NATIONAL QUALITY FORUM

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MEASURE APPLICATIONS PARTNERSHIP HOSPITAL WORKGROUP

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THURSDAY DECEMBER 17, 2015

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The Workgroup met at the National Quality Forum, 9th Floor Conference Room, 1030 15th Street, N.W., Washington, D.C., at 8:30 a.m., Cristie Upshaw Travis and Ronald S. Walters, Co-Chairs, presiding.

PRESENT:

CRISTIE UPSHAW TRAVIS, MSHHA, Co-Chair RONALD S. WALTERS, MD, MBA, MHA, MS, Co-Chair RICHARD BANKOWITZ, MD, MBA, FACP, Premier, Inc. ANDREA BENIN, MD, Children's Hospital Association DAVID ENGLER, PhD, America's Essential Hospitals NANCY FOSTER, American Hospital Association SHELLEY FULD NASSO, National Coalition for Cancer Survivorship HELEN HASKELL, MA, Mothers Against Medical Error MARTIN HATLIE, JD, Project Patient Care JEFF JACOBS, MD, The Society of Thoracic Surgeons HEATHER LEWIS, RN, Geisinger Health System SHEKHAR MEHTA, PharmD, MS, Pharmacy Quality Alliance ALLEN NISSENSON, MD, FACP, FASN, FNKF, Kidney Care Partners KAREN ROTH, RN, MBA, CPA, St. Louis Area Business Health Coalition LESLIE SCHULTZ, PhD, Premier, Inc. BROCK SLABACH, MPH, FACHE, National Rural Health Association

DONNA SLOSBURG, BSN, LHRM, CASC, ASC Quality Collaboration KELLY TRAUTNER, AFT Nurses and Health Professionals WEI YING, MD, MS, MBA, Blue Cross Blue Shield of Massachusetts INDIVIDUAL SUBJECT MATTER EXPERTS (Voting): GREGORY ALEXANDER, PhD, RN, FAAN ELIZABETH EVANS, DNP JACK FOWLER, PhD MITCHELL LEVY, MD, FCCM, FCCP DOLORES MITCHELL R. SEAN MORRISON, MD MICHAEL P. PHELAN, MD, FACEP ANN MARIE SULLIVAN, MD FEDERAL GOVERNMENT LIAISONS (Non-voting): PAMELA OWENS, PhD, Agency for Healthcare Research and Quality (AHRQ)* DANIEL POLLOCK, MD, Centers for Disease Control and Prevention (CDC) PIERRE YOUNG, MD, MPH, Centers for Medicare and Medicaid Services (CMS) MAP DUAL ELIGIBILITIES WORKGROUP LIAISON PRESENT: THOMAS LUTZOW, PhD, MBA NOF STAFF: CHRISTINE CASSEL, President and CEO ELISA MUNTHALI, Vice President, Quality Measurement MARCIA WILSON, Senior Vice President, Quality Measurement TAROON AMIN, Staff Support WUNMI ISIJOLA, Senior Project Manager ERIN O'ROURKE, Senior Project Manager ZEHRA SHAHAB, Project Manager JEAN-LUC TILLY, Project Analyst

ALSO PRESENT:

KYLE CAMPBELL, PharmD, MS, Health Services Advisory Group* JOSEPH CLIFT, EdD, MS, PMP, Centers for Medicare and Medicaid Services (CMS) ELIZABETH DRYE, MD, Yale School of Medicine Center for Outcomes Research & Evaluation* MAYUR DESAI, PhD, MPH, Yale School of Medicine Center for Outcomes Research & Evaluation* JOSEPH MESSANA, MD, UM-KECC VINITHA MEYYUR, PhD, Centers for Medicare and Medicaid Services (CMS) KAREN PACE, PhD, RN, Health Services Advisory Group CHRISTINE RANSHOUS, Mathematica Policy Research*

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1 P-R-O-C-E-E-D-I-N-G-S 2 (8:32 a.m.) CO-CHAIR TRAVIS: I want to welcome 3 4 everybody to Day 2. That's always kind of a nice 5 thing to be able to say. We made it through Day 1. 6 7 I personally want to thank everybody that's on the workgroup because I found the 8 9 discussions that we had yesterday to be right on 10 target in terms of the issues that we were 11 addressing, and also extremely helpful. 12 I know that the conversation around 13 the table helped me make my decisions about how 14 to vote, which is what the whole purpose of us 15 coming together is because if it was just about 16 us preparing ahead of time, we could vote on a 17 SurveyMonkey. It's really about the interaction 18 of the group together. 19 I found that to be, this year 20 especially, valuable to me as I was making my 21 decisions. Ron always likes to say that 22 sometimes in the past, we've still been on IQR on

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the morning of the second day, so I think we can 1 2 at least chart our own progress over time. 3 There was only one program that we 4 didn't get to yesterday, which was cancer. That 5 is where we're going to start this morning. We are going to make a slight change on the agenda. 6 7 We do have a couple of people that have to get out early due to the flight schedules. 8 9 So we're going to cover cancer first, 10 then end-stage renal, hospital outpatient 11 quality, then we're going to do inpatient psych, 12 and we're going to end today with ambulatory 13 Just note that there's a slight change surgery. 14 in the agenda as we move forward. 15 Ron -- whispering in my ear, which is 16 why we have co-chairs -- does that work for 17 people for us to make that kind of a change? 18 (No response.) 19 CO-CHAIR TRAVIS: Okay, thank you so 20 It's hard to remember everything. much Ron. 21 With that little bit of background, 22 Taroon would like some time at the beginning of

our meeting this morning to kind of give us some
background information that I think will help us
kind of frame the work that we did yesterday, but
the work that we're continuing on today. Kind of
understanding the big picture and how some of our
work fits within it, which I think is an
excellent addition to today's agenda.

3 Just for a few minutes, Taroon is9 going to give some remarks.

10 Thanks, Cristie. DR. AMIN: I had a 11 number of sort of reflections from our 12 conversation yesterday, particularly toward the 13 end of the day. I wanted to connect some of the 14 conversations that we're having with the 15 Coordinating Committee with the work of this 16 committee, so that you have a sense of some of 17 the overarching issues that we discussed to make 18 sure that you get a sense of how all this 19 information is connecting back.

20 As you may know, one of the key 21 enhancements from this year's pre-rulemaking 22 cycle was the addition of a September in-person

meeting of the Coordinating Committee. 1 The 2 purpose of that Coordinating Committee meeting was to really set the agenda for this year's 3 4 pre-rulemaking cycle, look at the preliminary 5 analysis algorithm that staff used to make their recommendations, so the rubric, but there are a 6 7 number of conversations that emerged yesterday that I wanted to just link up to some of the 8 9 conversations that we've been having at the 10 coordinating committee.

11 The first was that Nancy and Michael 12 brought up this idea around the overarching 13 strategic way to look at the measures that are 14 coming into the MAP. That is not only for the 15 individual programs, but also looking across the 16 different programs that the workgroup is looking 17 at, but across all the different workgroups.

18 The Coordinating Committee recommended 19 moving forward with an idea that's tentatively 20 being called the MAP core concepts, which is 21 essentially a strategic framework to narrow down 22 what are the key areas that we want to make

progress on across all the workgroups, and then 1 2 think more strategically about what are the key levers across the different settings that can 3 4 actually influence some of these outcomes? The Coordinating Committee will be 5 undergoing a discussion around how to identify 6 and develop a set of core concepts that we will 7 be using going forward for our MAP pre-rulemaking 8 9 work going forward. This will be on their agenda 10 for the January meeting. 11 Additionally, I think we had this 12 discussion about the gaps in alignment. Again, 13 this is around the impact that this has to the 14 private sector. Dolores and Wei brought of these 15 points up around the huge impact that the CMS 16 programs have across the public and private 17 sector. Again, the goal here was really to then think about using these core concepts as a way to 18 drive alignment, and then also to drive 19 20 identification of where there's still gaps across 21 all of these programs.

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Clearly, the goal is not to measure

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the same thing in every program. We had that
 discussion last year around advanced care
 directives, which I won't remind anybody about.
 But the idea is that some of these are very
 important concepts, but it may not be appropriate
 all the time to measure in every setting.

7 We really need to think a little bit 8 more strategically about what are the core 9 concepts that we need to measure, and what are 10 the contribution of all these various settings to 11 advance all these objectives? We think this is 12 going to be a key tool going forward next year.

13 The second is a little bit of 14 discussion of where we ended yesterday around 15 these program-specific goals and the nature of 16 the incentive structures maybe driving the 17 particular types of measures that we would select 18 for different programs. Again, one of the key 19 changes of this year was we were trying -- one of 20 the things I would encourage us to keep thinking 21 about is that as we think about the fall web 22 meeting for the workgroup, how to use that as a

time to really look at the current measures in the program, the incentive structure, and really coming up with -- and also assessing the CMS program goals that have already been outlined and coming up with how the MAP, particularly this workgroup, wants to look at each individual program.

Again, we'll continue to work through how we can use that fall web meeting to advance that objective, but that's not lost -- again, I just wanted to -- that point was brought up multiple times yesterday. That issue isn't lost.

The last is this idea about data. 13 We 14 came back to this conversation over and over 15 again yesterday around what's the data that we 16 have? One of the interesting evolutionary 17 elements of what the MAP has seen over the last 18 five years is a continued growth in the number of 19 measures that are under development or measures 20 that haven't been seen by the endorsement 21 process.

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Again, this is another element that

the Coordinating Committee's going to discuss 1 2 quite a bit to understand what is the date -because we traditionally relied on the NOF 3 4 endorsement process to understand measure 5 performance, understand how well -- this concern about unintended consequences and without that as 6 7 the input, we're left with the situation we're in, which we've discussed a number of times. 8 9 I'm not here to say we have an answer 10 to that challenge, or evolution, but it is 11 something that the Coordinating Committee is 12 going to have to discuss because that has been an 13 evolutionary change in the way that the MAP has 14 functioned, and also has some implications for 15 the decision categories and what they actually 16 mean. 17 With that, I just wanted to reflect on 18 those three overarching issues. Obviously, I 19 would welcome comments. I don't want to distract 20 too much, but I wanted to at least make sure that 21 we articulated that all of these overarching 22 issues that you've been discussing that are

outside of the individual measures will be taken back to the Coordinating Committee for further discussion. We'll be providing that back to you at the start of pre-rulemaking at least next year, if not before that.

6 CO-CHAIR WALTERS: So yes, Taroon, I had a question that kind of tails off that. 7 From a strategic perspective -- and people in the room 8 9 that weren't involved can kind of picture this --10 not only did we talk about the MUC list, but we 11 talked about the current measures also, at the 12 very beginning. You can imagine that's why it 13 took much longer than this one even did.

14 Obviously, we don't do that now, 15 starting last year or this year, but as part of 16 that framing the big picture -- because the TEPs 17 aren't going to do that. The TEPs are very 18 specific in their orientation. Yet to get --19 probably the Coordinating Committee can frame it 20 to some degree, but again, then that gets split 21 out into different programs.

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Where does that strategic coordination

We kind of alluded it -- some of the 1 occur? 2 measures we talked about actually talked about their relationship to other measures, but those 3 4 other measures weren't on the list for review, so 5 how do you see that happening? I think that there's two 6 DR. AMIN: points to that, and I'd welcome other thoughts 7 from other NQF staff that have thought about this 8 9 as well. 10 The first is where we really think 11 about this -- we as the Coordinating Committee, 12 and then also staff as we've been thinking this 13 -- which is the core concepts idea is, again, 14 informed by the work from the IOM Vital Signs and 15 other work that other workgroups have already put 16 into this, as a way that when we're thinking 17 about coordination across all these workgroups, 18 it's not really at the measure level. It's going to be a little bit higher 19 20 than that. Therefore, we can get coordination on 21 a concept because the data sources are going to 22 be different. The level of analysis is going to

be different. It's going to drive some changes,
 in terms of how the measures are constructed.
 Alignment on an individual measure, while it may
 be important in some instances, it's a little
 bit, maybe at a higher level.

But I think you're bringing up another 6 7 important point, which is one that we've been struggling with back and forth and I think we're 8 9 going to have to work with our colleagues at CMS 10 a bit on this next year as well, which is that --11 and this is one of the changes that we had, which 12 is that CMS has made it relatively clear that 13 we're not necessarily structured to make 14 recommendations about existing measures that are 15 in the programs.

But on the other hand -- and we also have very limited time to do this, given the volume of work we have to do, just looking at the new measures coming in. But it's really important to understand the context of the program and the measures that are currently in it -- as we had this whole PSI 90 conversation

yesterday, it was all about what's already in the
 program.

I think we're going to need to figure 3 4 out -- we meaning staff -- we're going to have to 5 help figure out how to use that fall web meeting, as well, to really get a good understanding of 6 7 the context of the measures that are currently in it, in the programs, to be able to really make 8 9 strategic recommendations about new measures 10 coming in. 11 It's going to be increasingly 12 important as these programs mature -- the 13 measures in the programs mature and we get more 14 experience, discussing what's currently in the 15 program needs to be potentially something that's 16 brought back into the process, but we're just 17 going to need to work with our colleagues at CMS 18 to figure out how we can do that most 19 appropriately and use your time in the fall and 20 in this in-person meeting most effectively. 21 CO-CHAIR TRAVIS: Okay, I see some 22 cards. I don't know who came up first, so I'll

go with Andrea first because she's over there. 1 2 MEMBER BENIN: Taroon, I guess I would like to also see that somebody comes up with a 3 plan around how we would see metrics revalidated 4 5 with ICD-10. A lot of these metrics now are based on claims and ICD-10 is guite different. 6 7 It's quite different as a user and when I do coding, it's very different, although 8 9 we're not talking about professional coding. 10 We're talking about a different kind of coding. 11 I think that should be an important part of what 12 happens over the next year. CO-CHAIR TRAVIS: Thank you, Andrea. 13 14 Okay, Dan. 15 Taroon, thanks. DR. POLLOCK: My 16 question concerns the relationship between what 17 you're describing and the new NQF approach to 18 measure maintenance, which emphasizes use of the 19 measure and is de-emphasizing the reliability and 20 validity. 21 Because I think some of our questions 22 about measures that have been in the programs for

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a while relate to the usefulness of the measure
and what the data show. It would be an
opportunity, potentially, to bring into the
measure maintenance process some structured
questions regarding what's happened to the
clinical phenomenon of concern during the course
of the measure's lifespan.

Actually, I think 8 MS. O'ROURKE: 9 that's a great idea and a great way that we can 10 continue to build the MAP-CDP integration that 11 we've been talking about. I think we can work 12 with the maintenance team to see what information 13 we can get from that with maybe some new 14 questions to build in and how to bring that back 15 to the MAP.

Because I think, as you were saying, this body's not really constituted to go into things like the reliability and validity of an individual measure. We defer that to the CDP standing committees, but how we can really look at the usefulness of a measure and what's changed about the underlying clinical conditions seems

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like something we can build into the MAP process. 1 2 DR. AMIN: I would just -- rest assured that this is an active conversation that 3 we're having and we're continuing to work on 4 5 It's absolutely a key element to reduce that. the workload of measure developers in particular, 6 7 but get additional information back to the key stakeholders as you're making decisions. 8 9 CO-CHAIR TRAVIS: Okay, Marty. 10 MEMBER HATLIE: One of the big 11 discussions we had yesterday was about the 12 pathway or framework from a reporting program to 13 a payment program. Is that one of the concepts 14 that the Coordinating Committee will take on in 15 January and then work with CMS on? I realize that there are statutory 16 17 parameters there, but I think you've got a pretty 18 clear message that there was a -- maybe even a 19 consensus there that we needed some more work 20 there. 21 MS. O'ROURKE: I think that's a very 22 good point and it actually brings me back to the

guiding principles. I don't know if Ron or 1 2 Cristie or some of the people who have been around the table a while remember when we 3 4 developed those and have kind of moved away from 5 them, but perhaps they still resonate with the group and it's something we should work with the 6 7 Coordinating Committee to fold back into the 8 process. 9 Maybe see what from that we can build 10 on into things like the preliminary analysis to 11 show how a measure would mesh with what this 12 group has laid out. 13 DR. AMIN: I also think it probably 14 interacts as well, with -- as we're thinking 15 about the program goals and the way that you want 16 to provide program -- I don't want to say program 17 guidance because that implies something that's 18 out of scope for the MAP. 19 Again, it's one of the challenges with 20 all this. We're trying to make sure that you guys can get your work done, and we're not going 21 22 too far out of scope, but obviously, all these

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things interact.

2	One of the key elements here, as well,
3	is as you're thinking about the programs, if you
4	have guidance about how you're selecting measures
5	into it so the way the measure's coming to CDP
6	is that they have this experience, I mean we've
7	heard that quite a bit in terms of public
8	reporting that might make an impact in terms
9	of how you're thinking about that program in
10	particular, and we might apply that going forward
11	and just make that more clear.
12	There's opportunity to interact in
13	multiple different ways with that, but we heard
14	it. We heard that feedback.
15	CO-CHAIR TRAVIS: I really like, Erin,
16	your thought about the guiding principles. I
17	don't remember them specifically, but I do
18	remember that one of the reasons we developed
19	them was to aid in this type of decision-making
20	so that we were all on the same page from a
21	framework as to how we moved measures along.
22	That's a great suggestion to kind of

bring them back out, maybe take a look at them. 1 2 They may need to be refreshed, but seeing how that could help the work of our group. So thank 3 4 you, Marty, for bringing that up. 5 Thank you, Cristie, MEMBER FOSTER: and Taroon, thank you for providing this 6 It's actually very useful to me and I 7 framework. appreciate the work that's underway. 8 I want to 9 make two quick suggestions. 10 One is I think that to the extent the 11 Coordinating Committee wants to task, if you 12 will, the workgroups to focus on certain things, 13 to really engage on particular issues -- I, for 14 one, would welcome that because if they're laying 15 it out as part of a bigger, broader strategy, to 16 be very explicit about that would be helpful, I 17 think. 18 Secondly, perhaps just dovetailing off 19 of Dan's point, I do think we need to be able to 20 look at whether the measures are accomplishing 21 their desired objective and provide feedback to

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CMS and others on whether we made the right bet.

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1	If we ask hospitals to report on
2	community-wide smoking prevalence, did it
3	actually have the impact or was that the wrong
4	thing? It's not going to be as strong a measure
5	or as strong a lever as we hope?
6	How do we build that into the process
7	in a thoughtful way, so that we are communicating
8	effectively with all of the policymakers that
9	want to be interested in this?
10	DR. AMIN: So just one quick reflection
11	on that, just because it's such a huge part of
12	the conversation yesterday at the PAC meeting and
13	at the clinician meeting.
14	The need for this sort of revise and
15	resubmit or we're approving and we want to see
16	some data back is one thing that the NQF staff
17	and NQF leadership are going to need to work with
18	CMS about because this has been that was a key
19	element of our conversation two years ago in
20	terms of our improvement. That was clear to us
21	that that was out of scope with our conversation
22	with CMS.

There's time to revisit that. I think 1 2 given a conversation with the Coordinating Committee and with CMS, I think we can think 3 4 about how to do that, how to do some version of 5 that that meets the stakeholder needs. We heard that loud and clear. So we're going to have to 6 7 work on that. CO-CHAIR TRAVIS: Allen. 8 9 MEMBER NISSENSON: I think something 10 else we discussed yesterday I think would be 11 helpful is to get some distal evidence of how 12 metrics are eventually utilized. What I mean by 13 that is if we have three categories: support, 14 conditional support, and do not support, do we 15 know which metrics within those three categories 16 have been implemented by CMS? 17 It's possible that even some of the do 18 not support ones were implemented and turned out 19 I think to close the loop and to to be good. 20 better inform the group going forward, that would 21 be very helpful information. 22 CO-CHAIR TRAVIS: I don't know if this

helps it be more in scope, but to a certain extent, the way I'm looking at some of this discussion is that we're evaluating our own work. In other words, it's our work that we're taking a look at. We made recommendations, and then were our recommendations helpful?

7 I think having a better understanding -- because obviously the group that we've pulled 8 9 together understands measure evaluation. I think 10 it's good for us to kind of challenge ourselves 11 in terms of our own performance, as a workgroup, 12 and what has happened with our measures, which I 13 know you all track, and then the measures that 14 went into programs, what kind of impact did they 15 have? Thinking about it more as looking 16 internally at our own work, from that 17 perspective.

DR. AMIN: Cristie, I think this is a really, really good point on the data. I just want to reflect on the fact that one of the things that NQF staff has really been thinking about is this how do we provide the feedback on

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the measure decisions?

2	The challenge that we've had about
3	and I just want to give you a sense of the
4	challenge, and we can come back and think about
5	it some more, which is that sometimes we don't
6	know it's not always clear why the measures
7	haven't been taken off. They might be taken off
8	two years later. They might be taken off three
9	years later. The raw numbers are often
10	misleading, even for us to interpret to provide
11	feedback back to you.
12	With all that being said, we'll take
13	it back and consider it some more and figure out
14	what kind of information we can bring back. I
15	would just say that it's been challenging for us
16	to interpret the uptake rate, if you will,
17	because it's not always clear, given the and
18	it's not something that's necessarily within the
19	MAP's control either, to change potentially.
20	Either way, good feedback.
21	CO-CHAIR TRAVIS: I might just
22	mention, on the SharePoint site there is a

1 it's under what's called National Impact Report.
2 It's an external consultant who was contracted by
3 CMS to come in and assess the answers to a lot of
4 the questions we just raised. What has the MAP
5 process in general accomplished, and what are the
6 gaps still? Again, this is an external
7 consultant.

8 It's posted on the SharePoint site. 9 It's about 200 and some pages, but for those of 10 you that are interested in this feedback, I 11 thought it was a very good review and gave me a 12 lot of things to think about. It's called the 13 National Impact Report, and it should be at the 14 top there.

MS. SHAHAB: It's not on the public
SharePoint. It's on the committee SharePoint
site, but I can also add it on the public, if
you'd like.

19 CO-CHAIR TRAVIS: Helen, did you have
20 another point? That's okay. I just wanted to be
21 sure. Thank you all for that, and thank you,
22 Taroon, for bringing those issues to our

Obviously, we're very interested in 1 attention. 2 those, so thank you for that. I think we will go on and get started 3 4 this morning. Our first program that we're going 5 to be looking at is the PPS-Exempt Cancer Hospital Quality Reporting Program. 6 I'm going to 7 turn it over to Zehra for an overview of the 8 program. 9 MS. SHAHAB: Thanks, Cristie. 10 PPS-Exempt Cancer Hospital Program is a voluntary 11 data reporting program and the data is published 12 on Hospital Compare. 13 The goals of the program are to 14 provide information about the quality of care in 15 cancer hospitals, specifically the 11 cancer 16 hospitals that are exempt from the inpatient 17 prospective payment system and the Inpatient 18 Quality Reporting Program. Additionally, the 19 program is used to encourage hospitals and 20 clinicians to improve the quality of care to 21 share information and to learn from each other's 22 best practices. That's a quick overview of the

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program.

