:16 188:22 211:4 briefina 81:17 briefly 12:14 41:13 106:20 292:20 bring 121:3 143:10 150:15 190:17 212:15 241:9 243:22 252:11 264:7 285:7 286:7 296:4 bringing 32:7 35:9 65:11 73:4 124:1 152:4 190:9 238:2 281:6 284:20 brings 47:14 broad 39:8 110:11 162:11 177:15 broader 105:11 194:7 broadly 197:11 broken 250:21,22 brought 61:2 72:14 117:1,1 122:7,21 166:14 187:21 201:2 221:3 browser 156:11 **bruise** 176:7,7 **BSN** 1:19 build 52:9 68:15 95:22 96:13 113:18 215:19 216:2,4 building 47:21 177:20 221:1 built 47:2 111:4 134:15 185:16 **bull** 258:14

bunch 202:5 bundles 134:18 burden 27:12,20 28:3 28:22 29:17 30:10,15 31:6 147:18 149:9 167:6 209:5 224:17 243:22 288:5,5 burdens 31:7 burdensome 35:4 207:12 business 17:19 262:5 buy 235:11 С C-118:15 150:20 C-section 103:9 105:15 125:18 148:15 169:21 170:4,20 171:5 173:18 **C-sections** 115:22 118:2 134:5 171:3 **CABG** 219:11.11 CABGs 219:14,15 220:2 Caesarian 132:11 146:18 caesarians 263:7,9 **CAHPS** 43:5 50:13,16 51:21 54:5,11 CAHs 4:12.15 calciphylaxis 201:22 calculate 93:6 253:15 calculating 236:10 calendar 87:21 269:5 California 130:9 131:10 134.1 call 50:20 72:21 82:7 107:18 229:13 284:10 called 219:2 calling 8:18 calls 29:17 cancelled 122:12 cancer 3:4,8 4:16 16:22 17:12 24:9 45:2,3,4,5 45:6 58:17 100:9 172:14 225:8,15 226:1,2 228:5 231:4 233:2 234:12,15 239:4,15 241:14,16 241:18 242:3 245:9 245:12,21 247:18 248:1,2 252:3,6 255:4 258:3,4,12,15 259:17 275:5 **Capitol** 81:17 capture 90:21 96:12 123:5 135:13 136:12 145:10 151:20 162:1

162:4 185:20 197:10 237:12 248:17 286:22 captured 112:21 122:13 142:11 166:1 225:2 232:14 capturing 90:19 123:13 189:15 card 35:11 184:8 264:6 cards 9:5 183:4 care 1:13,16,17,21 11:17 12:9,20 13:6 26:1,9 28:19 29:9,10 29:15 38:7 40:7,10 41:6,7,9 43:4,14 44:1 44:3,7,9 45:13 46:5,6 46:13,18,21 47:5,8 48:4,7 49:8 54:17 55:4,9 56:18 57:18 58:14 59:10 60:6,6,16 64:16 66:21 67:6 71:3 76:19 78:11,12 101:1 101:5 102:5,6,8 117:17 118:17 128:18 150:18 183:21 207:7 207:11,16 209:2 212:16,17,22 226:1,8 227:4.5 273:16.17 278:15 280:2 282:13 284:4 285:16 286:5,9 286:16 288:11 289:12 295:1 careful 51:9 175:18 208:16 **carefully** 207:20 caregivers 27:17 31:3 carries 286:11 carry 236:17 carve 178:19 case 32:4 37:7 39:21 41:2 66:16,17 75:8 78:14 153:19 192:15 cases 75:7 213:20 234:16,19 235:6,8 255:8 278:17 cast 93:9 290:1 casting 93:19 casual 74:1 categories 84:6,8 85:5 85:14 86:16,21 89:22 90:7 94:19 95:15 98:7 109:18 113:10 146:4 154:6 160:3 163:3,16 172:4 187:11 188:14 197:10 216:22 238:20 256:17 296:22 category 86:12 89:19 91:7,11 146:21 157:19 165:17,17

172:21 173:2 184:4 187:18 188:4,12 191:22 198:3 277:12 cause 60:3 129:2 195:11 204:13 220:17 caused 179:9 282:20 causing 207:17 CAUTI 41:15 caution 207:14 cautious 140:18 283:14 caveat 155:16 192:11 **CDC** 2:13 19:17 275:1,2 CDI 41:16 **CDP** 188:12 ceases 69:22 cell 9:7 center 15:2 38:11 54:1 59:11 76:5 centers 2:10,12 3:5,8 20:10 50:18 184:17 189:19 241:15,18 243:15 CEO 12:19 17:18 certain 110:18 116:14 116:14 259:19 260:15 260:17 261:8 289:6 certainly 5:22 55:19 58:1 60:11 61:13 74:18 96:2,6 110:22 132:9 158:1,6 163:5 168:2 204:4.6 231:5 233:1 259:12 264:13 276:8,12 289:11 295:12 297:3 certification 195:1 cervical 45:4 **cesarean** 42:9,14 103:14 cessation 43:10 cetera 256:1,1 257:12 chairing 54:14 **CHAIRS** 1:10 challenge 129:2 146:6 146:11,19 217:1 254:8 **challenges** 46:17,19 78:3 178:18 180:6 243:7 challenging 183:13 245:6 247:8 chance 77:2 198:1,2 change 6:14 50:17,21 60:12 91:18 153:17 162:9 177:3 180:3 187:21 188:13,16 200:22 217:8,11 219:15 221:13 237:2 237:7 277:21 278:1

290:14 changed 9:4 87:8 94:11 108:3,14 141:21 142:11 160:15 179:16 217:6 changes 142:16 159:4 161:13,15 165:2 181:10 188:4 201:8 201:14 217:14 227:2 262:1 270:2 275:11 changing 55:2 180:5 channels 162:15 charge 137:16 charged 46:2 chart 119:3 120:4 121:5 122:8,18 123:9 135:6 140:22 152:11 153:4 168:13,17 182:4,17 chart- 105:20 chart-abstracted 105:22 153:8 169:10 charted 183:17 **CHAUDHRY** 2:15 **Chaudry** 36:8,9,16 38:18,20 39:4 50:1 check 75:7 284:9 checkbox-y 35:5 checking 178:4 291:16 Chicago 12:21 Chief 13:22 20:6 26:15 **child** 50:16 51:22 52:2 52:10 54:2,6,6,10 131:6 childhood 45:11 118:13 children 45:10 50:14.18 78:10 151:3 **Children's** 2:3 32:15 77:20 78:1 117:15 chime 223:18 choice 259:22 277:11 choices 101:5 162:17 263:19,20 choose 163:18 212:3 260:3 choosing 105:11 234:19 chose 27:1 chosen 234:11 chronic 29:12 102:7 118:13 275:20 276:12 285:2,4 circle 267:12 circumstance 174:13 citizens 65:17 claims 55:15 189:3 236:12 243:18 244:7 244:9,12,18 245:5,7,8 245:11 246:6,13,15

247:16 248:17.18 249:2,5,8 250:3 251:22 253:13 254:17 clarification 97:20 135:3 140:4 145:15 153:8 187:10 188:22 189:17 203:12 205:6 214:21 217:22 255:15 clarifications 88:13 213:8 215:3 **clarify** 85:10 89:9 110:20 193:8 241:21 252:21 clarifying 88:9,21 89:2 89:3,6,17 clarity 104:12 146:14 147:1 199:16 200:19 257:9 class 215:20 216:1 217:9 clear 29:22 58:5,6 78:9 93:4 154:7 160:7 176:20 188:19 194:11 209:20 211:16 231:17 245:2 247:14 249:4 258:8 clearer 86:15 87:2 96:15 **clearly** 37:21 48:5,6 56:13 75:16 110:15 234:2 264:18 286:20 clicker 97:11.12 clickers 92:13 clinical 14:13 43:12 104:6 141:12.13 142:1 182:2 184:19 211:13 245:9 246:1,6 246:8,12 247:11 248:6 251:20 280:20 clinically 184:15 208:7 246:18 clinician 26:17 40:16 43:5 44:21 82:4,7 237:15 268:17 269:2 clinician's 49:2 clinician-patient 48:1 clinicians 27:20,22 48:20 49:2,6 56:14 57:17 58:3,7 150:1 182:4 226:7 close 53:1 123:10 129:16 156:21 158:13 166:9 185:18 187:4 198:22 265:10 267:15 292:6 closed 165:3 223:2 255:21 256:5,15 closely 116:19 123:20

176:19 224:16 closer 38:21 116:6 168:3 closing 61:12 clots 118:10 cluster 238:12 **CMS** 2:11 3:10,14,18 4:5 7:1,4 17:8 18:15 19:3,17 23:1,16 24:3 24:15,20 26:5 27:1,5 27:9 28:2,17 30:6,8 31:19 33:15,22 34:13 37:10,16 50:5 56:4,21 63:4,5 64:8 65:12 70:5 74:3 90:20 101:3 101:8 102:3 104:18 104:20 112:16 113:2 113:11 124:13 127:11 127:19 128:13,21 130:19 137:1 143:21 147:17 148:2 153:17 161:8 162:5 170:1 172:6 174:13 181:8 188:11 192:18,22 193:5,16 194:6 197:11 218:22 224:16 257:8 258:2.6 266:15 269:14 271:21 274:12 274:17 276:4 278:12 278:22 279:10 281:14 282:1 295:22 297:9 CMS' 218:6 CMS's 29:7 150:10 co-chair 3:12 7:12 17:17 21:12 22:5.12 31:22 32:20 33:11 35:7,21 38:9 61:5 95:17 99:2 124:21 125:4 130:20 131:2 131:15,21 132:6,8 158:20 159:20 161:5 161:11 165:21 191:6 191:10 202:7 203:11 206:6 208:3 209:13 210:3,16 214:7,14 216:20 217:15,18 218:4,14 219:4 220:5 220:22 221:19 225:1 227:7,20 228:15 230:15 233:16 234:22 237:17 238:19,22 240:11,21 241:4 251:4,7 252:19 255:2 255:12 257:6 259:7 261:12 262:7 264:5 265:18 266:10 267:4 268:6 269:20 270:4 270:10 272:5 294:19

297:17 co-chairs 1:9 5:5 9:15 16:13 21:6 88:20 89:15,19 269:13 297:3,12 co-lead 20:17 coalition 1:20 12:20,21 13:5 code 236:21 247:20 codes 215:22 216:5 248:22 252:2 coding 162:1 coefficient 247:5 cognitions 290:5 cognizant 142:21 Cohen 15:2 collaborative 30:7 32:7 72:13 73:5 74:20 131:9 colleague 49:21 colleagues 19:16 21:5 21:18 51:19 57:13 113:21 194:17 195:13 201:18 208:8 297:9 collect 5:20 243:3 collected 54:7 72:13 collecting 72:19 168:17 243:5 collection 101:3 121:4 139:9 152:2 243:22 collects 121:7 245:22 College 132:3 Colleges 1:18 14:8 colorectal 45:5 coloring 85:19 combine 10:5 combined 245:18 246:6 250:2 combining 54:17 55:9 come 6:18 27:1 28:8 35:18 52:18 53:15 60:15 91:15 106:20 106:21 109:8 114:9 139:13 153:12 154:4 156:22 162:8 183:9 192:4 200:15 212:7 215:13 244:12 246:15 268:16 269:15 277:15 comes 109:1 170:1 185:4,5,8 195:17 220:15 245:20 comfort 192:9 comfortable 137:19 161:17 200:20 208:14 236:15 coming 5:4,8,11 82:12 90:17 109:4 130:8 134:1 142:6 175:16

175:19 198:17 222:21 273:1 277:22 292:10 commence 94:1 comment 4:18,20 51:4 58:22 62:15 65:18 67:15 69:1 70:4 74:22 75:2 79:16 80:16,19 80:21 83:6 87:1 91:19 92:5 102:12,16,18 115:10 120:2 121:18 121:19 126:6 128:14 129:7,11 142:14 150:12 170:13 174:7 174:8,16 176:4 187:6 189:9 206:14 210:2 221:2 225:10 227:8 227:12,14,17 242:21 252:22 261:1 267:10 267:18,19,22 268:3 269:19 288:14 291:1 298:2 commenters 75:5 commenting 91:18 269:8 comments 23:2 24:15 24:18 25:14.14 49:20 59:22 60:17 63:18 74:19 75:15 76:1 77:3 80:10,17 85:19 90:14 90:19,21 91:19 92:2,3 96:1 102:20 103:2 113:18 121:1 125:10 129:5 130:1,14,17 132:7 133:20 135:11 150:5,7,10 152:10 160:11 167:19 176:9 177:12,14 181:16 183:4,9 184:10 196:3 197:8,12 211:3 218:15 221:21 227:18 234:1 238:17 239:19 261:3 268:4 274:1,6 276:17 277:17 280:16 286:5 **Commission** 112:8,12 112:16 131:7 141:19 143:5,6,21 168:20 Commissioner 18:19 **commit** 6:22 commitment 29:6 committed 27:5 28:2 committee 10:4,8 11:14 16:4,7 21:7 22:8,11 25:10 32:6 35:17 42:13 44:6,19 46:2 55:6 56:8 57:10 60:14 72:4 80:6 84:20 87:11 88:16 90:15 92:8

106:22 107:13 121:22 122:2 125:9 146:2 165:9 166:9 169:15 172:5 174:11 181:18 183:3 192:2,18,22 199:22 200:16 223:21 241:2 266:5,16,19 269:6 271:1 298:3 committee's 201:15 Committees 162:7 common 61:1 78:2 118:2 148:2 154:15 204:7 214:22 communicate 194:10 communication 29:11 41:21 42:1 48:2 60:2 102:5 227:4 communities 29:13 57:6 community 47:22 57:9 59:6 206:18 comorbidities 43:21 comparability 121:3 287:6 comparable 74:10 121:9 comparative 78:3.5 compare 79:17 168:14 190:21 225:21 compared 8:11 69:6 182:17 249:10 comparing 221:12 comparison 191:5 249:9 comparisons 42:21 53:7 79:17 compelling 147:10 149:2 153:1 287:21 competence 200:13 complete 173:16 completed 15:22 203:9 270:20 completely 138:18 139:22 149:13 209:7 completing 181:19 complex 82:21 107:18 184:19 279:6 281:9 286:21 complexity 184:14 complicate 190:11 complicated 83:3 206:1 207:12 complicating 257:15 complication 236:5 239:21 complications 124:8 228:4 231:4,21 232:3 232:6,9,13,17 235:21

238:10 240:6 248:8 248:10 253:4 **component** 134:9,15 137:2 192:21 components 271:15 composite 107:19 Comprehensive 16:22 comprised 37:21 computer 25:5 concept 85:10 136:7,8 146:1 205:8 218:2 229:5 conceptual 113:19 114:1 136:19 conceptualize 287:1 conceptually 137:6 146:12 231:10 237:4 237:13 concern 67:19 116:17 196:18,20 202:22 204:13 205:8,13 206:15 213:9 234:2 271:8 concerned 75:18 concerning 167:16 205:16 concerns 67:3 90:21 127:6 141:5 151:11 162:1,12 166:11 174:10 187:11 199:21 202:17,20 211:5,7 230:20 231:8,15 233:22 conclude 49:19 **concluded** 268:22 concludes 19:12 265:19 condition 78:10,17,17 157:22 160:20 177:5 185:2 192:8,16,17 193:15 194:7 222:6 222:10 244:13 condition-by 78:9 conditional 85:15 86:4 95:9 120:16 154:13 157:21 158:4,22 159:16 160:18,19 161:14 162:3,18 163:4,9,19 164:2,3 173:11,22 176:1 177:5 187:15 188:5 193:14 194:14 197:18 198:6,13 202:14 214:16 217:16,17 219:21 222:6,9,19 conditions 118:13 153:10 154:12,14,15 197:14,16,21 199:17

201:7.12.17 202:1 208:2 223:14 conducted 84:14 Conference 1:8 confirm 168:8 confirmed 182:3,14 conflict 16:11 21:2 conflicts 32:16,18 confused 145:19 146:13 235:3 236:3 confusing 89:9 212:20 confusion 86:3,5 146:5 congratulations 6:11 6:17 Congress 81:19 cons 76:9 consensus 87:15 90:17 94:22 109:9 140:13 consent 87:21 consequence 169:8 207:17 consequences 31:7 116:11 117:2 125:19 134:4 142:18 148:9 167:13.15 184:22 224:13 271:8 274:16 276:10.11.21 280:18 288:18 consider 27:14 65:16 184:16 240:2,8 250:5 271:22 281:22 289:18 considerable 7:9 consideration 4:18 7:6 22:19 23:9 55:10 84:5 100:1.10 121:19 124:14 167:22 204:10 206:21 267:16 271:15 286:6 considerations 134:19 considered 55:21 63:3 99:19 100:7 176:14 181:10 204:15 266:22 267:1.2 considering 62:19,20 144:1 271:10 consistency 84:7 consistent 96:5 consistently 195:22 292:18 constructed 73:15,19 125:14 consult 18:14 181:20 consultant 19:8 22:10 consumer 11:12 118:5 126:7 152:15 consumers 54:19 101:4 129:12 contacts 17:8

contains 216:1 contemporaneous 250:3 content 13:3 **CONTENTS** 4:1 context 72:5 197:4 287:4 288:2 289:1 290:3 continually 252:14 continue 30:2 50:6 91:15 121:13 133:16 139:17 143:9 145:6 220:6 274:12 continued 28:17 continues 63:17 116:21 123:22 175:12 continuing 29:3 64:8 continuum 62:3 contraceptive 45:12 **contract** 18:16 Contractor 3:16 contractors 24:21 contracts 19:3 112:17 contradictory 62:6 contraindication 128:2 contraindications 128:4 contribute 263:14 contrived 237:1 control 2:12 20:11 44:1 49:2,6 57:20 58:6,7 86:10 207:18 220:3 271:13 277:8 291:19 **controlling** 45:8 58:17 convened 82:16 **convenes** 25:4,6 convening 24:19 conversation 185:11 192:4 197:4 290:15 293:22 297:7 conversations 9:18 108:8 197:2 conversion 148:10 convey 124:3 coordinated 64:22 coordinating 22:8,10 84:20 88:16 90:15 92:8 266:5,19 269:6 298:3 coordination 29:11 40:4 41:8 60:7,16 102:6 227:4 289:12 copies 101:22 core 3:6 19:8 30:6 32:6 37:14 38:3 39:15 40:11,12 50:7,9 52:19 54:2,6,13 56:22 61:18 66:20,21 131:6 137:1

181:12 196:7 Corinna 3:4 241:1 **corner** 172:9 Corporation 12:12 correct 90:9,10 105:8 112:10 155:7 157:22 158:2 203:16 222:7 corrected 274:11 correctly 110:10 166:2 169:21 273:20 correlation 122:11 247:5 cost 46:6 118:14 132:20 134:14 293:22 cost-effective 207:10 costs 48:5,8 counsel 234:21 counseling 43:16 45:9 count 87:19 157:3 199:5,6 216:12 217:3 223:5,6 254:20 265:15 counter 207:9 counting 189:4 212:12 213:6 254:17 country 51:14 52:21 77:11 119:8 132:13 133:6 167:6 178:14 274:10 276:15 277:20 287:8 291:7 counts 165:6 couple 5:7 16:3 17:20 32:3 39:14 44:2 54:21 60:1 62:16 71:20 72:9 81:20 109:3.15 115:14 132:7 164:21 183:8 184:9 198:16 214:19 215:8 222:22 233:21 285:22 289:9 course 6:3 29:14 91:5 95:7 123:17 131:7 159:14 179:15 252:15 270:10 courses 287:20 covariate 246:21 covariates 246:22 **cover** 181:4 coverage 77:5 covered 67:2 181:4 241:9 **CPHQ** 2:17 crappy 137:13 crazy 210:10 create 118:8 138:6 261:19 creating 37:15 255:9 280:1 creation 62:15

credit 236:6 crisis 272:15 277:2 Cristie 1:9,11 5:5 7:11 9:22 16:14,15 17:18 23:22 32:8 34:10 87:5 91:3 94:13 113:17 130:19 157:16 197:19 199:14 214:6 223:10 266:7 268:13 269:12 297:12 criteria 40:17 41:1,5 45:18 84:18,19 85:3 115:8,9 116:14,22 117:3 132:21 146:3 154:7 229:18,22 252:6 critical 4:12 75:5 100:5 114:19 234:8 245:15 288:10 criticizing 275:2 cross-cutting 40:21 41:3 43:18 52:4 crossed 5:10 cull 238:11 cultures 291:16.17 cumbersome 183:19 curious 34:11.16 73:16 78:21 127:4 195:14 205:16 234:9,10 current 37:1 50:7 83:22 127:7 160:14 166:19 231:12 235:7 currently 44:16 85:12 112:21 161:17 168:17 175:5 201:13 207:9 220:14 227:1 243:15 curtain 22:13,14 cusp 53:11 cutoff 234:11 244:8,16 cycle 108:12 243:13 D **D.C** 1:9 **da** 258:20 damaging 285:12 Dan 2:12 19:17,19 20:9 142:13 251:15 286:19 Dan's 291:1 danger 189:21 dashboards 293:19 date 136:11 DaVita 12:11 day 4:21 6:4 8:13 20:11

deal 30:17 51:18 55:15 80:4 128:20 217:10 284:2 292:13 296:8 dealing 116:16 184:19 211:19 deaths 291:6 debate 42:10 **Debbie** 13:10 **Deborah** 2:5 120:18 debridement 179:5 decades 62:17 118:7 120:13 **December** 1:6 6:4,16 269:9 **decide** 57:1 163:2,15 296:21 decided 40:16 44:19 72:6 deciding 73:7 decision 84:5,6,8,10,12 85:4.13 86:21 88:2.6 90:6 91:7,11,15 144:2 145:18,21 146:4,20 154:3 160:2 192:19 197:6 201:10,15 216:22 decision- 136:20 137:2 decisions 27:19 49:3 58:9 70:18 188:8 197:1 declines 134:4 decreasing 171:2 decubitus 202:2 dedicate 206:18 **Dedicated** 3:4,7 241:14 241:18 dedication 6:18 31:19 deep 162:22 175:8 176:4.11 195:7 200:10 deepest 65:21 deeply 290:20 default 90:8 95:7 defect 122:13 defer 112:1 113:6 deferring 201:10 deficits 74:12 defined 87:10 120:8 179:14 definitely 17:3 59:21 133:20,22 293:8 definition 178:8 180:13 215:21 216:5

236:10,19 237:2,3,4

249:8 252:4 254:17

272:2

de-link 48:18

238:13 239:5 249:2,5

definitions 145:18 176:21 degree 139:20 182:16 delayed 267:13 delaying 48:7 deliberation 34:21 deliberations 78:22 delightful 150:6 delirium 273:1,6,12 276:11 deliverable 197:1 delivered 74:10 deliveries 42:12 114:7 133:13 delivery 44:17 58:15 116:8,13 117:17,18 123:4 125:2 demonstrate 106:10 denominator 75:19 87:19 116:9 dentists 285:21 depending 192:9 depends 187:22 deployed 288:10 depression 43:12 44:10 dermatitis 178:15 describe 242:5 described 276:20 describing 38:14 description 141:16 descriptors 175:10 deserves 153:3 Desi 2:21 22:2 97:13 268:7 designed 189:2 designing 188:11 **Desmirra** 2:21 22:1 92:11 despite 42:12 77:12 118:16 253:12 detail 39:9 57:15 85:4 96:7 178:10 183:2 283:13 284:14 details 63:6 99:11 108:15 141:20 241:20 245:6 deteriorate 142:19 determination 111:8 determine 91:7 determined 106:9 deterrent 220:19 **Detroit** 12:10 18:14 26:14 develop 63:10 176:6 286:14 294:7 developed 76:20 105:19 241:22 258:11 developer 17:1,9,15

112:7 168:12.16 196:2 199:12 223:20 229:14 240:1,7 266:15,17 267:3 developer's 251:13 developers 89:2 108:7 162:6 174:9 180:15 210:2,5,18 220:13 230:19 261:19 269:15 297:10 developing 17:3 25:18 64:10 76:7 development 17:14 19:5,9 27:3 224:11 241:19 275:20 281:7 281:21 282:5 286:13 devices 255:22 devil 284:14 diabetes 43:18,19 44:1 205:13 diabetics 219:12,15 diagnosis 40:22 249:7 252:2 diagnostic 201:21 207:7 diagnostic-specific 79:4 diagram 252:10 294:12 dialog 137:4 dialysate 203:21 die 291:6.7 difference 31:2 33:18 159:16 173:17 174:2 204:22 250:8,10 252:22 254:3.6 256:10 261:3 267:1 290:7 differences 66:3 68:9 68:18 136:1 different 54:8 61:19 62:18,20 87:9,20 108:9 123:5 142:2 156:19 169:14 179:9 182:7 200:14 208:8 208:16 216:17 221:9 231:18,21 232:22,22 236:7 237:8,10,14 238:10 244:19 248:10 249:16 255:20 256:6 279:6 280:18 281:4 287:2 289:5 290:2 differential 263:12 differentiate 158:22 differentiation 221:5 differentiator 273:22 differently 254:20 differing 96:3 difficult 28:1 38:22

292:15

day-to- 292:14

76:13 165:15 186:10

186:14 195:9 272:14

days 7:9 156:20 236:9

48:17 179:20 180:3 183:15 210:13 251:8 272:18 293:2 difficulties 67:20 diluted 68:6 dimension 48:3 282:5 287:14 dimensions 288:6 ding 186:17 direct 57:1 185:3 directed 11:12 33:14 294:1 directing 294:5 direction 25:11 62:18 73:6 121:15 132:22 directions 232:10 directly 9:8 42:22 124:5 143:21 director 2:14,15,18,22 3:17 8:7 12:11 14:12 18:13 20:1 36:12 38:10 255:4 Directors 17:21 22:7 disadvantage 190:22 disagree 280:4 disappeared 34:12 disappointed 60:4.13 discernment 178:9 discharge 44:4 282:20 283:15,18 285:20 discharges 287:17 disclose 11:7,18,20 12:1 13:1,8,15 14:18 14:22 15:5,8,17 16:10 19:2 20:4,8,20 32:16 disclosed 183:5 **disclosure** 4:4 12:6 32:4 98:3 206:10 235:5 disclosures 4:3 9:20 10:6,20 12:11 13:9,12 14:3,10 15:21 17:20 19:12 20:22 32:3,12 32:19.21 discovered 205:19 discovery 204:18 discrete 112:21 discretion 89:20 188:20 discriminating 242:9 discuss 36:22 91:17 discussant 95:20 96:11 109:14 210:4 225:11 discussants 88:7,11 89:10 94:15 103:12 103:18,21 106:17 111:13 117:6,22 120:20 121:16,20 122:1 173:5 174:5,10

181:3.3 203:19 209:18 214:18 230:17 233:15 238:18 242:19 264:14 discussed 46:5 47:7,20 54:17 55:7 66:20 101:7 115:17 229:13 discussing 155:17 discussion 4:9 14:4 17:13 20:7 33:6 37:2 42:8 44:8 48:15,19 51:2,7,15 57:16 58:1 58:11,19 78:7 81:13 84:16 88:8 91:2,16,20 91:21,22 93:21 94:16 98:5,10 108:5 109:11 111:1 112:2 145:17 147:7 152:4 155:21 157:20 173:8 189:8 190:3,4 195:18 197:5 197:22 223:13 228:17 249:17 264:17 266:9 266:17,21 267:13 277:16 284:1,21 294:20 296:16 297:1 discussions 55:1 56:17 57:10 85:1 276:22 283:12 disease 2:12 20:10 29:13 102:7 245:13 288:5 disorder 289:22 disparities 192:2,17,21 199:21 204:19 disparity 205:4 displayed 104:8,9 displays 99:22 226:10 dissenting 90:1 distinct 238:9 distinction 254:7 distract 115:1 ditto 7:13 dive 89:10 dividing 86:15 doc 236:19 docs 278:16 280:2 doctors 263:8,9,10 document 180:1 295:12 295:15 documentation 127:20 128:8 142:16,18 183:16 247:21 248:12 252:9 documented 46:17 178:16 186:12 189:6 189:12 267:6 documenting 128:1,4 178:5

DoD 19:5 doing 6:16,22 7:17 17:2 38:14 50:19 63:2 64:21 65:13 69:14,17 70:10,20,21 71:2,6,8 82:1,3,20,22 98:20 107:15 167:2 184:1 193:6 216:7 220:2,19 220:21 224:10 251:9 258:5,22 260:19 272:6 273:3 276:6 278:5,22 281:13 289:1 domain 194:12 domains 67:7 102:2 227:3 donor 272:12 **Dopp** 1:13 14:11,12 109:20 111:12 113:6 147:6 167:19 dozen 6:8,9 Dr 19:21 22:9 23:22 34:17 36:15,20 38:12 38:19 39:2,5 51:17 55:6 57:12 59:21 62:14 65:7 68:22 70:16 71:21 74:18 77:17 79:1 181:11,15 188:21 190:2 199:16 200:18 210:22 213:12 214:9 218:6 258:10 286:4 296:12 draft 298:1 drawing 291:16 **DRGs** 63:14 drill 66:12 drilled 65:21 drive 33:19 129:18 137:10,14,20 138:3 138:22 142:15 145:7 152:1 203:3 260:11 driven 261:7 driver 143:1 drivers 138:7 170:16 drives 180:1 driving 139:9,10 144:12 146:10 257:21 dropped 85:8 179:18 179:21 182:14 253:19 **DrPH** 2:3 drug 204:7 215:20 216:1 217:9 224:4 277:11,12 285:14 drugs 72:3 208:10 209:8 216:7 273:5 due 48:7 116:12 120:21 181:5 203:9 244:15 285:4

duplicative 9:17 29:5 Duseja 2:10 20:5,6 150:4 dysfunction 236:1 248:19 Ε e- 148:10 earlier 35:9 60:9 101:7 111:14 122:7 123:5 215:4 255:13 260:12 294:22 early 68:12 91:19 111:1 114:6 122:21 123:3 125:1 133:13 172:22 182:1 238:3 270:22 ease 283:18 easier 141:2 215:19 216:2,8 239:9 260:1 266:1 easiest 226:17 easily 139:3 easy 53:12,19 echo 61:6 65:8 94:9 echoing 149:6 289:15 eclampsia 125:14,18 126:3 149:12 166:13 166:17 eclipsed 291:10 ECMO 190:19 191:2.5.7 193:19 200:1.2 economics 12:5 eCQM 104:9,13 105:11 105:20 106:4,4,14 177:21 179:20 180:8 181:5 eCQMs 105:1,11 141:14 145:4 153:17 153:18 196:11 203:2 206:14,20 207:2 216:7 ED 249:1 ED-3 105:6 editors 107:22 Education 3:16 effect 224:12,12 272:17 287:11 effective 29:10,12 45:13 102:5,6 296:7 effectively 278:6 effects 207:20 261:10 262:22 263:15 efficient 7:14 96:13 effort 28:22 60:10 64:17 278:14 efforts 7:14 40:5 62:22 64:7,8 134:17 EHR 166:4 182:17

224:14.16 **EHR-based** 144:18 EHRs 101:2 182:7 either 25:15 38:21 59:12 71:18 73:5 89:5 89:18 168:1 175:17 178:19 181:8 188:4 189:20 192:12 194:1 213:14 214:4 elderly 41:20 273:5 elective 114:6 116:8 123:3 125:2 133:13 electronic 26:20 30:19 31:16 104:6 119:1,17 119:21 135:12 140:6 141:1 145:10 170:9 173:9 179:12 185:17 189:4 electronically 122:16 123:2 135:16 136:12 142:11 202:22 electronically-202:20 element 141:18 229:21 230:3,6 239:3 elements 110:3,6,14,19 111:3,5 112:20 259:1 Eligible 4:12,14 100:5 eliminate 114:6 eliminated 163:16 Elisa 2:19 10:1 143:20 eloquent 292:9 eluded 24:13 email 111:17 112:2 186:10 emails 21:21 eMeasure 175:3 183:12 203:13 emergency 41:21 42:2 59:12 60:2 71:7 emerging 78:18 emphasis 279:12 281:14 emphasize 77:8 161:7 193:6 Employees 1:21 15:7 employer 16:6 19:3 empowering 27:17 encodes 256:7 encounter 74:13 236:18 encourage 31:14 226:6 261:18 276:4 278:12 291:4 encouraging 33:3 277:9 endocrine 204:21 endorse 17:4 126:14 140:6 180:10

endorsed 40:20 44:16 44:21 79:8 119:4 122:11,19 135:4 139:14 140:5,5,22 148:3 152:12 203:5 endorsement 106:6,12 106:15 109:5 113:3 122:10 127:12,15 142:8 143:11 154:16 158:1,8 159:15,19 162:8 166:7 173:15 199:20 201:11,16 203:8 222:7 223:22 228:14 endorsing 129:3 ends 195:5 253:9 enemy 78:14 engagement 29:10 102:4 227:6 281:6,20 enhanced 181:22 enhancement 290:13 enormous 290:6 enrolled 252:14 ensure 37:19 182:2,19 enter 93:5 94:4.16 164:21 265:9 entire 121:22 122:2 205:1 235:9 entirely 183:22 entities 63:9 envelope 78:13 environment 39:20 46:4,13 48:7 63:3,12 63:17,18 69:3 255:9 environments 41:9.10 42:6 47:17 64:5,11 69:5,6,17 80:3 **Epic** 26:18 236:17 epidemic 271:10 274:10 282:20 291:10 292:14 epidemiologist 20:10 20:17 episode 205:11 221:6 282:19 episodes 205:1,9 221:7 288:11 equal 87:15 equating 291:2 equation 274:3 equipment 255:10 equity 31:15 erectile 235:22 248:19 Erin 2:22 22:6 85:18 erring 218:3 **Error** 1:20 Errors 11:10 escape 270:21

especially 61:15 71:19 78:10 151:11 224:17 251:12 260:5 281:8 281:15 297:12,20 ESRD 26:2 201:22 244:13 essential 1:17 13:14 27:11 184:13 292:10 297:11 essentially 86:16 191:15 219:17 establish 87:12 established 87:14 119:11 et 256:1,1 257:12 etcetera 39:21 47:16,20 56:2,2 57:22 58:1 76:10,10 79:18 95:10 evaluated 251:20 evaluating 83:22 evaluation 106:15 228:13 event 147:9 204:8 209:6 213:14,14,18 213:22 214:2 216:13 218:10 events 71:20 205:10.18 212:5,6 213:17 214:3 224:7,20,21 eventual 290:4 eventually 155:18 223:21 everybody 8:9 9:1 12:19 31:14 48:6 60:5 66:16,17 88:22 125:9 154:8 200:20 214:15 259:18 264:6 265:20 275:2 279:4 296:14 296:20 everybody's 6:6 90:3 154:7 everyone's 90:19 evidence 56:3 118:16 134:1 260:2.16 evolved 229:12 exact 6:10 119:10 185:17 exactly 6:15 94:18 108:21 120:6 121:15 182:10,14 195:18 212:2 223:13 examined 171:4 example 285:5 289:20 examples 109:3 exceeded 10:15 excellent 71:9 exception 13:18 excited 30:4 82:14

174:19 exciting 8:13 30:12 92:15 175:1 281:11 281.15exclude 126:3 178:20 excluded 125:22 exclusion 162:2 190:18 191:1 exclusions 125:22 166:10 excruciating 39:9 excuse 69:14 85:8 execution 136:9 exempt 100:8 225:7,15 226:3 existing 7:3 79:21 105:20 227:1 exists 69:3 116:9 167:1 175:5 expand 167:9 expanding 191:14 expansion 48:10 expect 48:20,21 expectation 279:15 expectations 273:19,20 274:2 277:5 expense 29:3 **experience** 13:22 14:2 26:21 34:3 52:4 110:10 143:9 172:3 177:20 186:1 283:19 292:21 experienced 236:11 261:21 experiences 226:9 experiment 74:4 experimental 76:12 experimentation 133:21 **expert** 13:4 19:2 51:22 82:16 190:3,13 211:9 295:11 expertise 194:19 195:2 232:4 experts 2:6 10:10 11:1 13:17 15:21 16:14 19:13 38:1 52:10 53:14 107:14 109:7 explain 149:14 explained 107:1 229:10 explaining 211:6 explains 84:11 explicit 113:8 121:15 exploration 285:13 explore 73:1 exploring 285:17 express 174:11 expressed 119:9

202:20 expression 141:14 142:12 expressivity 141:15 exquisitely 73:14 extant 144:15 extended 287:20 extending 289:12 extends 254:21,21 extension 242:15 extent 114:11 288:9 external 53:6,6 Extracorporeal 191:8 extract 213:2 extracted 213:20 extraordinary 34:1 extreme 189:20 **extremely** 24:12,18 74:15 120:12 179:20 182:20 extremes 235:14 eve 298:1 F fabulous 172:5 219:13 face 203:1 229:21 230:2 250:11 faced 37:4 facets 46:15 facilitate 84:13 facilities 61:12 71:2,5 224:17 facility 40:14 105:9 facing 292:14 fact 51:2 56:11 61:15 79:2 122:17 134:14 176:12 187:12 195:8 205:9,13 208:12 209:4 243:2 246:13 247:9,22 264:2 273:16 274:14 286:8 287:6,17 289:17 factor 192:9 factors 125:15 166:2 192:6 209:10,19 214:19 235:10 245:9 246:20 247:11 248:6 251:20 288:19 faculty 18:20 fail 116:22 fair 97:3 108:2 111:10 139:5,6,6 177:19 fairly 98:8 144:9 fall 51:5 106:5 137:18 188:4 229:1,1 falls 41:19 false 215:17 familiar 125:5

families 139:6.20 family 29:9 102:4 227:5 281:6,20 fantastic 170:10 far 77:22 121:2 145:9,9 148:22 151:6 257:13 262:12 277:17 280:6 fashion 197:13 fast 186:20 fault 270:5 favor 163:4 260:21 **FDA** 220:12,21 224:10 feared 261:21 feasible 166:5 182:9 211:12 213:1 224:3 federal 2:10 19:13 23:9 24:17 25:8 38:2 61:22 62:3,10,15,21 76:4 80:11 226:11 242:3 246:2 federally 245:20 Fee-for-Service 252:15 feed 255:8 290:6 feedback 7:1,5 35:18 55:14 60:20 61:1,4 82:8 83:12.13 86:13 124:12,14 130:18 162:5 172:4,6 174:12 199:11 249:20 255:10 256:16 265:21 271:1 272:3 288:8 296:15 296:17 feel 39:10 90:12 91:17 96:6 113:14 121:16 127:13 137:7 150:16 150:17 161:21 165:17 172:21 223:18 254:22 255:17 269:22 feeling 6:8 41:7 45:2 52:17 53:4 96:1 feelings 178:11 feels 208:14 209:3 fell 167:21 fellow 35:15 117:6,22 181:3 233:14 felt 41:17 42:5 44:6 49:4 51:20 52:1,7,11 53:2 58:2,4 60:22 147:10 211:10 218:8 254:6 258:13 264:15 ferret 234:6 field 76:19 127:8 129:14 197:11 201:8 fields 112:21 fifth 6:13 fifty 70:11 figure 39:22 87:18 138:6 272:20 295:20

figuring 208:12 fill 68:19 129:12 **filled** 27:4 filling 7:20 29:18 66:1,9 134:21 186:6 fills 129:8 final 48:3 50:3 60:15 179:14 221:21 268:9 270:18 finalize 298:3 finalized 101:10 finally 30:14 31:14 41:5 42:20 43:14 44:14 45:12 46:9 49:9 174:20 233:6 272:16 financial 10:15 18:11 find 28:1 112:19 115:15 115:18 130:13.14 135:12 180:3 186:7 215:13 228:1 236:10 247:10 248:5 250:20 260:20 280:21 finding 69:15 148:6 182:8,9,15,17 finds 270:5 fine 94:8 98:19 159:18 217:4 258:8 fingertips 270:14 finish 93:21 210:3 first 5:7 6:2 10:18 33:12 39:15 40:19 46:22 50:15 51:17 68:15 73:7 80:18 89:12 93:1 98:22 99:10,13 102:9 102:13 103:9 106:3 106:21 107:3,21 108:12 111:12 113:20 114:15 120:9 127:21 134:11 150:4,14 152:19 154:8 155:6,8 155:12 161:6 163:19 166:4 172:20 173:1 174:15 189:6,12,14 198:7 201:1 206:2 218:11 222:3 230:18 242:21 254:8 258:11 260:4 270:3 274:6 289:8 296:15 fiscal 101:11 fish 203:21 fit 31:11 252:6 fits 173:21 five 46:4 175:10 204:17 205:21 208:20 210:9 212:7,10 213:5 215:9 215:14 217:6 223:1 239:5 257:4 five-minute 211:14

224:2 five-person 82:16 fix 127:20 180:11 217:5 257:5 275:11,15 285:14 fixed 128:11 fixes 285:15 flag 90:14 215:13 flavor 162:11 197:22 Fleisher 2:7 18:4,4 19:7 59:2 70:4 125:12 126:2,5 147:22 158:10 169:19 196:5 218:17 219:2,5 235:2 257:7 272:8 flexibility 29:7 50:20 293:11 294:4,7 flights 270:21 flip 142:16 196:4 228:2 **Floor** 1:8 flow 252:9 flowsheet 179:13,22 183:12 186:12 focus 33:15 42:19 43:17 46:8 65:19 67:8 71:15 113:19 115:1 117:8 119:22 121:7 137:2 200:10 218:11 271:19 277:1 293:3,4 focused 40:9,22 41:14 46:7 114:19 224:4 277:4 focusing 29:20 47:5 65:12 78:20 275:8 276:1.6 fodder 56:17 folks 81:20 184:18 293:16 folks' 207:1 follow 57:22 67:15 110:14 152:10 follow- 43:13 follow-up 43:12 192:14 257:13.14 followed 36:19 37:1 following 29:7 77:13 145:1 follows 84:17 food 185:6 forces 137:16 forcing 128:13 Ford 18:13 26:15 34:20 292:12 forefront 151:16 foremost 166:4 form 10:13,14 15:22 16:1 123:9,14 197:13 239:15

formal 222:14 format 185:21 forth 44:19 53:7 73:13 113:22 153:21 190:9 Forty 208:14 Forum 1:1,8 131:8 forward 20:7 24:17 25:14 27:6 31:20 33:20 50:10 66:4 72:11 74:16 83:14 91:8 106:11 108:17 113:5 114:20 118:1 120:1,13 127:11 140:1 141:6 153:2,5 157:12 161:15 180:10 188:18 199:20 217:12 237:14 250:3 267:6 268:19 269:7 289:17 foster 1:14 14:19,20 33:14 56:6,7 72:9 104:3 113:16 115:5 135:2 167:9 168:15 185:15,21 189:16 193:12 220:9 279:3 found 13:3 117:12 131:3.19 178:2 182:20 214:2 219:10 247:8 248:19 264:19 291:18,22 foundation 17:6 214:22 four 5:12 37:4.5 40:17 85:13 87:22 89:22 91:16 94:19 95:18 105:10 109:17 113:10 154:6 165:10 176:20 179:5,7 232:7 234:17 234:19 238:20 257:4 297:15 fourth 41:5 46:7 frailty 185:4 frame 54:11 187:12 220:16 224:2 232:7 249:6 framework 79:10 framing 150:9 Frank 1:15 11:2,5 71:10 233:17 255:2,14 289:14 frankly 25:3 258:16 271:9 free 34:4 39:11 91:17 113:14 223:18 269:22 freedom 188:15 freestanding 241:15 frequent 231:5 frequently 204:7 **Friday** 111:18 friends 33:10 283:19

front 16:3 21:4 60:5 192:10 fruit 290:17 full 98:3 138:4 162:9 175:10 206:10 210:1 235:5 fully 49:18 105:19 127:10 173:12,14 184:11 203:7 293:8 fun 202:6 function 128:13 functionality 263:2 fund 50:6 funded 218:19 245:20 funding 18:6 76:4 further 22:22 72:4 74:3 98:5 155:20 158:17 201:8 242:6 249:20 250:6 257:15 285:1 future 25:11 79:15 82:1 83:2 97:19 112:22 123:20 181:12 196:10 218:1,7 250:11 286:6 **FY** 123:10 FY17 54:11 G gabapentin 273:4 Gail 115:11 gain 143:9 293:11 gains 66:8 game 63:22 gap 46:14 129:8,12,15 134:21 150:16 202:16 271:2 gaps 23:11 25:12 29:18 38:6 40:2,9 46:3