2	About the consent calendar, there's
3	five measures on this consent calendar.
4	Admissions and emergency department visits and
5	that is an update, and MAP has previously
6	reviewed that. SSI, CDI, and MRSA are already
7	currently in the program, are also updates.
8	Oncology, it's currently in the program, but it's
9	undergoing a change to include breast and rectal
10	cancers.
11	Before we start the consent calendar,
12	we will open it up for public comment.
13	CO-CHAIR TRAVIS: Thank you, Zehra.
14	Is there any comment in the room?
15	DR. PHELAN: I do. Can I make a
16	comment?
17	CO-CHAIR TRAVIS: Sure. Did anybody
18	show up? No? Okay. Yes, Michael.
19	DR. PHELAN: I just need a better
20	explanation of why these 11 or 12 hospitals
21	continue to be exempt from some of these patient
22	safety programs. I'm wondering if CMS can give

some insight into that at all. 1 2 I'm just wondering because these are not very different, and I've wondered why 12 3 4 hospitals are then exempt from a lot of these 5 programs and we have to work differently. Is it possible to make any comment on that? 6 DR. YOUNG: 7 So --(Simultaneous speaking.) 8 9 DR. PHELAN: I'm thinking legacy. I'm 10 thinking that this was some kind of legacy from 11 20 years ago legislation or 30 years ago. It's 12 bothered me since I've been on the MAP. 13 Right. Well, I need to DR. YOUNG: 14 double check, but my understanding is that this 15 is related to legislative limitations. 16 MS. O'ROURKE: I can try to illuminate 17 a little bit. Our understanding was that these 18 hospitals are exempt from the inpatient 19 prospective payment system, and because of that, 20 they are essentially exempt from IQR since the 21 mechanism for that is an update associated with 22 that payment.

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1	This program was put in by the
2	Affordable Care Act to basically close a
3	reporting gap that was created by the different
4	payment systems.
5	DR. PHELAN: Again, I guess the
6	question, as we deal with this, these are
7	patients that are exactly the same patients that
8	we see in our normal hospitals, but there's 12
9	hospitals exempt from it.
10	From my perspective, I'd be like, oh,
11	well, you don't have to be in the IQR, but we're
12	going to include a separate category that's now
13	the exact same measures that are included, but
14	it's going to affect the PPS hospitals.
15	MS. O'ROURKE: You raise a very good
16	point, and I'll turn it to Nancy in one second to
17	illuminate, but I think that's something the MAP
18	has struggled with since the beginning is we know
19	the vast, vast majority of cancer patients are
20	treated in the normal, acute-care hospitals.
21	To try to get some of the cancer
22	metrics into IQR has been a resounding theme of

this group, and at the same time, to put in some essential quality safety measures into the PCHQR Program, so that patients have the same level of guarantee that their care is the same standard across the board.

I think that's something this group 6 has stated throughout its existence, while 7 looking at these two programs. We've made those 8 9 recommendations year after year, but I think we 10 can echo it again that there needs to be better 11 symmetry between the programs and that cancer is 12 a key gap for IQR. We also need some of the 13 overarching measures in this program.

14 MEMBER FOSTER: Michael -- Erin had it 15 exactly right. This is structure of payment 16 programs deciding what group somebody falls in 17 here. Part of the reason we're looking at some 18 of the same measures, I believe, is that there's 19 a lot of concurrence with your thought that these 20 hospitals need to be paying attention to the same 21 issues and so forth.

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I would tell you that while you come

from an unusual place, the thought that these 1 2 hospitals are caring for the same kinds of cancer patients as everyone else may be a bit of an 3 4 overreach. In fact, your average community 5 hospital is not caring for the same severity as these, which is why there was the separate 6 7 payment system created, and why we may want to think about whether the risk adjustment, when 8 9 it's necessary, is strong enough to enable a real 10 side-by-side comparison of quality. 11 CO-CHAIR TRAVIS: Thank you. I'm 12 sorry I didn't see your card before we opened for 13 public comment, but I'm going to now give the 14 people in the room another chance for public 15 comment in case any of that discussion led them 16 to want to comment. 17 (Pause.) 18 CO-CHAIR TRAVIS: I don't see anybody 19 in the room, so Operator, could you see if 20 there's any public comment on the PPS-Exempt 21 Cancer Hospital Quality Reporting Program on the 22 line?

1	OPERATOR: Yes, ma'am. At this time,
2	if you have a comment, please press star, then
3	the number one.
4	(Pause.)
5	OPERATOR: There are no comments at
6	this time.
7	CO-CHAIR TRAVIS: Okay, thank you very
8	much. We are going to move then into the
9	discussion of the measures that are in this
10	program.
11	As Zehra indicated, these measures are
12	pretty much updates. We've also discussed
13	several of these measures yesterday, in
14	relationship to other programs. We have had one
15	measure that is pulled, that is Measure Number 1,
16	but Measures 2 through 5 have not been pulled for
17	discussion.
18	Those would constitute our consent
19	calendar with the recommendation that comes from
20	the staff. Zehra, could you just remind us, for
21	each measure, what that recommendation is?
22	MS. SHAHAB: Sure, Cristie. Number 2,

SSI, was conditional support pending NQF update. 1 2 That was the staff recommendation. Number 3, CDI, conditional support pending NQF annual 3 4 Number 4, MRSA, conditional support update. 5 pending NQF review and endorsement. Number 5, oncology, conditional support pending NQF 6 7 endorsement. CO-CHAIR TRAVIS: One last time, does 8 9 anyone want to pull any of the measures that have 10 not been pulled so far? Dan? 11 DR. POLLOCK: No, I don't want to 12 pull. I just want to ask a question about the 13 MRSA. 14 Zehra, if I heard you correctly, the 15 condition there was pending endorsement and 16 that's a measure that's been endorsed -- or that 17 same measure has been endorsed and in use. 18 MS. O'ROURKE: I think that was a bit 19 of an overreach on the preliminary analysis. I 20 believe we meant more of pending the update of 21 the -- the annual update. 22 DR. POLLOCK: Right, that's what Zehra

mentioned about the CDI measure. I think that 1 2 the same verbiage applies to Number 4. 3 MS. O'ROURKE: Okay, we can change that condition. 4 5 CO-CHAIR TRAVIS: Yes, thank you. 6 Thank you, Dan. 7 (Simultaneous speaking.) MS. RANSHOUS: This is Christine on 8 9 the line. It's also our understanding that the radiation that's found in normal tissues has been 10 11 endorsed with the updates. 12 CO-CHAIR TRAVIS: Okay, that's Number 13 5? 14 MS. RANSHOUS: Yes, ma'am. 15 CO-CHAIR TRAVIS: It appears that 16 nobody wants to pull any of these other measures. 17 They will move forward. We will be sure that we 18 clean up the language to have it accurately 19 reflect the current status, such as what Dan just 20 brought up and we will do that for Number 5 too. 21 I guess I'd like to ask if there are 22 any objections to this consent calendar moving

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forward with these staff recommendations? 1 2 (No response.) CO-CHAIR TRAVIS: Wonderful. 3 Thank 4 you very much for that. We will move to the one 5 that has been pulled, which is Number 1, admissions and emergency department visits for 6 7 patients receiving outpatient chemotherapy. That was pulled by Nancy and we'll hear from Nancy 8 9 first, and then give our lead discussants an 10 opportunity to respond. Nancy. 11 I'm not the clinical MEMBER FOSTER: 12 expert in the room -- Ron. However, my 13 understanding of cancer patient treatment is that 14 there are lots of -- I know this basically from 15 what Ron has told us in years past -- that the 16 walls between the hospital and the outpatient 17 setting are much more fluid than in other 18 settings and one might plan for people to come 19 back to the hospital for treatment as part of 20 their ongoing care. 21 It's all about the measure 22 specifications here for me and getting those

right so that they recognize the actual nature of 1 2 cancer care treatment as it is happening now and we were not really able to look at the specs. 3 I pulled this simply to say I'm not 4 5 sure I can conditionally support this unless, as we discussed yesterday, Erin can assure me that 6 7 going forward, the NQF review will really look at that issue of is this consistent with how cancer 8 9 care treatment is done today, in which case 10 conditional support would make sense to me. 11 MS. O'ROURKE: That's certainly a 12 strong condition we can put on this measure that 13 it be reviewed by the Admissions and Readmissions 14 Standing Committee, and we can pass along to that 15 committee a particular concern that cancer is 16 different than other conditions, and they should 17 give this one a very thorough look. 18 CO-CHAIR TRAVIS: Reactions from our

10 -- I'm trying to remember who they all are -- our
20 lead discussants, Ron, Shelley, and Wei?
21 Shelley.

22

MEMBER FULD NASSO: I think that's an

important thing to consider in the review, but when I read the way it's described, it's really looking at the complications that are expected and treatable for the people undergoing chemotherapy.

6 So much of the effort on value and 7 cost both for patients -- they don't want to end 8 up in the ER or be admitted when they don't need 9 to be -- and it's part of the Innovation Center's 10 oncology care management pilot. It's part of a 11 lot of efforts to try to reduce unnecessary ED 12 visits and admissions.

13 The patient-centered medical home 14 model is one way of making sure that you're 15 really managing those symptoms better while 16 patients are going through chemotherapy. All of 17 these things -- anemia, dehydration, diarrhea --18 these are things that we know happen and can be managed by the physician who's administering the 19 20 chemotherapy so patients don't end up -- I think 21 as long as the condition is that careful review 22 to make sure that this reflects the right kind of

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cancer care practice, I think this is really 1 2 important from a patient perspective. But I think it's also from a resource 3 4 utilization perspective because there's so much 5 focus on the cost of cancer care. This is one area where we can really make a big difference if 6 we manage patient symptoms better, and we don't. 7 Patients don't want to end up in the ER. 8 They 9 don't. 10 If we can just manage it better --11 some practices are doing really well at that and 12 others are not. So many practices are now owned 13 by the hospitals that I think that it makes sense 14 for the hospitals and practices to work together 15 on reducing this. 16 CO-CHAIR TRAVIS: Thank you, Shelley. 17 Wei. 18 MEMBER YING: I will agree with this 19 previous comment. I actually liked -- among the 20 consent calendar, this is the measure I liked the 21 best. 22 One reason is that as we mentioned

1	earlier, a lot of the measures being endorsed
2	here are not just being used for these programs.
3	The ripple effect is actually quite significant.
4	This measure, because this doesn't rely on
5	specific treatment and specific clinical
6	conditions, so actually the denominator, the
7	eligible population, is much bigger to manage.
8	When we expand it beyond these exempt hospitals
9	to the acute-care facility, this measure actually
10	becomes measurable. Other condition-specific
11	measures, sometimes it's just very hard to get
12	enough volume for us to look at.
13	Just to share a little bit of
14	experience, before this measure even became
15	existent as a health plan, we even started to
16	develop similar measures ourselves, trying to
17	look at the complications after chemotherapy.
18	It's very important area for us.
19	CO-CHAIR TRAVIS: Thank you, Wei.
20	Before we open it up to everyone, Ron.
21	CO-CHAIR WALTERS: We're perfectly
22	comfortable with conditional support pending

endorsement. We've not seen the specs either on
 this measure, although from the description, I
 think we have a very good feel for what's
 involved.

5 As was mentioned earlier -- I'm going to try not to be repetitive. I think everybody 6 7 summarized it. Nobody likes to come into the hospital and to the extent you might want to call 8 9 these potentially preventable admissions, I think 10 that gets the flavor of what this measure's 11 trying to accomplish. It's good for the patient. 12 It's good clinical care.

As Nancy and I discussed in the first MAP meeting a long time ago, this is the start -and you've seen other examples of the kinds of things that might well blend into other programs over time. We support it. We just want it to get endorsed.

19CO-CHAIR TRAVIS: Okay. Thank you to20Nancy and our lead discussants. Tom.

21 MEMBER LUTZOW: I would just recommend 22 that -- this is a ground for a review of SES

1	impact, I think, too. Anything having to do with
2	outpatient our members have a very high I
3	should explain that iCare only serves Medicare
4	individuals who are dually eligible.
5	We have a very high no-show rate for
6	anything outpatient. Transportation's a
7	challenge. Health literacy, especially with
8	complications like this, if there's any reaction
9	that's not comfortable to the patient, the
10	patient, I think, makes the decision that
11	treatment isn't something they want to do, so
12	there's that resistance, despite doctor
13	recommendations and despite the treatment
14	regimen.
15	As part of the review, I think it
16	would be important to look at the impact of SES
17	on anything having to do with outpatient services
18	that if the member's not compliant results in an
19	ER visit or an inpatient stay. I'm just
20	surprised it's not here as a condition to look
21	at.
22	CO-CHAIR TRAVIS: Thank you, Tom.

1	Just as a reminder, all the measures that will
2	coming through NQF for endorsement during the
3	trial period will be required to look at SES
4	adjustment. What they find may be different
5	based on the measure, as we talked about
6	yesterday, having that conceptual framework
7	first, and then looking at the empirical
8	evidence.
9	Thank you for bringing that up. It is
10	baked into the process at this point, so thank
11	you for that. Andrea.
12	MEMBER BENIN: Ron, I'm just a little,
13	actually, confused by your comments. We bring
14	kids with fever and neutropenia into the ED.
15	That's what we do with them. That's what you do
16	with a sick kid. I don't know about on the adult
17	side. If you have fever and neutropenia and
18	sepsis, you don't come to the ED?
19	I'm just surprised by these diagnoses.
20	Maybe that's a difference between what you do
21	with adults and what you do with kids, but fever
22	and neutropenia goes to the ED and gets admitted

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a lot of the time, and certainly sepsis -- a 1 2 diagnosis of sepsis would be an ED -- those, to me, are appropriate uses for the ED. 3 4 Now better if you can bring them into 5 the clinic, treat them in the clinic, pump them up, then send them to inpatient, but we can't 6 always get them into the clinic. Sometimes it's 7 after hours. Sometimes the clinic is full. 8 It's 9 better to do it faster if you can get them 10 through the ED. I feel, just by the limited 11 12 information listed here -- clinically extremely 13 uncomfortable with sort of just saying this is 14 not a good thing to be doing. I would want 15 whatever the technical review to look at be 16 pretty robust. I'm sure that it will be, but I 17 wouldn't -- without knowing a little bit more 18 about this and understanding it a little bit 19 better, that's not a quality metric I would want 20 my kid -- or my mother, whichever the adult 21 version is. I don't know -- or myself. I'm just 22 a little bit confused by what is delineated here.

1	CO-CHAIR WALTERS: Let me reply to
2	that. A common conclusion reached when both
3	measures are discussed is that the proper end
4	result should be zero. It usually is never is
5	that what you're going to say, Sean?
6	Yes, the result is not going to be
7	zero. What you're really looking for is to make
8	sure you find what "the normal" rate is and what
9	is the standard deviation and variation around
10	that, and analyze the variation, when it's too
11	high, as to why that's occurring.
12	So I agree with you completely, but we
13	do not expect the rate to be zero. We expect it
14	to be some background rate of, depending on the
15	disease you're talking about, and then to look at
16	preventable causes if that rate is too high, or
17	if one place is 40 percent and another place is 5
18	percent. There's an opportunity for performance
19	improvement there.
20	That's what measurement gets you, but
21	it's very commonly believed that the right answer
22	is zero. No, the rate is seldom zero, except for

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maybe cutting off the wrong body part. 1 2 CO-CHAIR TRAVIS: I'm glad you 3 clarified that. There may be a few others in 4 that category, actually, but we won't go there 5 Michael. right now. Maybe Ron can address 6 DR. PHELAN: 7 this, but why was leukemia excluded from this? Was there a reason? I know you're not the 8 9 measure developer. Was it because they have such 10 high rates of these? I just couldn't figure out 11 why leukemia -- and if it is, wouldn't your 12 argument bear for the same thing for leukemia 13 patients, that there's going to be a baseline 14 I just didn't know why it was excluded. rate? 15 CO-CHAIR WALTERS: Click on the 16 measure specs from what we have in the discussion 17 quide. Number 1 exclusion is patients with a diagnosis of leukemia any time during the 18 19 measurement period. 20 CO-CHAIR TRAVIS: Why? He's --21 (Simultaneous speaking.) 22 DR. PHELAN: I guess why, yes.

This is Christine --1 MS. RANSHOUS: 2 (Simultaneous speaking.) Sorry, Ron, this is 3 MS. RANSHOUS: 4 Christine Ranshous, one of the measure 5 developers. I can start that, but maybe you can build on it. 6 7 We excluded patients with leukemia because leukemia patients often have a higher 8 9 toxicity in their treatment and an expected 10 recurrence of disease. They're also often 11 treated in the inpatient setting for their 12 chemotherapy, not in the outpatient setting. 13 When you look at their rates of admissions in 14 these categories, they're much higher than all of 15 the other cancer patients. 16 They just seemed to be categorically 17 different and to make this measure more effective 18 and understandable and directly useful, it seemed 19 to make sense to exclude them and focus on some 20 of these other cancer patients. 21 DR. PHELAN: But wouldn't that argue, 22 then, for a separate measure on the same

If it would sway your results either 1 category? 2 way because you have too many admissions and stuff like that, wouldn't that really call for a 3 4 separate measure then for leukemia patients, the 5 same type of measure, but it would have a different rate because it would be higher for the 6 7 complications, but the same idea that you'd be looking at a baseline rate, and then significant 8 9 deviations from that with, of course, including 10 some SDS adjustment and other risk factor 11 adjustment? 12 To me -- from a perspective from a 13 patient, I don't know what the numbers are -- I 14 don't know if there's 80 cancer patients to every 15 20 leukemia patients -- but to me, it would seem 16 like it would be a call for another similar type 17 measure. 18 MS. RANSHOUS: This is Christine 19 I think that is a good idea that can be again. 20 explored. I think one of the challenges with 21 leukemia patients is the planned versus unplanned 22 and getting more of that preventable aspect of

it. To your point of having -- if we expect some of this to go in and we're looking at variation, then maybe there's an argument to be made for making this a paired measure.

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5 CO-CHAIR TRAVIS: Thank you. Mitch. I was just going to 6 MEMBER LEVY: 7 respond to Andrea. I don't think this is about driving people to the clinic for me. I think 8 9 it's just as Ron said, this is just about looking 10 at preventable complications and using it as a 11 quality metric. I'm comfortable with it being an 12 ED-based measure, rather than -- I don't think 13 that it's driving people into the clinic.

14 MEMBER BENIN: I think the question is 15 whether you really think you can properly risk 16 adjust for this. I think that's what the review 17 will have to be. When you have fever and 18 neutropenia and sepsis, to the extent to which 19 some of those are preventable or may or may not 20 be preventable, you don't want to deter them from 21 an ED. That's not the goal of what any of us 22 want to do.

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I'd feel very differently from Ron 1 2 about how you should make quality metrics and what their goal should be, but if it's truly 3 4 risk-adjusted properly, then that's one thing. 5 If that's the direction that you people want to qo, that's fine. 6 7 I think that the proof will be in the pudding eventually on this and we'll see what 8 9 I think, also, that this will come down happens. 10 to coding and different things --- and how you 11 code. 12 CO-CHAIR TRAVIS: Okay. I think this 13 has been a really good discussion. I know -- I 14 see Erin and her team over here taking notes. 15 This is an example of something that 16 I think the comments and the thoughts from the 17 MAP can be shared through the CDP process, the 18 consensus process, in terms of the measure 19 endorsement when it comes through, so thank you 20 for your thoughts on that. 21 Seeing no other cards, I think we will 22 move on and go to a vote.

MR. TILLY: The polling is now open 1 2 for admissions and emergency department visits for patients receiving outpatient chemotherapy, 3 4 MUC15-951. The options are support, conditional 5 support, and do not support. 6 (Voting.) 7 MR. TILLY: The results are 38 percent support, 63 percent conditional support, 0 8 9 percent do not support, so the recommendation is 10 conditional support. 11 MS. O'ROURKE: Just to clarify the conditions, that would be pending NQF review and 12 13 endorsement with a special consideration for the 14 Admissions and Readmissions Standing Committee to 15 consider the diagnoses included in this measure 16 and pay particular attention to the exclusions 17 and risk adjustment. 18 CO-CHAIR TRAVIS: Okay. Thank you all 19 I'll turn it over to Ron. very much. 20 CO-CHAIR WALTERS: Thank you. You may 21 notice from the schedules we're doing fabulous on 22 time. I expect a lot of the next couple hours

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will take the end-stage renal.

2 We have seven measures, which in total, six of them have been pulled. Melissa's 3 4 going to give an overview of the program, 5 momentarily. Good morning. 6 MS. MARINELARENA: As 7 soon as the slides come back up --(Simultaneous speaking.) 8 9 CO-CHAIR WALTERS: That'd make it easy 10 for you. 11 MS. MARINELARENA: Right, so I can 12 share them with everybody else. Thank you. ESRD 13 is new to our group this year. Welcome to ESRD. 14 We're happy to have you here. 15 Quick review on the program. This is 16 a pay-for-performance and public reporting 17 The incentive structure is, as of 2012, program. 18 payments to dialysis, facilities are reduced if 19 facilities do not meet or exceed the required 20 total performance. Payment reductions are on the 21 sliding scale, and they amount to a maximum of 2 22 percent per year. The program goals are to

1	improve the quality of dialysis care and produce
2	better outcomes for beneficiaries. That is the
3	overview. I will hand it over, and we can start
4	the discussion.
5	CO-CHAIR WALTERS: Are there any
6	public comments in the room?
7	(No audible response.)
8	Seeing none, Operator, would you open
9	up the line for comments?
10	OPERATOR: At this time, in order to
11	make a public comment, please press Star 1 on
12	your telephone keypad. There are no public
13	comments at this time.
14	CO-CHAIR WALTERS: Okay, thank you.
15	As I mentioned, there is one measure that, right
16	now, is on the consent calendar, measurement of
17	phosphorous concentration. That preliminary
18	staff analysis on that was support. Is there
19	anybody in the room that would like to pull that
20	measure?
21	(No audible response.)
22	MEMBER BENIN: I have a question just

1 about the program. To what extent is this
2 program intended to involve children? When I
3 look on Dialysis Compare, there's some pediatric
4 metrics that have some reporting there. I'm just
5 wondering what are we looking at here? Is this
6 just adults right now?

7 DR. YOUNG: No, it does include 8 pediatric. Anybody who has end-stage renal 9 disease can apply to Medicare. This is not just 10 a Medicare population, meaning over 65. We do 11 have ESRD beneficiaries who are less than 65, 12 including kids.

MEMBER BENIN: So some of these metrics have been tested in children and some of them haven't?

16 CO-CHAIR WALTERS: I think as we go 17 through the measures that have been pulled 18 individually, we can talk about that.

MEMBER BENIN: Okay. Does the reporting happen -- when they do the reporting, though, it happens as a whole group, by facility, or does it happen by ages?