72:2,2 239:16

206:14 293:10

generalize 69:4

285:12

generally 118:19

generation 235:11

generator 17:16

233:8,13

qeography 47:14

gestation 125:2

gathering 240:5

132:16,19 139:18 152:21 158:14,17 162:11 166:19 191:16 262:14 267:6 270:13 273:14,15 274:1 277:6 278:16 279:17 279:18 281:1 297:14 **Ghinassi** 1:15 11:4,5 71:11 233:18 255:15 256:19 257:3 Gigi 3:13 53:22 give 7:1,15 9:14 23:21 38:16 39:8 55:4 59:18 60:20 61:3 66:3 77:1 82:6,10 93:15 95:13 101:1 113:14 130:13 130:18 144:16 148:18 158:21 164:6,21 172:6 194:2 195:10 196:12 204:13 221:17 223:1,5 228:6 230:18 241:5,6 258:10 265:14 269:3 282:4 283:10,15 284:12,13 given 71:20 78:7 98:2 143:4,6 179:2 190:12 199:11 211:18 221:7 283:18 285:10 290:7 gives 94:22 121:15 giving 83:17 120:8 202:12 225:14 230:1 271:9,18 glad 133:3 66:20 67:4,6,15 68:20 glass 216:1 224:4 Glassman 1:16 11:16 11:16 174:19 175:1 Gayle 1:18 14:7 187:8 177:4 200:8 glucometer 207:6 general 26:9 53:17 56:19 69:4,9 99:10 209:22 215:11 109:6 189:10 190:5 glucose 204:16 215:15 218:20 219:19 220:3 220:12 224:10 goal 28:21 57:8 131:12 197:20,21 262:19 148:9,13 226:6 288:16 289:4 290:4 goals 29:8 100:21 225:22 258:6 generations 255:22 gotten 55:13 60:22 geographic 37:6 61:13 135:19 282:3 government 2:10 61:22 geographically 287:7 62:10,19 65:14 80:11 geographies 61:19 246:2 governmental 63:9 64:22

gestational 141:17

getting 43:7 64:15

73:21 81:7 103:13

115:2 118:20 126:5

grade 245:14 248:5 grand 24:2 grant 18:6 gray 161:19 greater 76:14 87:15 90:5,8 91:12 185:21 190:13 ground 195:1 group 2:3 3:17 5:13 7:18 12:3 15:4 17:19 17:21 18:9 20:2 25:17 25:18 43:6 45:16 51:15 52:1,11 60:20 64:7 66:2 73:16 79:2 81:22 82:9 83:12 88:9 89:20 90:16 94:22 95:3,22 99:20 109:7 111:2,7,17 112:1 113:7 130:9 131:5 132:2 151:7,22 153:22 155:11,14 156:7 165:18 188:15 194:6 200:18 201:21 201:22 211:10,20 241:15,19 257:16,18 258:1.9 259:13 260:6 271:15 272:4 277:20 285:8 group's 197:5 201:10 **groups** 39:19 64:8 78:6 79:18 129:20 130:2 140:5 152:13 guess 17:16 49:19 50:3 57:3 95:1 115:19 146:4 149:1 153:15 176:16 177:13 183:14 187:19 208:8 217:1 218:17 guidance 25:11 179:2,6 194:10 220:12 223:20 224:2 297:13 guide 84:16 91:21,22 guidelines 14:13 91:18 212:3 275:1,2 293:6 guiding 37:13 Guinan 1:17 13:13,14 98:1 184:9 191:21 192:13 206:10 292:7 н HAC 175:5 179:2,10 half 167:6 hallucinations 273:8 hallway 9:7

283:4 handful 51:7 handle 163:1 166:16

hand 55:19 79:16 92:22

285:18 handled 53:17 200:7 hands 92:13 happen 33:21,21,22 34:6 109:1,2 138:16 138:17 201:14 204:7 232:10 234:17 263:13 263:21 279:7 280:12 286:2 happened 109:3 178:22 204:1 272:13 276:22 happening 34:7 53:13 110:15 139:16 205:18 262:17 272:11 283:14 happens 138:14 208:7 215:17 happy 22:3 34:17 107:5 hard 26:9 35:12 79:16 114:5 125:10 130:22 184:1 222:8 247:7 270:12 273:13 281:1 297:21 harm 103:10,11 132:17 172:16 202:10 204:5 harms 182:3 Haskell 11:9 hassle 5:20 hat 132:8,8 292:11 hate 159:20 160:17 191:6 Hatlie 1:17 12:18,18 87:1 96:17 97:16 129:5 130:16 136:16 177:11 280:15 HCAHPS 41:17 51:21 HCAPHS 271:7 header 180:2 238:12 heads 269:3 health 1:15 2:5 3:11,13 4:7 11:7,22 12:4,5 14:2,14 15:3,4 17:19 18:20 19:1 26:16 30:5 31:16 36:5,10,21 37:3 37:19 38:11,15 39:14 41:11 44:11,17 47:17 47:18 50:4 51:22 52:10,18 54:5 56:19 56:20,22 57:8 58:15 59:3,8,10 61:4 62:1,2 62:16,21 63:6 65:13 65:16,16,22 66:22 69:19 76:4 77:9 78:2 81:16,22 119:17 123:13 124:4 132:1 133:8,17 182:6 194:5 194:22 healthcare 2:1,5,11 13:11 14:1 20:12,19

26:12 27:22 78:16 81:20 115:3 167:21 209:5,8 healthcare-related 18:2 healthy 29:14 131:11 hear 17:14 20:3 38:22 39:2 51:3 95:5 116:21 130:7 150:6 213:15 249:19 255:13 heard 20:22 24:1 27:8 56:3 60:21 86:2 90:3 95:7 121:20 129:17 143:20 144:1,6 146:1 150:12 157:18 158:16 167:14 197:19 214:17 223:10 241:8 258:11 264:13 291:3 292:17 292:18 hearing 16:8 36:3 138:4 138:14 146:8,16 166:3 170:7 199:20 251:12 heart 24:15 62:8 held 128:6 Helen 11:9 hello 15:13 36:14.15.16 help 23:11 24:21 33:19 40:17 41:1 55:9 82:17 95:6,16 96:14 129:1 129:11,16 145:7,11 278:18 282:4 297:9 helped 62:22 helpful 24:19 33:1 41:4 56:4 62:12 74:15 95:22 116:21 186:19 187:3 228:3 260:8 264:20 287:3 helping 168:6 204:4 278:22 helps 25:10,11 74:7 149:19 hemoglobin 43:22 Henry 18:13 26:15 34:20 292:12 heterogeneity 37:7 Hey 76:3 hi 12:2 18:18 22:12 32:17 56:6 77:4 181:11 240:21 high 45:8 58:17 64:16 102:2 117:11 120:9 182:16 214:11 227:3 276:10,12 high-impact 31:1 high-level 268:15 high-risk 182:18 233:1 higher 58:12 59:14 118:14 163:20 199:3

> Neal R. Gross and Co., Inc. Washington DC

205:10 232:11 254:3 higher-level 48:21 highest 252:1 254:10 highlight 166:15 168:3 196:22 197:7 highly 118:20 Hill 81:17 HINN 18:15 hire 263:22 historical 55:4 Historically 105:4 history 136:11 194:3 283:8 hit 156:21 244:22 hold 57:17 59:13 66:14 104:1 253:17 holding 57:5 58:12 holes 66:1 home 175:17,18 237:2 237:3 282:21 286:1 hone 33:17 honest 56:4 60:4 242:20 272:3 honestly 79:5 258:21 271:2 hope 95:13 98:8 211:5 244:22 hoped 182:8 hopefully 23:4 65:1 86:14 103:6 214:21 264:19 hoping 115:15 horrible 202:1 Hospice 1:21 13:5 hospital's 70:19 hospital- 42:22 246:21 256:9 hospital-acquired 175:2,4 hospitalist 13:22 hospitalists 35:19 hospitalization 205:2,7 262:21 hospitalized 204:6,9 273:2 275:16,18 hospitals 1:17 4:12,12 4:15 13:15 24:9,9,10 26:4 34:19 42:2,4,11 42:21 44:5 52:5,5 56:14 57:2 68:4,10 70:1,1,6 72:15 75:6 75:16,22 100:5,5,18 110:5,17 114:4 119:5 119:20 128:20 131:10 139:4,7 140:19 144:16 151:8,15,17 182:8 184:13 190:15 190:21 191:1 193:18

194:21 195:15 203:1 208:11 213:1 220:14 226:2,3,6 233:7 239:9 241:16,17 242:9 250:14 253:19 254:4 258:3,4,12,16,17,17 259:17,20 260:4,10 260:15,18 261:7,9 273:20 280:2,5 292:11,15 host 26:3 hotels 6:7 hours 6:4 176:6 178:6 189:7,12 house 258:21 huge 56:19 179:9 273:22 294:18 humans 195:20,21 hung 66:11 hyperglycemia 207:18 218:2 224:9 hypoglycemia 103:11 199:15 202:10 203:22 204:6 205:15 207:19 211:20 212:5,13 218:8.9 hypoglycemic 204:14 204:22 205:11 213:7 213:22 hysteria 275:10 L i.e 40:21 ICD-10 247:20 ICD-9 247:20 252:2 icebreaker 8:5 **ICHOM** 248:11 ICU 184:18 204:11 idea 17:16 54:17 82:21 107:10 ideal 170:8 242:22 279:13 288:16 ideally 40:21 ideas 7:3 271:22 identified 37:4 40:13 44:15 45:16 46:15,18 67:5 72:2 102:3 182:3 182:11 246:3 identifies 211:22 identify 23:11 25:12 39:15 40:2 44:19 58:13 76:9 175:15 206:1 247:19 identifying 29:18 38:3,5 40:9,18 208:21 212:4 296:4

illicit 71:19

illness 275:5

illumination 224:8 imagine 98:5 253:21 immediate 213:22 immediately 187:13 immunization 43:11 45:11 impact 18:14 49:3 117:17 203:12 247:1 247:2 254:16 294:9 296:19 impactful 149:8 impacting 58:9 **impacts** 61:13 imperfect 68:15 implant 285:5 implement 56:22 190:8 216:8 implementation 26:18 63:14 85:11 86:17,18 220:20 224:7 243:7 implemented 107:9 134:6 161:18 242:4 245:21 276:7 implementer 17:9 implementers 144:17 implementing 26:21 implications 160:18 implicitly 134:15 implored 113:4 imply 201:8 importance 46:12 117:16 123:12 136:18 146:10 218:12 254:12 261:17 271:12 274:6 281:5 289:11 **important** 7:6 9:13 16:10 25:2,13 27:9 29:19,22 34:8 41:10 41:18 42:5,13,15 43:19 45:22 48:12 49:4 51:8,20 52:8,12 60:7,17 61:7 62:2,15 62:17 63:22 64:18 67:18 68:13 69:1.18 70:18 73:17 77:21 94:13 114:13 117:4 120:12 124:7 128:9 132:20 133:8 134:11 134:20 138:19 139:8 140:14 145:22 147:11 175:22 178:21 179:11 180:9 183:20 184:12 201:17 204:4 209:11 211:10 213:8 219:7 219:13 231:2,6,22 233:5 238:11 242:8 242:14,15 244:4 245:3,10 246:18

256:18 258:13 261:11 261:15 262:2,9,18 264:1 272:21 274:11 276:5 279:1 284:22 285:7,18 287:12 288:17 296:17 impossible 61:20 impressed 72:18 268:20 impression 104:5 impressions 206:5 262:16 improve 27:16 55:9 62:22 142:20 145:2 150:22 226:7 278:11 improved 270:9 improvement 12:20,21 14:13 28:18 31:10 34:5,6 37:11 53:6 86:14 87:4 133:9 142:22 144:14 185:22 191:3 203:3 214:1 294:5 improvements 94:18 190:11 improving 40:6 47:10 48:1 49:7 151:2 in-hospital 236:4 in-person 74:10 inability 75:12 inappropriate 193:17 275:9 291:13 incent 293:5 incentive 101:8 225:19 incentives 20:2 25:17 292:19 incentivize 289:5 incidence 219:11 276:10 incident 186:6 221:15 262:21 incidents 216:10 221:16 inclined 117:7 176:3 include 31:4 42:14 44:6 45:18,19 49:5 52:8,13 52:18 101:9 114:13 154:14,21 159:15 176:18 207:8 230:7 248:5 266:16 271:15 285:21 included 38:3 43:5,21 84:15 101:11 102:3 105:2 122:8,14 125:16 131:11 149:4 244:11 247:21,22 248:3,9,15 251:19 252:17

includes 288:3.4 including 25:20 30:15 31:8 42:8,17 57:5 81:16 114:2 141:16 169:17 200:21 204:22 209:22 213:2 248:20 287:16 inclusion 106:2 155:2 incontinence 235:22 248.20 incontinence-associ... 178:15 incorporate 124:13 218:15 incorporated 91:20 incorporates 279:10 increase 55:19 170:5 170:20,21 256:21 increased 125:15 126:11 275:21 increases 273:7 increasing 167:15 170:18 273:6 incredibly 128:11 183:20 independent 203:17 independently 170:18 index 122:12 232:17 indicate 127:1 indication 288:4 indicator 131:12 indicators 20:18 individual 2:6 16:5 49:2 58:7 61:8 66:12 253:14 265:19 283:7 individually 157:14 individuals 157:9,10 164:7,8 165:6,7 199:2 199:3,7,7,8 223:7,8 234:4 244:11 265:13 265:14,16,16 industry 144:5 infant 117:15 149:14,20 169:6 infection 110:16 262:16 infection-related 41:15 infections 118:9 167:21 168:4 291:8 infectious 288:5 influence 235:12 244:14 influenced 79:2 influences 255:11 influenza 43:11 inform 169:4 informatics 19:1 information 27:18 47:18 53:8 54:20

59:18 68:2.14 69:19 69:21 73:20 88:12 89:8 97:13 101:4 110:8 112:4 113:11 115:16 118:20 119:16 126:21 135:21 136:10 136:18,20 137:3 159:22 185:20 194:5 194:8,11 221:18 226:1,8 240:5 243:3 245:8,11,13 246:1,18 247:6 249:12 250:13 262:14 280:9 informational 256:13 informed 101:5 infrastructure 61:16 206:20 infusing 29:6 initial 28:5 67:5 109:4 204:3 262:16 initially 34:12 103:19 205:4 206:3 initiative 27:10 33:16 280:20 injuries 190:6,14 injury 41:19 103:10 172:16 173:6,8 175:3 175:4,9,11,15 176:5,8 176:11 178:6 179:13 182:5 185:5 189:5,11 195:7 200:9.11 innovation 29:7 132:1 inpatient 4:10 24:10 26:2,11 78:11 100:2 104:21 190:14 226:3 226:4 280:6 **input** 4:13,19 9:13,14 23:8 24:12 25:7 43:7 51:20 52:1 86:11 90:12 93:8 193:7 194:6 282:3,3 296:10 297:11 inputs 281:8 inside 186:15 insight 66:2 insightful 297:7 insights 66:10 77:22 insofar 292:22 instance 56:2 218:9 245:12 institution 277:3 instructions 86:22 92:19 285:20 instruments 107:20 insurance 3:13 30:5 48:977:5,13,14 insurers 57:6 128:15,19 integrated 44:17 58:15

59:15 79:21 intended 84:20 209:21 279:12 intent 50:22 124:3 intention 147:17 intentional 28:8 intentions 218:7 inter 178:17 interest 10:6,15 16:5,12 26:18 32:16 34:18 42:17 65:10 81:18 149:18 158:14 272:22 interested 16:7 51:1,22 52:10 83:6,7 interesting 24:7 42:7 44:8 56:10 59:7 82:8 83:4 126:20 148:2 149:16 207:6 216:19 219:7 232:19 233:9 238:15 257:14 262:11 272:10 285:19 interestingly 266:20 Interests 4:4 interim 243:18 Intermountain 2:1 14:1 50:13 internal 53:5 177:21 International 1:21 15:7 18:15 129:7 internist 26:10 interoperability 4:11,14 26:1 31:16 100:4 101:2 286:8 interpretation 274:21 interpretations 47:19 interpreters 47:21 interrupt 226:14 intersection 26:19 interval 232:2,2 intervention 43:10 254:14 interviewing 272:12 intriguing 67:9 introduce 10:18 19:16 21:14,16,17 32:10 introduced 23:19 42:22 63:5 introduction 26:6 103:16 introductions 4:3 10:6 88:5 invasive 2:2 12:3 231:20 285:11 investing 260:15 investment 255:6 260:20 investments 260:11 involve 50:9

involved 58:10 75:22 118:6 254:13 280:19 290:1,21 **involving** 289:18 lowa 76:6 IQR 3:9 4:11,13 98:21 100:2,13 101:14,19 102:2 103:3 104:4,13 105:2,9 106:2 123:1,9 124:17 153:5 172:13 174:16,16 225:6 Ira 3:11 36:12,14 38:8 38:18 50:2 56:6 70:15 73:10 81:13 82:5,15 Ira's 73:5 ironed 91:4 isolation 37:6 **issue** 41:7 42:15 43:20 44:5 47:11,12 48:5,11 48:16 52:14 53:15,16 63:1 69:2 77:11 79:20 110:21 113:19 114:1 114:15 117:14 124:7 132:11,11,12 134:2,9 138:19 149:10 166:13 179:16 182:10.13 184:12 185:6 195:6 200:20 204:4 207:4 212:6 220:20 232:1 254:18 263:5 272:22 273:2 281:9 285:18 294:12 295:6 **issues** 37:4,5,8 47:15 49:16 55:2 59:7 80:12 89:17 114:3.14.16.19 118:11 127:22 130:10 136:7 145:8,9 146:9 146:22 148:19 159:7 159:8,12,13 162:2 173:20 178:17 183:11 184:19 186:2,21 189:18 195:5,18 210:18 224:15 229:4 235:18,20 236:1,2 241:7 266:13,22 280:22 291:11,14 295:21 item 33:7 36:4 81:3 146:5 items 47:5 72:6 J Jack 2:8 13:19 16:17

J ack 2:8 13:19 16:17 18:12 26:16 65:4 127:17 129:10,17 137:11 177:18 185:16 190:16 200:19 215:5 215:6 217:19 277:18

279:4 280:8 **Janis** 14:9 January 92:7 214:13 269:4,10 298:4 **JD** 1:17 Jeff 18:7 jeopardy 71:18 job 20:11 24:3 107:7 172:5,7 237:18 251:5 251:10 258:5 Johnson 2:15 36:11 81:12 107:5 **join** 112:12 240:15 joined 36:11 241:2 269:15 joining 21:22 297:11 joint 12:12 112:8,11,15 131:7 141:19 143:5,6 143:21 168:20 **jointly** 30:6 jokes 8:3 Jordan 2:8 18:12,12 65:18 127:18 177:19 186:4 190:17 191:8 191:14 215:7 217:1 217:17 277:19 iot 157:16 journal 107:22 journey 286:18 judge 148:19 172:7 jump 179:10 297:5 June 127:1 **Jung** 2:16 21:19,20 66:18 81:4 83:15 86:20 99:18 202:11 225:13 226:18 228:8 Κ **Kaisers** 196:9 Karen 2:2,15 12:2 36:11 106:18 229:10 238:5 Kate 169:11 keen 285:15 keep 27:13 28:20 33:3 77:15 101:17 134:7 155:17 214:5 224:9 242:20 244:21 262:19 268:20 269:4 270:3 272:2 298:1 keeping 142:20 211:1 Keith 1:13 12:8,13 201:19 203:19 207:5 217:20 218:15 ketamine 273:4,7

kidney 1:13 12:9 272:12 kids 43:6 killers 281:2 killing 143:13 Kim 11:16 **Kimberly** 1:16 174:18 kinds 39:22 43:21 49:5 55:17 107:20 108:18 218:10 273:4 280:18 281:4 knew 191:10 Knight 206:7 knowing 67:19 119:10 141:18 known 25:22 Kristen 3:7 240:14 Kristin 241:13 kudos 33:21 L lab 204:17 205:20 207:8 209:21,22 212:9,15 212:20,22 214:1 labor 290:15,16 labs 212:19 lack 29:19 47:15 120:21 122:15 laid 57:19 234:1 Lamaze 129:7.22 Lamaze's 129:11 landed 228:19 language 47:19 86:8 141:12,13 142:2 188:13 274:7.11 275:6,13 280:18 large 59:9 71:17 181:6 194:21 278:4 282:18 large-scale 273:8 largely 189:15 larger 134:9 lastly 205:20 Laughter 156:13,16 174:22 181:14 191:12 213:11 219:1 launch 220:16 launched 27:15 LCSW 3:13 lead 3:15 14:1 26:17 76:6 88:6,11 89:10 94:15 95:20 96:11 103:12,18,21 104:18 104:20 106:16 109:14 111:13 117:6 120:20 121:16,20 122:1 173:5 174:5,10 181:3 181:3 203:18 209:18 210:4 214:18 225:11

(202) 234-4433

Kettering 241:1

key 37:4 38:2 39:14

46:17 47:4,11,14

48:15 293:12 294:3

230:17 238:18 264:13 leader 15:2 leadership 81:19 297:13,19 leading 30:6 91:4 107:3 271:9 leads 275:19,20 lean 238:20 leaning 89:21 216:21 Leapfrog 17:21 131:4 133:3,4 Leapfrog's 18:8 learn 72:22 151:17 226:8 280:11 learned 74:21 78:21 195:4 learning 73:6 74:15 212:18 leave 34:10 234:18 238:3 282:17 leaving 95:4,4 287:19 led 207:22 275:9 276:14 Lee 1:18 2:7 13:18 14:7 14:7 16:17 18:4 59:1 61:6 70:3 115:12 125:11 147:4.21 149:7 158:9 167:10 187:9 196:4 218:16 220:5 235:1 238:2 255:5 257:6 272:7 276:8 279:15 Lee's 196:21 252:21 left 11:3 53:10 101:18 234:4 267:8 legislation 77:12 Legreid 1:13 14:11 legs 171:18 lend 255:11 length 118:10 lengthy 16:1 **lenient** 144:9 lens 84:2 let's 55:14 76:22 80:17 98:22 102:13 111:10 149:5 168:5 173:5 203:18 210:3 225:5 230:17 260:13 letters 125:6 level 40:14,16 44:18,21 54:7 58:12,15 59:3 61:9 66:13 96:7 131:8 178:9 188:9 237:16 242:12 246:7,19,22 247:2 250:8,10 252:1 253:2,6,10,11,11 256:10 259:14 260:1 260:7,22 261:4,5 262:6 281:20 288:21

295:18 296:2 levels 218:20 219:19 levers 49:7 57:21 58:8 liaisons 2:10 19:13 38:2 license 47:9 lies 293:3 life 294:13 lifetime 215:15 likelihood 118:13 256:21,22 Likewise 21:6 liking 129:17 limit 92:3 244:15 limitations 49:12 limited 52:7 110:11 245:8 249:1 Lindsey 2:9 13:19 16:18 19:1 126:15 138:10 141:7 180:22 286:3 Lindsey's 160:11 line 86:4,16 92:10 240:16,18,19,22 279:22 lines 12:16 80:17 102:12,15,21 293:7 link 151:1.5 linked 246:3 linking 275:8 Lisa 1:20 11:9 54:15 109:20.21 117:20 129:9,19 130:2 152:7 261:13 284:18 Lisa's 132:14 274:1 list 7:2 28:6,7 33:17 34:13 56:7 77:15 82:7 85:2 95:8,20 103:3 105:7 109:14 111:13 130:14 131:4,17 132:14 135:5 140:4 162:9 163:2,21 164:12 177:22 194:8 199:18 215:21 216:4 216:5 224:4 248:9,14 248:18 listed 34:12 50:5 111:12 122:22 201:17 listen 108:7 197:15 251:8 listening 94:14 145:16 147:22 lists 226:22 literacy 47:18 literally 6:21 literature 232:5 240:3 little 9:4 20:3 37:22 38:21,21 40:8 50:17

55:7 60:4,13,22 64:11 67:18 68:6 76:17,21 83:4 86:15 94:11 95:11 96:14 98:14 107:12 108:3,9 111:15 115:15 117:10 134:14 145:19 146:13 158:17 171:15,19 176:22 180:16 183:1 194:2,7,18 199:2 205:3 210:10 230:10 231:10 232:20 247:8 260:1 267:20 277:6 280:9 lived 27:21 28:15 lives 262:1 living 29:14 64:12 local 59:6 219:11,12 localized 228:5 231:4 248:1,11 location 182:12,12 locations 287:8 lock 93:20 165:1 log 92:19 logged 92:17,21 logical 242:17 logistics 81:8 long 8:1 24:8 90:22 95:21 130:6 131:17 137:13 140:4 152:13 243:12 248:17 289:2 long-lasting 262:22 longer 13:3 42:12 87:22 112:16 176:5 220:14 232:7 look 9:11 25:14 27:6 31:20 40:11 41:3,12 56:7 59:15 63:20 67:21 68:7 72:18 74:2 77:9,14,16 79:8 90:15 92:1 107:15,16 116:6 120:11 124:3 133:17 145:18 146:3 149:2 167:17 169:4 176:18 182:18 183:1 184:20 186:17 193:16 194:8 195:2 199:22 210:17 213:17 214:3 216:16 216:19 220:1,2 221:14,15 222:8 224:1 238:8 239:10 239:11 243:19 244:17 246:5,11 249:14,19 253:10 254:1 257:3 261:11 268:18 269:7 273:12,13 292:2 295:5.5 **looked** 46:20 48:4