1	DR. YOUNG: It's by facility.
2	CO-CHAIR WALTERS: Okay, so Measure
3	No. 3, which the recommendation was support, will
4	stand on the consent calendar. We'll begin
5	discussion of Measure No. 1, which is avoidance
6	of utilization of high ultrafiltration rate.
7	That was pulled by Allen, who is also one of the
8	lead discussants, so we'll start out with that
9	one.
10	MEMBER NISSENSON: This, there are
11	just a few almost housekeeping issues. No. 1, if
12	you look in the specs, everywhere you see a
13	greater than 13 should say greater than or equal
14	to. If you look at what's actually in the
15	material, and that's not what it says.
16	It's a small nuance, but just
17	something that needs to be corrected. Secondly,
18	in the staff summary, the metric which has been
19	endorsed is stated to be a CMS and KCQA metric.
20	It's actually a KCQA metric, not a CMS metric.
21	CMS had a similar metric, which was not endorsed,
22	so that's, just again, not accurate.

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 3 endorsed, w 4 in the faci 5 crossed out 	The third is a question, which is one susions in the metric that was which relates to the number of patients lity, which was less than 25, is This is more a question. Was that ionally, inadvertently? What was sort
 3 endorsed, w 4 in the faci 5 crossed out 	which relates to the number of patients lity, which was less than 25, is . This is more a question. Was that
4 in the faci 5 crossed out	lity, which was less than 25, is . This is more a question. Was that
5 crossed out	. This is more a question. Was that
6 done intent	ionally, inadvertently? What was sort
7 of the thou	ght process? Because that's different
8 from the me	tric that was actually endorsed.
9 Other than	that, this is a key area. We're very
10 supportive	of this and would agree with the staff
11 assessment,	with those few modifications.
12	CO-CHAIR WALTERS: I understand it,
13 actually yo	ou supported the staff recommendation.
14 It was just	kind of some typographical and some
15 formatting	things.
16	MEMBER NISSENSON: Essentially, yes.
17 The substan	ce we don't disagree with. The
18 exclusion n	eeds to be explained. I think that's
19 not clear.	Then the attribution, the developer
20 needs to be	corrected.
21	CO-CHAIR WALTERS: Let's take that
22 one, then.	Is there any other discussion about

1 that measure, or any other questions? 2 DR. PHELAN: Allen, can you explain 3 that measure to us a little bit? I'm just not 4 familiar enough with end-stage renal disease to 5 know what it means, actually. MEMBER NISSENSON: It relates to the 6 7 rate of fluid removal during an individual dialysis treatment. It's based on evidence that 8 9 suggests that if you remove fluid too rapidly 10 during a single treatment, you'll get episodes of 11 hypotension and all kinds of bad consequences. 12 DR. PHELAN: Why would people want to 13 be doing that -- I'm just curious -- to patients? 14 What would be the -- to go faster through the 15 dialysis system or --16 MEMBER NISSENSON: No, it's more the 17 interdialytic weight gain. You have more or less 18 a fixed time period. The prescription is four 19 hours. Patient comes in and gains 20 kilograms. 20 They don't want to stay longer than four hours, 21 so the staff might say, "All right, we'll just 22 turn up the dials to remove all the fluid," and

exceed the filtration rate. It's more that kind 1 2 of a thing. It's more patient driven by excessive interdialytic weight gain. 3 4 DR. PHELAN: Thank you. CO-CHAIR WALTERS: I have to go back 5 to public comment in just a sec. 6 There was a 7 technical glitch, but Elizabeth first. I just want to point out 8 MS. EVANS: 9 that I was part of the renal standing committee. 10 We approved this. There were two measures, two 11 metrics. One was an individual time period, and 12 one was per week. We selected the metric for the 13 week long, mainly because of the issue of 14 potential gaming for that individual metric, 15 which is a very important thing in all aspects of 16 healthcare, like we discussed yesterday. 17 CO-CHAIR WALTERS: So you support the 18 measure? 19 MS. EVANS: Yes, I do support it. 20 CO-CHAIR WALTERS: Sean. We had a technical glitch, so let's go back to public 21 22 comment on the phone.

1	MS. O'ROURKE: Operator, can you open
2	up the line for Lisa McGonegal, please?
3	OPERATOR: Lisa's line is open.
4	MS. MCGONEGAL: Thank you. Can you
5	hear me?
6	MS. O'ROURKE: Yes, Lisa, we can.
7	MS. MCGONEGAL: Okay, great. Sorry
8	about that. She didn't seem to pick up on my
9	cue. This is Lisa McGonegal from Kidney Care
10	Partners. First, thanks for the opportunity to
11	comment, and again, apologies for the glitch
12	there.
13	Kidney Care Partners is a coalition of
14	members of the kidney care community. It
15	includes the full spectrum of stakeholders
16	related to dialysis care. We encompass patient
17	advocates, healthcare professionals, dialysis
18	providers, researchers, manufacturers, suppliers,
19	all organized to advance policies and improve the
20	quality of care for individuals with chronic
21	kidney disease and end-stage renal disease.
22	First, we'd like to thank the MAP and the

 hospital workgroup for undertaking this very
 important and grueling work that you're doing
 here these two days.

4 We just want to offer one comment on 5 a single measure under consideration that you'll be discussing in a few minutes. This is 6 7 MUC15-761, which is ESRD vaccination full-season influenza vaccination submitted by CMS for your 8 9 consideration. First of all, we'd like to note 10 that KCP, of course, recognizes the high 11 importance of influenza vaccination in patients 12 with ESRD.

13 This is a vulnerable population, and 14 obviously vaccinating them against the flu is 15 extremely important, but we do oppose MUC15-761, 16 primarily because the measure is not endorsed. 17 You heard Taroon speak this morning about the 18 increasing number of measures that are being 19 advanced to the MAP that aren't endorsed. We 20 believe that CMS should work within the NOF 21 rubrics to seek modification for a measure that 22 has already been endorsed that addresses

influenza immunization in the ESRD population. 1 2 This is NQF 0226. This measure was endorsed in 2007, was re-assessed in 2013, and re-endorsed at 3 The measure is fully aligned with the 4 that time. 5 standard NQF influenza specification. It's been fully tested, and it's already in the NQF 6 portfolio. 7

We think, at this time, that this 8 9 measure should be considered, rather than 10 pursuing a new measure being advanced through the 11 At this time, I'd like to urge the MAP and MAP. 12 the hospital workgroup to urge CMS to work within 13 the NQF rubric and include the measure that is 14 already endorsed. Thank you for your time. 15 CO-CHAIR WALTERS: Thank you very 16 much, Lisa. Let's return to Measure 1. Is there

17 any discussion about Measure 1?

18 (No audible response.)
19 Seeing none, let's proceed to vote.
20 MEMBER FOSTER: I should have used my
21 microphone. Is it, or is it a change in the
22 specifications? What are we voting on?

MEMBER NISSENSON: That was the 1 2 question. Was it just a mistake or intentional? 3 DR. YOUNG: It's an error. 4 MEMBER FOSTER: Thank you. 5 DR. YOUNG: It's intended to be --(Simultaneous speaking.) 6 MEMBER NISSENSON: 7 So we are voting to support or not support or conditionally support 8 9 the endorsed measure. 10 MR. TILLY: Okay, the polling is now 11 open for avoidance of utilization of high 12 ultrafiltration rate, MUC15-758. The options are 13 support, conditional support, and do not support. 14 (Voting.) 15 The results are 85 percent support, 15 16 percent conditional support, 0 percent do not 17 support, so the measure recommendation is 18 support. 19 CO-CHAIR WALTERS: Thank you very 20 much. We'll move on to Measure 2, which is the 21 vaccination measure. Allen asked that be pulled 22 for discussion.

I don't have a lot 1 MEMBER NISSENSON: 2 to add to Lisa's comment. I seem to recall when 3 I was on the post-acute-care workgroup these past few years, in 2013, when this came up, we had the 4 5 same discussion. I think it's the same discussion now, which is there is an endorsed 6 7 measure, which was re-endorsed, that applies to the ESRD patients and has worked perfectly well 8 9 for many years. It's just not clear why a 10 modified measure is needed, or what value that really gives, other than to potentially create 11 12 confusion in the community, who I think have 13 worked quite diligently and quite well to 14 immunize almost all patients with ESRD under the 15 current metrics. 16 CO-CHAIR WALTERS: Give CMS a chance 17 to respond to that in just a second. Elizabeth. 18 MS. EVANS: I agree with Allen. Ι 19 don't have anything else to add. 20 CO-CHAIR WALTERS: Sean. Would you 21 like to answer the question that's been brought 22 up, or the issue that's been brought up by three

1

people?

2	DR. YOUNG: Would I like to, is that
3	the question? One, thank you for support for the
4	topic area because we do agree that this is an
5	important area to measure on quality. The
6	endorsed measure, the data source for that is
7	claims. The reason we put this particular
8	measure on the MUC list is for consideration as
9	using NHSN as a possible data source to obtain
10	data on flu vaccinations with dialysis
11	facilities. That's the rationale behind putting
12	this measure up.
13	CO-CHAIR WALTERS: All right. I
14	suspected there were going to be cards up after
15	that. Sean.
16	DR. MORRISON: Yes, just a clarifying
17	question for Pierre. Pierre, then if this goes
18	through, will CMS reconcile the two measures that
19	are now in existence? Just to respond to Allen's
20	question about why do we have two measures
21	looking at the same thing? I guess that's my
22	confusion. I know we went through this

yesterday, but I'll just ask a clarifying 1 2 question again. DR. YOUNG: We certainly will take 3 4 this under consideration. Thank you. I quess leaning back to 5 DR. PHELAN: you for the same question, does CMS prefer to 6 7 NHSN database data, or do they prefer the claims, and is there a difference in the outcome of both? 8 9 Because I guess that's the question. Obviously, 10 if this is coming up for consideration, there 11 must be a reason. Does CDC prefer the data from 12 the CDC, rather than the claims-based data, and 13 if it does, Allen -- then the second question to 14 Allen is would you expect a difference between 15 the two because my expectation would be that they 16 would align pretty closely. 17 MEMBER NISSENSON: Let me just add a 18 clarifying question. Where does NHSN get its 19 data? 20 DR. POLLOCK: NHSN has a feature built 21 into it that enables patient influenza

22 vaccination coverage to be reported, but at

present time, there's only voluntary use of that 1 2 It is not a heavily used feature. feature. We offered to enable NHSN to be used 3 4 for this purpose and continue to offer that, but 5 if there are compelling reasons to use an existing approach that works -- the fact of the 6 7 matter is NHSN is essentially serving as a functional system, but if there is already a 8 9 functional approach that is effective, I could be 10 sympathetic to the point of view of why change it 11 if it's not broken. 12 MEMBER NISSENSON: I guess just to add 13 another point, Michael, right now CMS is using 14 claims data. We also have a new data system 15 called CrownWeb, which is an electronic system. 16 That's what was identified for this new measure, 17 which is capturing data through CrownWeb, which 18 -- and Pierre, I'm sure, would be happy to 19 comment -- is still a work in progress. It's 20 going to eventually be very good and a valuable 21 system. It's still a work in progress. 22 Some of the data elements that are

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necessary for the metric are not currently captured in CrownWeb. Again, this seems more aspirational, for when we have data collection systems in the future that capture the data. I come back to if it's not broken, why are we working on fixing it now?

7 Because this seems to be something not only is the metric working, in terms of people 8 9 understanding it, but immunization rates in 10 dialysis patients have gone up dramatically in the past five years to now, influenza vaccination 11 12 is occurring throughout the population at a rate 13 of greater than 90 percent. It's one of those 14 things that if we're looking for areas where we 15 don't want to add additional measures or new 16 burdens of data collection and reporting, this 17 doesn't seem to be an area that should be focused 18 on.

DR. POLLOCK: With that -- Allen, thank you -- if the options are existing claims based, yet be built CrownWeb functionality, or existing NHSN functionality, and if the option

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actually is really more between CrownWeb yet to 1 2 be built and NHSN, NHSN's already built. From the vantage point of having a 3 4 system that's already available for use, that's 5 being used to capture healthcare worker vaccination coverage, as well, which is to say 6 7 NHSN is used to capture dialysis facility healthcare worker vaccination coverage, then I 8 9 would change what I said earlier and say yes, 10 let's go with a system that's already built. It 11 depends on what CMS is looking at, in terms of 12 its options. I would toss it back to Pierre just 13 to clarify what's at stake. 14 DR. YOUNG: Is Tamara Garcia -- she's 15 on the line, but she said she's on mute. 16 MS. SHAHAB: Operator, can you open up 17 the line for Tamara Garcia, please? 18 OPERATOR: One moment, please. Her 19 line is open. 20 DR. GARCIA: Hello, this is Tamara 21 Garcia. I just sort of wanted to let you all 22 know that we will provide you all with

information for both data sources for this immunization measure.

In terms of what we're looking to 3 4 propose and the policy that we're currently 5 developing, we can't really speak too much to that, but we will say that both the NHSN system 6 and the CrownWeb system are going to be 7 considered viable options as data sources for 8 9 this measure. In terms of what the -- if the 10 committee has any comments on a preferred system, 11 we would love to hear back from you all on that. 12 DR. POLLOCK: I think systems are very 13 important, but I think measures are important, 14 I think, really, what's before the group too. 15 here is a question about the measure. Certainly, 16 what system would be used to enable the measure 17 to be reported is important, but I have to admit 18 I'm a little bit confused here about whether the 19 measure itself is different than the measure 20 that's currently in use. 21 Measures have numerators, 22

denominators, exclusions, risk adjustment if

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appropriate. Without having studied the existing
 measure and the proposed measure for this group,
 what's the analysis of the Delta?
 DR. GARCIA: We are currently still in
 the process of developing the specifications for
 the measure that we will look to propose. Those

are things that are still under consideration.

8 In terms of what you think is 9 appropriate, with respect to the measure, are you 10 stating that you think that the measure that's 11 currently in place, or the measure that's up for 12 discussion, whether or not it will be directly 13 aligned with the QIP measure, do you think that 14 it's appropriate?

15 What are your thoughts there, in terms 16 of the current measure and what we currently are 17 discussing, and then what we'll look to propose 18 for the QIP, is there anything that you think is 19 inappropriate based on what's currently -- the 20 measure in question today, or do you have any 21 sort of thoughts that you'd like to share with us 22 while we are in the process of developing what

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we're going to propose?

2 CO-CHAIR WALTERS: Mitchell, I suspect you and Nancy are going to say about the same 3 4 thing because your cards went up identically, at 5 the same time. I'm sorry you can't see 6 MEMBER LEVY: 7 everybody's face because everybody is so puzzled. I guess, Pierre, you're going to say something. 8 9 It sounds to me like you're describing developing 10 a measure, and we think we're voting on a 11 measure. I think we really need some 12 clarification. 13 (Simultaneous speaking.) 14 DR. GARCIA: No, I apologize. Pierre, 15 you can clarify if you'd like.

16 DR. YOUNG: Thanks, Tamara. So I do 17 want to clarify. It is a fully developed 18 If you have questions, we have our measure. 19 measure developer on the line, if you have 20 specific questions. The additional piece here is 21 potentially using NHSN as a data source. 22 **CO-CHAIR WALTERS:** Nancy.

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I think what you're 1 MEMBER FOSTER: 2 hearing around the room is consensus on the fact that this is an important thing to measure, and 3 4 that we ought to do it right. As Dolores knows, 5 I'm not a huge fan of claims-based measures generally speaking, but I think this one might 6 actually work. 7 I would urge you to look at the existing claims-based measure. If, for some 8 9 reason, you think the validity/veracity of it is 10 not what you need it to be, then tell us about 11 But otherwise, the only other that. 12 consideration I would put on the table is if, in 13 fact, you think that there is some greater 14 capability to use NHSN or some other platform 15 across all sectors of the healthcare system in 16 some way that allows greater coordination on flu 17 vacs. 18 Then maybe there's a reason to do 19 But you've got something that's working this.

right now. I'm with Allen. Why break that unless there's a substantial reason to do that if you want flu vacs measures?

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Mitchell. 1 CO-CHAIR WALTERS: 2 MEMBER LEVY: Pierre, I'm sorry to be I hear that you're putting a measure 3 so thick. on the table that's going to use NHSN data, but 4 Dan's expressing concern about the validity of 5 using those -- no, you're saying it's volunteer? 6 7 DR. POLLOCK: We would welcome use of NHSN for this purpose, but not if it means 8 9 something that's already working is abandoned. 10 We have an investment in NHSN. The taxpayer has Something's built. 11 an investment in NHSN. But 12 if something's already working, my goodness, we 13 have enough work to do with what we've got. We 14 don't need more. If it's not working, if there 15 are, indeed, deficiencies/shortcomings with a 16 claims-based approach -- and I'm not an expert on 17 that. 18 I don't know -- then by all means

18 I don't know -- then by all means
19 let's use something that's already built, namely
20 NHSN, rather than new functionality in CrownWeb.
21 But isn't this really about a measure? If the
22 measure's the same, then what are we talking

about here? I remain a little bit puzzled. 1 2 CO-CHAIR WALTERS: I think we've done a good job of getting what the issue is out on 3 4 the table. Allen, after your comment, I'm going 5 to ask you and Beth -- because you seem to be collaborating a lot over there -- for 6 recommendations about what you would make to the 7 group for how to vote on this measure -- on this 8 9 Allen. measure. 10 One, it would be do MEMBER NISSENSON: 11 not support, but I want to answer Dan's question. 12 I'll just give you a few examples because these 13 measures aren't the same. One, the vaccination 14 dates are different. You don't have to go into 15 the details, but the existing metric is 16 consistent with other NOF-endorsed influenza 17 vaccination metrics, in terms of the dates. 18 There's no discussion of any contraindications in 19 the exclusion. I'm just give you a few examples. 20 It doesn't address inactivated 21 vaccine, which is something that's addressed in 22 the currently endorsed measure. This one also

excludes patients who are incident patients, at least in the first 30 days, which the existing metric includes patients from Day 1. There are substantive differences compared to the existing measure.

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That's very helpful, 6 DR. POLLOCK: Now we're talking about the potential 7 Allen. need to get clinical data that would be relevant 8 9 with respect to a decision about whether to 10 vaccinate a patient or not. Those data may not 11 be available in a purely claims-based approach. 12 Again, I think the issue really, here, should be 13 much more about the measure itself, the proposed 14 measure, which would use clinical and other 15 records that are maintained and not be purely 16 claims, if I'm understanding that correctly. If 17 the discussion is around is there a value in 18 going beyond a claim in order to understand some 19 of the factors that you just mentioned, I think 20 that there's inherent value in the claim --21 inherent value in an alternative approach to a 22 claims based, but I think that's really the

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central issue, not -- whether we use CrownWeb or 1 2 NHSN, that's something that ultimately is an operational consideration. I've laid out what 3 4 I'd be concerned about. But if the measure's a 5 better measure, by all means, let's shift to that 6 one. 7 CO-CHAIR WALTERS: Beth, do you have a suggestion about a registry-based measure? 8 9 My only comment about NHSN MS. EVANS: 10 or CrownWeb is the additional time for staff to 11 input that data. That does have some relevance. 12 But generally, based on what Allen has said, 13 comparing the two measures, I think the older 14 measure or the endorsed measure is the 15 appropriate measure to stay with using 16 claims-based data right. 17 (Simultaneous speaking.) 18 CO-CHAIR WALTERS: Sean, you're the 19 other lead discussant. 20 DR. MORRISON: I am still trying to 21 wrap my head around this. I appreciate Dan's 22 comments about the advantage of moving beyond

claims-based data. Thinking about this measure, 1 2 it's conditional, based upon NQF endorsement, and actually, I think I would like to see that go 3 4 through the endorsement process first. So I 5 would not reject it out of hand. I'd like to see it go through the NQF endorsement process. I'd 6 7 like to see the specs. I'd like to see how it compares to the other measures which would be 8 9 part of that endorsement process, and then I'd 10 like to see it back again. 11 CO-CHAIR WALTERS: Allen. 12 MEMBER NISSENSON: I want to go back 13 to --14 CO-CHAIR WALTERS: I think we're going 15 to draw this to a close pretty soon. Allen and 16 Dan. 17 (Simultaneous speaking.) 18 MEMBER NISSENSON: -- Dan's point, 19 which is my interpretation of the difference is 20 that all of the differences are negative 21 differences. They're not enhancements. The 22 things that I rattled off are things that are not

included in the new metric, or changed, that make 1 2 the metric worse. My second point, and Pierre can correct me if this is inaccurate, I don't 3 4 know that the current metric has to use claims 5 That may be the way it's endorsed right data. now, but in terms of the actual specs, whether 6 7 that exact set of specs could be documented using either CrownWeb or going through NHSN -- I think 8 9 to your point, which is an appropriate metric? 10 The existing one is more in line with other 11 endorsed influenza metrics. The new one does not 12 include the things that I mentioned which, I 13 think, make that metric worse, not improve it, 14 from a clinical point of view. 15 CO-CHAIR WALTERS: Dan, last comment. 16 DR. POLLOCK: Two comments. 17 CO-CHAIR WALTERS: Last comments. 18 DR. POLLOCK: First, to Beth's point 19 about data burden, it's not built into CrownWeb 20 We don't know what the data burden is, so yet. 21 how can we compare without having a system to 22 compare it against? In terms of what are the

negatives that Allen's alluded to, there are 1 2 contraindications to administering influenza vaccination. If those contraindications are not 3 4 taken into account in a measure that uses the 5 denominator of the patient population and the numerator, those for whom a claim has been 6 submitted for influenza vaccination, then that 7 doesn't capture or enable a facility or group of 8 9 facilities to report that the reason for 10 non-submission of a claim is the contraindications. That would be a gap that I 11 12 think should be addressed. 13 CO-CHAIR WALTERS: After this very 14 rich and deep discussion, is there any of the 15 non-renal experts in the room that don't 16 understand all the issues that have been brought 17 up? Okay, let's vote. 18 MR. TILLY: Okay, the polling is now 19 open for ESRD vaccination for full-season 20 influenza vaccination, MUC15-761. The options 21 are support, conditional support, and do not 22 support.

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1	(Voting.)
2	The results are 8 percent support, 23
3	percent conditional support, and 69 percent do
4	not support. The recommendation is do not
5	support.
6	CO-CHAIR WALTERS: That's a pretty
7	strong mandate. We'll move on to Measure No. 4,
8	which is hypercalcemia measure. That was pulled
9	by Allen.
10	MEMBER NISSENSON: This one, I think,
11	is a little bit simpler. There are two issues
12	with this one, really. One is that this is
13	already a topped-out measure. In fact, NQF has
14	already recommended it for reserve status.
15	But probably more importantly, from a
16	clinical point of view, when this metric was
17	added, it was because it was felt and I think
18	there was a legislative mandate to include some
19	kind of metric related to bone and mineral
20	metabolism, which is an important clinical area
21	for kidney patients.
22	This one was picked because there was

a hypercalcemia metric already endorsed by NQF 1 2 for other settings. That all perfect sense. The unfortunate part is that it's not clinically 3 4 important in this population because almost 5 everybody has calciums below this target level. We've just, as a group, endorsed the 6 7 phosphorous measure, which is another metric that applies to bone disease, which is not perfect 8 9 entire, but it's more perfect than hypercalcemia. 10 So for both of those reasons, this measure is not 11 Again, as we're looking to economize relevant. 12 on a number of metrics out there, this one really 13 doesn't add any value for clinical care. 14 CO-CHAIR WALTERS: Beth. 15 I actually brought the MS. EVANS: 16 paper from the renal standing committee, and we 17 had down that 1454 NQF, proportion of patients with hypercalcemia, was endorsed on reserve 18 19 We thought it was a topped-out measure. status. 20 We alluded to the fact that we needed to have 21 some sort of bone mineral metric, but this really 22 was not an indicated one. That was our way that

we would just review it, but we didn't find it to
 be necessary.