108:10 116:18 129:5 136:4 159:7 177:7 194:4 234:5 246:17 248:14 249:2,5,7 250:9 252:10 253:11 254:2 255:20 256:4,5 looking 20:7 46:3 48:13 54:18,19 56:12 59:9 69:7 74:3 75:3,14 77:6 78:15 84:2 96:18 113:5 115:19 123:19 124:2,11 127:11 133:2,10 138:2 146:22 148:14 167:1 169:11 170:22 171:2 173:21 178:1,21 179:18 182:4 184:21 191:3 196:14 201:12 209:7 215:4,14 222:21 223:22 249:21 251:22 253:13 256:2 256:10 258:2 262:20 270:20 286:10,12 290:12,17 looks 93:17 121:10 164:6 165:2.4 198:16 211:17 234:3 **loop** 187:4 lost 172:11 lot 6:12 17:9 21:21 34:21 38:17 50:18 51:14 55:13 65:15 66:2 68:3 69:10,20 73:2,3 76:17 77:12 79:2.12 95:6 101:17 103:18 109:11 110:7 110:17 115:20 116:15 119:4 133:22 157:19 161:19 169:20 184:16 184:18,18 185:7 189:8 193:18 206:16 208:15 215:19 216:8 218:7,12 223:10,15 232:5 234:2,3 240:2 248:22 260:2 262:11 264:13 266:8 278:4 279:6 280:6 282:11 283:16,22 284:15,19 285:3 294:20 295:16 295:18,19 lots 42:10 64:1 74:5,5,6 74:6 77:22 95:19 145:4 152:14 246:17 263:9 loud 61:11 157:6 louder 38:22 lousy 138:19,20 love 25:20 237:2

low 37:7 39:20 41:2 53:16 67:20 70:5,7,7 71:8 80:2 204:16,18 205:15,17 206:16 209:1 284:6 low-case 82:18 83:8 lower 30:14 212:3 254:3 luck 280:13 lumped 256:3 lunch 168:6 171:7,8,9 171:10,11,14,16,19 187:7 lungs 191:17 Μ **M.D** 4:5 MA 2:3 ma'am 227:15 268:1 macro 19:4 66:22 Madison 2:16 21:16,19 65:5 66:15 81:2 83:13 85:22 202:11 226:13 magic 8:3 magnitude 190:20 main 114:3 232:4 **maintain** 105:14 maintained 216:3 248:22 maintaining 112:17 maintenance 109:2 203:10,16 major 49:3 50:21 62:7 125:15 266:12 287:18 majority 45:17,21 49:12 58:4 75:5 76:15 95:3 120:20 201:10 214:17 248:18 making 27:5,10 29:8,15 30:16 33:18,21,22 34:6 38:6 57:7 63:1 86:8 102:8 136:21 137:3 166:4 170:14 170:22 186:20 205:6 215:21 227:5 254:7 260:10 294:15 297:8 manage 277:5,8 285:14 manageable 72:6 managed 273:22 management 4:9 98:20 271:17,19,20 272:14 273:21 290:5 292:22 295:8 Manager 2:16 15:15 21:20 managing 280:1,13 **mandated** 245:20 mandatory 37:9 153:18

154:3 manner 59:16 Manning 1:19 8:17,17 15:10,12,14,15 80:9 94:5 145:14 MAP 3:11 4:6 8:10 14:16 22:10 24:4 36:4 36:10,21 37:15,18,21 38:9,15 39:14 50:4 82:3,5 84:4,17,19,21 84:22 85:2,10 86:6,6 86:9,12 88:3 106:1 124:2 150:15 153:9,9 153:12 154:4 156:19 161:7 166:11 169:14 193:4,9 194:13 197:2 202:17,18 205:5 228:16 229:11 256:7 281:19 MAP's 85:9 mapping 79:6 MAPs 218:1 marathons 5:14 march 163:1 Marcia 76:6 margins 206:17 Marie 2:8 13:19 16:17 210:6 262:7 282:9 Marinelarena 2:17 8:4.6 87:7 90:18 100:11 103:15 105:15 153:7 154:10 155:8 159:2 168:8,11 169:9 172:17 173:7 228:20 Marisa 2:4 11:21 239:1 mark 236:21 Marsha 1:19 8:16,17 15:10,15 80:7 94:2,4 144:20 145:12 marshal 288:7 **MARTIN** 1:17 Marty 12:18 96:16 97:12 129:4 136:15 138:19 177:10 198:20 280:14 282:11 Marty's 199:4,8 Maryellen 1:17 13:14 98:2 191:20 193:12 206:9 282:8 292:6 Maryellen's 224:14 mass 122:12 Massachusetts 134:2 materials 84:15 148:1 248:9 maternal 114:10,12,14 117:13 118:10 123:13 124:4,6 125:16 126:11 132:1,10

133:8,10,17 134:10 148:16 149:15,21 167:15 169:5,17 170:6,13,14,17,17,21 171:3 maternity 134:17 math 98:2 Mathematica 14:6 matter 2:6 10:10.22 13:4,17 15:21 16:14 19:13 38:1 70:5 99:6 171:21 298:5 matters 78:20 183:18 231:6 maximally 256:17 MBA 1:11 2:2 McGIFFERT 1:20 11:8 11:9,19 54:16 109:22 117:21 120:17 130:4 131:3,19,22 140:8,10 152:9 155:4,10 166:12,18 224:19 261:14 266:7,12 284:19 289:15 McNIFF 3:7 240:14 241:12.13 251:6.21 252:7 253:7 256:4 257:2 **MD** 1:11,13,20 2:1,7,8 2:10,12 3:6,17 16:20 mean 16:11 35:8 50:17 72:17 128:18 136:22 136:22 150:5 152:18 155:11 159:3 160:17 160:21 167:5.10 169:22 170:16,17,21 171:7 189:7 212:19 220:13 232:12 234:13 236:13 253:10 254:13 261:10 278:20 280:17 280:19 281:13 291:5 meaning 250:20 meaningful 5:19 25:22 27:9,11,15,18,19 29:1 29:5,16 31:2,3 33:16 33:18 35:5 68:9,16 98:8 101:8 124:4 147:18 150:11,13 168:4 211:11 248:15 256:18 281:12 294:9 297:1 meaningfulness 250:12 251:1 means 17:5 38:15 133:16 234:16 282:16 283:7 meant 160:19 188:14 measure's 143:13

measure-testing 243:2 measured 73:2 measurement 2:18,20 4:9 10:2 30:15 37:11 38:6 40:3,4 46:3,18 78:4,8,10 79:13,20,21 80:2 83:3 98:21 137:22 143:1 204:17 205:21 206:2 219:19 231:11,16 242:22 281:7,15,21 282:5 measurements 28:10 119:21 measurers 71:1 measuring 34:7 40:6 56:16 57:4 74:14 139:2,3 195:15 275:22 287:13,15 291:21 294:21 295:8 Medicaid 2:11 4:11,14 54:1 100:4 118:15 128:18 131:6 167:5 169:2 medical 1:18,20 11:10 12:11 14:8 15:15 16:20 17:6 20:6.10 26:20 119:1 184:17 189:19 206:18 255:8 285:4 291:14 Medicare 2:10 4:11,14 54:1 64:14 100:3 118:15 242:1 244:7,9 244:12,15 245:19 251:22 252:14,16 253:13 medication 35:2 44:4 71:18 283:1,1 medications 211:19 Medicine 18:21 35:16 290:22 meds 283:22 Medtronic's 12:3 Medtronic-Minimally 2:2 meet 75:6 100:18 111:17,19 116:14 229:18,22 273:19 277:13 293:13 298:3 meeting 5:8 6:3 7:6 21:11 23:7 82:5 83:18 83:19 84:15 100:15 112:3,3 150:16 225:17 265:21 267:14 268:21 269:1,2,6 meetings 25:9 111:1 270:15 meets 201:13 Melissa 2:17 8:6 9:22

21:15 83:13 85:18 99:17 106:22 153:7 176:1 228:20 members 10:8 19:15 38:1 60:20 77:2 80:6 84:21 86:12 87:11 97:9 107:13 135:15 146:2 181:13 184:17 185:7 206:16 269:14 281:19 297:7 membership 293:16 **membrane** 191:8 Memorial 241:1 Memphis 17:19 mental 18:20 44:11 77:9 mention 34:2 35:8 71:14 74:1 131:13 136:16 mentioned 49:10 59:3 60:9 77:5 82:15 111:14 129:20 133:3 136:17 255:21 259:16 282:1 287:17 294:22 mentions 255:21 mergers 59:20 messages 62:6.11 met 1:8 21:15 147:10 147:20 160:20 meter 220:12 224:10 method 231:9 240:4 methodology 18:7 148:12 218:18 237:5 239:8,12 249:4 methods 45:14 106:8 107:2,6,9 108:11 113:12 114:18 115:17 135:11 159:6 160:13 195:17 228:12,17 229:2,3,9,11,16 metrics 287:15 MHA 1:11 MHS 3:6 MI 290:13 mic 141:8 Michelle 3:17 4:5 7:4 19:19,22 23:19,20 24:1 32:22 33:6 34:2 36:2 65:3 98:19 101:7 104:15 200:17 257:8 270:18 292:12 Michigan 1:19 12:10 15:11,16 microphone 9:8,10 mid-January 83:6 midst 243:2 Midwives 132:4 milestones 288:10

million 29:3 215:15 222:8 mind 5:10 27:13 28:4 28:21 33:3 38:20 104:16 110:20 114:16 134:7 216:20 262:19 268:21 277:15 minds 96:15 163:14 234:4 minimally 12:3 231:19 minimize 224:17 minimizes 254:15 minimum 87:17 253:15 Minnesota 38:11 minor 217:14 minutes 33:5 38:14 39:7 92:4 109:15 171:14 204:18 205:21 208:20 210:9 212:7 212:10 213:5 215:9 216:11,12 217:7 241:6 281:18 296:11 MIPS 25:21 MIS 238:8 misalignment 292:19 misinterpreted 202:2 211:15 missed 67:10 223:18 251:18 misses 128:3 209:7 missing 23:16 66:9 67:3 71:16 110:7 128:7,8 182:19 Mississippi 62:8 mitigate 193:20 mitigating 166:1 185:13 191:22 192:6,9,20 207:21 209:10,19 211:7 214:19 219:22 mitigation 85:7,17,22 154:18 158:12 159:1 159:3 162:20 163:8 163:13 164:13,19 198:4 201:6 208:1 209:15 210:15 223:11 228:10 230:9,14 231:14 264:12 265:7 mixed 178:11 **mixture** 22:17 MLIR 1:19 modalities 271:19 model 31:13 141:14 142:12 224:22 models 290:14 moderately 45:13 Molina 2:5 13:11 moment 92:20 172:17 186:3

moments 164:21 money 132:21 257:21 monitoring 123:20 monotonic 280:17 month 19:22 24:2 273:1 284:10 months 44:10 53:18 179:3 262:15 263:3 286:1 moot 88:1 morbidity 151:3 218:11 Morgan 3:9 104:17,17 112:13 122:5,5 125:1 125:21 126:4 127:9 143:22 morning 5:3 8:5 9:22 11:4,8,21 12:19 13:13 13:20 14:11,19 15:12 15:14 17:17 18:22 19:21 20:5,16 32:13 32:17 36:8,16 76:13 77:19 229:11 Morrison 1:20 13:2,2,8 138:13 180:18 274:5 290:19 mortality 19:9 73:12 114:10,12,14 118:11 124:6 125:16 126:12 132:10 133:11 134:10 148:16 149:15,20,21 167:15 169:6,6,17 170:6,13,14,17,18,21 171:3 292:2 **Moscovice** 3:11 36:13 36:15,20 38:12,19 39:2,5 51:17 55:6 57:12 59:21 62:14 68:22 70:16 71:21 74:18 77:17 79:1 mother 116:16 137:5 mothers 1:20 11:10 118:9 151:3 motions 88:22 motivation 39:17 motivational 290:13 move 33:7 36:3 66:4 74:16 81:3 88:13 95:2 103:4 106:11 109:14 111:10 114:20 118:1 120:13 140:1 153:2 153:14 157:12 164:11 172:15 180:10 188:18 217:12 225:5 251:11 266:8 267:6 268:19 289:17 moved 123:7 189:20 257:19 moves 250:3

moving 50:10 83:14 189:21 260:13 MPA 2:9,17 **MPH** 2:1,2,14,19 3:7 **MSHHA** 1:11 **MSN** 2:4 Mt 18:20 MUC 7:2 28:6 82:7 83:22 88:18 91:3 103:3 MUC2018-265:2 MUC2018-107 198:9,14 MUC2018-109 202:9 222:16 MUC2018-150 228:5 MUC2018-52 156:5 164:1,3,17 muddy 159:21 multi- 132:1 multi-step 207:5 multifaceted 271:16 288:2 multimodal 273:3 277:10 multiple 25:4,6 29:4 30:10,11,18 131:8 183:10 200:6 205:9 213:17 216:10 221:6 221:16 224:20,21 271:18 290:21 multiples 216:19 Munthali 2:19 9:21 10:1 12:13 13:7,16 15:9,13 15:18 18:17 19:6,11 20:15,21 32:8 143:19 mute 9:7 12:16 Ν

N 258:1

N.W 1:9 name 5:4 8:6 10:1 13:20 20:5,16 21:19 32:14 36:6,9 63:11 96:19 97:7 Nancy 1:14 6:2 14:19 33:13 35:10 56:5,7 57:15 72:8 104:2 113:15 117:7 132:9 135:1 136:19 137:7 167:8 185:14 190:19 191:13 193:11 220:8 279:2 287:12 292:20 Nancy's 126:5 narcotics 208:9 narrow 120:10 narrowed 28:4 narrowing 285:1 nasty 6:19

nation 74:16 national 1:1,8,15,20 11:6,17 13:5 16:22 20:12 74:4 131:8,12 219:10 224:15 242:1 290:22 nationally 148:14 207:3 natural 279:20 nature 193:19 253:5 navigate 266:2 NCCN 16:21 near 112:22 nearer- 243:20 necessarily 145:11 162:8 232:14 259:5 need 9:14 32:3 45:2 49:17 51:9 53:3 55:20 58:9 61:14 63:6,22 64:13,19 71:5 72:4 75:7 89:22 90:4 113:2 114:8 115:1 121:22 124:13 133:10 136:9 140:3 147:11 152:16 155:20 160:4 162:8 166:10 175:13 180:8 198:17 205:6 208:17 219:9 221:11 230:3 247:4,10,12 249:20 250:5 252:3 256:16 270:14 275:5 276:19 277:5 279:7,7 280:11 282:14,15 284:7,7,8 284:13 285:21 288:19 294:13,14,14 needed 44:11 206:20 246:8,13 248:5,22 252:13 281:2 Needless 243:4 needs 34:15 38:4 116:6 116:18 137:17 138:16 159:4 206:3 285:13 293:22 negates 259:5 negative 64:5 256:22 nephrologist 12:10 nervous 37:22 net 48:11 292:11 Network 11:12 17:1 20:13 never 6:3,9 69:2,21 153:5 167:14 186:8 186:21 191:18 218:21 219:8 239:3 286:2 new 18:19 19:22 24:3 60:18 63:10 65:15 76:7,12 78:18 81:8 86:12 92:12 106:7 108:13 109:4 121:14

141:13 172:3.3 186:12 189:5,15 216:4,5 275:7 286:13 newer 235:15 nice 12:22 81:21 196:7 239:11 night 111:18 nightmares 273:8 **NIH** 18:7 218:19 nine 40:13 41:13 43:2 99:20 118:16 164:7 177:15 noise 208:15 Nolan 1:21 15:6,6 167:4 nominated 16:6 non-open 238:12 249:19 **non-opioid** 293:20 294:1 non-profit 12:21 non-voting 19:14 note 85:5 122:20 123:11 142:9 175:11 175:13,18 203:4 220:9 226:14 noted 48:17 75:5 176:9 176:16 182:15 219:4 227:4 261:2 notes 71:13 75:4,15 85:8 181:20 251:8 **notice** 93:9 95:20 noticed 81:13 195:19 notices 195:5 notion 41:2 48:12,19 60:6 63:1 69:15 70:17 74:19.20 79:7 **novel** 243:19 **NQF** 2:14 10:2 11:15 13:2 21:14 22:10 24:19 25:3 30:5,12 36:19 39:6,18 40:20 44:16 47:2 49:21 53:13 57:13 75:1 79:8 79:14 88:10 89:9 101:20 105:22 106:5 106:12,14 113:3 116:5 122:10,18 127:12,14 131:13 135:4,5 139:14 142:7 143:10,20 148:2 154:15 158:1 159:15 159:18 166:7 173:14 173:19 174:1 199:20 201:11 203:4,7 205:5 214:13 222:7 228:13 228:22 229:18,22 234:5 238:21 239:6 240:9 295:10 297:4

number 6:10 8:11.11 61:12 72:6 75:6 80:22 97:12 102:19 135:18 146:5 185:1 186:9 212:3 227:17 235:12 236:9 249:5,7 253:17 253:20 255:19 257:4 261:20 268:3 272:14 274:16,17 276:2 287:1 numbers 51:5 54:19 125:5 157:2 214:3 numerator 75:18 204:16 249:9 254:20 numerical 94:22 numerous 17:8 nurse 132:4 178:4 nurses 179:22 186:13 nursing 1:16 11:17 175:17 183:17 194:17 195:13 nutrition 45:10 185:5 nuts 180:2 Ο **O'Rourke** 2:22 22:6,6 85:20 90:10 97:6 112:10 155:12 157:1 161:3,6,12 165:22 166:15 168:2 171:9 171:13,18 188:10 192:7 193:1,22 196:17,20 199:19 200:2,5,10 223:17 224:21 226:13 237:11 240:17 297:5,18 obesity-related 43:20 objectives 23:7 obligation 96:2 obtain 127:14 obviously 22:19 23:7 54:8 55:10 75:19 181:2 188:10 239:14 243:6 244:10,19 271:6,17 279:5 286:4 occur 98:9,13 116:13 220:17 232:6 occurred 213:15 223:13 262:20,21 occurring 254:15 occurs 172:8 odds 7:7,9 offer 26:5 68:22 201:21 220:18 293:20 offered 277:7 offering 284:4 office 18:19 236:20 officer 14:1 20:6 26:15

62:16.21 officers 258:21 offices 293:17 old 54:19 95:10 148:3,7 238:13 older 140:7 235:16 on-the- 194:22 once 10:20 43:5,7 86:7 158:21 165:11 172:12 173:15 203:8 213:21 222:9 252:7,12 253:9 253:12,13 279:17 oncologist 16:20 oncology 239:3 245:6 one-fourth 100:19 one-two 73:9 one-year 232:2 onerous 28:1 ones 5:19 52:22 56:12 60:17 67:8 68:11 72:7 214:7 223:15 231:9 290:8 ongoing 28:17 30:18 60:10 online 94:2 211:2 onset 234:14 **Oops** 131:19 open 49:21 50:8 80:16 88:8 93:7,19 102:12 102:15 103:1 117:11 121:21 125:8 174:11 198:9 222:16 227:8 231:20 238:8 240:18 240:19 249:19 250:21 255:21 256:5,14 267:17 opening 4:5 23:21 32:22 openness 16:12 operate 206:16 235:17 operating 61:16 operationalize 86:3 operationalized 166:5 operator 80:20 102:17 227:13,15 236:2 240:17,19 267:21 268:1 operator-dependent 235:9 opiate-free 273:16 opiate-sparing 273:17 opinion 90:2 95:5 96:3 109:17 139:21 258:11 267:2 opioid 267:12 268:9 271:10 272:15 274:9 275:9 277:2 282:20 287:15 288:1 291:9

291:22 292:14 293:17 295:11,21 opioid-induced 147:8 opioid-naive 277:22 opioid-related 291:6 opioids 46:9 72:3 271:9 271:18 274:8,19,21 275:4 276:15 280:7 286:1 287:10 opportunities 25:12 65:15 185:22 230:18 opportunity 4:18,20 21:13 25:13 28:13 31:9 33:16 34:1 35:20 35:22 50:8 60:19 89:1 92:1 144:17 195:3 197:8 213:5 268:9 270:22 278:11 280:7 286:14 295:4 opposed 97:17 235:4 290:8 opposite 154:18 215:8 232:10 optimal 44:1 126:10 option 156:9,9 164:4,4 164:20,20 198:14,15 222:20.20 265:8.8 options 284:5 289:9 **ORARE** 147:8 order 99:10 103:7 190:20 242:17.19 246:8 253:15 267:15 organization 14:4 17:6 organizational 1:12 10:9,12,17,21 15:19 37:22 organizations 27:22 168:17 177:16 183:7 organized 72:13 original 148:13 274:17 originally 28:6 **Orlowski** 14:9 ostomy 186:13 other's 96:1 113:18 226:9 ought 277:3 out-of-pocket 48:5,8 outcome 31:5 45:19 46:10 105:19 107:18 124:9 149:17,22 175:21 229:3 244:14 247:1 261:17 262:9 288:15 outcomes 27:16 29:21 46:11 78:19 117:13 117:14 118:9 239:21 242:9 243:20 245:17 248:15 273:14

outline 22:16 outlined 113:17 outpatient 26:11 278:10 output 290:9 Outreach 3:15 outside 8:7 59:5 197:9 197:22 278:9 overall 42:12 44:12 52:14 67:1 69:7 206:4 229:16 241:7 250:18 252:11 256:12 271:20 overarching 37:8 236:6 overlap 116:7 overly 65:19 66:11 oversees 17:7 oversight 20:12 overturn 91:12 overuse 118:4 287:4,10 288:1,1 291:2 overused 287:9 overview 4:6,8,10,16 36:4,19 38:16 39:8 83:17,21 92:10 100:12 202:12 225:9 225:14 owe 139:19.20 265:21 **Owens** 2:11 8:20,20 19:18 20:16,17 ownership 18:2 oxygen 191:16 oxygenation 191:9 Ρ P-R-O-C-E-E-D-I-N-G-S 5:1 **p.m** 171:22 172:1 298:6 **PA** 90:13 PAC 161:22 194:2 268:21 PAC/LTC 268:17 packed 297:15 packet 148:6 page 234:12,15 paid 16:9 19:8 pain 4:9 98:17,20 269:21 271:3,3,7,11 271:12,17,18,19,20 272:14 273:21,21 274:8,17,21 275:5,7,8 275:16,18,20,22 276:5,12,19 277:5,9 280:1,13 281:2 282:16 283:5,16,22 284:7 285:2,4,14,18 286:8,11,17 288:5,21 289:6 291:19,21 292:22 294:14 295:8