CO-CHAIR WALTERS: 3 Sean. 4 DR. MORRISON: I had a couple of 5 questions about that. The first was that I'm not sure that making the argument a topped-out 6 7 measure, so it should be discontinued, is a good argument. Because what we know, based upon many 8 9 of the quality metrics, is that once we put 10 something in place, the big issue is how do you 11 continue it.

12 The fact that it's topped out could 13 have two issues. One is it's working, and we 14 should continue it because it's working? Two, 15 what's the unintended consequence of dropping it 16 out, and are we going to see a return back to 17 where things are? The second, which I would 18 appreciate both Allen and Beth's comment about, 19 is that in the developer response to the measure, 20 they did note that there is still variability in 21 terms of hypercalcemia, ranging anywhere from 0 22 up to 4 percent, and the developer again pointed

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out that this measure was continually important
 for safety monitoring.

3	Again, I'd appreciate hearing back
4	those comments. Again, every time somebody says
5	a measure is topped out, I ask is that because
6	it's working and we should continue it, rather
7	than we've made the accomplishments, time to pack
8	up, go home, and we can move on to something
9	else, and then we just watch it slide back again
10	because our attention is focused on something
11	else.
12	CO-CHAIR WALTERS: Thank you. I do
13	want to get back to CMS, but let's see if we
14	accumulate some more questions.
15	(Simultaneous speaking).
16	DR. PHELAN: Along the same lines as
17	Sean, although I disagree a little bit that if
18	it's topped out I don't know. We can always
19	come back and review it and see what happens. My
20	concern is A, is it topped out? You mentioned 4
21	percent. I'm reading, in our agenda that we have
22	today, that it the gap was 15 percent of

facilities performing worse than expected. 1 2 This goes back to our discussion we've 3 had a couple times before. Bringing this kind of 4 data back to us, so we can see what actually is 5 the rate of hypercalcemia in these ESRD facilities, so we can say oh, yes, it looks like 6 it's topped out. I'm not sure I would -- if it's 7 15 percent, that doesn't sound like it's topped 8 9 If it's 4 percent, I'm not sure out to me. 10 that's topped out. I think I would still want to 11 12 encourage the use of this type of measure. Not 13 knowing what the actual rate is now makes me a 14 little bit worried about not supporting this. 15 Because initially, I was kind of leading towards 16 do not support, until I read the comments that, 17 at least in what we have, I'm hearing 15 percent. 18 Sean's mentioned 4 percent. That's where I'm 19 concerned. Is it topped out is my first 20 question. If it is topped out, I would be 21 comfortable, but what does the definition of 22 topped out mean? That's my comment.

1 CO-CHAIR WALTERS: We're going to get 2 back to Allen and CMS in just a second. Jeff. MEMBER JACOBS: I wanted to chime in 3 on this concept of topped out, also. This is 4 5 more in my hat, sometimes, as a measure developer and as a heart surgeon. I've been sitting in 6 7 this chair here before, presenting measures about cardiac surgery, which were good measures, which 8 9 had the discussion about being topped out, and 10 then were put into reserve status because they 11 were topped out. 12 One of the unintended consequences of 13 taking a good measure and turning it into a 14 reserve status because it's topped out is that 15 the funding that an institution allocates to 16 comply with that measure suddenly disappears. 17 These measures are sometimes used as a weapon 18 when a clinician is meeting with a middle manager 19 in a hospital to request allocation of funds for 20 an important quality activity within a hospital. 21 When the measure disappears because it's topped 22 out, then the funding magically disappears, also,

because the middle manager can advance their own 1 2 career by using that funding to make their bottom 3 line look better. That's kind of a pessimistic 4 way to look at it, but it's also a realistic way. 5 I would echo the sentiments that just putting measures into reserve status or making them 6 7 disappear because they're topped out may have some unintended consequences that are not so 8 9 good. 10 CO-CHAIR WALTERS: Let's go to Allen, 11 and then Mitchell. 12 MEMBER LEVY: Although I really 13 appreciate what you're saying and what Sean's 14 There's so much metric fatigue amongst saving. 15 hospitals and data collectors. That's how it's 16 happening. Our job here is to add metric after 17 metric after metric. 18 What we've done in my work, or at a 19 certain point when you're over 80-90 percent, 20 it's fine to take it off the table. It doesn't 21 mean you never revisit it again. You can still 22 monitor it. If it turns out that it's slipping

into the 50s and 60s, then it's time to 1 2 re-invigorate it, but I do think at a certain point, you have to acknowledge that when you get 3 4 to a certain level, it's time to stop. CO-CHAIR WALTERS: I think we're 5 settling in on what the key issue is here. 6 7 Allen. 8 MEMBER NISSENSON: Sean, in response 9 to your question, I agree with the general 10 concept of removing topping out. We have 11 metrics, for example, adequacy of dialysis, where 12 the curve has shifted way to the right, very 13 little variation, but where the vast majority of 14 people don't believe that should be removed. 15 What's different about this metric is 16 that it wasn't needed in the first place. When 17 it was first introduced, there were very few 18 facilities that exceeded the benchmark, which is 19 arbitrarily set in very small percentage of 20 patients with hypercalcemia, but that metric was 21 picked. 22 Since the metric has been in place,

1	there's no evidence that I'm aware of that it's
2	changed at all. It sort of was addressing a
3	problem that wasn't a problem. For that reason,
4	this one, I think, is in a little different
5	category of topped out than some others might be.
6	DR. MORRISON: That's very helpful.
7	As I say, I'm a geriatrician, not a nephrologist,
8	so extremely helpful, thank you.
9	CO-CHAIR WALTERS: Okay, you should
10	have a lot to respond to by now.
11	DR. YOUNG: There are two things we
12	wanted to respond to. One was on the topped out
13	issue. As Beth indicated, this was endorsed for,
14	I guess I don't know if that's the word, but
15	reserve status under recent consideration from
16	the renal standing committee. Though in those
17	discussions, there was not small percentage of
18	facilities which still were not performing at
19	this high level, compared to the other
20	facilities. I was wondering if Casey, if you are
21	on the line, can you talk a little bit about the
22	performance data?

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1 DR. MESSANA: Yes. Pierre, this is 2 Joe Messana at U of M KECC. I'm here with Stacy. For the committee members, I'm a nephrologist and 3 work with U of M KECC on quality measure 4 5 development. CO-CHAIR WALTERS: You're cutting out 6 real bad. We're getting about every other word. 7 We're kind of getting the gist of what you're 8 9 saying, but not easily. 10 Is this better? DR. MESSANA: 11 CO-CHAIR WALTERS: We'll see. Okay, 12 go ahead. 13 DR. MESSANA: I'll try -- and I can go 14 on the handset if need me. Please let me know. 15 Please interrupt. We submitted a request for 16 reconsideration to the standing committee after 17 the topped-out argument was made. We presented 18 data that showed that many facilities were very 19 successful in their ability to achieve extremely 20 low rates of hypercalcemia. 21 Over half the facilities, or about 22 half the facilities -- 3,000 or so facilities

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have 1 percent or less of their patients with 1 2 hypercalcemia. So this metric, I should add, was developed as a safety measure. So it wasn't just 3 4 looking at individual patients. To be flagged, 5 one had to have an average calcium over a three-month period above the generally accepted 6 7 normal range that was the original percent. So it's a fairly conservative measure of 8 9 hypercalcemia as a safety measure. If you look 10 at the distribution of this measure, something on 11 the order of 23 percent of dialysis facilities 12 have 4 percent or greater of their patients. 13 Although we think that there is a 14 distinct performance gap, in that many --15 including, I'm sure, many of Dr. Nissenson's 16 facilities have no patients with hypercalcemia, 17 where nearly 25 percent of facilities in the 18 country have 4 percent or more of their patients 19 with hypercalcemia. We think that's an eloquent 20 argument for the persistent gap. 21 MEMBER NISSENSON: Say that last thing 22 again -- 25 percent of facilities have what

percent of their patients with hypercalcemia? 1 2 DR. MESSANA: Have 4 percent or more of their patients, so 23 percent of facilities in 3 4 the U.S., in the year that we looked at -- I 5 believe it was 2014 data, 23 percent of U.S. facilities had 4 percent or more of their 6 7 patients with a quarterly average calcium value that was considered hypercalcemia. 8 9 CO-CHAIR WALTERS: I think that's 10 helpful data. I hope we're getting closer to a 11 conclusion. Allen. 12 MEMBER NISSENSON: Joe and I have 13 discussed this at length in the past. I think 14 it's for the group to decide if 4 percent of 15 patients represents a huge gap. For those 4 16 percent of patients who are hypercalcemic, that's 17 a problem. On a population basis, when we look 18 at all the other metrics we have and the 19 performance distributions, whether it's 20 phosphorous, in the case of bone disease, or 21 other things, there's a much wider gap of 22 performance and a need to focus on issues.

Again, it's not to take anything away 1 2 from the importance of the very small number of patients who are hypercalcemic. That's something 3 4 that needs to be addressed, but whether that 5 really makes the cut as a true performance metric for an organization or a facility, I think I 6 7 would still challenge that. CO-CHAIR WALTERS: Your recommendation 8 9 to the committee was? 10 MEMBER NISSENSON: Mine was to not 11 support. 12 CO-CHAIR WALTERS: Is there any other 13 discussion? Does everybody understand the issue 14 at hand? Let's go with a vote. 15 MR. TILLY: The polling is now open 16 for proportion of patients with hypercalcemia, 17 MUC15-1165. The options are support, conditional 18 support, and do not support. 19 (Voting.) 20 We're just looking for a couple more, 21 if you guys want to try again. The results are 22 25 percent support, 8 percent conditional

1 support, 67 percent do not support. The 2 recommendation is do not support. CO-CHAIR WALTERS: 3 Thank you very much. I know that took a little time, but it's 4 5 very important to clarify what -- I think we're doing a good job of getting to what is the issue 6 7 on the table? You can lay that out as easily as possible, so that people can make a decision. 8 9 MEMBER BENIN: Another programmatic 10 question? 11 CO-CHAIR WALTERS: Sure. I am trying to learn a 12 MEMBER BENIN: 13 little bit more about this program, make sure I 14 understand it properly. It looked as though, for 15 some of the metrics, if you have small numbers, 16 you don't count. Does that mean you don't count 17 just on Dialysis Compare, or do you not count 18 also for the payment program? If you have less 19 than 25 patients in your dialysis program, these 20 percentage -- one or two patients makes a 21 difference in these numbers in a big way. I'm 22 just wondering does that impact the payment

incentive, also, or is it just Dialysis Compare? 1 2 What's the situation? 3 DR. YOUNG: Tamara, can you answer 4 that question? 5 DR. GARCIA: For the ESRD-QIP Sure. program, we have a small facility adjuster for 6 7 facilities that have 11 to 25 patients that are eligible for any given measure. 8 That accounts 9 for the impact of patients who might be outliers, 10 one or two patients who have outcomes that are 11 extreme on one end or the other. For the 12 ESRD-QIP program, that's how we account for that. 13 Again, it's 11 to 25 patients. It's a small 14 facility adjuster. It's applied on a 15 measure-by-measure basis. Did that answer your 16 question? 17 MEMBER BENIN: Partially. What does 18 that mean? It just gets adjusted to -- I'm just 19 not sure what that means. 20 (Simultaneous speaking.) 21 DR. GARCIA: Yes. If a facility 22 performs below the benchmark, which is the 90th

percentile -- if they're not in the top 10 1 2 percent of performers for any given measure, they will have an adjustment applied to that measure 3 if they have 11 to 25 patients. 4 That will 5 prevent those -- the patients who, again, have extreme outcomes from impacting the measure 6 score, to the point where they would, in essence, 7 receive a reduction based on one or two folks. 8 9 It prevents that from happening. It adjusts 10 their score up and accounts for that small sample 11 size. 12 MEMBER BENIN: People generally have 13 been happy with that adjuster? 14 DR. GARCIA: Yes, they are very much 15 happy with that adjuster. We received very 16 positive feedback on it when it was finalized in 17 the Calendar Year 2016 rule, which was published 18 in early November. 19 CO-CHAIR WALTERS: Okay, moving on to 20 Measure 5, standardized mortality ratio. That 21 was pulled by Nancy. 22 MEMBER FOSTER: It is a hospitalization

This is one of those measures that we 1 measure. 2 think will be exquisitely sensitive to SDS, sociodemographic factors, so really wanted to 3 4 explore that with this group and emphasize the 5 need for that to be looked at by the NQF panel as they consider it. 6 7 CO-CHAIR WALTERS: The staff recommendation was conditional support pending 8 9 NOF endorsement. 10 MEMBER FOSTER: With my enhanced 11 understanding of how this works, I would support 12 the conditional support, as long as we can point 13 to the SDS factor, as well, in this measure. 14 CO-CHAIR WALTERS: Yes, Pierre. 15 DR. YOUNG: You said mortality, but 16 we're talking about hospitalization, correct? 17 CO-CHAIR WALTERS: This one's 18 hospitalization, that's correct. Allen. 19 MEMBER NISSENSON: This comment is 20 going to apply both to this one and the 21 standardized mortality ratio. We have a number 22 of issues with using standardized ratios for

The issues include one, there's 1 these metrics. 2 no way for us to reproduce the information, since the denominator is calculated, and we have no way 3 of calculating that ourselves, so we can't 4 5 actually track this. Secondly, when you look longitudinally, we think it's much more valuable 6 7 -- and we've recently published some data on this -- to look at rates, rather than standardized 8 9 ratios, so hospitalization rates, mortality 10 We can follow those over time and look at rates. 11 trends. Whereas, with standardized ratios, we 12 can't really demonstrate trends. 13 In addition -- and you'll notice in 14 the specs, the developer describes using --15 applying a risk adjustment model to risk adjust 16 these standardized ratios -- and applies, again, 17 to both -- but it has not been possible to 18 actually get the risk adjustment model, so it can 19 be looked at. 20 Sociodemographic status is one factor 21 we've talked about a lot, but there are a bunch 22 of other things that have now been demonstrated

in the ESRD patients that drive outcomes, 1 2 including mortality and hospitalization, besides SDS, geography. There's a whole list of things. 3 4 Possibly, they're all included. I'm skeptical. 5 But without actually being able to see the methods, it's very difficult to have confidence 6 The final thing is that for those 7 in this. measures where there is some comorbidity 8 9 adjustment -- and I'm sure Pierre will want to 10 comment on this -- CMS just recently had a TEP 11 looking at what the best source of information is for comorbidity, obtaining comorbidity data. 12 For 13 some of these standardized metrics, what's 14 currently used is a form -- without getting too 15 deeply into the weeds, but this is fairly 16 superficial -- a form called the 2728 Form. 17 It's a Medicare ESRD attestation form 18 that a nephrologist has to sign when a patient 19 starts dialysis. On that form is a checklist, 20 where you check off comorbidities. That's done 21 once when the patient starts dialysis. That is

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now used as the comorbidity list for adjustments

in some of these standardized ratios, despite the
 fact, as we all know, these chronically ill
 patients have changing comorbidities, but there's
 no opportunity to change.

So we're strongly in favor of using 5 claims data, which is more contemporary and more 6 accurate. CMS, I think, agrees, and just had a 7 TEP that met and, my understanding was, made that 8 9 recommendation. But these ratios don't use that 10 methodology, or they don't comment on that. It 11 seems to me if there's going to be a change in 12 methodology that endorsing these metrics kind of 13 doesn't make sense, besides the other things that 14 I think are important.

15 CO-CHAIR WALTERS: Do your comments 16 apply to Measure 7, too? There's going to be a 17 method to my madness here in just a second. 18 MEMBER NISSENSON: Four --19 You said 5 and 6. CO-CHAIR WALTERS: 20 MEMBER NISSENSON: Four, five --Five and six you 21 CO-CHAIR WALTERS: 22 talked about.

MEMBER NISSENSON: Four, five and six. 1 2 They largely apply to all three of these. (Simultaneous speaking) 3 4 CO-CHAIR WALTERS: Five, six, and 5 seven? Five, six, and 6 MEMBER NISSENSON: 7 seven, yes. 8 CO-CHAIR WALTERS: Nancy, did your 9 comments apply to 7, also? 10 MEMBER FOSTER: Yes, thank you. 11 CO-CHAIR WALTERS: All right. Because 12 the other person who pulled No. 6 was Sean. I'm 13 going to ask you to talk about not only 6, but as 14 a lead discussant, your opinion about 5, 6 and 7 15 is. 16 DR. MORRISON: Let me do 5 and 7 17 first, Ron, and then come back to 6 because 18 they're different issues. I think part of this 19 -- what I'd like to say is 5 and 7 are all 20 pending NQF endorsement. 21 I think this comes back to how much do 22 you trust the NQF process to look at the issues

that both Nancy and Allen raised about does the 1 2 measure include the right risk adjustment? Are the models correct? I think that all of us are 3 4 appropriately skeptical, but I do come from the 5 bias, having sat on those panels, that it is a very rigorous and scientific process that these 6 issues are looked at and that we can be pretty 7 confident, when they come forward to us, that the 8 9 science behind them is good.

10 What I'm hearing is concerns about the 11 I think the conditional support for science. 12 those measures is appropriate, and that they go 13 through the NQF endorsement process, and that these will be resolved. I do trust that will 14 15 happen, but I do come from that bias. Those are 16 elated to the re-admission and to the 17 hospitalization rate. The reason that I asked 18 that the mortality rate be pulled -- and those of you who have been on this committee for a long 19 20 time with me know how I feel about mortality 21 rates -- but it really is, I think, that 22 mortality for end-stage renal disease is really

quite a poor measure as it's written now. 1 2 Most people who discontinue dialysis elect to discontinue dialysis. They determine at 3 4 some point that continuing on dialysis is a fate 5 worse than death. For the people with advanced dementia who get started on dialysis in the 6 7 hospital because their kidneys fail, they continue that afterwards. 8 9 This measure would penalize those 10 people who elect to discontinue it, particularly 11 older adults, over Age 70, where the median 12 survival is only about three and a half years. 13 It's not like the younger dialysis population,

14 you can expect to live many, many years. This is 15 a very short life expectancy. As a clinician, I 16 will typically say to my patients considering this, "Let's do a three or four-month trial of 17 18 dialysis and see what it's like for you, with the 19 option that you can discontinue that." That then 20 penalizes the dialysis center for whom that 21 person says, "This is just not for me." I would 22 I would at like to see this measure go back.

least like to see a provision that excludes 1 2 patients who are referred to hospice, for example, from the denominator because those 3 4 people have made an informed choice to 5 discontinue. We expect them to die after they discontinue, or Buck would accept it. That's why 6 7 I asked the mortality measure to be pulled, Ron. CO-CHAIR WALTERS: 8 We'll get to Beth 9 next, but let's clarify the endorsement status of 10 5, 6, and 7. 11 MS. MARINELARENA: Six and seven are 12 endorsed. 13 CO-CHAIR WALTERS: That's what I want 14 to make sure we --15 DR. MORRISON: Is that the case, Ron? 16 Because 6 says pending endorsement, sorry. 17 CO-CHAIR WALTERS: That's why we're 18 just double checking. Because staff 19 recommendation for 5 was pending endorsement, for 20 6 was pending endorsement, and for 7 was support. 21 As I look in the notes, it has been through the 22 board vote and everything, so let's just make

sure everybody understands 5, 6, and 7. Can you 1 2 make sure you check that? So we can get that resolved in everybody's mind. 3 Sean, just to clarify, 4 MS. MITCHELL: 5 are you recommending do not support No. 5? 6 DR. MORRISON: I'm sorry, Dolores. 7 I'm recommending support 5 pending NQF endorsement, but Ron is checking on that. 8 I'm 9 recommending do not support the mortality issue 10 because on this one, I think there's an important 11 group that's been -- and then 7, I was 12 recommending -- I was recommending support 7, and 13 that that's been NQF endorsed. 14 MS. MITCHELL: That's helpful. Thank 15 you. MS. MARINELARENA: All of these 16 17 measures are endorsed. They're up for 18 maintenance, and we do have a renal project that 19 opened up. 20 **PARTICIPANT:** A what? 21 MS. MARINELARENA: A renal project 22 that's opening up for next year, so they'll be up

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1	for maintenance in 2016, but they are currently
2	endorsed.
3	CO-CHAIR WALTERS: I see you had your
4	card up first.
5	MS. EVANS: Yes, have several things
6	to say with this. I do agree with Allen that the
7	hospitalization ratio and mortality ratio, having
8	sat through the QIP many times and listening to
9	it, everybody's face just kind of zones out when
10	they say that. It has no relevance to the staff.
11	They don't understand it.
12	We need to make it an understandable
13	metric, in order for it to be valid for us to
14	use. Changing it to a rate would make it more
15	ability to be trended and tracked. The second
16	thing on the mortality ratio, I totally agree
17	with Sean. I can't tell you how many times we
18	look at when patients go on hospice, which is a
19	horrible thing for us to look at how long do they
20	live on hospice and stop dialysis?
21	That was discussed on that 31 days
22	they get the palliative care consult. The same

thing for us. When our patients go on hospice, 1 2 how long do they live on the hospice, so we're not penalized for that aspect of it? It's not a 3 4 good thing to look at. To remove that if 5 patients go on hospice, that should be an appropriate measure that we use without a time 6 Then the final thing is the standardized 7 frame. re-admission ratio. Yesterday it was discussed 8 9 over and over how the hospitals have the burden 10 for so many aspects of care. It's the same thing 11 with dialysis clinics.

12 They have the burden for these care 13 which really is not within their regimen to be 14 able to provide. This re-admission ratio is 15 pretty much out of their ability to make a 16 difference. That really is the nephrology 17 provider's role. We really would like to work 18 with CMS to have some sort of a transition 19 coordinator.

20 Our hospitalization re-admission is 21 phenomenally higher than people not ESRD. We 22 know it is a big problem, both financially and

1	the outcomes from it are very bad. To put this
2	in here is selecting the wrong way of monitoring
3	it. There's other, better methods that we really
4	feel should be placed in action.
5	CO-CHAIR WALTERS: What are your
6	recommendations for 5, 6, and 7?
7	MS. EVANS: For 5 it's conditional if
8	it's changed to a rate; 6, I will say, also, do
9	not support, and 7 is do not support.
10	CO-CHAIR WALTERS: Allen.
11	MEMBER NISSENSON: Just a quick
12	comment that I completely agree with Sean. I
13	think mortality, whether you make it a rate or a
14	ratio, however you calculate it, the way it's
15	currently viewed for ESRD patients is an
16	inappropriate metric. Unless it's fixed, in
17	terms of the exclusions, which have to do with
18	the initial trial all the things you
19	mentioned, I totally agree with that. I, you
20	might guess, for all three of these metrics, I
21	would recommend not supporting, but I feel very
22	strongly about the mortality one, as Sean has

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articulated.

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2 CO-CHAIR WALTERS: Thank you. 3 Mitchell.

4 MEMBER LEVY: I'm going to disagree 5 with Sean and Allen. If you remember, we struggled with this with COPD last year. For me, 6 7 especially working in the MICU, finally having advanced care planning with a COPD patient and 8 9 getting them to hospice is a very important 10 therapeutic intervention for us. We had this 11 discussion last year, where it was shocking that 12 in the metric, hospice was not an exclusion 13 criteria for measuring COPD mortality. I've come 14 to accept that, in that I agree that it's a very 15 crude measure, but no more crude for ESRD than it 16 is for measuring mortality from COPD and CHF in 17 the hospital.

18 I've come to accept the imperfection
19 of it. I think as a broad stroke, it's going to
20 drive change. Perhaps we'll refine the metric.
21 But I also think that if your mortality is much
22 higher because you're putting all your ESRD

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patients on hospice, it's hard for me to imagine 1 2 that there are going to be a lot of outliers like I think it'll come out in the wash. 3 that. I'm 4 comfortable with that imperfection for this 5 measure, in the same way that I was for COPD. CO-CHAIR WALTERS: So far we've got 6 7 Nancy, Ann Marie, Wei, and Helen. Nancy. Seeking further 8 MEMBER FOSTER: 9 clarification around the NQF process here. You 10 said the measures are endorsed, but they're up 11 for review. I assume when they went through 12 endorsement before, we really didn't have the SDS 13 trial period open. My original request around 14 SDS is something that would be entirely 15 appropriate for the upcoming review. I'm seeing 16 nods, so that sounds like (Simultaneous 17 speaking). 18 MS. MARINELARENA: During the trial 19 review, all measures are subject to SDS. We 20 especially look at the outcome measures, but we do that. When the staff gets the measure 21 22 submission forms, if it's not provided to us, we

need to have a rationale, but we do ask for that. 1 2 MEMBER FOSTER: Good. Secondly, I'm curious about how to respond to Beth's comment 3 around conditional support, but only if it's 4 5 changed away from an SIR. To me, that's a different measure. I'm looking at Beth. I would 6 be perfectly happy saying, based on what you 7 said, that we should not support this, but 8 9 encourage the development of a similar, but 10 different measure that is not a ratio. Am I 11 misinterpreting, in your aspect, whether we're 12 talking about two different measures or the same 13 measure? 14 MS. MARINELARENA: Talking about 15 suggesting a rate would be a completely different 16 measure. So right now, you're going to be voting 17 on what's on the table before you, which is the 18 ratio. It's currently endorsed, and I believe 19 it's already in the program. 20 CO-CHAIR WALTERS: Ann Marie. 21 MS. MARINELARENA: And so is 7. It's also in the program. So the new introduction to 22

the program is the mortality measure.

2 DR. SULLIVAN: Two things. First, I think that the issue about re-admissions and it 3 being difficult is something that comes up every 4 5 time someone is involved in being responsible for some degree of the re-admission numbers. 6 I think the wider you spread that, the better off you 7 I think hospitals felt they couldn't do it 8 are. 9 when it first came, and I think wherever you see 10 it, you get that initial reaction. 11 I think that the re-admission should 12 My other question, though, is on the stay. 13 ratio. Since often rates have been used, was 14 there any specific reason that a ratio was used 15 with this population? Did people think this in 16 any way was a good idea at the time? I'm just 17 curious as to why it's here. I know most people 18 here feel it's not a good idea, but is there 19 anything positive about having a ratio versus a 20 rate, or it was just happenstance? 21 CO-CHAIR WALTERS: I think you can 22 take a break to answer that question, that

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specific one.

2	DR. YOUNG: Actually, I'm going to ask
3	if Casey or somebody from UM-KECC can address
4	this specific question about why a ratio, though
5	we are, I will add, cognizant of the express
6	concerns about the usability of a ratio, and we
7	are actively looking at a rate measure.
8	DR. SULLIVAN: Then could you just
9	clarify are you really, seriously considering
10	going to a rate? Because then I think that would
11	influence how much we would support or not
12	support this.
13	DR. YOUNG: Can somebody from UM-KECC
14	address the question?
15	JOHN: Hello, this is John again. As
16	a clinician, and not a biostatistician, I may not
17	be able to fully answer it, but we've had
18	extensive discussions over the years regarding
19	direct versus indirect standardization. Because
20	of the very low rate events, particularly for
21	mortality, indirect standardization approaches
22	have been strongly recommended by our

biostatisticians and have not been questioned by 1 2 the NQF standing committees for initial certification and re-endorsement. Whether one 3 expresses the results of indirect standardization 4 5 as a ratio or as a rate, multiplying the ratio by the national average, as is done in Hospital 6 7 Compare, seems to be less important an issue than the methodologic one of using indirect 8 9 standardization based on data structure. 10 CO-CHAIR WALTERS: Okay, thank you. 11 Helen, your card went down, right? 12 MS. HASKELL: I just have a question 13 about hospice. I can see that there's fairly 14 complex time limits on when people are considered 15 to be on or off dialysis, but if going on hospice 16 is going off dialysis, can the measure not be 17 adjusted so that hospice is not reflected if it's 18 up for maintenance? 19 CO-CHAIR WALTERS: We'll put that on 20 the list of later questions. Wei. 21 MEMBER YING: I want to say that this 22 is not the first set of measure ratio being used.

The standardized infection ratio has always been 1 2 there, so not just this set. Whenever ratio is used, there is always this trending question. 3 Ι don't think this should be the reason either we 4 5 endorse or not endorse in this measure. Another thing about the rate is even it becomes a rate --6 7 for example, the re-admission rate, actually I'm leaving out that this year actually convened a 8 9 workgroup to look at the trending issue. Even if 10 it becomes a rate, when it's risk adjusted, it 11 still has the trending over time problem. Ι 12 don't think this is one of the key factors that 13 should prevent us from supporting this measure. 14 CO-CHAIR WALTERS: Jack. 15 DR. FOWLER: Just one more comment on 16 the rate ratio. I went and looked up what's the 17 Anyways, I'm clear about that. ratio of. 18 Somebody creates an expected number, and then 19 it's the ratio of what's observed to what's 20 expected. It's the way that the statisticians 21 adjust it for whatever the model is, which I 22 can't attest to. But that's what it is, in case

you wondered what the ratio was about.

2 CO-CHAIR WALTERS: Okay, Pierre. Thank you for the very 3 DR. YOUNG: rich discussion here. I think just to offer a 4 general comment, we've included on the MUC list, 5 but also in programs, measures of re-admissions 6 7 and mortality, not just in hospitals, but also in other facilities, too. I think that reflects a 8 9 viewpoint from CMS that there is a joint role for 10 all providers to work together in sort of taking 11 care of patients. Certainly, there is always this larger 12 question of who has the primary responsibility for doing that, but we hope that there is agreement that everybody does need to work

13 14 15 16 together in order to take care of patients, and 17 that these measures encourage care coordination 18 in the interest of the patient's health. That's, 19 I think, the intent, from our standpoint, for 20 including these measures in these programs to 21 drive quality improvement.

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There are a couple issues, also, that

Allen had raised that we are also actively 1 2 working on, such as the use of claims data for comorbidity. That was just recently discussed at 3 4 this TEP, and they were supportive of that. Ι 5 will say that the measure -- as Melissa just mentioned, there is a renal project opening up. 6 7 We are planning to submit the measures to that committee for consideration for maintenance in 8 9 April, so they will be reviewed in that process, 10 under the CDP process.

11 CO-CHAIR TRAVIS: I just wanted to 12 kind of reinforce some of what Pierre said, as 13 well as Ann Marie. During the review process, 14 through the CDP process and endorsement, the 15 issue relative to re-admissions was thoroughly 16 discussed, and rightfully so.

But I think that from the CSAC's position, when we looked at it, was really looking at this joint accountability issue that Pierre brought up. One of the things we heard, and we've heard in the MAP originally from the hospital group, was they're not the only ones

that impact re-admission.

2 I think it's actually a good sign that CMS is beginning to bring re-admission into these 3 other programs because the answer is it isn't 4 5 just one provider's responsibility to be held accountable for that. It is really trying to 6 7 encourage this care coordination and providers working with each other, including the 8 9 nephrologist and the other providers. To Ann 10 Marie's earlier point, I think there is 11 definitely people who are uncomfortable with it 12 when it first gets introduced. They may never 13 like it, but I think it is kind of an effort that 14 we're seeing to spread the re-admission measure 15 into the continuum of care and, therefore, 16 actually encourage that working together for care 17 continuation. 18 The other thing that I just bring up

18 The other thing that I just bring up
19 a little bit -- and I appreciate the interest and
20 the need, really, for facilities to be able to
21 kind of calculate what they're going to look like
22 -- as Wei brought up, we have the risk

standardized approach in a lot of other measures.
 But one of the things that I've noticed in my own
 market is that sometimes the measures that
 purchasers need or consumers need may be
 different than the measures that providers need
 for internal quality improvement.

7 They make sense to us, but they don't always give the level of detail or the ability to 8 9 recreate them to the providers. I think it's 10 fair to have both sets of measures because these 11 programs are also used by purchasers and 12 I recognize the tension. I do think consumers. 13 the fact that we use those types of measures in 14 other programs also, I think, is an important 15 piece that Wei brought up. Those are my 16 thoughts.

17 CO-CHAIR WALTERS: I agree. There are 18 other viewpoints and considerations to achieve 19 that cross-programmatic stuff that Taroon was 20 talking about earlier, as well as different 21 perspectives for both those considerations. 22 Andrea.

MEMBER BENIN: 1 Sorry, I just have a 2 question to try to resolve this in my mind, understanding this rate and ratio issue. Is this 3 just a matter of how the report is formatted? 4 5 Couldn't it just be reported with the rate on it, Because we deal with this all the time. 6 as well? 7 I tell everybody what our central line infection rate is, but then I tell them how it stands 8 9 statistically based on what the SIR is. 10 I'm like, "You're doing okay; you're 11 not doing okay." We do that with mortality, too. 12 We say the mortality rate is 1 percent, and 13 that's an ODE ratio of 0.65, and it's adjusted, 14 and it's good or it's not good. So to my mind, 15 this isn't actually -- because statistically, 16 based on what we just heard, we want this done 17 statistically, probably, in the way that it's 18 being done. So isn't it just a matter of then 19 adding the actual percentage to -- I'm just a 20 little bit -- I'm not sure if the issue is really 21 a methodological one, or if the issue is a desire 22 to have, as Cristie says, some information that

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people can use that feels more actionable. 1 If 2 that's the case, then it sounds to me like it's just a matter of tweaking the report, but I'm --3 so I'm confused as to whether this is a 4 5 substantive issue or not because it doesn't (Simultaneous speaking). 6 7 CO-CHAIR WALTERS: Sean. 8 DR. MORRISON: Andrea, yes, it's very 9 simple to do. You have an observed to expected 10 ratio. You have your actual rate, and you can then look at both of them. 11 So statistically, 12 yes, it's very easy to do. You're right. That's 13 what my institution does, as well. 14 CO-CHAIR WALTERS: Allen. 15 That all sounds MEMBER NISSENSON: 16 great. The problem is with how you determine 17 what the expected rate is. I think if that were 18 totally transparent and people agreed on that 19 methodology, then I agree with you. Then you can 20 just do arithmetic, and you can translate that 21 into a rate. But right now, it's opaque. It's

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not that standardized ratios are not a

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statistically valid approach. It's that if 1 2 you're comparing actual to expected, how do you determine what is expected? Because it's not 3 4 just simply the average death rate across the 5 country or the average hospitalization rate. It's adjusted for a bunch of 6 7 characteristics which, unless you know what those are, you don't have a chance to comment on 8 9 whether those are appropriate, or whether all of 10 the appropriate things are included. But again, 11 I'm not a statistician either, but I can tell you 12 this has been an ongoing dialogue with the 13 measure developers that work with CMS on the ESRD 14 program for over a decade. We have yet to come 15 to some unanimity of opinion about this. 16 CO-CHAIR WALTERS: Okay, we're 17 approaching a vote. As Erin just reminded me, 18 the reason I did this in this way, because there 19 were issues that were shared amongst those three 20 measures, and then there are also some unique 21 differences. For Measure No. 5, we're heading 22

into a vote, but not quite ready to vote yet.

Are there any issues specific to 5 that someone 1 2 would like to bring up that has not already been mentioned? Does everybody in the room understand 3 4 the issues related to the hospitalization ratio? 5 Cristie. CO-CHAIR TRAVIS: I apologize because 6 7 I've gotten kind of confused as to what the NQF status is with some of these. I would just like 8 9 to hear it one more time what the status is. 10 CO-CHAIR WALTERS: For 5. Let's do 5, 11 just 5. 12 CO-CHAIR TRAVIS: What is the status 13 for 5? 14 MS. MARINELARENA: Five is endorsed, 15 and it's up for maintenance. Based on the 16 information that we received, the change would be 17 to the risk adjustment model. That will be 18 reviewed. In SDS, it is -- we'll evaluate it for 19 SDS, as well, as part of our trial period. 20 CO-CHAIR TRAVIS: I apologize. Can I 21 ask a clarifying question? I was trying to 22 figure this out, and I didn't hear your

instructions ahead of time, so I apologize. 1 Ι 2 guess my question is, just to be sure I understand, it's been endorsed, it's up for 3 4 maintenance, the risk adjustment is probably 5 what's going to come through and have SDS as part of it, but is it clear how the expected is -- is 6 7 that part of the specs in this endorsed measure (Simultaneous speaking.) 8

9 DR. AMIN: Cristie, I think you're 10 bringing up a really good point. The question 11 here is -- it's almost a versioning question. 12 There are updates to this measure, and the 13 updates are substantial, in the sense that it's 14 related to the risk adjustment model.

For these outcome measures, obviously risk adjustment model is an important element. Maybe a good way to characterize this is that a previous version was endorsed. This new version will be reviewed by the renal committee for the full specifications, which include updates to the risk adjustment model.

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All of the clarity around the new risk

adjustment model is up to interpretation if you
have enough, or whether it's sufficient. That's
up to this committee to decide. Is that fair?
You can make some conditional recommendations to
the renal committee to specifically look at the
concerns that have been raised here.
CO-CHAIR TRAVIS: Just so that --

7 because I know we're going to do this on the next 8 9 two measures, and this will help me not have to 10 ask these questions again. Just for my understanding, the adjustments to the risk 11 12 adjustment model, I'm thinking, would probably 13 have an impact on how the expected gets determined. So all of that will be reviewed in 14 15 2016? Okay, thank you. 16 CO-CHAIR WALTERS: Okay, let's move to

a vote on Measure 5, the hospitalization.

(Simultaneous speaking.)

DR. MORRISON: Ron, I'm sorry, just to be clear in my mind, if we vote support, what we are voting for is that this -- we support this pending the re-review of this measure within the

18

NOF endorsement?

2 CO-CHAIR WALTERS: That would be a 3 conditional support.

DR. MORRISON: Okay, that's what I was clear -- okay, thank you.

6 MR. TILLY: The polling is now open 7 for standardized hospitalization ratio modified, 8 MUC15-693. (Voting.) The results are 12 percent 9 support, 81 percent conditional support, 8 10 percent do not support. The recommendation is 11 conditional support.

12 CO-CHAIR WALTERS: Thank you. Now 13 we're going to go to Measure 6. Specific issues 14 related to 6, I think you've heard a lot of them. 15 It is, again, a ratio. It's about the mortality 16 side of things. Its NQF endorsement status is --17 MS. MARINELARENA: This measure is 18 also endorsed, and it will be up for review. 19 CO-CHAIR WALTERS: Okay, are there any 20 other questions that anyone would like to ask 21 about Measure 6 specifically? (No audible 22 response.)

MR. TILLY: The polling is open for 1 2 standardized mortality ratio modified, MUC15-575. The options are support, conditional support, do 3 not support. (Voting.) The results are 15 4 5 percent support, 38 percent conditional support, 46 percent do not support. The recommendation is 6 7 do not support. CO-CHAIR WALTERS: Okay, now let's 8 9 move on to Measure 7, which is the re-admission 10 ratio, and clarify, again, what its NQF status 11 is. This measure is 12 MS. MARINELARENA: 13 already endorsed. It is an NQF-endorsed measure, 14 and it will be up for maintenance. 15 To clarify this one, MS. O'ROURKE: 16 this is one of the ones that's in the SDS trial 17 period, so the re-admissions standing committee 18 will be taking a look at this in the spring to 19 make a decision about including SDS factors in 20 the risk adjustment model. I just wanted to 21 point that out, in case that is important for 22 your voting.

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1	CO-CHAIR WALTERS: Are there any other
2	specific questions that we've talked about
3	Measure 7 that I wanted it to be clarified before
4	the vote? Okay.
5	MR. TILLY: Polling is now open for
6	standardized re-admission ratio for dialysis
7	facilities, MUC15-1167. (Voting.) I hate to do
8	this, but it looks like we need just one more, so
9	if you all could just try again. (Voting.) The
10	results are in, 38 percent support, 46 percent
11	conditional support, 15 percent do not support.
12	The recommendation is conditional support.
13	CO-CHAIR WALTERS: Thank you for
14	everybody working their way through some
15	difficult issues in this program.
16	MEMBER LEVY: Before you move on,
17	could I just understand what the conditional
18	support is? This one is a little less than
19	MS. O'ROURKE: I would say my
20	understanding would be that this is pending the
21	results of the SDS trial decision of the standing
22	committee.

1 CO-CHAIR WALTERS: Sorry, is everybody 2 okay with that, if we don't catch the conditions? MS. O'ROURKE: And NOF re-endorsement. 3 Yes, it's the standing committee's decision to 4 5 support the endorsement as is or add SDS factors. CO-CHAIR WALTERS: I believe it's time 6 7 for a short break, correct? (Whereupon, the above-entitled meeting 8 9 went off the record at 10:52 a.m. and went back 10 on the record at 11:06 a.m.) 11 CO-CHAIR TRAVIS: Okay, we're going to 12 go on and get started. We've almost gotten 13 ourselves exactly right back. We're a few 14 minutes past being on schedule, but almost right 15 there. Our next program is the hospital 16 Outpatient Quality Reporting program. I'm going 17 to turn it over to Jean-Luc, who's going to 18 provide an overview of the program for us. 19 MR. TILLY: Thank you, Cristie. The 20 hospital Outpatient Quality Reporting program, 21 OQR, is a pay-for-reporting program, where data 22 is reported on Hospital Compare. Hospitals that

don't report data receive a 2 percent reduction
 in their annual payment update.

The program's goals are to establish 3 a system for collecting and providing data on 4 outpatient services, which include clinic and 5 critical care visits, and provide consumers with 6 7 that information to help them make informed decisions. There are two measures under 8 9 consideration for OQR. First on your list is 10 admissions and emergency department visits for 11 patients receiving outpatient chemotherapy.

12 This measure is also under 13 consideration of the PCHQR program. The second 14 measure is NQF endorsed. It measures risk 15 standardized hospital visits within seven days 16 after hospital outpatient surgery. I'll turn it 17 over to Cristie for public comment.

18 CO-CHAIR TRAVIS: Okay, thank you. Do 19 we have any public comment from the room relative 20 to this program? (No audible response.) Okay, 21 seeing none, Operator, can you open up the lines 22 and see if there's any public comment from those

on the phone?

2 OPERATOR: Yes, ma'am. At this time, 3 if you would like to make a public comment, 4 please press star, then the No. 1. There are no 5 public comments at this time.

CO-CHAIR TRAVIS: Okay, thank you. 6 As 7 Jean-Luc indicated, we have two measures, and we've had some robust discussion about, 8 9 certainly, Measure No. 1, which was also in our 10 cancer hospital, but now you'll see it over here 11 in the hospital outpatient reporting. This kind 12 of goes back to the comments earlier about 13 looking at cancer care not just in the cancer 14 hospitals, but also where a large part of it is 15 delivered, which is in the community.

16 Then the second one is a risk 17 standardized hospital visits within seven days 18 after hospital outpatient surgery, which kind of 19 gets us back to our previous discussions on risk 20 standardized approaches. Both of these have been 21 pulled by Nancy. We will take these one at a 22 time because they are different. Nancy, if you

would like to talk about why you pulled these
 measures for discussion -- this first measure for
 discussion.

4 MEMBER FOSTER: I pulled the first 5 measure for discussion here for the very same reason that we talked about it in the cancer care 6 7 hospitals. Because of that, if we would just simply repeat the same recommendations that were 8 9 made in the cancer care hospitals, I would be 10 happy with the conditional support. I think 11 that's where we ended up with this measure for 12 cancer care hospitals.

13 Yes. MS. O'ROURKE: We had ultimately 14 decided to conditionally support it, pending NQF 15 review and endorsement, with instructions to the 16 standing committee to pay particular attention to 17 the diagnoses included in this measure, as well 18 as risk adjustment for socioeconomic factors and 19 the appropriate exclusions.

20 CO-CHAIR TRAVIS: Okay, so that's 21 Nancy's recommendation, that it be consistent 22 with what we agreed to for the cancer hospitals.

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1	The lead discussants for these were Helen and
2	Shek. Would either one of you want to go
3	first, Shek?
4	MEMBER MEHTA: Yes, I don't have
5	anything else to add. I think we talked about it
6	this morning.
7	CO-CHAIR TRAVIS: Okay, thank you.
8	Helen?
9	MS. HASKELL: Really, the only thing
10	I have to add to the previous discussion is a
11	question. I see my role as asking dumb questions
12	here. It seems to me that this is a measure that
13	could have unintended consequences, in terms of
14	treatment. That's a question I'd like to raise
15	with people who know a lot more about cancer care
16	than I do, if these side effects are related to
17	things like dose, might it have unfortunate
18	consequences on the initial treatment? That's my
19	only thought.
20	CO-CHAIR TRAVIS: So is there someone
21	who can address Helen's questions relative to the
22	potential unintended consequences of this

measure?

2 CHRISTINA: This is Christina, one of the measure developers. I quess I would ask for 3 a little bit more clarification. Are you 4 5 thinking that maybe treatments would be changed to less effective treatments in the chance of 6 7 reducing an admission? MS. HASKELL: That's what I'm 8 9 wondering, yes. 10 CHRISTINA: I suppose that's a 11 possibility. The measure is risk adjusted and 12 takes into account things like age, sex, the 13 cancer type, and comorbidities, as well as the 14 frequency of the chemo treatment being received. 15 I do think that the risk adjustment might help 16 level that playing field and remove the concern 17 from providers. 18 CO-CHAIR TRAVIS: Andrea. 19 MEMBER BENIN: I'm sorry that I missed 20 the beginning of your comment, Nancy. This 21 metric goes right into a pay program, without any experience with it first, that's what's different 22

than the reporting.