296:15 painless 297:17 **Palliative** 1:21 13:5 Pam 2:11 8:16,19,20 19:17,20 20:15,17 80:7 94:3,3 pan 238:16 panel 53:13 82:16 106:8 107:2,10 108:11,13 110:2 113:12 114:18 115:17 127:2 135:11 141:10 142:3 159:6 160:13 166:19 190:3,13 195:17 211:9 228:12 228:17 229:2,3,11,16 231:9 Panel's 229:9 panelists 107:7 panels 109:10 282:2 paperwork 5:18 28:3 119:22 parity 77:8,12,15 parsimonious 28:6 part 5:17,18 17:13 28:8 28:22 75:9 88:10 96:21 97:2 131:6 133:8 135:9,10 137:7 149:1 190:8 192:3 194:21 204:15,20 241:16,17 247:14 257:12 266:5 279:9 289:22 290:14 partial 240:6 participants 87:16 participate 100:18 participated 14:5 participating 131:11 183:7 participation 24:5 31:20 37:10 108:6 199:12 particular 26:18 65:10 67:3 108:10.17 139:10 166:16 176:19 199:21 219:14 226:2 239:16,20,22 240:4 273:6 289:4 295:1,21 particularly 30:4 40:1 41:20 46:8,10,16 55:12 67:9 71:5 80:2 105:5 150:7 210:12 275:19 279:4,11 288:10 **partly** 144:8 partner 12:12 partners 1:13 12:9 24:20 102:4

Partnership 1:3 25:1 partnerships 47:22 parts 10:7 61:22 62:19 pass 89:15,18 90:5,13 162:5 197:10 220:15 passed 35:1 162:13 passing 166:8 patient 1:17 11:11,11 11:13,14 12:20 13:22 14:21 19:4 31:4 41:18 45:20 126:10 132:17 136:3 175:16,19 179:4 185:8 187:1 194:5 204:11,14 205:1,7,8 206:3 208:22 209:2,7 211:9 213:14 221:6,7 231:7 246:6,19 248:14 249:10 250:7 252:1 261:4 262:9 279:15 281:6 286:18 292:13 292:21 293:13 294:9 295:6 patient's 211:22 patient- 46:10 245:16 patient-centered 286:5 286:10 patient-level 246:20 patient-reported 30:1 78:19 239:21 261:17 273:14 patients 5:17 27:17 28:3,19 31:3 33:19 37:5 42:1 43:7 45:17 49:4 51:5.13 57:22 59:5 70:12 101:2 119:22 126:3 139:5 139:19 150:2 175:13 175:22 182:19 183:10 184:14 185:1 189:19 189:21 190:19 193:19 194:9 200:1,2 204:5,5 204:9 211:11,18,20 216:17 218:10 231:6 232:22 233:2 240:6 247:18,22 251:19 252:6,17 253:14,20 260:3,6 261:8 271:9 271:13 272:12 273:2 273:15 275:17,18 277:4 278:7 280:19 280:21 281:4 282:15 284:21 285:9 287:19 289:1,7 290:7 **Patrick** 219:3 patterns 66:7 293:18 pause 12:14 90:11 269:17

pay 64:19 100:16,17 166:9 282:14 284:15 pay-for-value 63:18 payer 244:18 payers 30:3,9 31:13 paying 100:22 payment 4:16 31:12,12 49:16 55:12 56:2 100:8,20 225:6 226:4 279:11 292:21,22 293:1 payments 55:16 PC-01 122:21 123:3 124:17,19,22 PC-02 123:6 PCHQR 3:15 4:17,18,19 225:19 226:11 241:16 242:1.8 peaked 5:15 pediatric 13:21 pediatrics 78:9 peer 78:5 79:18 255:7 penalized 75:12 penalty 104:10 179:2 190:21 Pennsvlvania 18:6 people 5:13 7:10,19 9:11 27:4 58:2 64:4 69:16 72:14 73:20 90:12 93:12,16 94:16 95:19 97:8 102:14 103:1 109:7 129:13 130:7,11 131:11 135:11 138:21 140:21 141:3 147:18 162:13 163:11 170:7 171:10 171:11 172:8 181:8 182:9 189:1 195:1 208:17 227:9 261:22 262:12 263:18 270:21 275:4 278:2,6,15 282:21 283:3,16 284:4,21 285:1,3,10 291:5 294:4,13,16 percent 64:12 87:10,16 87:17 90:4,7 91:12 93:15 112:20 113:1 118:14 150:21 155:22 163:11 164:9,10 165:4,5 199:1,3 204:8 204:9,10 223:4,4 238:14 247:22 253:18 265:12,13 percentage 93:10 157:2 percentages 164:9 perfect 28:10 78:14,15 140:13 241:12 286:14 performance 2:15 78:4

78:5 117:11 123:18 123:21 124:19 136:4 193:18 195:15 243:4 243:8 perinatal 129:13 131:9 period 72:14 91:19 175:15 204:15 267:10 269:8 permutations 165:12 person 9:12 25:15 29:9 87:12 89:5 102:4 137:22 157:4 227:5 277:22 281:20 286:10 personal 7:15 258:14 283:19 personalized 282:13 284:3 personally 118:5 119:19 132:15 159:21 264:19 265:22 perspective 50:10 52:12 55:12,13,22 56:1 59:19 63:21 70:19 82:6,11,13 126:7 146:17 150:10 151:22 152:16 193:10 231:7 251:14 perspectives 46:21 287:2 pertains 233:12 pertinent 115:10 **PFE** 137:1 281:14 **Ph.D** 82:17 pharmacist 14:12 111:13 Pharmacists 14:15 **Pharmacy** 1:13 14:16 **PharmD** 1:13 **phased** 37:9 phasing 73:9 **PhD** 1:15,16 2:7,11,14 3:11 Phillips 2:1 13:20,21 35:13 50:12.12 148:22 166:22 168:22 183:5 184:5 194:16 208:6 252:20 276:17 phone 8:16 10:22 11:1 12:15 19:18,20 25:15 36:13 38:9,21 65:8 77:2 80:7 87:12 89:5 102:21 144:21 145:13 162:21 202:12 227:14 228:21 230:4 240:15 267:22 phones 9:7 physical 45:10 289:7 physically 194:22

physician 12:4 66:6 235:4 236:16 253:21 257:17,17 259:13 physician-262:5 physician-based 259:4 physicians 259:21 260:4 274:22 293:1 293:19 **PI** 105:2.6 pick 56:21 261:16 **picking** 279:5 picture 133:17 224:6,8 235:3 piece 50:17 95:18 116:9 133:12,14 211:14 275:12,14 pieces 61:18 133:1 pile 280:15 **piling** 288:13 **pills** 283:4 **pilot** 168:7 Pittman 2:2 32:17,18 144:22 153:15 209:17 place 53:4 66:13 90:16 149:17 257:11 270:13 287:4 places 5:20 34:21 62:4 plan 6:14 23:3 43:13 54:5 143:9 230:12 290:2 planned 60:3 planning 44:7,17 297:10 plans 30:5 74:6 play 48:6 63:16 64:10 117:1,2 185:4,5 259:1 played 53:7 73:3 plays 87:5 please 9:7 12:15 21:9 30:21 36:17 37:18 50:11 80:21 93:8 94:18 96:3 102:18 109:15 113:14 136:6 161:5 164:14 223:18 227:14,17 237:2 242:20 267:22 268:3 271:5 297:22 pleasure 23:18 plug 259:11 PMD 236:20 point 60:9 64:17,18 65:21 71:9,22 76:2 78:13 84:22 88:1 90:11 116:10 123:5 123:16 126:17 134:13 134:21 135:3 144:3 144:22 146:5 149:12 150:14,19 153:16,22

157:2.12 161:7 167:11,22 169:3 193:4 200:19 207:4,7 207:11 212:16,17,22 213:13 217:21 221:3 224:14 228:16 237:13 238:7 250:5 251:2 253:16 255:16 259:14 260:9,12 262:22 264:7 267:8 279:5 280:17 287:16 289:16 pointed 6:2 60:1 71:9 115:7 points 69:12 72:10 122:2 173:3 233:21 294:17 policies 49:13 63:10 64:10 policy 12:5 14:21 24:16 27:2 47:8 48:9 52:12 55:12,21,22 59:19 62:16,22 76:4 137:1 153:17 215:10 275:11 policymakers 56:18 **Poll** 92:20 Pollock 2:12 20:9.9 142:14 251:16 252:5 252:18 286:20 poor 43:22 219:17 278:15 population 38:5 40:7 41:21 42:16 48:7 64:12 71:17 118:19 120:7,10 123:6 136:3 170:5,15 171:4 181:6 219:18 220:1 221:16 248:2 252:1,12 292:13 293:13 294:9 population-based 31:12 portfolio 23:14 portfolios 23:17 position 293:2 positive 55:13 182:16 214:11 215:17 positively 87:17,18 127:13 possible 41:4 53:21 64:16 188:5 214:5 223:11 293:15 **possibly** 5:11 165:12 post 44:4 263:2 post-acute 26:1 post-op 272:14 post-surgery 262:17 275:19 potential 57:11 58:8 85:7,16,21 137:5

154:18 158:11 159:1 159:3 162:20 163:7 163:13 164:13,19 166:9 185:13 192:5 198:4 208:1 209:15 228:10 231:14 251:20 264:11 265:6 potentially 50:18 126:10 134:17 149:17 176:8 237:14 296:1 powerful 281:2 powerfully 150:2 PPS 225:7,7,15 **PPS)-Exempt** 4:16 practice 37:6 72:20 277:21 280:20 practices 29:14 69:15 226:9 296:3 practicing 47:9 practitioner 26:13 pre-post 243:12 pre-rulemaking 4:8,13 4:19 81:6 82:13 83:14 predecessor 135:6 predicted 214:11 predictive 182:16 preeclampsia 125:14 126:3 166:13,17 167:10,11,12 Prefect 210:22 prefer 186:17 preliminary 84:14,16 88:14,18 89:7,14 91:13,13 103:19 105:16 106:13 145:20 146:8 156:6 173:10 197:17 198:6,11 202:14 222:4,5,13,17 228:7,9,19 229:8 265:4 Premier 2:2 32:18 prep 297:19 prepared 270:15 prescribe 208:11 275:4 291:21 293:20 prescribing 274:8 275:10 276:14 284:16 291:13,18 293:6,18 prescription 71:18 283:22 284:12 291:6 prescriptions 282:22 287:16 present 3:3,22 87:11 88:19 110:3 111:6 112:8 178:4 179:7,8 187:3 189:11 277:12 presentation 36:20 39:6 171:8 204:20

270:18 presentations 27:8 125:22 presented 101:6 preserve 85:9 **President** 2:19 10:2 14:20 presiding 1:10 press 80:21 102:18 227:17 268:3 pressure 14:5 45:8 58:18 103:10 116:13 172:16 173:6.8 175:2 175:4,9,11,15 176:5 179:19 182:5 185:5 186:12 187:13 189:5 189:10,22 190:6,13 194:19 200:21,22 292:4 pretty 79:10 110:11 127:13 138:1 213:3 251:5 283:21 285:15 prevalence 232:11 prevalent 239:15 prevent 212:12 213:6 242:10 prevention 2:13 20:11 29:12 43:8 102:7 preventive 43:14 prevents 254:15 previous 34:3 36:19 47:2 87:9 140:17 148:20 202:17,19 204:20 previously 55:8 122:8 primarily 175:7 primary 26:8,9 28:21 144:12 278:15 prime 183:22 principal 143:1 principles 29:6 prior 122:9 125:2 200:22 239:17 249:6 270:3 prioritization 136:7 priority 102:2 227:3 private 65:1 128:15,19 236:19 244:18 **PRO** 243:6 PRO- 242:21 **PRO-based** 243:4,7 probability 276:12 probably 5:9 6:13 21:21 25:3 32:3 62:4 68:8 95:22 110:19 117:10 118:11 125:5 129:1 131:16 133:12 134:11 141:10 161:20 179:14

Neal R. Gross and Co., Inc.

Washington DC

194:1 195:13 205:17 207:9 215:3 217:10 228:1 240:2 261:20 264:8 267:14 272:1 282:13 283:9 291:13 problem 74:8 82:18 83:9 275:15,16 279:6 279:9 280:1 285:16 286:21 288:1,1 problematic 78:12 problems 118:12 158:8 236:14 253:8 276:14 278:3 procedure 70:20 118:4 263:11 277:22 procedures 70:12 88:17 112:5 118:3 238:9,12 255:20 257:4 260:18 261:22 263:20 process 9:4,5 25:2 29:21 31:5 45:19 81:9 82:13 83:14,17 84:13 86:6 87:3,7 88:4 94:9 96:22 98:16 106:12 106:19 107:3.21 108:14 113:12.13.13 113:14 121:9 139:10 149:18,21 152:12 162:22 165:16,19 168:10 172:3,10 186:5,18 191:22 196:18 199:13 204:12 206:1 219:9 222:2 234:6 265:22 270:2.6 281:7 282:5 288:20 processes 121:4 productive 8:13 products 143:8 professional 118:18 129:20 132:2 professionals 41:11 129:13 profile 84:21 prognosis 245:10,15 program 3:15 4:11,12 4:13,14,17 6:1 31:8 50:16 60:19 83:21 84:1 99:11,15 100:2,3 100:4,8,9,13,17,19,21 101:19 102:11 104:4 104:7,21,22 105:2,3,7 105:9 114:3 123:1,8 123:10,13 124:17 144:9 145:11 151:7 154:2 155:3 160:21 161:10 172:14 173:21 175:5 190:22 225:8

225:10,12,16,18,18 225:20,22 226:5,21 227:9 235:4,4 236:7 237:8,9,15,22 239:16 242:3 244:3,4 245:21 245:22 258:7 264:16 279:10,11 294:5 programs 3:9 23:10,12 24:17 25:19,21 26:1,3 26:5 28:13,16,18 29:2 29:4 30:3,11 31:13 37:11 45:22 55:17 63:4 64:15 99:19,20 100:1 145:5 226:12 226:16 237:20 259:12 281:14 293:1 294:7 296:5 progress 100:22 114:7 176:12 179:19 project 1:17 2:15,16,21 4:7 11:13 12:19 21:20 21:20 22:2,3 36:5,10 36:10,12 37:3 83:4 204:21 243:3 244:20 281:12 projects 243:16 prom 274:2 promise 98:12 156:15 promote 28:3 29:13 **promoting** 4:11,14 25:22 29:10,11 100:4 102:5.6 promptly 9:9 prone 280:21 propagate 274:12 proper 293:5 prophylaxis 42:5 **propose** 158:10,19 250:16 proposed 71:22 104:13 175:3 pros 76:9 prospect 143:14 **Prospective** 4:16 100:8 225:6 226:4 prostate 228:5 231:4 233:2 235:21 239:4 245:12 247:17 248:1 248:11 252:3,6,11 prostatectomies 240:7 protecting 48:10 provide 20:12 23:1,8 25:7,10 28:19 36:18 40:3 52:6,6 83:20 84:21 88:5,7,9,11 89:6 92:2 101:3 103:16 108:18 118:17 135:3 136:10 146:14

159:11 168:12.18 225:22 229:9 230:5 259:18 288:8 provided 142:1 229:6 229:14,18,20 247:6 296:17 provider 18:15 137:5 293:12 providers 37:5,10,14 37:20 45:17 57:3 69:7 69:8 76:16 100:22 184:13 242:16 provides 246:2 providing 83:21 99:18 146:18 254:14 255:9 287:15 296:10 297:11 psych 24:10 psyche 26:2 psychiatric 1:15 34:11 34:15,19,22 psychiatrist 18:21 **pubic** 100:17 public 4:18,20 25:13,15 35:16 47:16 51:10 64:15 73:8,18 77:3 80:16.19.21 91:19 92:2.5 100:16 102:12 102:16,20 103:2 108:6 118:6 152:16 152:17,21 153:2 170:4 174:7,8,15 189:9 193:17 225:10 226:14,19 227:8,18 229:13 267:9,9,17,19 267:22 268:4 269:8 269:19 298:2 publication 193:17 publicize 81:21 publicly 72:19 74:22 104:8,9 119:5,7 144:11 published 218:21 225:21 publishing 119:15 pull 183:12 271:4 pulled 35:6 285:22 pulling 203:20 punished 144:19 purchasing 104:22 123:8 purpose 256:20 purposes 20:14 250:19 256:14 purview 23:10 147:13 192:5 **push** 119:20 pushing 62:5 78:13 237:5

put 17:22 23:14 53:20 91:8 110:13 140:18 147:19 149:20 151:6 152:11 153:5 160:21 179:6,21 180:2 185:9 191:16 193:1 199:19 220:12 224:11 236:7 236:21 237:7,14 242:12 258:7 290:3 293:1 puts 157:11 293:1 putting 127:19 132:8 133:15 137:15 138:21 145:10 170:19 203:21 Q QIN-QIO 17:6 **QMVIG** 3:17 20:1,7 25:17 quality 1:1,8,13,16 2:12 2:18,20 4:9,10,16 10:2 11:17 14:2,13,16 14:20 15:4 18:1,13 20:1,14,18,19 23:10 25:16 26:12,13,15,19 28:9 29:8 30:7,16,20 32:6 33:20 34:5 37:10 37:11,13 45:21 48:18 53:5 64:16 76:19 98:20 100:3.9.22 101:4 104:6.21 118:21 131:8,9 137:1 138:22 141:12,13 142:1,15,17,22 143:1 144:15 146:6,11,19 152:19 185:22 203:3 225:8,15,18,20 226:1 226:5,7 241:2 255:4 263:18 276:6 quantity 101:1 quarter 105:10 question 53:19 59:8 82:20 93:3 96:17 98:1 104:3 109:22 111:22 117:7 126:19 140:15 143:4 145:15 146:7 148:12,18 153:6 156:5 164:1,17 176:16,17,22 177:2 185:16 187:10 191:21 193:13 196:21 198:10 213:16 219:7 255:5 257:14 258:14 271:14 273:18 279:18 questioned 246:14 questions 21:9 33:6,9 36:2 39:11 49:22 54:3 65:5 66:15,19,22 67:4

86:20 88:10.21 89:2.4 89:6,16 99:12 107:11 115:20 116:2,7 194:16 197:20 215:2 230:19 234:3.20 242:6 244:2 245:1 246:4 248:7 249:16 251:12 265:3 271:7 271:11 queuing 172:18 quick 36:18 70:4 72:10 96:17 98:1 100:12 170:12 209:17 274:5 275:11 285:14,15 quickly 71:7 128:11 152:9 168:9 186:14 254:19 Quinnonez 2:21 22:1.2 92:15 94:6 156:4,14 157:5,8 163:22 164:6 164:16 198:8,21 222:15 265:1 268:13 quite 81:15 101:20 111:15 122:21 176:20 182:9 183:12 219:17 248:17 258:21 271:2 quorum 87:10,18 quote 274:9 291:9 quoting 167:10 R **R** 1:20 raise 9:5 92:21 183:4 raised 48:11 57:16 63:19 76:2 115:21 116:1 166:11 200:19 ramifications 283:13 randomized 273:9 Raney 3:13 53:22,22 range 175:10 204:8 207:1 rapid 134:3,5 185:21 rare 182:20 rarely 215:16 rate 42:9,14 rated 123:10 rater 178:17 rates 115:21 139:3 146:18 148:15 150:20 169:21 170:4 171:5 238:10 262:16 292:2 rationale 84:11 202:15 rationales 95:14 ratios 116:14 re-admission 75:3 re-admissions 60:3 73:11 re-focus 34:5

re-initiated 30:4 re-specification 237:15 re-specifications 203:14 re-specified 160:4 203:6,6 reach 84:4 107:12 reached 84:12 88:6 89:7 90:6.7 reaches 155:22 reaching 145:9 react 112:8 read 66:16 85:3 93:1,2 110:1 148:1 157:5,6 212:17 226:17 239:4 reading 120:3 readings 209:22 215:15 readmission 43:1 44:10 59:12 237:3 reads 127:7 156:5 164:1,17 198:10 265:3 ready 8:2 9:19 85:11 86:17,18 103:13 141:4 147:16.20 152:8 161:14 171:9 183:22 209:12 240:3 270:15 real 42:17 73:3 77:11 78:3 117:12,13 147:17 152:9 176:12 180:6 204:10 253:8 259:1 284:3 287:5 real-time 21:3 30:16 93:6 realistically 162:18 reality 69:12 139:5 179:8 217:11 realize 295:4 realm 157:20 reason 94:21 111:6 123:11 144:12 163:21 173:12 179:21 183:22 212:2 228:11 241:8 244:8 251:1 253:7 256:19 275:3,11 281:3 reasonably 190:1 reasoning 90:13 reasons 110:2 115:14 206:4 221:8 reassess 276:5 recall 104:10 receive 88:2 100:19 204:14 received 10:13 21:21 92:18 126:21,22 230:8,10,13

receiving 28:16 250:14 **recheck** 212:8,14 rechecked 212:10 recidivist 216:16 recognize 27:21 28:9 30:14 53:20 58:6 123:12 254:12 272:1 272:18 288:17 recognizing 271:12 283:16 recommend 110:2 113:10 120:1 153:9 193:14 229:4 289:18 290:12 recommendation 37:8 50:4 89:17 90:8 94:21 98:6 106:13 113:9 115:6,13 120:15 139:22 154:9 155:1,5 155:11,14,15,19 156:2,7,9 157:19 160:22 169:12,14 173:4,22 176:1,4 177:12 181:2 184:4,6 197:9,17,18 198:12 214:15 222:5.14.18 222:19 231:13 234:21 249:18 264:10,15 265:5,5 274:19 recommendations 23:15 30:22 36:21 37:12 38:6 40:3,6 53:15 57:22 82:2 90:22 92:6,7 109:16 113:15 159:11 173:13 173:18 174:2 193:9 205:14 229:10,15,15 229:17 230:8,11 233:19 240:10 298:1 recommended 56:11 190:18 193:15 228:12 238:21 243:11 256:12 recommending 242:7 reconciliation 35:3 44:4 reconnect 198:17 record 96:21 97:2,17 99:7 119:1 142:20 171:22 179:12 186:16 189:4 200:6 223:7 225:2 298:6 records 26:20 31:17 119:17 recruit 257:22 recuse 17:12 **red** 87:8 redirecting 293:3 reduce 27:12 28:22

30:10 119:21 169:21 256:21 reduces 170:4 reducing 27:20 28:2 147:18 288:21 289:6 **reduction** 100:20 redundancy 117:1 Reena 2:10 19:19 20:6 104:15 147:5 150:3 Reena's 153:15 refer 72:12 287:4 reference 54:12 226:20 referral 47:10 referred 61:11 refine 50:9 86:1,5 95:10 147:13 249:20 refinement 28:14 238:7 reflect 253:3 276:19 reflected 281:22 reflecting 94:12 reflection 254:22 reflects 95:3 223:12 **refrain** 93:18 refresh 156:11 regard 114:8 125:12 204:3 regarding 40:6 81:8 134:10 271:11 regardless 192:19 201:9,15 295:6 region 68:19 regional 66:2 registries 30:19 **Registry** 242:3 245:21 regret 191:11 regular 35:18 regularly 122:13 208:7 285:9 regulatory 295:19 reimbursement 12:5 reimbursing 49:13 reinvented 87:3 reiterate 85:13 225:17 244:3 261:15 related 16:2 17:22 41:15,16,19 42:4,18 43:9,10,11,13,15 45:9 48:4 53:9 58:16 64:4 66:20 75:15 113:13 114:12 121:2,3,5 124:4,7,12 136:2 145:15 146:18 168:3 220:9 245:8,16 relates 35:19 47:18 150:11 195:15 relationship 134:16 relationships 47:10 relative 124:17 267:11