2	MS. MITCHELL: If you said it, I was
3	zoned out, but isn't the point of this that with
4	proper outpatient care by the attending and other
5	physicians that these should not be necessary?
6	In fact, I would think the hospitals would, in
7	fact, welcome that kind of spreading around or
8	coordinating or better collaborating with people
9	outside of the hospital. I would think it would
10	be a good thing.
11	MEMBER FOSTER: I think this is a
12	measure of hospital performance, so I'm not sure
13	what the coordination is you're anticipating.
14	MS. MITCHELL: If the other people are
15	doing their job, then the hospital measure will
16	look good. No?
17	MEMBER FOSTER: True. I guess this is
18	sort of looking at, as I understand it, potential
19	unintended consequences of treatment from
20	patients who were hospitalized.
21	MS. MITCHELL: Were hospitalized.
22	MEMBER FOSTER: Who were hospitalized.

MS. MITCHELL: You had treatment in 1 2 the hospital. You're discharged. MEMBER FOSTER: (Simultaneous 3 4 speaking.) 5 MS. MITCHELL: Other people in the delivery system are following you, no? 6 7 MEMBER FOSTER: (Simultaneous speaking.) You don't have to be -- let me look 8 9 at the specs again. I don't think you have to 10 have been hospitalized to begin with to get into 11 this. You just have to be in chemotherapy. 12 MS. MITCHELL: Hospital outpatient 13 departments. 14 CHRISTINA: Yes, this is Christina 15 again, one of the measure developers, just to 16 confirm where you guys landed on that. The 17 denominator are patients who are receiving their 18 chemotherapy in an outpatient hospital 19 department. It's not a re-admission measure. It 20 just looks at first admission, I guess, related 21 to following an outpatient chemotherapy. So it 22 is focusing on, like you described, that care and

management of the treatment and symptoms in the
 outpatient setting there they're receiving their
 treatment to prevent those inpatient admissions.

MEMBER FOSTER: Dolores, it's 4 5 patients, who are our patients, coming back to us with complications is what it's intending to look 6 7 Per our discussion earlier today, one would at. need to look at the specs to know whether that's, 8 9 in fact, what it's capturing. That's why we were 10 deferring to the NQF steering committee to look 11 at this and to make sure that is what they're 12 Andrea and Michael and others -- I'm capturing. 13 trying to remember who else raised some concerns 14 about what could happen as unintended 15 consequences if the measure is not properly constructed was my recollection of the earlier 16 17 discussion. I was raising some questions about 18 whether it's going to need to be adjusted for 19 sociodemographic factors because people in some 20 settings may go to a private physician instead of 21 going back to the hospital.

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Lots of questions about is it

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1 constructed right, but support for the concept of 2 having this measure, for the very reason you've 3 outlined, that if it's constructed right, it will 4 get at an important issue of whether we're 5 treating patients appropriately and not inducing 6 these bad complications. Then any clinician that 7 wants to correct that should please do so.

It gets into this 8 MS. MITCHELL: 9 slippery area of were you treating them 10 correctly, but also what's happening out there, 11 and that, in fact, if you're aware of where your 12 patients have gone and the attending physician 13 has picked up where you left off, temporarily at 14 least, that's a good thing. Then the system is 15 working as a system ought to work. I would think 16 -- one worries about when everybody's 17 accountable, then nobody's accountable, or at 18 least that sometimes is the case. But in this 19 case, when it's working well, it's that 20 everybody's working together. An unintended 21 consequence -- I guess what I'm struggling with 22 is what is the nature of an unintended

consequence in this scenario?

2 I can't figure out what it is. If you're doing your job at the hospital outpatient 3 department, and the doctors in the community are 4 5 doing their job when the patient goes home, then what is the unintended consequence of measuring 6 7 how many people go back that maybe didn't need to go back because one of you isn't doing your job? 8 9 I completely agree with MEMBER LEVY: 10 you, Dolores. I think that every metric, we 11 always worry about unintended consequences, to 12 the extent that sometimes, that's the big bugaboo 13 that we use to push away any possible metric. 14 What you said is exactly right. These are known 15 complications of chemotherapy. What this is, 16 it's a quality metric looking at does an 17 institution track that? When people leave with 18 the potential of known complications -- diarrhea, 19 nausea, sepsis -- how well are they doing? Yes, 20 there are some complicating and confounding 21 factors, like socioeconomic status, where are 22 they being seen, in a clinic or a private

practice? On the other hand, this is a good area
 of accountability when administering agents with
 known complications.

I fear that we're overthinking it a little bit and using this unintended consequence a little too liberally. If the fact that someone might adjust a dose to prevent this, that, to me, that's a tough one. I really think so. I feel like this is a pretty clean measure.

10 MS. MITCHELL: I guess what I'm 11 thinking about, in terms of, you know, what would 12 a hospital have done that would end up in their 13 having a bad score? It would, I assume, mean 14 that when -- poor discharge planning is the 15 common phrase, not saying to somebody, if you 16 have any symptoms of the following order, this is 17 who you probably need to call, not necessarily to 18 rush back to the ER.

That kind of consequence is
foreseeable and could be prevented and taken care
of in good discharge planning. That's where, if
the hospital didn't do it, that's bad. If the

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doctor out in the community says, I'm busy, go
 back to the ER or ED, then that's where it's been
 the failure at that level.

4 MEMBER LEVY: Well I could see in 5 safety net hospitals, where you have populations 6 with high degree of non-compliance, but I think 7 that's a very specific subset, and in general, it 8 feels to me you wouldn't want that to drive the 9 value of a quality metric.

10 Just for me to have CO-CHAIR TRAVIS: a clarification -- and I know I could probably 11 12 read it on this screen right here, but if 13 somebody can tell me what the numerator and the 14 denominators are, I think that would help us 15 focus our -- be sure we're focusing our comments 16 around how this measure is actually constructed. 17 Is there -- I don't know if there's someone on 18 the line, or --19 This is Christine

MS. RANSHOUS: This is Christine
Ranshous again, one of the developers. I can
restate that denominator and the numerator. The
denominator are Medicare patients 18 years and

older who have a diagnosis of cancer and have at 1 2 least one outpatient chemotherapy treatment at the facility. Then the numerator looks -- each 3 4 of those patients within 30 days after one of 5 those outpatient chemotherapy treatments, did they then be seen at an ED or an inpatient 6 7 admission for ten specific conditions, which include anemia, dehydration, diarrhea, over a 8 9 certain fever, nausea, neutropenia, pain, 10 pneumonia and sepsis, which --11 CO-CHAIR TRAVIS: Thank you. 12 MS. RANSHOUS: Yes. 13 CO-CHAIR TRAVIS: Yes, no that's 14 extremely helpful. So the hospital that's being 15 measured is really looking at chemotherapy 16 patients that got their chemotherapy at their 17 facility. And so I just wanted to kind of make 18 that clear, I wanted to be clear on it, that 19 that's where they're receiving it, is at the 20 hospital -- within a hospital. 21 Then if they go to the ED or have an 22 inpatient admission with any of those conditions, 1 that's the numerator. So it's a little bit 2 different than perhaps thinking about somebody 3 going to a physician's office for chemotherapy. 4 They're getting the chemotherapy in the hospital 5 that is being measured here. So I just wanted to 6 be sure we were kind of all on the same page 7 relative to that piece. Sean.

Yes, I think this is a 8 DR. MORRISON: I was thinking 9 critically important measure. 10 about this, actually, from one of the comments 11 that was made about the end-stage renal disease 12 program, as well. These are both critically 13 important medications, have severe and 14 predictable toxic side effects, and -- sorry, 15 severe and predictable -- and effective 16 treatments that are associated with them. 17 And if we're going to say an 18 outpatient hospital, well, you're just a delivery 19 model, that's it. We're going to give 20 chemotherapy, and that's it, and you're on your 21 own with your provider, well, that's one way of 22 thinking about it.

1	I would say that if you are going to
2	take the responsibility to give these
3	medications, to have patients come in and see
4	them, then you have a responsibility to take care
5	of people all the way through the course of that
6	event, and that you have responsibility of if
7	they're going to their primary care provider to
8	be treated for treatment-related side effects, to
9	effectively communicate with them what the plan
10	of care is for that. I think that's the
11	responsibility of delivering these drugs.
12	I think it's not to be on a soap
13	box, but if Dolores can do it, I can do it, too.
14	I think it's the same with dialysis centers. I
15	think to say that it's the responsibility of the
16	nephrologist, it's the responsibility of the
17	primary care physician to handle all of these
18	things is incorrect. When patients go to the
19	dialysis center, they look at that as their
20	primary care. And so I think when patients go to
21	an outpatient cancer center for the treatment of
22	their cancer, they look at that as their site of
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care and that we have a responsibility, as people 1 2 working in hospitals, to take care of them. CO-CHAIR TRAVIS: Thank you, Sean. 3 4 Ann Marie --- yes, well Mitch is next, but have 5 you already said what you wanted to say, Mitch? 6 Thank you. Ron. 7 CO-CHAIR WALTERS: So yes, I strongly support it, like Sean does, for the same reasons, 8 9 and with the same stipulations that we did 10 I would make a bet that -- again, earlier. 11 forget the self-contained institutions a second 12 because that's a whole different issue. 13 As a system of care, I'd be willing to 14 bet that no one has a report like this right now, 15 and that feedback loop to the individual 16 physicians about their potentially preventable 17 visits to the ED or admissions doesn't exist for 18 most hospitals. That's why the beauty of this is 19 a pay-for-reporting. If it were -- I mean, I 20 agree, attribution comes into play, when you 21 really think like a systems person and you wonder 22 who's going to take the hit financially for it.

But as a start, having that information go back 1 2 as crosstalk between a given hospital and the attending physicians at that hospital which, yes, 3 4 could be all over the place, can't help but 5 improve patient care. This is exactly the kind of measure that we need to -- and in this 6 7 particular program to improve care. I think it will. 8 9 CO-CHAIR TRAVIS: Thank you, Ron. Ann 10 Marie, you put your card down. Okay, good, just 11 wanted to be sure. Shelley. 12 MEMBER FULD NASSO: I think I'm going 13 to pass because I think it's all been said. 14 CO-CHAIR TRAVIS: Okay, thank you very 15 much. Nancy. Perhaps I wasn't 16 MEMBER FOSTER: 17 clear. Let me be very specific here. We also 18 support the use of this measure if it -- what we 19 have right now are not specs for the measure, but 20 a brief description of it. So we think A, that 21 it's important that the NQF committee be able to 22 take a look at it and make sure that the specs

live up to the description, which most often they do, but not always, and opine on that, and then wrestle to the ground some issues that are relevant in cancer care that I think will have to be addressed here to get accuracy in the measure and appropriateness of the measure.

7 Because it is not, say, uncommon, in my anecdotal, not data-driven experience here, 8 9 for a hospital such as MD Anderson or a Johns 10 Hopkins or another center with a major cancer 11 care capability to develop a cancer treatment 12 plan, maybe see that patient once or twice in 13 their outpatient center, and then discharge that 14 patient to a smaller hospital that is in that 15 patient's hometown, where the hospital and its 16 outpatient department or others are trying to 17 execute on that plan.

Well who do you -- what's the attribution of the complications if they develop? I don't know the answer to that. I just want to make sure that the NQF panel has a chance to wrestle that one to the ground, along with the

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issues that Mitch has already referenced around sociodemographics and whether they apply here or not.

4 I don't even know the answer to 5 whether they apply or not, but I want to take a look at it because at least conceptually, it 6 7 would make -- sorry, let me rephrase that. I don't want to necessarily take a look at it. 8 Ι 9 want the committee to take a look at that because 10 conceptually, at least, there could be a link. 11 That's my only issue is conditional support now, 12 so that the NQF has a chance to do its job, 13 period. 14 CO-CHAIR TRAVIS: -- that 15 clarification. Andrea. 16 MEMBER BENIN: I can just try to 17 clarify apropos Helen's question. My comments 18 before weren't really in concern of unintended 19 consequences, per se, that this would force 20 patients to go to the wrong direction or 21 whatever, although it certainly could, but I 22 don't -- that wasn't really my concern, more that

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are these really preventable things that are 1 2 appropriate to be measured? I think that gets addressed by the idea that we think this metric 3 4 needs more work/evaluation/measure specs, et 5 cetera. CO-CHAIR TRAVIS: So the review 6 process, if I'm understanding you, Andrea --7 going through the endorsement process should 8 9 address those concerns, assuming it's a robust --10 (Simultaneous speaking.) 11 MEMBER BENIN: Maybe. The fact that 12 we don't have measure specs, and it hasn't gone 13 through anything, we have no idea right now what 14 this really addresses. That, to me, is a little 15 bizarre. It seems premature to have this here, 16 but it is what it is. 17 CO-CHAIR TRAVIS: Okay, thank you. 18 Marty. 19 MEMBER HATLIE: Just a quick comment. 20 I really, really like this measure. There's a 21 lot of work happening right now in patient and 22 family engagement. A lot of it's being supported by CMS in its different transformation programs,
 the Partnership for Patients, Transforming
 Clinical Practice, the QIOs.

4 We're all trying to figure out where 5 we get the best value out of engaging patients, and it's kind of falling into three buckets. 6 One 7 is just the infrastructure. Do we have infrastructure to bring the voice of the patient 8 9 into our organizations as we prioritize. One is 10 activations, you know, how do we tell which 11 patients can actually be partners in their care, 12 which ones can't?

13 But the third piece is really 14 relationships, how we manage the relationships 15 with patients after discharge, so that we can 16 avoid things like rehospitalization or coming 17 back. If you call your doctor's office if you're having symptoms after chemo, do you get an 18 19 answer, or do you say, you've got an appointment 20 in a week, why don't you just wait until then? 21 It's stuff like that that really, 22 there's not very much activity going on, yet

there's a lot of interest, but it's really, 1 2 really new. This just fits in there really well, so I'm excited to see this, and I think it's on 3 4 the right side of history. Thank you. 5 CO-CHAIR TRAVIS: Thank you, Marty. Dolores. 6 7 MS. MITCHELL: Well I think I was a little incoherent before, and I forgot that these 8 9 were outpatient treatments, not inpatient, so 10 scrap the thing I said about discharge planning. 11 We talk a lot in the health policy world about 12 not having silos. Here we are, the hospital 13 group, talking about the hospital's 14 responsibility. Nobody is tougher on the 15 hospitals than I am, but it seems to me --16 there's no disagreement there, right? But fair 17 is fair. 18 If, in fact, we mean something -- and 19 I think Marty started on the theme that I was 20 incoherently trying to get to, is that what the 21 patient wants, involving the patient's family, to

be supportive, working with the patient to see

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how much of responsibility the patient can assume 1 2 -- it may be that it starts at the hospital level when you've gone in for your chemo and are 3 4 talking about leaving, but certainly, it does not 5 absolve all the others from participating. I don't know where that leaves me 6 7 about how to vote on this one, but I think we need to get away from the silo idea and say, hey, 8 9 we're all involved here, not just the hospitals. 10 Sorry, Sean, I almost always agree with you, but 11 you lost me on this one. 12 CO-CHAIR TRAVIS: Thank you, Dolores. 13 And as is probably kind of clear as we've been 14 talking about it, especially, Nancy, when you put 15 forth your recommendation, this measure is not 16 yet endorsed, so if we could -- and Nancy's 17 recommendation was that it be conditional upon 18 endorsement, with a few other caveats that were 19 added to it because of the specific nature -- a 20 few other conditions added to it for the specific 21 nature of this, so, you know, with the -- all of 22 those conditions would go to the consensus

development process, so that they could see what the MAP was concerned about or wanted to be sure to look at during the review process. Tom.

MEMBER LUTZOW: Yes. I'm not hospital 4 5 I fund hospitals, and my concern is that either. by not adjusting, in this case, the exclusions 6 7 correctly, there's a chance that we'll end up driving resources out of the inner city by not 8 9 measuring correctly or adjusting correctly. 10 That's the basis of the remark.

Marty brought up the concept here of patient activation. I'd like to extend that to this whole issue of patient accountability, where the patient could be a driver, and of course SES accentuates that a bit. The presence of mental health, behavioral issues among the SES population accentuates that a bit.

But there should be, perhaps, an adjustment, maybe an exclusion for a poor level or a failing level of patient accountability as a driver of poor measure performance. That's something I think that needs to be looked at.

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The risk is we will see resources being driven 1 2 out of the inner city as a result of that unless 3 we account for it. 4 CO-CHAIR TRAVIS: Thank you, Tom. Ι 5 don't see any other cards up. I guess that means it's time to move to a vote on this measure. 6 7 Jean-Luc. MR. TILLY: The polling is now open 8 9 for admissions in emergency department visits for 10 patients receiving outpatient chemotherapy, 11 MUC15-951. 12 (Voting.) 13 MR. TILLY: We just need one more 14 vote. 15 (Voting.) 16 MS. SHAHAB: Can you please vote 17 again? 18 (Voting.) MR. TILLY: The results are 32 percent 19 20 support, 64 percent conditional support, 4 21 percent do not support. The recommendation is 22 conditional support.

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This would be the same 1 MS. O'ROURKE: 2 conditions that we attached to this measure for the PCHOR program, but also some good discussion 3 4 for some of the overarching themes about the 5 report about truly engaging the patient and responsibility of the system. 6 That's true. 7 CO-CHAIR TRAVIS: Plus, we all feel better about it anyway because we got 8 9 to the same place with that robust discussion. Ι 10 appreciate that. The next measure is risk standardized hospital visits within seven days 11 12 after hospital outpatient surgery. Nancy, you 13 pulled this measure, so you're first up. 14 MEMBER FOSTER: Thank you. I'm not on 15 mute, am I? No, okay. I sort of hit both 16 buttons at once. This, again, is a measure that 17 we think would be responsive to sociodemographic 18 factors, particularly noting that people who 19 don't have a primary source of care are more 20 likely to come back to the emergency department. 21 We're glad to have them come back.

We'd love to make sure they don't have

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That was our concern about this and wanted 1 to. 2 to make sure that we recommend this for conditional support, so that we get a look at 3 4 I know it has recently been endorsed by that. 5 the NOF, but I do not believe that they looked at the SDS factor for this, is my recollection of 6 7 reading the materials. I'm curious as to why and really think this warrants that look. 8 9 MS. MARINELARENA: Nancy, you're 10 correct. This just got endorsed through the 11 The endorsement was in surgery project. 12 This was submitted prior to the SDS September. 13 trial period began, so they were not required to 14 look at SDS in the risk adjustment model. 15 I understand them not MEMBER FOSTER: 16 being required to do so, but I just can't imagine 17 circumstances under which you couldn't 18 conceptually agree that this may be one of those 19 measures that is very responsive to 20 sociodemographics and one that would need to be 21 looked at before it's put into a program with 22 required reporting for that very reason. Because

1	having those hospitals that serve impoverished
2	communities look bad just because somebody got
3	their measure in under the wire doesn't make a
4	lot of sense to me.
5	DR. DRYE: Hi, this is Elizabeth Drye,
6	one of the developers, at Yale, of the measure.
7	Just to clarify, although this wasn't formally in
8	the SDS pilot, we did submit analysis with the
9	of rates and socioeconomic status to the
10	committee, and it was discussed during review.
11	It was actually commented on in the review
12	process, too. So it was very transparent, and
13	we're happy to review it with you now if that
14	would be helpful.
15	MS. MARINELARENA: Yes, please.
16	DR. DRYE: Mayur, do you want to do
17	that, from Yale?
18	DR. DESAI: Sure. Good morning, this
19	is Mayur Desai from Yale Center for Outcomes
20	Research and Evaluation with the measure
21	development team. So we, as part of the testing,
22	looked at two variables that are typically used

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in this setting.

2 One is the proportion of patients -at the patient level, whether the patient is 3 African-American and also dual eligible, and the 4 5 results, with and without adjustment for those variables, were nearly identical, with 6 7 correlation coefficients of 0.99 in that range. A second analysis that we did was we 8 9 looked at the proportion of patients at a 10 facility who are African-American and the 11 proportion of patients who are dual eligible as 12 proxies for sociodemographic status. Those two 13 also showed comparable results. So we felt at 14 this time it wasn't necessary or important to 15 control for those variables. Also, we would just 16 point out that CMS is fully participating in the 17 SDS trial, and currently, the Office of the 18 Assistant Secretary for Planning and Evaluation is doing research in this area and is going to be 19 20 issuing a report in October of 2016, next year. 21 Based on their analysis, we will adjust the 22 measures accordingly.

1 CO-CHAIR TRAVIS: Thank you. Nancy, 2 any thoughts about that from your perspective? 3 MEMBER FOSTER: I'm pretty sure 4 everyone heard me yesterday on the issue of 5 adjustment by race, so I won't repeat myself. And additionally, dual eligibility is maybe a 6 7 proxy for poverty, but less robust than adjusting by census track or zip code or other factors. 8 9 We're really looking at a series of 10 factors that affect the community and the 11 availability of additional resources in the community. That's where we think the impact 12 13 comes from. Defining that community is really 14 important as we go forward. Dual eligibility, 15 depending on what state you're in, what the 16 coverage of your Medicaid population is, it 17 varies enormously. So there's a lot of noise in 18 that particular set of measures or particular 19 adjustment. 20 CO-CHAIR TRAVIS: Thank you. Is that 21 David? Okay, thank you. 22 MEMBER ENGLER: Thank you very much.

I agree with Nancy that the community-based 1 2 factors are incredibly important in this metric and have been proven to be important in other 3 4 similar metrics on returns. Having said that, 5 with that not being done, we would suggest strongly that SDS adjustment be looked at. 6 The 7 other part then turns to a question that I have of the developers is what was the final result of 8 9 the receiver/operator curve on predictability of 10 this measure with and without the risk adjustment 11 for race or SDS factors? 12 DR. YOUNG: Elizabeth, are you still 13 14 DR. DESAI: I'm sorry. This is Mayur 15 Desai again. Could you repeat the question? 16 MEMBER ENGLER: Thank you very much, 17 I will. My question goes to the 18 receiver/operator curve of this adjustment 19 So what did you find when you looked at factor. 20 the model, in terms of its predictability? 21 DR. DESAI: Thank you. We're just 22 I don't have trying to look that up right now.

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that handy at the moment.

2 DR. DRYE: We do have it, but you might want to go on and we'll get back to you, 3 4 we're just pulling it out. 5 DR. DESAI: We're pulling up the documentation right now. I'm sorry for the 6 7 delay. CO-CHAIR TRAVIS: That's okay. 8 We'll 9 come back to David's guestion in a moment. Sean. 10 I actually had a DR. MORRISON: comment with Dolores about this. I struggle with 11 12 this all the time. It's interesting that this is 13 coming from the Yale group because one of the 14 reasons that we, as a country, spend so much on 15 healthcare is we spend so little on social 16 services. 17 And I really struggle with who is

18 responsible when we start talking about 19 socioeconomic status and who are we going to hold 20 accountable for that. Because if we don't hold 21 the hospitals accountable for it, there is no 22 safety net in this country to take care of those

people in the community. Is it right to hold 1 2 hospitals responsible for that? I don't know, but that's where we're spending the money, and 3 4 that's the path we are going down. So I am 5 completely schizophrenic on this, but on this particular issue, again, if we're doing an 6 7 outpatient operation, I do think it's our responsibility to ensure that our patients are 8 9 well taken care of in the post-operative period.

10 That may not be fair on the hospitals 11 and the surgical sites that are doing that, and I 12 recognize that. But until we, as a country, 13 decide that we're going to start spending money 14 on other forms of social support, this is the 15 only place where we can ensure that those 16 patients get the care that they need by putting 17 that responsibility on their shoulders.

And I would argue it's not perfect. If's not what I would like it to be, as the Yale group has shown. It's not what other countries do, but it's what we do, and that's why I would support these types of measures.

1 CO-CHAIR TRAVIS: Thank you, Sean. 2 Donna. MEMBER SLOSBURG: 3 I just have a different concern about this measure. 4 I agree 5 with everything everybody has said up to this However, my concern goes to the 6 point. reliability of this measure. It's a claims-based 7 measure, and the reliability does not cover the 8 9 entire seven days because of the three-day rule. 10 We've had this discussion with Yale previously, 11 and I know that they've made some adjustments. Ι 12 don't know if everybody is -- is everybody 13 familiar with the three-day rule? 14 Nancy, you're going to probably have 15 to speak to this. I'll do my best. I'm not a 16 coding person. Basically, the three-day payment 17 window requires that outpatient services provided 18 by a hospital or any Part B entity wholly owned 19 or wholly operated by a hospital, so an HOPD, 20 must be billed with the inpatient stay. 21 In addition, outpatient services 22 provided by a hospital or any Part B entity, on

the first, second, and third calendar days preceding the date of beneficiary's inpatient admission, are also deemed related to the admission and must be billed with the inpatient stay.

So what that means, simply stated, is 6 7 that the measure would only identify visits occurring on Days 4, 5, 6, and 7, following the 8 9 index hospital outpatient visit. Index claims 10 for 0, 1, 2, and 3 would not be created and, 11 therefore, would not be counted. I do know that 12 an attempt -- the measure is using physician 13 claims for place of service in attempt to fill 14 the three-day gap for the missing hospital 15 outpatient claims. However, there's been a long 16 history of inaccuracy for point-of-service 17 physician claims. I had a lot of statistics, but 18 I do want to bring up that point because I think 19 it's a relevant one.

20 CO-CHAIR TRAVIS: Would the developer 21 like to respond to those comments?

DR. DRYE: Sure. Hi, it's Elizabeth

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1 Drye again. So that's true, it's definitely a 2 challenge of this measure that it uses claims to 3 identify the cases eligible for the measure, and 4 also the outcomes to deal with the three-day 5 payment rule. We have looked at that really 6 closely. We do use physician claims.

7 We have a couple -- we tested that approach in an analogous measure. We have a 8 9 measure of seven-day visits that is the same 10 outcome following colonoscopies for hospital 11 outpatient departments and ambulatory surgery 12 That went through national testing. centers. 13 Every facility got all of their patient-level 14 data, plus they got a measure score 15 confidentially this past summer.

We took a lot of detailed, case-level information from providers on where our claims-based analysis -- how it did or didn't line up with their actual patient experience. We identified some additional ways -- overall, we had, I think, a really great outcome from the dry run. 1 There was good acceptance of the 2 measure, and the algorithm worked well, but we have identified a couple ways to tighten it up 3 even further. Those we are building into the 4 5 colonoscopy measure before it's used in public We're doing that right now. 6 reporting. Then we 7 will apply those, as well, to the surgery 8 measure.

9 We're using every piece of claims 10 information we can. We will be likely excluding 11 a few more cases where it's not as clear, but in 12 terms of the reliability in the coding and 13 billing, we're not relying on anything that 14 shouldn't be correct. These are things that 15 really should be correct in the claims, so we 16 have to rely on that. I would just say when we 17 ran the colonoscopy dry run, there were 18 definitely some facilities that learned the way 19 they were coding was not aligned with what 20 Medicare requires, and that was a piece of what 21 they learned from the process, itself.

So there's nothing that is perfect.

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It's not going to be 100 percent, but we think 1 2 we're very, very close to that, and we're going to be doing better based on what we learned from 3 4 the colonoscopy measure. This issue was also 5 just vetted extensively at every stage through rulemaking and through NQF review, so I think we 6 7 learned a ton from input from Donna and others. 8 CO-CHAIR TRAVIS: Okay, thank you. 9 Brock. 10 I'd like to kind of MEMBER SLABACH: 11 follow up on what Sean was saying, and I believe 12 that my take would be that hospitals are dealing 13 with the social impacts of the problems that 14 we're talking about here. We're seeing large 15 amounts of uncompensated care, and 60 percent of 16 the emergency visits around the United States are 17 low acuity, meaning they're basically clinic 18 visits, because they're all mostly in health 19 professional shortage areas, and there's not the 20 resources to be able to respond effectively to 21 the issues that we're talking about, the social 22 determinants.

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1	That's why the social determinants are
2	so critically important to be able to then not
3	create a reporting problem for these facilities
4	that are dealing with these kinds of severe
5	problems that lead the public to an impression
6	that they're having problems in these areas, not
7	because of anything that their responsible for
8	necessarily, directly, but because of the
9	socioeconomic issues that are in the community.
10	This is a reporting issue, and
11	potentially a reimbursement issue if this moves
12	into one of the reporting programs that have
13	financial impacts directly. I think that we are
14	dealing with that. I want to make the case that
15	that's not that we are dealing with it, it's
16	just that this is a reporting problem.
17	CO-CHAIR TRAVIS: Thank you. Tom.
18	MEMBER LUTZOW: Yes. I'd like to
19	follow up on something Sean said, too. I think
20	one of the real limitations of the national
21	performance measurement initiative across the
22	board is its limited reach into coordinating

social services with medical. It has the ability 1 2 to do that in part because CMS funds 60 percent of Medicaid, and Medicaid covers waiver services, 3 4 group home, adult family home, a host of other 5 daycare programs and so on. It does have the ability to extend its reach in part. 6 Some of those services are funded by sources 7 non-governmental, United Way would be an example. 8 9 Despite that, where there is 10 opportunity to extend the national performance 11 program, it should. Group homes are in a great 12 position to help with re-admission prevention. 13 They're in a great position to help with 14 medication adherence and a host of other things, 15 even reducing no shows to primary care. 16 But what is missing is extending the 17 national performance measurement program where it 18 can be extended into Medicaid, and also into 19 private funding through at least national 20 quidance. There's more weight to that. NOF 21 could be a leader in offering performance 22 guidance to non-medical providers, and I think

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it's a missing piece to the puzzle.

2 CO-CHAIR TRAVIS: Thank you very much 3 for helping us recognize that kind of gap in how 4 this working. Anyone else? Nancy? Oh, okay. 5 Kelly.

Hi. I just wanted to 6 MS. TRAUTNER: sort of follow up on what both Sean and Tom were 7 just saying. I think this is easier to wrap our 8 9 arms around for those of who like to dig through 10 IRS filings and looking at the community benefits 11 Schedule H form that hospitals file. I think in 12 2009, hospitals spent about 20 percent of their 13 community benefits expenditures on community 14 health improvement activities, and those did not 15 extend to Medicaid losses or bad debt 16 expenditures.

I think as the system continues to expand and embrace the concept of population health, and while we kind of flesh out what that exactly means, depending on where you sit in the system, I think it's very important to continue to have that as a central piece in the

conversation about quality measurement and
 everything that we're talking about, with respect
 to the healthcare system.

CO-CHAIR TRAVIS: Thank you. I think if you all -- the developers had a chance to pull the information that David asked about earlier --- and David, you might want to repeat your guestion.

9 MEMBER ENGLER: Thank you. I was 10 asking about the predictive nature of the model, 11 in terms of how predictive it was --- it's a sort 12 of open ended --

DR. DESAI: Yes, thank you. I just wanted to respond about that question about the state statistics. The model had, in our development, testing and validation, had a C statistic of 0.71.

I would just note that we also looked at -- and this adjusted for age, a range of comorbidities -- 24 comorbidities, in addition to the complexity of the surgery, as determined by the work RBUs and a measure of body system, which

are analytic approaches consistent with the 1 2 literature and with the NSQIP program. We did look at the addition of the sociodemographic 3 4 variables related to race and dual eligibility. We did not report, in our 5 documentation -- we're looking through that -- we 6 7 didn't report a C statistic with those two variables added, but I would just note that when 8 9 we did add those two variables, the correlation 10 in the facility results were at the 0.99 level, 11 so the C statistic is unlikely to have changed 12 with the addition of those two variables. 13 MEMBER ENGLER: That's correct --14 (Simultaneous speaking.) 15 This is Elizabeth. DR. DRYE: Let me 16 just add -- because that's kind of something we 17 throw around, the correlation was .99. More 18 specifically, what we did was we estimated the 19 measure score with the full model that Mayur laid 20 out for every facility, then we re-estimated the 21 measure score with the SDS adjustment in it. 22 We compared the measure scores for all

the facilities and they basically didn't change. 1 2 So that is a correlation between the measure scores of those 4,000 plus hospital outpatient 3 4 departments that was so high. Hence, we 5 concluded it really doesn't make a difference in the measure score, after adjusting for all of 6 these other factors. 7 MEMBER ENGLER: Thank you very much. 8 9 CO-CHAIR TRAVIS: Thank you all. 10 Okay, well why don't we take a vote, and then 11 we'll see what happens, and then we'll see what we have to do. Oh, yes you may. 12 13 MS. HASKELL: I just want to express 14 an opinion, which is I think this is a really, 15 really important measure. The vast majority of 16 our surgeries are done on an outpatient basis, 17 and we really don't have a way of tracking those. 18 The providers don't have a way of tracking them. 19 I just can't imagine not having -- not approving 20 something like this if we've got it because it's 21 sort of the Wild West right now.

CO-CHAIR TRAVIS: Shek.

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MEMBER MEHTA: All right, I don't want
to take up too much time, but in the
CO-CHAIR TRAVIS: Do not apologize.
I meant to come to you all. I never did come to
you all, so thank you, Shek.
MEMBER MEHTA: That's fine. For the
conditional support option is there a way to
address the time frame that, I guess, Donna was
talking about, in terms of the delay? I don't
know
(Simultaneous speaking.)
CO-CHAIR TRAVIS: It seemed to me that
would be a change in the measure specifications
itself. Therefore I'll look to NQF staff, but
it seems like it would be a different measure.
We're really to vote on the measure as it looks
here.
MEMBER MEHTA: In that case, for the
option of conditional support, is it to do more
comprehensive SDS analysis or assessment?
CO-CHAIR TRAVIS: Any feedback on how
the SDS might be impacted?

1	DR. AMIN: The recommendation would be
2	conditional on looking at some of these
3	additional factors beyond what the surgery
4	committee looked at. I would say I would just
5	reiterate that this measure was just looked at by
6	the surgery endorsement maintenance committee.
7	While it was not part of the SDS trial, the
8	measure developers did provide sufficient
9	significant information, which was provided in
10	your discussion guide, about what they looked at.
11	Nancy's point about the robustness of
12	the variables that they looked at is another
13	question, but the SDS question was looked at
14	pretty significantly already. We would need
15	specific guidance on what you would want the
16	standing committee to look at, in addition to
17	what was already looked at. I think Nancy made
18	some points around additional variables, but
19	we want to right. Thank you.
20	CO-CHAIR TRAVIS: Michael.
21	DR. PHELAN: I guess going back to
22	Shek's point about the it's not a different

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measure, but it goes back to Donna's point about 1 2 the lack of data on the first three days, which is kind of shocking to me, but not really because 3 4 I think this problem has come up in other 5 measures before, where it's some kind of billing Could CMS maybe re-answer or give me a 6 problem. 7 little bit more clarity of what the difficulty is, and is it insurmountable? What I'm hearing 8 9 is it may be insurmountable, but is it something 10 that could be looked at to capture those first 11 three days? 12 Because to me, those first three days 13 may be an important number of patients who are 14 coming back in to be re-admitted. So is the 15 issue completely insurmountable, or is something 16 with some mathematical analysis and some pulling 17 of data, it can be retrieved? Because it seems 18 to me like that would be a pretty important 19 cohort not to be dropped out of your first three 20 days. 21 So it's not a seven day, it's really 22 day 4 through 7. The measure should be a little

bit more specific. If it's insurmountable, then we can accept the measure as it is, but I think what Shek is getting at is, is there a way to make this dependent on whether someone can look at -- whether we can start to try to capture those first three days? Did I get that correctly? Okay.

8 MS. HASKELL: I thought they addressed 9 that with the physician billing.

10 DR. DRYE: Right. This is Elizabeth, 11 at Yale. Sorry, I probably wasn't as clear in defining this before. We do address it. 12 It's 13 all of those days because we are able to look at 14 the physician claims that are filed as outpatient 15 surgical claims and cross-check them a couple 16 different ways to make sure that they are indeed outpatient surgeries. 17

18 Then we can link them to patients who 19 have inpatient claims that have incorporated, 20 according to the three-day payment window, the 21 facility portion of the bill. We are able to 22 capture visits on any of those days. As I

mentioned, we tested that algorithm with real 1 2 data going to thousands of facilities during the colonoscopy measure dry run this past summer, and 3 we've refined it even a little bit further. 4 So 5 yes, we've already worked around that problem. CO-CHAIR TRAVIS: 6 Okay. So I quess I've got three of you all who probably -- okay, I 7 had written down Brock first, but are you going 8 9 to let somebody else say it, or are you going to 10 say it? 11 MEMBER SLABACH: No I just wanted to 12 ask a question about the SDS adjustment because I 13 understand that there may not be any differential 14 on a national basis, but I'm trying to figure out 15 how this applies to institution-specific 16 information. 17 So if I'm in my small hospital in 18 southwest Mississippi, would this make a 19 difference in my hospital, in terms of the 20 adjustment? I would have to say that it would 21 because I know my population versus maybe the 22 national picture. I think there's two different

areas I wanted to kind of get an idea, and then 1 2 maybe my -- catch up on knowledge about SDS. (Simultaneous speaking.) 3 DR. DRYE: Hi, this is Elizabeth Drye, 4 5 I'm just cutting you off, just say if you sorry. want me to stop elaborating. I just wanted to 6 7 make two points because I think the SDS adjustment is hard to digest when you only have a 8 9 few minutes to talk about it. 10 One point is that when we looked at 11 the relationship of the scores, with and without 12 adjustment, we were looking at each individual 13 facility, and it gave each facility two scores, 14 one with adjustment, one without adjustment. 15 Comparing that across 4,000 hospitals, there was 16 almost no difference. So we did look at the 17 individual facility level and the extent to which 18 facilities would be affected. We saw very, very 19 little -- really no appreciable effect. 20 The other thing I just wanted to say 21 in terms of -- maybe it was Taroon, if I'm just 22 recognizing your voice -- point earlier, the

variables we use, Medicaid dual eligibility and 1 2 race, those are patient-level variables we know are accurate for the patient. While we are doing 3 work at Yale, and others are looking at how could 4 5 we characterize community-level factors that may be affecting the rate of outcomes for some of 6 these risk adjusted outcome measures, there 7 really isn't anything that's as tightly tied to 8 9 the patient, other than what we were able to use.

10 We think we started with the most 11 powerful variables, even though there might be 12 other variables we want to look at. Finally, I 13 would just add in the setting of this particular 14 measure, this is a cohort of patients who could 15 have been operated on in ambulatory surgery 16 centers. They are surgeries that are safe to do 17 even at ASTs, and they're same-day surgeries. Ι 18 think it's just probably a group that is slightly 19 less vulnerable to the factors that we think 20 about for very sick admitted patients who then 21 get discharged home.

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CO-CHAIR TRAVIS: Okay, thank you so

1 much, Elizabeth. We have a couple more cards, 2 I want to be sure we get to you, maybe three. but I also want to be sure that we're not just 3 4 being repetitive of our earlier discussion, which 5 I think has been pretty robust. Because I think we need to get to the vote, and then see where we 6 7 Then we could focus our discussions around are. what the results of the vote are. 8

9 If anybody wants to put down their 10 card, given that suggestion, that would be fine. But if you keep your card up, please try to make 11 12 a statement that is not repetitive in nature, but 13 is additive to helping us make a decision on this 14 I would really appreciate that because we vote. 15 don't want to rehash everything that we've just 16 spent the last hour, practically, talking about.

DR. AMIN: Cristie, could I just also add one thing to that? I just want to reiterate the importance of the fact -- just sort of delineate the endorsement process and the selection process. Obviously, a lot of these technical questions are important for people to

put out on the table. I would just encourage you, if there's still outstanding questions, to direct them to the surgery standing committee that recently reviewed this.

There's extensive information in your 5 discussion guide on their discussions. 6 I know 7 many of these questions around reliability testing and risk adjustment are important, but 8 9 clearly, given the volume of information that we 10 need to get through, and the way that committee 11 is really constituted, I would really recommend 12 suggesting that the endorsement committee review 13 any of these technical questions that you still 14 have outstanding.

15 CO-CHAIR TRAVIS: Okay, thank you. We 16 can't go through all the technical issues in this 17 setting because we're not really equipped, and 18 it's not in our scope. I think that's part of 19 what I'm hearing from Taroon. Okay, Donna.

20 MEMBER SLOSBURG: Just to be brief, I 21 appreciate all the work that Yale has done, but I 22 do want to continue to comment that community

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service claims are still an issue. I'm not going 1 2 to go into a lot of detail because you all are asking me to be brief, but I do think that if 3 4 we're going to publicly report something, I think 5 we need to be sure that the measure is reflecting what data we're collecting. 6 7 So whether it's to keep digging and finding a way to get those 0, 1, 2, and 3 8 9 patients, or whether it's to change the name of 10 the measure because it's really not an all cause 11 seven-day measure if you're not collecting all 12 those patients. Thank you. 13 CO-CHAIR TRAVIS: Thank you, Donna. 14 I appreciate that. Why don't we move to a vote 15 on this measure? 16 MR. TILLY: The polling is now open for risk standardized hospital visits within 17 18 seven days after hospital outpatient surgery, 19 MUC15-982. 20 (Voting.) 21 MS. SHAHAB: We still need a few more 22 votes, please.

1	(Voting.)
2	MR. TILLY: The results are 64 percent
3	support, 20 percent conditional support, 16
4	percent do not support. The recommendation is
5	support.
6	CO-CHAIR TRAVIS: Okay. Thank you
7	very much for working our way through that. I
8	really appreciate everybody's comments, and I
9	think it was helpful, so thank you very much. We
10	did decide we're going to have a working lunch.
11	We do get to eat. And so, what time, from you
12	all's perspective
13	MS. SHAHAB: We could take a 30-minute
14	lunch instead.
15	CO-CHAIR TRAVIS: Yes, why don't we do
16	a 30-minute lunch, so 12:40, because I do know
17	that we have several people who do have a hard
18	stop at 3:00, and some who have to leave before
19	that. Thank you all for your patience, if we can
20	come back at 12:40, and we will do inpatient
21	psych at that time. Thank you.
22	(Whereupon, the above-entitled meeting

went off the record at 12:08 p.m. and went back 1 2 on the record at 12:31 p.m.) CO-CHAIR TRAVIS: We're almost all 3 back. There's some people in the back of the 4 5 room, but I think for the first part of this, they can hear what we're going to be talking 6 7 about. Chris has joined us, and I think I will 8 turn it over to you, Chris. 9 MS. CASSEL: Thank you Cristie, and 10 thank you, Ron. I just want to interrupt the 11 important work of this group to just tell you, 12 personally, an announcement that now has gone out 13 on the press that I will be stepping down from my 14 role at NQF in March, not for any bad reason, for 15 a very good reason, which is that Kaiser 16 Permanente is starting a new medical school, its 17 own medical school, to be very innovative, very 18 dedicated to physicians learning how to practice 19 in teams and systems, using data, understanding 20 quality. 21 They've asked me to come and help lead 22 that effort and help get it started. For those

of you who know me, know that I have had a long career in academic medicine before I came to NQF and ABIM.

It was just irresistible to take this 4 5 opportunity to start from scratch with a system-based, not a university-based, but a 6 7 system-based medical school really focused on training top-notch clinicians and clinician 8 9 leaders. But it's bittersweet because NOF is a 10 wonderful and central and important organization, 11 and my work here has been so rewarding, and we're 12 doing so well. We're incredibly busy with both 13 government-funded work, more than ever in our 14 history, lots of it both central to federal 15 policy, such as what you're working on, and also 16 new areas in measurement science that are really 17 breaking new ground around attribution, 18 comparability, intended use, and other areas like 19 that.

20 We also have a growing portfolio of 21 foundation-funded work, including tomorrow, we're 22 announcing a new grant from the Gordon and Betty

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Moore Foundation on standardizing and adding quality to patient decision support, so that patients have more information about all of the different decision supports that they use. So there's lots going on here.

It's a very bittersweet time for me to 6 7 be leaving because I feel so connected to this organization and the such wonderful staff and all 8 9 of your and our terrific board. But on the other 10 hand, there couldn't be a better time to recruit 11 a new leader because the organization and its 12 work are just growing in importance, so valuing 13 the volunteer contributors to NQF's work, and 14 that is every single member of this working 15 group, all of MAP, and all of our standing 16 committees. We sent a personal note out to 17 everybody, so I don't want to clog up your 18 emails, but you'll get that, if you haven't 19 already, from me. I just wanted to personally 20 come and let you know about it. Hi, Pierre. I'm 21 happy, Cristie or Ron, to take any quick 22 questions. I know you've got a busy afternoon.

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This is coming down to the home stretch here, so 1 2 I don't want to hold you up too long. CO-CHAIR WALTERS: 3 Sean. 4 DR. MORRISON: Chris, I just wanted to 5 say congratulations. As somebody who trained with you as a medical student, not to age either 6 of us, had you as my chair, Kaiser could not have 7 picked a better person. This is really good for 8 9 American healthcare, so congratulations, and 10 thanks for everything you've done at NQF. 11 MS. CASSEL: Thank you, Sean. 12 (Applause.) 13 Okay, I'm going to let everybody get 14 back to work. 15 (Simultaneous speaking.) 16 DR. PHELAN: Just to let you know, 17 Sean graduated last year -- finished his 18 residency last year. 19 CO-CHAIR TRAVIS: Thank you so much, 20 Chris, and thank you for joining us and giving 21 the news to us personally. 22 MS. CASSEL: I might actually grab a

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little lunch.

2	CO-CHAIR TRAVIS: Please do. You've
3	earned it. Thank you all for coming back a
4	little bit earlier than we anticipated from lunch
5	because, as I indicated before, we're going to
6	start losing some people, and we want as many
7	brains around this table as possible for the
8	decisions that we still have left to make, which
9	are around inpatient psych and ambulatory
10	surgery.
11	As I indicated earlier today, we're
12	going to put inpatient psych first to accommodate
13	our lead discussants, but we also have a very
14	tight time frame for ambulatory surgery because
15	some of our lead discussants will have to leave
16	no later than between 2:30 and 3:00. I think we
17	can get through this work within those time
18	frames. The first one we're going to talk about
19	is inpatient psychiatric facilities quality
20	reporting system. I'm going to turn it over to
21	Erin, if she's here, to open up with an overview,
22	or somebody will do the overview.