295:21 relatively 68:12 134:3 172:22 relayed 266:18 relevancy 148:20 relevant 14:4 16:8 37:14 38:4,5 39:16,19 40:1 41:20 46:16 55:11 58:22 63:2 79:18 reliability 106:10 107:11 109:8 111:3,8 115:3,9 119:10 120:22 142:10 178:17 195:16 214:12 229:19 233:22 reliable 128:4 139:17 178:7 relief 272:16 relieve 294:14,14 reluctant 284:5 rely 178:3 remain 239:10 remarks 4:5 23:21 33:1 remember 5:14.15 7:19 9:2.9 10:13 21:2 33:11 35:14 74:19 75:18 80:6 96:19 98:11 127:19 165:9 187:1 261:16 remind 12:14 21:1 29:8 124:22 133:4 151:7 154:8 210:20 214:15 228:16 **reminded** 193:13 reminder 16:10 99:19 154:11 237:18 reminders 16:3 reminds 147:7 remiss 270:11 **remote** 47:22 removal 29:17 101:10 277:1 removals 123:1 remove 247:17 removed 29:1 101:14 101:19 105:6 120:4 122:9 271:7 renew 218:22 repeat 7:14 96:2 208:7 208:22 266:13 repeated 221:7 repeating 9:18 295:3 replace 86:1 271:11 reply 121:19 report 58:5 75:10,13 83:5 105:10 115:18 119:7 139:17 144:10

151:8,13,16 162:14 169:1 173:22 186:6 186:15 195:20 197:1 197:3 237:12 241:17 248:11,11 **reported** 46:11 54:10 119:6 139:15 144:11 175:6 194:12 231:18 250:21 256:12 **reporting** 4:11,17 28:10 35:17 45:20 54:11 100:3,9,16,17,17 104:7,11,21 110:16 118:6 129:19 134:2,6 139:16 152:16,17,21 170:4 175:4 195:21 203:2 225:8,16,18,20 226:5 251:2 reports 11:13 22:18 represent 16:5 representation 24:11 representative 19:4 representatives 1:12 10:9,12,17 15:20 **represented** 24:6 37:20 representing 11:6 12:9 13:4,11 14:15 25:17 32:14 241:14 reps 10:21 request 61:20 require 110:12 212:8 230:6 required 110:18 169:1 requirement 50:15 105:14 137:16 210:11 212.14 requirements 100:19 144:9 183:16 requires 50:16 86:6 research 2:11 15:2 20:19 38:11 76:5 resemblance 139:4 resident 216:15 residents 46:17 resistant 41:2 291:7 resolve 279:7,8 resource 206:15 resources 57:21 69:20 79:5 206:19 224:18 270:14 288:7,9 respect 105:1 122:6 142:18 respectful 22:20 respiratory 118:12 147:9 respond 65:4 88:10 89:3 112:7 122:1 136:15 174:7,9

	1		
180:16 181:9	126:1,11 149:10,18	158:11 159:17 162:19	284:3 291:20
responds 75:1	159:12 162:1 166:10	162:19 163:5,7,10,12	says 33:8,8 75:4 116:3
response 69:1 196:3	184:10 185:10 190:12	163:20 164:13,18	209:22 212:9 222:2
241:7 251:13,17	190:20 192:3 196:10	173:11 197:19 198:14	scale 278:5
266:15 275:10	196:15 205:10 209:5	202:15 214:16 222:20	scaling 239:9
responses 266:17	211:20 219:8 221:2	228:10 264:11 265:6	scared 284:6
responsibility 7:1	221:11 223:15 224:22	296:19	School 18:21
139:21 258:18	232:21,22 233:4	rules 77:13	Schreiber 3:17 4:5
responsible 25:18	245:2 246:11,13,18	run 92:6 158:7 186:15	19:21,22 23:22 24:2
57:18 58:12	247:4,10 248:6	207:9	34:17 65:7 199:16
rest 106:12 112:1 113:7	251:20 261:2,4 273:6	running 186:11	200:18 258:10 286:4
165:15 248:21	risky 208:10	rural 3:11 4:6 24:8 36:4	296:12
Restrooms 9:6	RN 1:16,19 2:4,17	36:10,21 37:3,4,10,14	science 28:11 151:12
resubmit 86:1,5,8 95:10	Robert 3:9 104:17	37:15,17,19,20 38:4,5	166:19
113:3 147:14	112:13 143:22	38:5,9,11,15 39:14,16	scientific 106:7,8 107:2
resubmitted 106:14	robot 235:11,12	39:20 40:1,7 41:8,11	107:6,9 113:12
166:6 228:13	robotic 238:8,14 255:22	42:2,11,16 44:5 45:17	114:17 115:16 127:2
resubmitting 127:11	255:22 260:14	46:4,13,16 47:16 48:6	135:10 141:10 142:3
result 43:21 68:4	robots 258:20	50:4,9 51:4 52:5,18	148:11,19 195:17
103:20 173:10 202:14	robust 145:16 170:3	52:21 56:16,18,20,22	234:7
218:3 228:8 240:1	266:14	57:8 59:6 61:4 62:1,2	scientifically 114:22
resulted 136:13	robustly 196:15	62:6,7,9,16,20,21	SCIP 218:20
results 69:16 90:13	robustness 196:11	63:2,5,12 64:5,13	scope 86:9 111:15,16
93:12,14 126:22	role 20:1 31:6 218:18	65:13,16,16,22 69:3,5	score 250:16,18 256:13
139:18 153:3 156:18	roll 9:20	69:6,7,17 70:1,1	Scott 2:4 11:22
157:8 164:5 173:19	rolling 258:8	72:15 74:17 78:2	screen 56:12 65:6
212:21 214:12 220:17	Ron 1:9 5:4 9:21 16:14	80:12 81:16,18,22	66:18 199:1 228:1,3
260:17 265:12	16:15,19 24:13 32:2	82:6,9,11,12	screening 42:20 43:8,9
resumed 99:7 171:22	56:6 91:3 107:6	Rutgers 11:5	43:12,13,15,16 45:2,3
retained 123:9		RxNorm 215:22 216:5	
review 23:7 86:7,22	108:20 113:16 138:13 174:3 180:20 196:17	RxNorms 224:5	45:4,5,6 58:17 71:1,3 71:12
88:7 119:3 120:5	269:12 296:12 297:12	RANOTIIS 224.3	=
121:5 127:2 140:22	Ronald 1:11 122:5	S	se 220:11,19 232:4 288:16
142:7 152:11 153:5	room 1:8 5:10 9:11	S 1:11	Sean 1:20 13:2,7 138:9
		-	
154:6 162:7 166:19	10:17 11:1 15:10 39:1 80:18,18 102:14	Safe 11:13	138:12 180:17 274:4
169:11,22 173:15			20014 20014 0
		safer 29:9 102:8	280:4 290:18
192:2 203:8,17 229:1	103:1 116:13 147:10	safety 11:11,14 14:2,21	Sean's 276:20
192:2 203:8,17 229:1 232:5 255:7,8	103:1 116:13 147:10 150:22 158:3 181:9	safety 11:11,14 14:2,21 18:1 20:13 48:10	Sean's 276:20 seat 7:20
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17	Sean's 276:20 seat 7:20 second 5:6 40:2,20
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16 reviewers 108:1	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19 272:9 278:4,8	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13 Sally 2:3 32:9,14 77:1	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15 67:17 68:13 94:14
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16 reviewers 108:1 reviewing 81:6 83:21	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19 272:9 278:4,8 rooms 42:2	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13 Sally 2:3 32:9,14 77:1 77:18,20 117:4 143:2	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15 67:17 68:13 94:14 104:1 114:9 130:13
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16 reviewers 108:1 reviewing 81:6 83:21 84:9	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19 272:9 278:4,8 rooms 42:2 Ross 3:15 240:18,20,22	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13 Sally 2:3 32:9,14 77:1 77:18,20 117:4 143:2 201:3	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15 67:17 68:13 94:14 104:1 114:9 130:13 164:7 182:5 195:3
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16 reviewers 108:1 reviewing 81:6 83:21 84:9 reviews 19:5 201:16	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19 272:9 278:4,8 rooms 42:2 Ross 3:15 240:18,20,22 255:3	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13 Sally 2:3 32:9,14 77:1 77:18,20 117:4 143:2 201:3 sample 52:16,20 63:20	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15 67:17 68:13 94:14 104:1 114:9 130:13 164:7 182:5 195:3 204:17 205:20 206:1
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16 reviewers 108:1 reviewing 81:6 83:21 84:9 reviews 19:5 201:16 240:3	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19 272:9 278:4,8 rooms 42:2 Ross 3:15 240:18,20,22 255:3 round 182:5	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13 Sally 2:3 32:9,14 77:1 77:18,20 117:4 143:2 201:3 sample 52:16,20 63:20 73:14 75:17 79:18	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15 67:17 68:13 94:14 104:1 114:9 130:13 164:7 182:5 195:3 204:17 205:20 206:1 216:11,13 234:9
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16 reviewers 108:1 reviewing 81:6 83:21 84:9 reviews 19:5 201:16 240:3 revised 228:11	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19 272:9 278:4,8 rooms 42:2 Ross 3:15 240:18,20,22 255:3 round 182:5 rounded 157:3	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13 Sally 2:3 32:9,14 77:1 77:18,20 117:4 143:2 201:3 sample 52:16,20 63:20 73:14 75:17 79:18 194:3 219:10 251:19	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15 67:17 68:13 94:14 104:1 114:9 130:13 164:7 182:5 195:3 204:17 205:20 206:1 216:11,13 234:9 236:9 243:9,10
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16 reviewers 108:1 reviewing 81:6 83:21 84:9 reviews 19:5 201:16 240:3 revised 228:11 rewritten 188:2	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19 272:9 278:4,8 rooms 42:2 Ross 3:15 240:18,20,22 255:3 round 182:5 rounded 157:3 rounds 181:19 214:10	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13 Sally 2:3 32:9,14 77:1 77:18,20 117:4 143:2 201:3 sample 52:16,20 63:20 73:14 75:17 79:18 194:3 219:10 251:19 Sarah 1:21 15:6 138:11	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15 67:17 68:13 94:14 104:1 114:9 130:13 164:7 182:5 195:3 204:17 205:20 206:1 216:11,13 234:9 236:9 243:9,10 254:11 269:8 275:12
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16 reviewers 108:1 reviewing 81:6 83:21 84:9 reviews 19:5 201:16 240:3 revised 228:11 rewritten 188:2 RHIhub 69:20	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19 272:9 278:4,8 rooms 42:2 Ross 3:15 240:18,20,22 255:3 round 182:5 rounded 157:3 rounds 181:19 214:10 row 179:13,22 180:2	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13 Sally 2:3 32:9,14 77:1 77:18,20 117:4 143:2 201:3 sample 52:16,20 63:20 73:14 75:17 79:18 194:3 219:10 251:19 Sarah 1:21 15:6 138:11 238:3	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15 67:17 68:13 94:14 104:1 114:9 130:13 164:7 182:5 195:3 204:17 205:20 206:1 216:11,13 234:9 236:9 243:9,10 254:11 269:8 275:12 279:3 296:12
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16 reviewers 108:1 reviewing 81:6 83:21 84:9 reviews 19:5 201:16 240:3 revised 228:11 rewritten 188:2 RHIhub 69:20 rich 246:1 266:21	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19 272:9 278:4,8 rooms 42:2 Ross 3:15 240:18,20,22 255:3 round 182:5 rounded 157:3 rounds 181:19 214:10 row 179:13,22 180:2 rubric 79:10	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13 Sally 2:3 32:9,14 77:1 77:18,20 117:4 143:2 201:3 sample 52:16,20 63:20 73:14 75:17 79:18 194:3 219:10 251:19 Sarah 1:21 15:6 138:11 238:3 satisfy 169:18	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15 67:17 68:13 94:14 104:1 114:9 130:13 164:7 182:5 195:3 204:17 205:20 206:1 216:11,13 234:9 236:9 243:9,10 254:11 269:8 275:12 279:3 296:12 secondary 41:9 42:3
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16 reviewers 108:1 reviewing 81:6 83:21 84:9 reviews 19:5 201:16 240:3 revised 228:11 rewritten 188:2 RHIhub 69:20 rich 246:1 266:21 Richard 206:7	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19 272:9 278:4,8 rooms 42:2 Ross 3:15 240:18,20,22 255:3 round 182:5 rounded 157:3 rounds 181:19 214:10 row 179:13,22 180:2 rubric 79:10 rule 123:11 153:12	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13 Sally 2:3 32:9,14 77:1 77:18,20 117:4 143:2 201:3 sample 52:16,20 63:20 73:14 75:17 79:18 194:3 219:10 251:19 Sarah 1:21 15:6 138:11 238:3 satisfy 169:18 saved 29:2	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15 67:17 68:13 94:14 104:1 114:9 130:13 164:7 182:5 195:3 204:17 205:20 206:1 216:11,13 234:9 236:9 243:9,10 254:11 269:8 275:12 279:3 296:12 secondary 41:9 42:3 Secondly 73:10 205:12
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16 reviewers 108:1 reviewing 81:6 83:21 84:9 reviews 19:5 201:16 240:3 revised 228:11 rewritten 188:2 RHIhub 69:20 rich 246:1 266:21 Richard 206:7 richness 246:8	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19 272:9 278:4,8 rooms 42:2 Ross 3:15 240:18,20,22 255:3 round 182:5 rounded 157:3 rounds 181:19 214:10 row 179:13,22 180:2 rubric 79:10 rule 123:11 153:12 216:2,10 226:11	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13 Sally 2:3 32:9,14 77:1 77:18,20 117:4 143:2 201:3 sample 52:16,20 63:20 73:14 75:17 79:18 194:3 219:10 251:19 Sarah 1:21 15:6 138:11 238:3 satisfy 169:18 saved 29:2 saw 73:10 76:13 108:16	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15 67:17 68:13 94:14 104:1 114:9 130:13 164:7 182:5 195:3 204:17 205:20 206:1 216:11,13 234:9 236:9 243:9,10 254:11 269:8 275:12 279:3 296:12 secondary 41:9 42:3 Secondly 73:10 205:12 seconds 165:1 223:1
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16 reviewers 108:1 reviewing 81:6 83:21 84:9 reviews 19:5 201:16 240:3 revised 228:11 rewritten 188:2 RHIhub 69:20 rich 246:1 266:21 Richard 206:7 richness 246:8 right-hand 93:10	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19 272:9 278:4,8 rooms 42:2 Ross 3:15 240:18,20,22 255:3 round 182:5 rounded 157:3 rounds 181:19 214:10 row 179:13,22 180:2 rubric 79:10 rule 123:11 153:12 216:2,10 226:11 227:2	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13 Sally 2:3 32:9,14 77:1 77:18,20 117:4 143:2 201:3 sample 52:16,20 63:20 73:14 75:17 79:18 194:3 219:10 251:19 Sarah 1:21 15:6 138:11 238:3 satisfy 169:18 saved 29:2 saw 73:10 76:13 108:16 110:15 127:21	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15 67:17 68:13 94:14 104:1 114:9 130:13 164:7 182:5 195:3 204:17 205:20 206:1 216:11,13 234:9 236:9 243:9,10 254:11 269:8 275:12 279:3 296:12 secondary 41:9 42:3 Secondly 73:10 205:12 seconds 165:1 223:1 sections 118:16 150:21
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16 reviewers 108:1 reviewing 81:6 83:21 84:9 reviews 19:5 201:16 240:3 revised 228:11 rewritten 188:2 RHIhub 69:20 rich 246:1 266:21 Richard 206:7 richness 246:8 right-hand 93:10 rigorous 234:5	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19 272:9 278:4,8 rooms 42:2 Ross 3:15 240:18,20,22 255:3 round 182:5 rounded 157:3 rounds 181:19 214:10 row 179:13,22 180:2 rubric 79:10 rule 123:11 153:12 216:2,10 226:11 227:2 ruled 53:1	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13 Sally 2:3 32:9,14 77:1 77:18,20 117:4 143:2 201:3 sample 52:16,20 63:20 73:14 75:17 79:18 194:3 219:10 251:19 Sarah 1:21 15:6 138:11 238:3 satisfy 169:18 saved 29:2 saw 73:10 76:13 108:16 110:15 127:21 saying 57:14 61:6 64:2	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15 67:17 68:13 94:14 104:1 114:9 130:13 164:7 182:5 195:3 204:17 205:20 206:1 216:11,13 234:9 236:9 243:9,10 254:11 269:8 275:12 279:3 296:12 secondary 41:9 42:3 Secondly 73:10 205:12 seconds 165:1 223:1 sections 118:16 150:21 157:13
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16 reviewers 108:1 reviewing 81:6 83:21 84:9 reviews 19:5 201:16 240:3 revised 228:11 rewritten 188:2 RHIhub 69:20 rich 246:1 266:21 Richard 206:7 richness 246:8 right-hand 93:10 rigorous 234:5 ring 286:5	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19 272:9 278:4,8 rooms 42:2 Ross 3:15 240:18,20,22 255:3 round 182:5 rounded 157:3 rounds 181:19 214:10 row 179:13,22 180:2 rubric 79:10 rule 123:11 153:12 216:2,10 226:11 227:2 ruled 53:1 rulemaking 25:8 34:14	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13 Sally 2:3 32:9,14 77:1 77:18,20 117:4 143:2 201:3 sample 52:16,20 63:20 73:14 75:17 79:18 194:3 219:10 251:19 Sarah 1:21 15:6 138:11 238:3 satisfy 169:18 saved 29:2 saw 73:10 76:13 108:16 110:15 127:21 saying 57:14 61:6 64:2 86:16,18 135:20	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15 67:17 68:13 94:14 104:1 114:9 130:13 164:7 182:5 195:3 204:17 205:20 206:1 216:11,13 234:9 236:9 243:9,10 254:11 269:8 275:12 279:3 296:12 secondary 41:9 42:3 Secondly 73:10 205:12 seconds 165:1 223:1 sections 118:16 150:21 157:13 sector 65:1
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16 reviewers 108:1 reviewing 81:6 83:21 84:9 reviews 19:5 201:16 240:3 revised 228:11 rewritten 188:2 RHIhub 69:20 rich 246:1 266:21 Richard 206:7 richness 246:8 right-hand 93:10 rigorous 234:5 ring 286:5 risk 48:13 51:4 116:2,3	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19 272:9 278:4,8 rooms 42:2 Ross 3:15 240:18,20,22 255:3 round 182:5 rounded 157:3 rounds 181:19 214:10 row 179:13,22 180:2 rubric 79:10 rule 123:11 153:12 216:2,10 226:11 227:2 ruled 53:1 rulemaking 25:8 34:14 83:16 85:6,14,15,16	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13 Sally 2:3 32:9,14 77:1 77:18,20 117:4 143:2 201:3 sample 52:16,20 63:20 73:14 75:17 79:18 194:3 219:10 251:19 Sarah 1:21 15:6 138:11 238:3 satisfy 169:18 saved 29:2 saw 73:10 76:13 108:16 110:15 127:21 saying 57:14 61:6 64:2 86:16,18 135:20 136:6 138:22 140:20	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15 67:17 68:13 94:14 104:1 114:9 130:13 164:7 182:5 195:3 204:17 205:20 206:1 216:11,13 234:9 236:9 243:9,10 254:11 269:8 275:12 279:3 296:12 secondary 41:9 42:3 Secondly 73:10 205:12 seconds 165:1 223:1 sections 118:16 150:21 157:13 sector 65:1 security 185:6
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16 reviewers 108:1 reviewing 81:6 83:21 84:9 reviews 19:5 201:16 240:3 revised 228:11 rewritten 188:2 RHIhub 69:20 rich 246:1 266:21 Richard 206:7 richness 246:8 right-hand 93:10 rigorous 234:5 ring 286:5 risk 48:13 51:4 116:2,3 116:15 118:8 120:2,3	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19 272:9 278:4,8 rooms 42:2 Ross 3:15 240:18,20,22 255:3 round 182:5 rounded 157:3 rounds 181:19 214:10 row 179:13,22 180:2 rubric 79:10 rule 123:11 153:12 216:2,10 226:11 227:2 ruled 53:1 rulemaking 25:8 34:14 83:16 85:6,14,15,16 85:17 105:17 107:2	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13 Sally 2:3 32:9,14 77:1 77:18,20 117:4 143:2 201:3 sample 52:16,20 63:20 73:14 75:17 79:18 194:3 219:10 251:19 Sarah 1:21 15:6 138:11 238:3 satisfy 169:18 saved 29:2 saw 73:10 76:13 108:16 110:15 127:21 saying 57:14 61:6 64:2 86:16,18 135:20 136:6 138:22 140:20 182:22 193:9 209:6	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15 67:17 68:13 94:14 104:1 114:9 130:13 164:7 182:5 195:3 204:17 205:20 206:1 216:11,13 234:9 236:9 243:9,10 254:11 269:8 275:12 279:3 296:12 secondary 41:9 42:3 Secondly 73:10 205:12 seconds 165:1 223:1 sections 118:16 150:21 157:13 sector 65:1 security 185:6 seeing 6:12 28:7 35:2
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16 reviewers 108:1 reviewing 81:6 83:21 84:9 reviews 19:5 201:16 240:3 revised 228:11 rewritten 188:2 RHIhub 69:20 rich 246:1 266:21 Richard 206:7 richness 246:8 right-hand 93:10 rigorous 234:5 ring 286:5 risk 48:13 51:4 116:2,3 116:15 118:8 120:2,3 120:9 122:6,15	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19 272:9 278:4,8 rooms 42:2 Ross 3:15 240:18,20,22 255:3 round 182:5 rounded 157:3 rounds 181:19 214:10 row 179:13,22 180:2 rubric 79:10 rule 123:11 153:12 216:2,10 226:11 227:2 ruled 53:1 rulemaking 25:8 34:14 83:16 85:6,14,15,16 85:17 105:17 107:2 109:12 145:21 154:11	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13 Sally 2:3 32:9,14 77:1 77:18,20 117:4 143:2 201:3 sample 52:16,20 63:20 73:14 75:17 79:18 194:3 219:10 251:19 Sarah 1:21 15:6 138:11 238:3 satisfy 169:18 saved 29:2 saw 73:10 76:13 108:16 110:15 127:21 saying 57:14 61:6 64:2 86:16,18 135:20 136:6 138:22 140:20 182:22 193:9 209:6 217:4,4,8 219:20	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15 67:17 68:13 94:14 104:1 114:9 130:13 164:7 182:5 195:3 204:17 205:20 206:1 216:11,13 234:9 236:9 243:9,10 254:11 269:8 275:12 279:3 296:12 secondary 41:9 42:3 Secondly 73:10 205:12 seconds 165:1 223:1 sections 118:16 150:21 157:13 sector 65:1 security 185:6 seeing 6:12 28:7 35:2 72:1,16 83:7 103:4
192:2 203:8,17 229:1 232:5 255:7,8 reviewed 106:7 141:10 142:4 160:13 225:16 reviewers 108:1 reviewing 81:6 83:21 84:9 reviews 19:5 201:16 240:3 revised 228:11 rewritten 188:2 RHIhub 69:20 rich 246:1 266:21 Richard 206:7 richness 246:8 right-hand 93:10 rigorous 234:5 ring 286:5 risk 48:13 51:4 116:2,3 116:15 118:8 120:2,3	103:1 116:13 147:10 150:22 158:3 181:9 181:13 215:5 227:10 227:11 240:14 267:19 272:9 278:4,8 rooms 42:2 Ross 3:15 240:18,20,22 255:3 round 182:5 rounded 157:3 rounds 181:19 214:10 row 179:13,22 180:2 rubric 79:10 rule 123:11 153:12 216:2,10 226:11 227:2 ruled 53:1 rulemaking 25:8 34:14 83:16 85:6,14,15,16 85:17 105:17 107:2	safety 11:11,14 14:2,21 18:1 20:13 48:10 209:8 292:11 293:17 safety-net 184:13 Sally 2:3 32:9,14 77:1 77:18,20 117:4 143:2 201:3 sample 52:16,20 63:20 73:14 75:17 79:18 194:3 219:10 251:19 Sarah 1:21 15:6 138:11 238:3 satisfy 169:18 saved 29:2 saw 73:10 76:13 108:16 110:15 127:21 saying 57:14 61:6 64:2 86:16,18 135:20 136:6 138:22 140:20 182:22 193:9 209:6	Sean's 276:20 seat 7:20 second 5:6 40:2,20 46:5,22 51:18 66:15 67:17 68:13 94:14 104:1 114:9 130:13 164:7 182:5 195:3 204:17 205:20 206:1 216:11,13 234:9 236:9 243:9,10 254:11 269:8 275:12 279:3 296:12 secondary 41:9 42:3 Secondly 73:10 205:12 seconds 165:1 223:1 sections 118:16 150:21 157:13 sector 65:1 security 185:6 seeing 6:12 28:7 35:2

148:15 210:1 274:15 276:9,9,15 282:6 seek 271:1 Seema 65:9 seemingly 287:9 seen 87:2 92:9 100:14 101:21 107:4 144:7 173:19 294:13 **SEER** 242:2 245:19,22 **SEER-** 245:18 SEER-Medicare 246:2 250:1 segment 71:17 **SEIU** 15:7 selected 37:20 107:17 211:8 selection 37:13,16 84:18,19 85:3 261:7 self- 42:20 self-selected 105:10 selling 273:16 semantics 81:7 sending 62:6,11 192:1 282:21 senior 2:14,15,17,19,22 8:6 10:1 22:7 35:15 36:11 sense 128:17 134:4 140:13 143:17 183:21 189:10 190:5,12 195:10 238:15 279:16 sensitive 61:14 62:9 73:14 245:17 260:12 sent 285:22 sentiment 59:22 72:5 separate 48:18 113:14 178:13 238:9 293:22 separated 178:13 252:3 separately 203:14 221:14 231:18 256:2 sequential 165:16 173:2 200:4,5 series 288:20 serious 141:5 212:5.13 218:9 275:4 291:14 seriously 296:18 serve 11:14 17:20 84:22 133:4 Service 1:21 15:7 services 2:11 49:14 54:1 serving 10:4 session 61:2 174:17 set 37:14 38:3 39:15 40:11,12 42:15 43:8 44:12 46:1 50:7.7.9 51:12 52:19 53:20 56:22 60:15 62:11

66:20.21 68:5 71:15 71:22 74:2 84:1 105:12 107:17,22 131:7 152:15 188:22 233:7,19 245:19 246:1,3 247:9 249:21 250:2 253:15 256:10 256:11 277:4 295:7 set's 117:3 sets 54:2,6,13 57:2 67:21 105:4 196:8 250:3 294:20 setting 40:14,15 41:14 42:19 43:3,5 44:3,9 44:16 50:14 55:5 56:16 57:19 58:14 81:16 137:12 175:16 242:11 273:20 276:13 278:10 280:6 286:9 286:11,11 289:13 291:14 295:1 settings 71:4 280:2 286:16 295:9 seven 38:1 44:14 58:13 243:14 severe 213:21 289:21 severity 128:9 Shannon 2:1 13:21 35:12 50:12 147:4 148:21 194:15 208:5 252:19 276:16 share 36:1 78:1 87:9 108:16 112:4 136:20 226:8 shared 72:4 137:2 147:1 280:8 **SharePoint** 226:15,19 sharing 82:2 216:21 Shay 167:20 Shehade 2:2 12:2,2 238:6.21 shift 98:13 short 24:13 37:1 215:10 shorten 165:18 **show** 35:11 51:12 85:9 147:19 187:13 189:13 254:18 showing 6:18 156:17 296:10 shown 149:5 shows 132:14 side 21:5 24:8 27:2,2 47:11 52:2 93:10 142:16 170:19,20 207:21 218:3 sides 58:2 274:3 sideways 131:1 signaling 206:17

significant 30:19 31:9 118:8 132:10 133:5 134:3 146:22 188:16 194:20 203:1 250:8 significantly 247:1 Silber 18:7 similar 54:3 **similarly** 291:12 **simple** 214:5 simpler 190:7 **simplify** 165:18 simply 40:22 209:6 212:9 276:2 277:11 Sinai 18:21 sincerely 24:5 single 66:5,5 139:18 213:18 218:8 236:18 286:21 singularly 277:8 **sir** 122:4 sit 16:4 32:5 35:16 site 226:15 sites 110:4 sits 263:18 sitting 95:19 172:8 situation 204:2 272:19 288:14 situations 119:12 **six** 17:7 44:10 53:18 234:16 257:4 **sixth** 6:13 **size** 37:6 52:16,20 63:20 73:14 75:17 79:18 sizes 51:3.10 skin 183:10 195:5 202:1 slide 23:18 36:17 37:18 50:2,11 81:11 93:2 99:18 225:14 226:10 226:22 239:17 268:14 271:4 slides 67:11 81:5 84:9 93:20 122:22 226:19 Sloan 241:1 257:10,18 sloppy 138:1 slot 80:15 slots 51:14 small 8:11 37:6 51:11 54:18 63:16 70:1 103:17 176:7 233:21 253:9 289:16 smaller 42:10 71:4 75:21 101:20 134:9 284:12 **SMFM** 132:2 **social** 185:3 **socially** 184:15 societies 118:18

Society 14:14 18:10 35:15 234:12,15 software 92:12 solely 71:16 209:21 solution 133:13 Solutions 15:3 solve 74:8 somebody 149:2 236:11,14 255:4 289:21 295:2,3 someone's 123:4 somewhat 110:11 280:5 292:19 293:2 soon 25:9 99:5 114:22 sorry 11:20 32:20 35:11 70:14 104:19 109:19 130:19 155:13 156:12 164:14 168:15 174:8 184:5 192:13 225:7 226:13 255:13 266:10 290:19 sort 53:10 56:9 59:10 59:16 73:8,22 76:11 108:8 113:19 124:12 186:1 196:12 213:17 237:10 271:16 283:8 291:10 sorts 277:15 sounded 110:6 sounds 129:14 166:3 217:19 225:3 source 242:2,5,22 244:7,9 245:5,7 248:12 space 26:12 273:7,10 spaces 54:4 sparse 66:6 **speak** 5:6 9:8 21:3,8 49:7 53:11 112:14 141:20 150:1 158:9 188:11 195:14 218:6 speaker 140:17 speaking 12:16 184:12 speaks 149:22 **spec** 181:9 special 90:15 163:21 Specialist 3:13 specialists 278:18 289:19 specialty 47:5 78:12 specific 39:10 40:22 67:4 68:5,19 95:14 109:17 165:5 171:4 223:5 229:9,17 230:7 233:7,8,13 259:17,19 259:21 260:20 261:9 265:15 286:9 289:1,7 294:6

specifically 46:7 66:21 77:10 80:15 151:4 206:22 233:12 241:22 243:10 244:2 specification 89:4 183:15 201:8 244:20 specifications 113:22 121:8 141:22 154:21 159:5,14 160:1,14 162:9 210:1 220:10 specifics 113:21 230:1 230:5 specified 85:12 122:16 123:3 141:11 142:1 159:18 161:17 202:21 202:22 213:13 234:3 specs 111:4 183:16 223:16 230:10 **spend** 38:13 79:12 **spent** 190:4 spirit 35:13 113:17 **spit** 5:21 **split** 90:12 spoke 129:9,10 192:1 **spoken** 112:14 264:6 sponsored 241:19 **spots** 66:9 spotty 119:7 spreadsheet 196:22 226:15 spurious 212:5,6,11 214:1 staff 2:14 6:11,17 34:5 88:3,5,14,17 89:6,13 89:17 90:8.13 94:21 98:6 103:16,18 105:16 112:8 115:6 115:13 154:6,9 155:1 155:5,13,18 156:2 157:18 158:20 172:11 175:22 177:11 180:19 184:6 197:17 199:19 210:12 222:7 228:6 231:12 255:8 258:19 264:10,14 270:11 staff's 139:22 156:8 173:10 176:3 181:2 202:13 214:15 stage 76:12 175:6,7,8 176:19 178:12,16,19 179:14 182:1 190:13 194:19 200:21 245:13 248:2,5 stages 183:11 290:14 staging 179:22 180:4 stakeholders 25:4,6 stalled 8:1 stamp 180:5

stand 91:14 standard 59:14 207:16 standardized 84:6 standing 57:3 107:13 162:6 166:8 223:21 standpoint 218:18 star 80:22 102:18 stars 25:20 start 10:11,16 16:13,15 19:19 53:4 74:21 79:6 79:7,11 83:20 85:20 87:13 89:18 90:1 91:8 98:22 102:11 103:13 119:16 134:12 151:20 161:6 171:16 178:5 196:14 203:19 211:14 215:5 222:12 223:17 225:11 227:9 230:21 235:2 264:9,21 started 94:16 100:12 107:21 110:16 215:4 251:21 starter 50:7 starting 11:2 49:15 64:17 76:20 84:22 103:13 starts 25:8 state 18:19 54:7 62:7,9 94:18 131:8 144:5 169:1 295:18 296:2 stated 142:5 208:20 statement 97:4 111:10 statements 84:11 states 17:7 30:9 49:13 49:15 54:9.12 119:6 119:15 128:15 149:3 152:14 167:2,5 169:2 242:4 245:22 295:20 296:3.6 stating 196:13 statistical 53:14 82:22 107:11 statistically 55:22 statistician 239:7,12 statisticians 82:17 83:8 status 45:12 101:21 126:18 127:7 184:22 211:4 status/non-184:21 stay 83:10 114:18 118:10 213:9 steering 32:5 step 62:18 72:11 112:6 134:11,20 218:1 290:2 steps 4:21 37:1 81:2,10 83:9 204:12 267:10 268:8,11 279:7

steward 143:7 162:21 stewarding 25:19 stewards 121:18 174:7 174:13 280:7,11 stewardship 287:11,13 287:18 293:8 295:11 295:15 stock 12:7 18:1,2 stop 80:1 stopping 209:1 272:13 strange 220:17 strategies 47:7 48:9,10 79:6,13,19 80:1 strategy 29:8 47:20 63.6 stratification 249:18 250:18,22 stratified 59:16 250:15 stratify 202:5 **Street** 1:9 strengthening 29:9 102:3 stress 275:21 stretch 54:21 171:18 strict 194:7 197:9 strikes 67:22 striking 129:6 **strong** 44:10 strongest 172:21 strongly 44:6 58:3 291:4 **structure** 225:19 **struggle** 136:5 **struggles** 296:20 struggling 135:12 280:3 295:19 studies 216:15 study 218:19 stuff 76:3 stupid 272:17 sub-drug 216:1 sub-regulatory 188:8 subbing 11:9 14:9 subgroups 108:4 subject 2:6 10:10,22 13:17 15:21 16:14 19:12 38:1 109:11 submission 122:9 248:8 submit 110:18 187:22 submitted 106:5 173:14 174:1 202:18 203:7 228:22 submitting 144:18 suboptimal 278:20 subpopulation 220:4 subsequent 118:15 subsequently 122:10

subset 219:14.17 220:1 subsets 196:14 substance 42:18 44:12 46:8 77:9 280:22 substances 71:14,19 substantial 69:9,10 118:4 substantiate 188:3 substantive 177:2 187:21 188:13 217:7 successful 268:22 successfully 151:19 288:7 suddenly 279:11 suffer 294:16 sufficient 106:10 254:9 sugar 204:18 211:22 212:8 suggest 163:6 284:22 suggesting 58:21 214:1 suggestion 126:17 158:21 221:3 281:17 suggestions 221:10 271:22 suggestive 287:7 suited 181:5 232:16 Sullivan 2:8 18:18.18 77:4 140:3,9,12 210:7 262:8 282:10 summarize 109:16 summarizing 267:10 summary 4:21 46:1 103:20 105:18 106:13 197:3 228:6 superior 115:1 supported 106:1 130:5 188:3 231:13 supporting 21:14 22:7 22:10 37:12 129:20 182:21 190:10 201:9 209:19 259:2 264:14 supportive 130:12 supposed 59:15 185:20 206:2 surgeon 235:15,16,20 236:5 249:13 253:2,9 253:10 257:19 surgeons 235:13 236:8 254:10 258:2 263:12 263:13 surgeries 231:19,20 260:16 surgery 18:8 132:15,17 132:18 235:21 249:16 250:9,15 252:11 260:14 262:20 surgical 124:8 228:4 231:3 256:7

surprised 69:2 129:22 247:3 surprising 67:9 69:11 254:5 surprisingly 26:8 surrounding 170:8 surveillance 20:13 surveillance-biased 236:13 survey 50:13 54:6 surveys 43:6 50:19 52:3,6,7 survive 252:13 Susannah 3:6 181:11 189:17 221:21 susceptible 189:22 swings 219:18 switch 98:19 207:8 switched 153:20 switching 216:9 sympathetic 275:21 sympathies 204:1 synced 84:21 syndromes 275:20 276:13 system 4:16 14:3,14 20:13 44:18 58:15 59:3,17,17 61:9 78:17 96:18 100:8 121:8 225:7 226:4 263:17 277:13 285:15 294:18 295:8 system-dependent 235:10 systematic 23:13 systems 1:15 26:16,22 30:15 59:8,10 61:7,15 61:16 138:4 182:7 194:22 236:1 263:19 294:21 Т table 47:14 64:4 92:19 95:19 99:22 205:22 tables 64:1 Tabulate 199:18 tagged 97:6 takeaway 293:10 294:3 taken 145:5 192:18 282:2 289:3 296:18 takes 24:15 39:7 279:12 283:2 285:16 talk 5:12 40:8 57:15 61:2 73:12 75:20 98:17 103:6 113:21 194:13 196:6 240:4 282:15 283:3,6 285:9 talked 48:8 81:14 91:2

(202) 234-4433

98:14 102:1 104:4 130:11 156:20 169:16 223:14 236:16 285:9 talking 9:11 38:20 70:21 83:1,2 97:21 120:14 157:17 185:4 235:19 253:12 263:11 279:16 284:4 tally 91:10 targets 287:18 Taroon 2:14 22:9 teaching 184:21,22 team 21:14 22:13 60:21 61:4 67:1 183:8 254:13,13,22 257:8 266:4 297:21 team-based 47:8 255:1 technical 69:19 82:16 183:15 190:3,12 211:9 253:4 technically 183:21 technologies 290:13 technology 48:1 235:18 255:7 tee 156:1 222:1 teed 65:6 66:15 teeth 285:22 tele-access 47:21 telehealth 47:10 49:10 49:14,17 61:17 74:1,4 74:6,7,9,11,12,14,16 76:3,5,8,14,16,19 telephone 3:22 102:13 229:13 tell 10:19 13:16 35:12 124:22 130:3 135:14 160:6,17 188:7 215:14 230:11 Telligen 19:3 telling 160:5 282:22 ten 70:10 118:16 165:1 215:11 216:2 217:7 234:16,17,19 ten-minute 98:22 tend 55:9 140:17 186:16 232:6,10 244:12 tending 208:21 tends 77:10 Tennessee 62:7 tension 138:15 tent 9:5 **TEP** 181:13 189:8 191:18 term 212:19 243:21 terms 43:20 46:21 47:6 47:8,15 48:9 49:3,7 51:21 52:14 53:8,16

Neal R. Gross and Co., Inc.

Washington DC

55:14 56:1 58:2.16 63:19 68:4,10 71:1 72:1 75:2,20,21 76:18 77:5 81:22 122:20 125:21 129:18 144:14 150:20 151:2,5 172:21 184:14,16 185:7,10 191:22 204:19 206:13,14,19 206:22 207:5,12,14 207:21 214:22 216:22 231:9,11 232:20 233:11 251:13 261:4 266:2 268:12 275:7 276:10 279:14 292:20 293:2,12,14,18,22 terrible 128:2 terribly 9:17 terrific 74:22 territory 73:1 tertiary 41:9 42:4 59:10 test 92:11 93:1,8 110:4 212:21 247:11 tested 127:10 173:14 199:13 203:7 242:12 244:5 247:1 248:10 248:16 286:15 testing 112:19 126:22 127:6,8 173:15,19 176:16,18 177:6,7 181:19,22 182:1,14 182:21 201:9 203:8 207:8 214:11 229:6 229:20,21,22 230:6 242:5 243:12,14,16 244:20 245:2,19 246:10 247:21 tests 208:22 209:21,22 Texas 17:6 118:7 257:12 text 87:8 thankful 14:17 thanks 7:15 20:8 32:8 32:12 56:6 94:6 113:16 115:12 135:2 138:13 184:9 252:20 262:6 268:10 296:13 theme 109:6 175:12 themes 61:1 therapeutic 288:2 Therapies 12:3 therapy 2:3 218:3 289:8 thin 279:22 things 5:7 17:10 27:13 34:2 52:2 57:4 60:11 62:5 63:20 66:4 67:22 73:17 74:1,5 83:2 84:3 107:20 108:4,9

108:18 110:17 114:20 115:2 125:6 127:19 128:8,12 136:12 149:13 154:20 177:21 178:2 180:12 182:22 184:16 186:20 187:4 187:21 189:13,15 194:17 195:20,21 196:7 202:5 206:13 211:4 212:22 215:8 215:16,20 216:15,17 217:3,5,13 220:13 222:8 223:16 228:2 231:2 239:7 245:3,14 246:11 248:13 263:13 263:22 267:8 268:18 273:3 277:15 278:1 280:10 281:11 285:8 285:20 293:17 third 40:5 41:1 46:6 47:1 49:15 73:22 275:14 thorough 233:19 thought 5:9 7:8 30:19 35:3 46:14 63:15 73:16 74:3 165:14.18 183:18 184:1 200:8 213:15 217:22 218:7 218:12 219:8 261:6 266.1 thoughtful 190:4 265:20 thoughts 23:2,15 36:1 67:5 79:14 111:20 152:3 thousand 79:9 three 38:1 46:20 54:22 55:14 67:7 71:11 82:2 100:6 103:5 104:12 130:1 146:5 165:7 171:6 174:20 176:20 177:21 179:5,7 182:6 199:8 204:12 215:15 238:9 265:16 267:9 274:5 threshold 75:6 87:15 224:1 253:15 284:6 thrown 278:16 tighten 230:9 tighter 220:3 230:10 timeliness 47:6 times 216:2 282:2 290:21 timestamps 213:2,2 timing 200:3 209:3 210:10 220:20 tiny 51:3 248:21 tip 292:11

	1	1	1
tired 138:3	TRAUS 191:6,10 202:7	truly 24:3 27:5 34:8	231:19,21 232:3
tissue 175:9 176:5,8,11	203:11 206:6 208:3	139:15 286:9,14	248:8 249:16 256:7
195:7 200:9,11	209:13 210:3,16	try 7:7 9:9 46:19 51:18	259:19 260:5,15,18
TJC 124:14 127:11	214:7,14 216:20	52:8 53:20 55:11,15	261:8 289:5,7
TMF 17:5	217:15,18 218:4,14	56:22 64:9,19 68:1,13	
tobacco 43:9 71:13	219:4 220:5,22	68:15,16,19 95:1,13	U
today 7:17 10:5 11:10	221:19 225:1 227:7	119:17 147:3 161:4	ugly 280:1
14:9,15 20:8 21:22	227:20 228:15 230:15	172:9,20 193:8	UI 249:1
22:15 24:21 25:18	233:16 234:22 237:17	213:19 221:11 241:9	ulcer 14:5 183:18
27:7,14 28:8 30:22	238:19,22 240:11,21	243:19 260:19 283:5	186:13 187:13 200:22
63:19 77:22 100:2,7	241:4 251:4,7 252:19	286:14 287:1	ulceration 202:2
100:10 152:4 162:10	255:2,12 257:6 259:7	trying 5:18 23:12 28:12	ulcers 179:19 190:1
167:2 237:18 240:4	261:12 262:7 264:5	30:8 53:14 72:5 74:19	
			194:19 200:6,21
241:13 266:14 269:16	265:18 266:10 267:4	76:8,9 86:12 104:11	ultimate 124:9
280:5 282:2 297:8	268:6 269:20 270:4	118:6 124:2 132:12	ultimately 195:6 207:22
today's 14:4	270:10 272:5 294:19	133:7 136:14 138:22	243:17 251:1
toes 218:1	297:17	145:9 148:1 160:8	unclear 111:6 160:4
toggle 67:12 93:11	travel 6:7,19 23:5	161:13 180:11 190:8	uncovered 201:7
toggling 81:5	257:13	190:11 193:3 194:19	underdeveloped
Tom 3:15 240:14,15,18	travels 286:17	207:18 243:3 264:7	287:13
240:21	Travis 1:9,11 7:12	272:20 275:15 296:21	underlying 9:5 195:11
tomorrow 82:4 269:1	17:17,18 21:12 22:5	TUESDAY 1:5	221:8
top 47:9 219:6	22:12 31:22 32:20	tuned 83:10 213:9	underscores 281:5
topic 67:1 81:18 111:14	33:11 35:7,21 61:5	Turbyville 2:3 32:13,14	understand 19:17
178:21 183:20	95:17 99:2 124:21	77:19 117:5 143:3,17	34:13 74:9 96:5
topics 50:10 66:19	125:4 130:20 131:2	201:4	104:12 114:13 119:2
topped 31:11 68:11	131:15,21 132:6	turn 9:9 23:20 32:1 38:8	119:10 126:6 136:2,6
123:18,21 124:20	158:20 159:20 161:5	49:20 81:1 85:18	149:9 177:1 209:5
total 24:2 49:6 93:12,14	161:11 165:21	106:16 121:17 128:10	understanding 110:9
99:21 100:6 177:15	treat 275:7 276:19	141:8 174:3,6,9 181:7	111:20 118:22 120:3
182:7 199:5	293:14	196:1 199:14 233:14	189:1 228:18 250:19
totally 235:3 239:2	treated 276:1	234:13 270:17	273:15
258:8	treatment 29:12 72:1	turned 9:8	understood 177:9
touch 27:12	102:7 126:10 228:4	turns 26:7 246:17	unfair 190:22 193:16
touched 194:18 292:20	231:3 245:10,15	tweaks 180:12 217:3	Unfortunately 218:21
tough 263:6	274:20 289:22 290:2	twenty 70:10	unhealthy 43:15
track 182:11 184:12	293:21	two 6:8 10:7,8 16:20	unified 65:17
224:9	treatments 276:7	41:14 43:22 54:21	uniform 158:14
tracked 96:20 97:1,5	285:11 294:2	55:14 60:8 68:8 70:9	unintended 31:7
trade 206:11	tremendous 26:21	75:14 76:1 79:3 81:12	116:11 117:2 125:19
trained 26:7	34:18 65:11	86:16 92:4 98:7 99:22	142:17 148:8 167:13
training 26:10 255:7	tremendously 6:1	105:4 112:22 114:3	167:14 169:7 184:22
258:19,19,20	trend 5:18	114:19 115:2 125:3	207:17 224:13 271:8
transfer 41:21 59:7,12	trial 273:9	128:3 144:16 156:10	274:15 276:9,20
60:2 194:5			000.40
00.2 .00	tricky 55:18	160:3 162:17 163:2	288:18
transferrable 286:17	tricky 55:18 tried 9:15 39:22 41:22	160:3 162:17 163:2 163:16,17 172:13	unintentional 218:2
	-		
transferrable 286:17	tried 9:15 39:22 41:22	163:16,17 172:13	unintentional 218:2
transferrable 286:17 transferred 42:3	tried 9:15 39:22 41:22 44:13 52:21 115:18	163:16,17 172:13 174:2 176:19 181:19	unintentional 218:2 Union 1:22 15:7 unique 72:22
transferrable 286:17 transferred 42:3 Transforming 280:19	tried 9:15 39:22 41:22 44:13 52:21 115:18 135:18 188:12 213:16	163:16,17 172:13 174:2 176:19 181:19 186:22 194:17 211:4	unintentional 218:2 Union 1:22 15:7
transferrable 286:17 transferred 42:3 Transforming 280:19 transition 27:4 60:6,16 144:5	tried 9:15 39:22 41:22 44:13 52:21 115:18 135:18 188:12 213:16 266:2 277:21 289:8 triggered 196:21	163:16,17 172:13 174:2 176:19 181:19 186:22 194:17 211:4 214:10 232:7 235:10 235:13 240:5 243:5	unintentional 218:2 Union 1:22 15:7 unique 72:22 United 30:9 University 1:19 11:5
transferrable 286:17 transferred 42:3 Transforming 280:19 transition 27:4 60:6,16	tried 9:15 39:22 41:22 44:13 52:21 115:18 135:18 188:12 213:16 266:2 277:21 289:8	163:16,17 172:13 174:2 176:19 181:19 186:22 194:17 211:4 214:10 232:7 235:10	unintentional 218:2 Union 1:22 15:7 unique 72:22 United 30:9
transferrable 286:17 transferred 42:3 Transforming 280:19 transition 27:4 60:6,16 144:5 transitions 41:6,8 46:6 56:19	tried 9:15 39:22 41:22 44:13 52:21 115:18 135:18 188:12 213:16 266:2 277:21 289:8 triggered 196:21 triggers 118:15 trim 5:18	163:16,17 172:13 174:2 176:19 181:19 186:22 194:17 211:4 214:10 232:7 235:10 235:13 240:5 243:5 252:2 259:15 262:15	unintentional 218:2 Union 1:22 15:7 unique 72:22 United 30:9 University 1:19 11:5 15:11,16 18:5 38:10 76:5
transferrable 286:17 transferred 42:3 Transforming 280:19 transition 27:4 60:6,16 144:5 transitions 41:6,8 46:6 56:19 translate 150:13	tried 9:15 39:22 41:22 44:13 52:21 115:18 135:18 188:12 213:16 266:2 277:21 289:8 triggered 196:21 triggers 118:15	163:16,17 172:13 174:2 176:19 181:19 186:22 194:17 211:4 214:10 232:7 235:10 235:13 240:5 243:5 252:2 259:15 262:15 267:8 274:17 291:1 291:11	unintentional 218:2 Union 1:22 15:7 unique 72:22 United 30:9 University 1:19 11:5 15:11,16 18:5 38:10 76:5 unlocked 156:12
transferrable 286:17 transferred 42:3 Transforming 280:19 transition 27:4 60:6,16 144:5 transitions 41:6,8 46:6 56:19 translate 150:13 transparency 16:12	tried 9:15 39:22 41:22 44:13 52:21 115:18 135:18 188:12 213:16 266:2 277:21 289:8 triggered 196:21 triggers 118:15 trim 5:18 trivial 217:11 trouble 90:16 156:14	163:16,17 172:13 174:2 176:19 181:19 186:22 194:17 211:4 214:10 232:7 235:10 235:13 240:5 243:5 252:2 259:15 262:15 267:8 274:17 291:1 291:11 two-day 5:14	unintentional 218:2 Union 1:22 15:7 unique 72:22 United 30:9 University 1:19 11:5 15:11,16 18:5 38:10 76:5 unlocked 156:12 unpaid 16:9
transferrable 286:17 transferred 42:3 Transforming 280:19 transition 27:4 60:6,16 144:5 transitions 41:6,8 46:6 56:19 translate 150:13 transparency 16:12 51:10 70:8	tried 9:15 39:22 41:22 44:13 52:21 115:18 135:18 188:12 213:16 266:2 277:21 289:8 triggered 196:21 triggers 118:15 trim 5:18 trivial 217:11 trouble 90:16 156:14 troublesome 210:9	163:16,17 172:13 174:2 176:19 181:19 186:22 194:17 211:4 214:10 232:7 235:10 235:13 240:5 243:5 252:2 259:15 262:15 267:8 274:17 291:1 291:11 two-day 5:14 tying 186:19 292:21,21	unintentional 218:2 Union 1:22 15:7 unique 72:22 United 30:9 University 1:19 11:5 15:11,16 18:5 38:10 76:5 unlocked 156:12 unpaid 16:9 unplanned 43:1
transferrable 286:17 transferred 42:3 Transforming 280:19 transition 27:4 60:6,16 144:5 transitions 41:6,8 46:6 56:19 translate 150:13 transparency 16:12 51:10 70:8 transport 71:7	tried 9:15 39:22 41:22 44:13 52:21 115:18 135:18 188:12 213:16 266:2 277:21 289:8 triggered 196:21 triggers 118:15 trim 5:18 trivial 217:11 trouble 90:16 156:14 troublesome 210:9 true 68:18 80:13 105:13	163:16,17 172:13 174:2 176:19 181:19 186:22 194:17 211:4 214:10 232:7 235:10 235:13 240:5 243:5 252:2 259:15 262:15 267:8 274:17 291:1 291:11 two-day 5:14 tying 186:19 292:21,21 type 192:11 225:18	unintentional 218:2 Union 1:22 15:7 unique 72:22 United 30:9 University 1:19 11:5 15:11,16 18:5 38:10 76:5 unlocked 156:12 unpaid 16:9 unplanned 43:1 unquote 274:9 291:10
transferrable 286:17 transferred 42:3 Transforming 280:19 transition 27:4 60:6,16 144:5 transitions 41:6,8 46:6 56:19 translate 150:13 transparency 16:12 51:10 70:8 transport 71:7 transportation 47:13	tried 9:15 39:22 41:22 44:13 52:21 115:18 135:18 188:12 213:16 266:2 277:21 289:8 triggered 196:21 triggers 118:15 trim 5:18 trivial 217:11 trouble 90:16 156:14 troublesome 210:9	163:16,17 172:13 174:2 176:19 181:19 186:22 194:17 211:4 214:10 232:7 235:10 235:13 240:5 243:5 252:2 259:15 262:15 267:8 274:17 291:1 291:11 two-day 5:14 tying 186:19 292:21,21 type 192:11 225:18 239:20 250:9,15	unintentional 218:2 Union 1:22 15:7 unique 72:22 United 30:9 University 1:19 11:5 15:11,16 18:5 38:10 76:5 unlocked 156:12 unpaid 16:9 unplanned 43:1 unquote 274:9 291:10 unrealistic 258:17
transferrable 286:17 transferred 42:3 Transforming 280:19 transition 27:4 60:6,16 144:5 transitions 41:6,8 46:6 56:19 translate 150:13 transparency 16:12 51:10 70:8 transport 71:7	tried 9:15 39:22 41:22 44:13 52:21 115:18 135:18 188:12 213:16 266:2 277:21 289:8 triggered 196:21 triggers 118:15 trim 5:18 trivial 217:11 trouble 90:16 156:14 troublesome 210:9 true 68:18 80:13 105:13 247:9 250:18,22	163:16,17 172:13 174:2 176:19 181:19 186:22 194:17 211:4 214:10 232:7 235:10 235:13 240:5 243:5 252:2 259:15 262:15 267:8 274:17 291:1 291:11 two-day 5:14 tying 186:19 292:21,21 type 192:11 225:18	unintentional 218:2 Union 1:22 15:7 unique 72:22 United 30:9 University 1:19 11:5 15:11,16 18:5 38:10 76:5 unlocked 156:12 unpaid 16:9 unplanned 43:1 unquote 274:9 291:10

unstageable 175:9 176:20 179:4 untreated 275:16,18 **up-** 60:4 **up-front** 40:17 63:15 update 100:20 181:17 268:15 updated 81:8 91:22 127:5 142:12 updates 22:18 56:2 83:18 84:7 101:8,12 226:10,21 **Upshaw** 1:9,11 7:12 17:17,18 21:12 22:5 22:12 31:22 32:20 33:11 35:7,21 61:5 95:17 99:2 124:21 125:4 130:20 131:2 131:15,21 132:6 158:20 159:20 161:5 161:11 165:21 191:6 191:10 202:7 203:11 206:6 208:3 209:13 210:3,16 214:7,14 216:20 217:15,18 218:4,14 219:4 220:5 220:22 221:19 225:1 227:7,20 228:15 230:15 233:16 234:22 237:17 238:19,22 240:11,21 241:4 251:4,7 252:19 255:2 255:12 257:6 259:7 261:12 262:7 264:5 265:18 266:10 267:4 268:6 269:20 270:4 270:10 272:5 294:19 297:17 upstream 277:6 urban 69:8 urinary 248:19 urine 291:16 use 17:3 23:3 25:22 40:17 42:20 43:9.16 44:22 46:8 47:9,22 49:12 50:13 55:14 56:1 71:12,19 72:3,11 76:14,16 79:19 110:5 131:9 142:15 161:22 186:13 192:11 193:5 207:7 216:11 218:22 220:14 236:10 241:22 242:8,10 244:6,7 245:7 258:15,16 280:22 282:19,22 283:1 284:8 287:11 287:19.21 288:4 293:5

useful 52:12 53:21 59:19 136:10 194:9 243:21 244:17 250:13 **uses** 57:11 191:15 usual 6:14 usually 93:2 107:18 154:20 207:6 246:12 270:5 Utah 148:15 168:22 V Valdes 2:4 11:21,22 239:2 valiantly 135:18 valid 71:21 133:9 139:15 246:9 validate 245:4 247:15 validating 178:2,7 validation 247:15 validity 106:10 107:12 109:8 110:13 111:3,8 115:10 120:21 229:20 229:21,21 230:2,6 233:11,22 250:11 valuable 24:13 112:2 263:4 282:3 value 15:4 29:6 70:12 73:4 182:16 205:12 212:20 214:2,12 237:21 258:1 277:13 295:13 value-based 20:2 25:16 25:21 31:8 55:16 104:22 123:8 valued 90:20 values 212:9,15,16 variability 115:21 117:12 180:1 224:15 variables 49:1 124:13 variation 68:3 69:2,5,10 69:22 124:18 133:5 150:17,20 178:14 varied 207:3 variety 53:8 63:4 69:18 71:3 150:7 177:16 246:20,21 249:15 256:6

various 29:2 50:10

vast 214:17 248:18

vehemently 135:15

vendors 207:2 224:16

Neal R. Gross and Co., Inc. Washington DC

293:18

VBP 3:9

vein 58:20

varying 183:11

vascular 195:6

vendor 224:14

122:22 165:11 292:15

version 6:12 54:6 105:20,21,22 106:4,4 120:5 122:8,17,18 123:3 142:3 153:9 168:13 169:10 185:17 226:19 versus 31:5 69:7 70:10 96:1 178:16 179:15 205:1 221:15 231:20 238:8,8 249:19 250:21 256:5,14 257:11 263:6 vibrant 48:19 Vice 2:19 10:1 14:20 17:21 view 23:13 50:6 134:22 147:15 193:4 259:14 viewpoints 41:18 Vinci 258:20 **VIQR** 3:15 vis-a-vis 267:3 visibility 260:3 **visually** 176:7 voice 31:4 90:3 volume 37:7 39:21 41:2 52:14 53:3,9,16 55:10 55:19 63:16 64:3 67:20 70:5,6,7,8 71:8 75:10 80:2 82:18 83:8 254:4.10 volumes 254:6 voluntarily 144:10 voluntary 131:5 151:8 151:14 153:16,17,21 225:20 vote 89:13,15 91:8,10 92:11 93:5,9,19,21 94:4,14 99:5 122:3 154:8 155:7,12,17,21 156:6,22 157:13 158:5,6,19 160:6 161:21 163:6,10,12 163:19 164:1,2,3,17 164:18 165:2,10 173:1,1 185:12 187:15 188:15 198:5 198:10,19,22 199:4,8 222:3,17 223:12 264:8,19,21 265:3 voted 42:13 96:20 97:7 97:13,14 157:9,10 164:7,8,10,10 165:4,5 165:6,7 199:2,3,8,9 201:5 223:4,4,7,8 265:14,16,17

venture 12:12

verify 208:22

Verma 65:9

votes 91:1 93:6 97:18 156:21 164:22 165:3 173:2 198:16,20 222:21,22,22 265:9 296:21 voting 81:8 84:13 86:22 87:7,10,13,16,16,18 89:12 91:3 92:12 93:3 93:4,8,8,13,16,19,22 93:22 94:2,3 96:18,22 97:8,9 98:16 112:5 153:14 155:4,22 156:2,4,18 157:9 162:18 164:16 165:3 165:16 168:10 198:9 222:12,16 223:2 238:20 251:11 265:2 265:10 266:3 VS 123:11 VTE 42:4 W wait 169:21 243:13 269:19 waiting 137:13,19 156:21 198:19 walked 32:9 walking 36:6 228:18 279:22 wanted 5:4.6 16:3 21:1 41:17 43:18 54:4 67:14 68:13 73:10 96:12 107:14 108:22 135:2 150:9 151:4 158:7 185:9 187:9 201:4,20 217:21 236:4 244:14 254:11 254:12 wanting 65:20 256:22 Ward 76:6 wash 261:10 Washington 1:9 wasn't 63:15 64:6 98:12 113:8 189:7 209:20 213:7 231:17 264:16 266:20,21 watch 220:20 watching 235:8 272:10 water 206:12 waters 159:21 203:21 wave 277:10 278:11 way 5:11 9:2 21:8 23:2 26:6 55:3 65:17 73:15 73:19 81:21 82:12 89:21 95:1,8 99:13,14 118:17 119:2 123:14 125:13 129:18 131:16 137:9 138:6,16

139:11 141:5 159:10 160:17 163:1 188:15 188:21 189:1 192:12 193:1,7 194:1 195:12 214:4 215:6 217:10 219:5 222:2 233:3 237:1,6,10 238:19 239:11,22 243:17,19 243:20 244:5 254:1 293:15 ways 33:20 46:18 59:13 62:20 76:17 78:18 82:22 132:13 137:8 138:3 139:12 277:8 285:13,17 292:16 293:18 wean 278:7 weather 5:12 web 100:15 225:17 webinar 101:6 102:1 week 195:9 284:10 weeks 125:2,3 186:22 291:1 weigh 160:8 weight 45:9 welcome 4:2 8:9 10:3 24:4.6 86:13 98:9 124:11 well- 177:8 273:21 well-known 143:7 went 42:10 44:18 50:21 56:8 81:17,19 91:6,9 98:15 99:7 100:15 102:10 147:12 153:11 171:22 205:17 219:5 227:22 229:2 234:12 250:10 264:3 281:21 296:20 298:6 weren't 82:9 130:8 152:20 182:19 232:14 254:4 266:22 whatnot 292:12 whatsoever 53:3 Wheeler 2:5 13:10,10 120:19 wheelhouse 207:15 White 2:4 11:22 wholeheartedly 180:7 wholly 180:14 WI-FI 198:18 wide 24:11 43:1 177:16 178:14 widely 20:14 wider 176:10 wilder 219:18 willing 59:5 126:13 window 176:10 187:12 189:9

wise 181:2 wish 98:12 242:17 Wisham 2:9 18:22 19:1 126:16 127:16 141:9 181:1 270:19 wishing 136:12 witnessed 24:15 women 120:8 wonder 59:8 70:8 194:20 276:21 277:3 wondered 78:6 234:10 wonderful 7:21 27:4 203:17 241:4 269:13 276:18 wonderfully 93:17 wondering 54:16 98:4 125:13 129:19 196:5 234:18 word 17:4 286:7 287:12 292:8 words 21:17 30:7 235:14 work 7:16,17 9:2 12:4 14:5 16:2,8 21:15 22:3,15,22 24:20 25:5 28:1,17 29:17 30:4,12 30:18 33:4 36:19 37:1 40:8 46:15 47:3 50:6 52:9 54:2 55:8 61:18 61:22 63:12 65:11 72:4 77:21 79:2.15 80:1 81:15,15,21 83:2 99:13,14,20 115:2 121:6,11,14 145:6 151:7 155:11,14 156:7 157:2 161:2 207:2 213:4 237:19 265:19 267:11 270:12 270:20 277:13 290:9 290:14 295:10,15,17 296:1 297:21 worked 26:11 34:20 39:5 78:7,16 108:2 165:16 238:13 239:3 285:3 workflow 211:13 243:6 workforce 47:8 workgroup 1:3,8,10 3:11 8:10 10:8 19:14 19:15 22:4 23:1 33:8 36:22 37:15,16,19,21 38:3,10,15 39:14,21 48:16 50:5 66:22 80:4 81:16 82:5 97:9 198:11 202:18,19,19 222:4,18 265:4 267:2 268:17,21 269:1,2,14 273:12 275:17 297:6

297:21 workgroup's 50:6 workgroups 38:13 39:7 82:3 84:4 working 8:7 22:18 27:6 29:13 31:21 53:13 54:9 57:7 93:17 95:8 114:4 129:14 130:9 171:11,16,19 196:6,9 224:16 243:9,15 280:8 289:21 works 169:20 172:10 239:8 workshop 290:22 world 79:22 148:4 216:8 263:2 293:7 worry 114:21 worse 235:16 273:17 worsening 182:13 worth 5:19 55:15 56:16 74:3 142:9 149:9 worthwhile 113:11 wouldn't 53:2 97:17 114:17 149:6 150:15 254:8 262:15 291:17 wound 186:13 wrap 174:14 write 209:14 written 197:3 wrong 72:20 112:10 154:20 160:1 215:12 237:6 283:11 wrote 33:1 210:19 211:1 214:8 255:18 Х **X** 51:13 Y Yale 3:6 19:8 181:8,12 196:7 year 9:13 23:11 27:16 29:1 55:20 70:9 84:8 86:2,13 87:3 88:22 94:10 97:1 107:10 128:3 138:15 147:7 169:11,22 170:1 192:1 213:10 216:3,4 229:1,12 236:11 243:11,13 252:14 262:13,14 263:3 266:2 270:1,2,3,3 291:7 year's 256:11 years 11:13 26:13 28:15 54:17.21.22 55:9 63:14 71:20 72:18 83:20 87:9,20

94:18 101:11 113:1 148:16 174:20 232:8 255:5 **years'** 55:15 yes/no 89:14 236:14 yesterday 82:7 111:19 112:3,3 161:22 186:11 194:3 268:21 York 18:19 young 235:13 Ζ 0 0.96 247:5 0471 106:1,1 1 **10,000** 10:15 12:6 18:3 10:48 99:7 100 29:2 93:15 131:10 **1030** 1:8 105 4:12 10th 92:7 269:10 **11** 1:6 40:14 43:4 99:1 157:10 226:2 241:15 **11:00** 99:4 11:02 99:8 **12** 165:5 12:14 171:22 12:30 171:17 172:1 **128,000** 252:4 13 199:3 265:13 14 157:9 **15** 11:13 38:14 39:7 171:14 216:11,12 223:7 281:18 296:11 15,000 291:5 15,545 252:16 150 265:3 15th 1:8 16 164:8 **18** 37:22 39:13 179:3 **184** 28:5 1989 152:19 **1st** 6:4,16 2 **2** 175:8 178:12,16,19 200:21 204:10 222:20 2.3 204:8 2:44 298:6 **20** 9:11 40:12 64:12 97:15 150:21 199:6 265:15 2009 249:22 251:22 2013 202:19 249:22 251:22

2014 106:2 153:10	6
204:20 2015 37:3	6
2017 37:18 39:13 106:6	6
127:3 141:10 2017-2018 4:6	6 6
2018 1:6 36:20 85:5 127:1 229:1	6
2018-107 172:15	_
2019 85:5 123:11 203:10	7
2020 131:11	7
21 199:7 21st 92:6 269:9	_
22 165:6 186:10	8
225 4:17 227 4:18	8 [.] 8
22nd 269:5 298:4 23 4:5 222:22	8
2363 203:5	_
23rd 269:5 298:4 24 6:4 97:12 176:6	9 9
178:6 189:6,12 255:4	9
24-hour 175:14 187:12 204:15	9 9
241 4:19 25 02:14 16 182:7	9
25 93:14,16 182:7 25,000 291:7	9 9
25,422 252:12 268 4:20,21	
298 4:22	
3	
3 175:6	
3:00 23:4	
30 237:3 252:4 253:18 347 252:4	
36 4:7 164:9	
37 125:2	
38 223:4 39 125:3	
4	
4 175:7	
40 5:16 54:9 149:3	
204:16 205:13,16 212:1,11 224:1	
234:17	
45 98:12	
5	
5 4:2 97:15 204:9 50 118:14 150:21	
205:15 208:15	
50/50 98:7 55 98:12	
6	

I

60 87:16,17 90:4,7 91:12 155:22 163:10 63 223:3 64 164:10 65 234:17 244:11 66 87:10 234:10,19 244:8 252:13 68 112:20
7 70 205:15 208:14 79 29:1
8 80 212:10 81 4:8 87 199:1 265:12 88 165:4
9 9 4:3,4 223:8 9:00 1:9 9:01 5:2 90 113:1 238:14 93 152:19 96 247:21 98 4:9 247:22 9th 1:8

CERTIFICATE

This is to certify that the foregoing transcript

In the matter of: Measure Applications Partnership Hospital Work Group

Before: NQF

Date: 12-11-18

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

www.nealrgross.com