MS. MARINELARENA: I'll take over. 1 2 CO-CHAIR TRAVIS: Thank you, Melissa. 3 MS. MARINELARENA: Again, another 4 quick overview on the psychiatric program. This 5 is a pay for reporting program, so payment is not going to be -- it's pay for reporting, so we keep 6 7 that clear as we're discussing the measures. The incentive structure for this program is inpatient 8 9 psychiatric hospitals or psychiatric units that 10 do not report data on the required measures will 11 receive a 2 percent reduction in their annual 12 federal payment. 13 The goals of this program are to

14 provide consumers with quality information to 15 help inform their decisions about their 16 healthcare options, to improve the quality of 17 inpatient psychiatric care by ensuring providers are aware of and reporting on best practices, and 18 19 lastly, to establish a system for collecting and 20 providing quality data for inpatient psychiatric 21 hospitals or psychiatric units.

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CO-CHAIR TRAVIS: Okay, thank you,

1	Melissa. We'd like to take some public comment
2	now. Is there any in the room?
3	(No audible response.)
4	Seeing none, Operator, could you
5	please see if there's any public comment on the
6	line?
7	OPERATOR: Yes, ma'am. At this time,
8	if you would like to make a comment, please press
9	star, then the No. 1. There are no comments at
10	this time.
11	CO-CHAIR TRAVIS: Okay, thank you very
12	much, Operator. We have two measures that are on
13	this calendar. The first one is substance use
14	core measure set for alcohol and other drug use
15	disorder treatment provided or offered at
16	discharge.
17	I'm going to let you read the rest of
18	what it says here. The second one is 30-day all
19	cause unplanned re-admission. It's a 30-day all
20	cause unplanned re-admission measure. The second
21	measure has been pulled by Nancy Foster, and we
22	will get to that in a moment, but the first

measure has not been pulled at this time and, 1 2 therefore, still sits on the consent calendar. The staff's preliminary analysis and 3 4 recommendation is support for this measure. Just 5 one last call if anybody wants to remove this measure off the consent calendar. 6 Jack. 7 DR. FOWLER: I don't agree with that. Okay, so you want to 8 CO-CHAIR TRAVIS: 9 pull it? Yes, that's fine. Well, Jack, since 10 we're on this measure, we'll go back to you. 11 Please help us understand why you wanted to pull 12 the measure. 13 DR. FOWLER: Sure. This is a measure 14 where the rate at which people are offered 15 entrance into either an alcohol or a drug abuse 16 support program when they're discharged, in the 17 event that they have been diagnosed -- they are 18 labeled as having either an alcohol or drug 19 problem. 20 The thing I don't like about this is 21 this is some provider checking boxes. All you've 22 got to do is say yes, we suggested he go into a

drug program, or we said you go into an alcohol 1 2 program, and if I didn't check the box that he has a substance problem, then it wouldn't count, 3 and it wouldn't matter because he wouldn't be in 4 5 the denominator. I just think quality measures that are totally under the control of a provider 6 7 who's getting evaluated checking boxes is pretty worthless. I wouldn't think a place was better 8 9 because they had a better score in this, so I 10 wouldn't want to recommend that anybody be 11 exposed to this information. That's it. 12 CO-CHAIR TRAVIS: Okay, thank you for 13 that. Ann Marie and Dolores are our other two 14 lead discussants. Jack's a lead discussant, as 15 Ann Marie, would you like to talk about well. 16 this measure? 17 DR. SULLIVAN: I would support the 18 I agree it's not, in some ways, the measure. 19 strongest, but it's part of three -- as far as I 20 understand, there are two pieces that are already 21 in place. This is the third. These indicators 22 have been around with ORYX and the Joint

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Commission for a while.

2 I think they're attempting -- they're only process measures; that's true. 3 But they're attempting to address the very serious issue of 4 5 comorbidity of substance abuse and alcohol in individuals who are in inpatient psychiatric 6 7 facilities. I believe that it's already required that you do an alcohol screening, and also that 8 9 you do a brief intervention for alcohol. That's 10 usually a kind of harm reduction or motivational 11 interviewing brief intervention. Now they would 12 be adding this third one, which is are you 13 actually either providing treatment or referring 14 somebody for treatment at the point of discharge 15 if you have discovered that they have an alcohol 16 problem, and then done some brief intervention? 17 There are two measures. One is just 18 that you've basically referred and people may 19 have refused. That's all in one. The second 20 group are those who you referred, but have not 21 refused. You're kind of, at least, dealing with 22 this issue where people say I referred you, but

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the guy said I don't want to go, and then you 1 2 don't have to worry about it anymore. You are segregating off a measure that 3 4 says -- and assuming that -- again, I think with 5 every measure, you have to assume that the providers are in it because they want to do it, 6 7 and they're not just checking boxes. But if they're in it because they really want to do it, 8 9 they would have two groups. They would be able 10 to follow a rate of those who were legitimately 11 given referrals and/or treatment on site --12 because sometimes you can take a drug, for 13 example, for alcohol abuse -- and what that 14 number would look like for your service, and then 15 two, what it would look like for those who you 16 offered it to, but refused. 17 I think tracking that's a good point

because you can say that theoretically, people would be checking the box that people accepted treatment meant that they felt there was some degree of motivation to follow up. You offer it to 100 people, maybe 20 of them say yes, I'll go

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or have treatment, and the other 80 just refuse, then they're probably not doing it right.

I do think the measure actually gets 3 at a critical issue, in terms of looking at how 4 5 we refer people and those people who refuse. 6 It's a process measure. It's not an outcome 7 The fourth wing of this, which is the measure. ORIX indicators do, does begin to look at what 8 9 happened to that referral. That's not in here 10 yet, but probably, my guess is, it might come at a later point. I do think it has a value in 11 12 making sure that providers are really paying 13 attention to substance abuse issues which, in the 14 past, to tell you the truth, they have not been 15 paying as much attention to as they should have. 16 While it's not the best of all indicators, I 17 would support it because I think it builds on the 18 first two, which are already out there, and gets 19 the psychiatric inpatient units to pay more 20 attention.

21 CO-CHAIR TRAVIS: Thank you, Ann
 22 Marie. Dolores, any comments?

I think I'm somewhere MS. MITCHELL: between the two of my co-religionists over here, in that I found the measure to be tepid, at best. Just to say anybody who said no, they don't matter, but they matter most, not least, it seems to me.

Even if it's not as severe as opioid 7 over use, which is approaching crisis proportions 8 9 in this country, if it isn't, in fact, already 10 there, drug use and deaths from drug over use are 11 really a very serious problem that has been 12 growing substantially over the past couple of 13 It seems to me that simply saying if they years. 14 refuse, that's the end of that is much in the way 15 of a necessary approach to a terrible social I don't know. Do we have some kind of 16 problem. 17 a conditional support option in which the 18 condition would be to ask the developers to beef 19 it up or bulk it up or get started on other 20 measures that support it that are more vigorous 21 and all-inclusive in their coverage? 22

I think this is just a high -- it has

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ripple effects not only on the lives of the 1 2 people who are involved, but as everybody knows who's in this business, anybody with any of these 3 4 problems also spends significantly more money and 5 uses significantly more resources on the medical side, so it's a double whammy, in a way. 6 As I 7 say, if we can do something for conditional support, that's where I would end up voting, so 8 9 you'll have to tell me because I don't know 10 whether we've got that option. 11 CO-CHAIR TRAVIS: I'm going to look to 12 NQF staff to help us kind of tease that out. It would seem to me that if we're looking at a 13 14 change in the specifications that it would be a 15 different measure and not the measure that is 16 before us today. I think we could, if that is 17 what we wanted, in our notes, indicate that we 18 would encourage the developer to move in that 19 direction. So we can send the note, but I think 20 we've got to deal specifically with the measure 21 in front of us today.

MS. MITCHELL: Who is the measure

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1 steward? 2 MS. MARINELARENA: Joint Commission. 3 MS. MITCHELL: I'm sorry, what? 4 MS. MARINELARENA: The Joint Commission. 5 MS. MITCHELL: What drug commission? 6 MS. MARINELARENA: The Joint 7 Commission. 8 9 (Simultaneous speaking.) 10 MS. MITCHELL: The quality of the 11 discussion is rapidly deteriorating. 12 CO-CHAIR TRAVIS: I know. We better 13 hurry up on these measures. 14 MS. MITCHELL: I take it there's no 15 spokesman for the developer of this measure? 16 CO-CHAIR TRAVIS: We can see if -- is 17 a developer on the line for this particular 18 measure? 19 DR. CAMPBELL: Yes, this is Kyle 20 Campbell with Health Services Advisory Group. 21 Can you hear me okay? 22 CO-CHAIR TRAVIS: Yes, we can.

1	DR. CAMPBELL: Okay. Yes, I think
2	there's been some important points made in the
3	discussion. We think that this is a very good
4	place to start, in terms of a measure related to
5	alcohol and other drug use disorder treatment in
6	the IPF setting. A couple of statistics that
7	I'll bring to your attention. In the Joint
8	Commission's testing data, they did an analysis
9	of data from 2010, with approximately 9,000
10	records, and they found that the compliance rate
11	of this measure was only 3.5 percent.
12	That would indicate quite a large room
13	for improvement on this particular measure. We
14	did look specifically about the cohort of
15	inpatient psychiatric facility patients, and we
16	found that in using the 2013 Medicare
17	administrative claims data, about 2.9 percent of
18	patients had alcohol-related primary diagnoses,
19	and an additional 16 percent, about 26,000
20	admissions, had alcohol-related diagnoses as a
21	secondary diagnosis. So we think that this is a
22	very important place to start for this population

that's at high risk. As was mentioned, this 1 2 measure does incorporate not just alcohol, but drug substance use. The president recently 3 4 issued a memo concerning the importance of 5 substance abuse in America. So we feel like from an importance 6 7 perspective, it's a good place to start. We recognize that it could certainly go further, but 8 9 this was the measure that was currently endorsed 10 and available that addressed this construct. 11 MS. MITCHELL: Whose compliance were 12 you talking about with that 3 percent, the 13 hospital's compliance or the patient's 14 compliance? 15 Yes, the hospital. DR. CAMPBELL: 16 That was the overall rate of the measure for the 17 hospitals that were evaluated. 18 MS. MITCHELL: Are you saying that 19 only 3 percent of the psychiatric hospitals ask 20 people or offer program support for their alcohol 21 or drug problems? 22 This sample is not from DR. CAMPBELL:

the inpatient psychiatric facilities. This was a
 sample of other hospitals, and it was based on
 approximately 9,000 records.

(Simultaneous speaking.)

I just want to clarify 5 MS. MITCHELL: where that 3 percent -- what is being measured by 6 7 that 3 percent? Are you saying that all patients who are in a hospital, not just a psychiatric 8 9 hospital, but any hospital that has an inpatient 10 psychiatric unit, I assume you mean, no? Nancy 11 Foster, my guru on such matters, shakes her head, 12 so that means anybody who comes into an 13 inpatient, and only 3 percent of them are queried 14 about and offered assistance for what appears to 15 be an issue with either drugs or alcohol, is that 16 right?

DR. CAMPBELL: Right. In the sample, just to describe it for you, eight of the hospitals that participated were VA hospitals, and six participating were referred to as SBIRT hospitals, which are screening, brief intervention, and referral to treatment program

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1	hospitals. These data were collected
2	MS. MITCHELL: What is that?
3	DR. CAMPBELL: To be honest, I can't
4	answer that specific question, but that's part of
5	(Simultaneous speaking).
6	MS. MITCHELL: Even Nancy doesn't know
7	the answer to that.
8	PARTICIPANT: They were involved in a
9	study for that screening and brief intervention
10	treatment.
11	DR. CAMPBELL: Right. They were
12	hospitals that were involved in a specific study
13	for screening, brief intervention, referral and
14	treatment. As was mentioned, those other
15	measures that are related to this measure in the
16	set, they were hospitals that were part of that
17	group.
18	MS. MITCHELL: Well, whatever the
19	group, or whatever that set of initials implies
20	about these institutions, this being a
21	nomenclature with which I am totally unfamiliar
22	as, apparently, is everybody in this room, that's

an appalling number, that 3 percent -- really 1 2 So anything that we could do to -- not to bad. encourage, but to mandate that people start 3 asking those obvious questions --4 MS. HASKELL: Does the measure exclude 5 people who don't accept the referral? 6 DR. CAMPBELL: The numerator for the 7 measure is the number of patients who received or 8 9 refused, at discharge, a prescription for 10 medication or treatment. If they refused, they 11 would be counted in the numerator as numerator 12 The second part of the measure, which compliant. 13 is reported as a separate rate, is the number of 14 patients who received a prescription at discharge 15 for medication for treatment of alcohol or other 16 drug use dependence or a referral for addiction 17 treatment. 18 CO-CHAIR TRAVIS: Okay, thank you. Ι 19 know this is going to be a little bit difficult 20 for us to kind of work through because it's

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unfamiliar territory, I think, to a lot of us

sitting here. But this is an endorsed measure.

1 2 We need to at least think about the process that it went through for the endorsement.

Some of these highly technical 3 questions, I am assuming, unless someone on staff 4 5 tells me differently, have been addressed at that But still, it is before us to see if we 6 level. feel comfortable that it comes into this program. 7 So I want to be sure that we address the issues 8 9 enough to feel comfortable voting on it, but not 10 so much that we have to get down into everything 11 that probably was adjudicated during the 12 endorsement process.

13 MS. MITCHELL: Cristie, don't I 14 remember that we used to do -- in the process of 15 going through these measures, that when we saw a 16 gap, that we identified it as a measures gap and 17 put it into a final report, saying let's get out 18 there and beat the bushes and find some groups 19 that are willing to put together some stronger, 20 better, more comprehensive measures? 21 CO-CHAIR TRAVIS: Yes, and this didn't

-- my comments were not to imply that we can't

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carry a message forward from this group that we 1 2 think stronger and better measures are needed in this area. 3 4 MS. MITCHELL: Yes, this is not a gap. 5 This is a chasm. No, thank you for 6 CO-CHAIR TRAVIS: 7 that clarification, Dolores. Would you like to 8 say something, Erin? 9 MS. O'ROURKE: Sure. I think 10 piggybacking on what Dolores was just saying, 11 that we heard very clearly at the fall web 12 meeting that this is a big gap area, and I think 13 building on that theme today. I can't tell you 14 how to vote, if it's a support or a conditional 15 support, but either way, we can capture, in the 16 rationale and in the accompanying report, that 17 outcomes for this area are a huge gap, and a 18 process measure could be an important start, and 19 the MAP would recommend the quick development and 20 adaptation of an outcome measure. 21 DR. PHELAN: Just going on the same --22 CO-CHAIR TRAVIS: I feel like I'm kind of losing a little control here. For those of
 you who know me, I am a control freak, so you
 don't want to see me morph into that in the last
 hour of this meeting, trust me. Thank you so
 much, Michael, I appreciate that. Nancy, I think
 you were next.

MEMBER FOSTER: At the time I raised 7 my card, it was to associate myself with the 8 9 remarks from the woman from Massachusetts. This 10 is a baby step forward in measurement in this 11 area, but it really -- we really need stronger 12 measures, as Erin has just outlined. I want to 13 remind folks that we're talking about a patient 14 population in inpatient psychiatric facilities 15 that are not just hospitalized for drug abuse or 16 substance disorders. We're talking about people 17 with schizophrenia and severe mental health 18 problems, where perhaps this or tobacco cessation 19 is not the major concern when they are actually 20 discharged, but their overall mental health. 21

So how we get to the right measures and really are measuring that which is important

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1 for patients who are hospitalized in a
2 psychiatric facility -- and there are fewer and
3 fewer of those these days -- is really the key
4 question I think we're trying to put on the
5 table. I really don't have heartache over this
6 particular measure, but I'm not really passionate
7 about it, either.

8 CO-CHAIR TRAVIS: Thank you, Nancy. 9 I know Greg has to leave in a few minutes, so I 10 wanted to be sure -- I hope you all don't mind. 11 I'm going to take him a little bit out of order. 12 If you have any comments, Greg, that you would 13 like to make.

14 DR. ALEXANDER: I just wondered, in 15 looking at this description, it's 18 years of age 16 and older. I just wonder what the justification 17 for that was because high school students have 18 major issues with this, and I just wondered if 19 we're not missing -- if there isn't a gap there? 20 Because high school students, you start earlier 21 intervention, and perhaps you have better outcomes in the end, and why they're not part of 22

this, or if there are other measures that take 1 2 that into account? CO-CHAIR WALTERS: The committee made 3 that same recommendation, but they had to deal 4 5 with the measure that was written, which was 18 So that was recognized last year by 6 and above. the steering committee. 7 CO-CHAIR TRAVIS: So common 8 9 identification of a gap around this measure. 10 Thank you very much for that, Greg. Ron. 11 CO-CHAIR WALTERS: We've got a chance 12 to talk about an outcome measure in just a 13 second, and I don't generally like process 14 measures, but again, as Nancy said, this is an 15 area that could use a lot of development. We 16 know that. I'd rather keep a process measure, as 17 we continue to work towards more relevant outcome 18 measures, rather than discard it. I also am 19 impressed, actually, that it is the Joint 20 Commission that's the steward, and it is a part 21 of their ORIX measures. So as we get into the 22 Inpatient Psychiatric Quality Reporting Program

more developed, this is -- if we lost this measure, there's not an easily fillable measure to take its place. As everybody mentioned, this is a big process step that there still exists to be a huge gap in. Someone asked how -- I think it was Dolores said how can we improve on the use of this measure?

8 One way is not going to be to get rid 9 of the measure. It's going to actually be to do 10 everything we can to enhance and to enforce the 11 use of the measure. I'm sorry, Jack, that it is 12 a checkbox, but there are plans to make it more 13 tied in to electronic health records and so on.

CO-CHAIR TRAVIS: Michael.

15 DR. PHELAN: I guess I want to 16 reiterate or establish the huge gap area in this. 17 This is such a small Inpatient Psychiatric 18 Quality Reporting Program compared to the 19 outpatient world, compared to the emergency 20 medicine world, compared to inpatient, where 21 someone -- I think the report, they said only 3 22 percent of patients who are admitted to a

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hospital were actually getting -- so I think from 1 2 this committee, recognizing that this is a gap area that needs a serious look at what measures 3 4 are out there, what measures can be developed, 5 and really push -- because this is a big area that -- I've been on the committing for a couple 6 7 years, and we keep reiterating. We never get any feedback from when is someone going to step up to 8 9 the plate and say this is -- and it's epidemic.

10 The heroin epidemic is -- a simple 11 measure like how often are heroin addicts getting 12 appropriate community resources to them, I think 13 people would be shocked that that does not happen 14 as often as it should. Having this as kind of a 15 stamp on the table or a fist on the table to say 16 we really want to get some measures around this 17 because it's important to the patients, and it's 18 important to their families.

19 I don't think there's a lot of measure 20 development that I'm hearing in the last couple 21 years around this area. I think if we're going 22 to focus or put some attention on some gap areas,

this one would be one that really needs it. 1 This 2 measure, it's a process measure. It's a first It is such a small, narrow portion of the 3 step. 4 people that potentially are affected nationwide, 5 and there is nothing out there that I've seen on the horizon or hear in meetings to say this is 6 7 what we have to develop -- seven outpatient 8 measures, seven inpatient measures, whatever 9 there is out there. But there needs to be a push 10 from somewhere, and I think this committee can at 11 least state that fact.

12 CO-CHAIR TRAVIS: Thank you for that, 13 Michael. To kind of reiterate what Erin said, I 14 think it's going to be very clear to the staff 15 when they write up our comments and our thoughts 16 around this that this is an area that people feel 17 very strongly about. To your point, things need 18 to start looking different because this isn't the 19 first time that we've had this conversation, 20 although I do think it may be one of the 21 strongest times we've had this conversation, so 22 thank you for that. David.

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1 MEMBER ENGLER: Thank you. I don't 2 want to reiterate what's already been said, but I will for a couple of reasons. I brought this up 3 about two years ago as a measure gap area. 4 5 Psychiatric care and the lack of real good measures in it is phenomenal to me as to why 6 they're not there. Second of all, if you look at 7 the re-admission data, you will find that reasons 8 9 for re-admissions predominantly are psychiatric 10 It's not only affecting inpatient psych care. 11 care, but it's also affecting the re-admission 12 penalties. Unless we can get to continuous care 13 for patients that have psychiatric disorders, in 14 particular drug and alcohol, which is a large 15 portion of the patients that my hospital serve, 16 until we can come to really good agreement and 17 get some measures out there, we're not going to 18 be able to address this gap. 19 I think this is a great first step.

20 Sorry it's a check the box, but you've got to 21 start somewhere. I would really encourage the 22 developers -- and I thank Joint Commission for

coming up with this -- I would encourage more and 1 2 more development on this because this stuff really matters. It really matters. 3 4 CO-CHAIR TRAVIS: Thank you, David. 5 I think what we're going to do is go to Jack, Sean, and then Ann Marie, and then I think that 6 7 hopefully, by that time, we'll be ready for a 8 vote. Jack. 9 DR. FOWLER: I actually have to go. 10 I think the choice about -- there's no question 11 that everybody thinks this is a good -- they want 12 I think it's a bit of a gesture, a measure. 13 myself, and I think the group has to decide 14 whether that's worth doing. I would probably 15 vote no, but it's going to pass, and that's fine. 16 CO-CHAIR TRAVIS: Thank you, Jack, and 17 thank you for bringing up this discussion point. 18 Sean. 19 DR. MORRISON: Thanks for leaving, 20 Jack, when I'm going to counter that. Actually, 21 what I would say is slightly different. When we 22 look at people hospitalized with serious mental

illness, schizophrenia, poorly treated
 depression, we tend not to focus on the comorbid
 illnesses that accompany that. We sort of give
 everybody a pass on tobacco and smoking
 cessation.

We say that drug and alcohol abuse are 6 7 just part of the disease. Actually, even though it is a process measure, and even though it's a 8 9 checkbox, it serves as a lightbulb measure to say 10 we shouldn't be forgetting about these just 11 because they have serious mental illness. We see 12 this with diabetes in the setting of serious 13 mental illness, as well. We just sort of say 14 schizophrenia's the problem. I do think this 15 sort of points a spotlight on the fact that this 16 is an area of importance. It may be a checkbox, 17 but the fact that we're not actually thinking 18 about it on discharge, if this actually shines a 19 light on the fact that we should think about it, 20 that's a really good first step.

21 CO-CHAIR TRAVIS: Thank you. I didn't 22 see Wei's card, so we'll go to Ann Marie, and

then Wei, and then hopefully we'll be at a time 1 2 when we can vote. Use your microphone. DR. SULLIVAN: -- would agree with 3 4 what everyone's saying, especially in terms of 5 the measure development, that unfortunately, there isn't anything out there that's a lot more 6 robust at this point in time than what we have, 7 but it's a very serious problem. You're 8 9 absolutely right. 10 The mental health field has had 11 trouble with this, paying attention to comorbidities, whether they're medical 12 13 comorbidities, substance abuse comorbidities, 14 tobacco, etc. I think it does shine the light. 15 It does force people to do it. Just one fact. 16 When we looked at avoidable admissions --17 Medicaid avoidable admissions in New York State, 18 half of those avoidable admissions -- half had 19 substance abuse and mental health problems 20 admitted to medical units. I think that's also 21 where the development has to go. 22 We're sitting here in -- inpatient

psych, we need a lot there, too, but we also need 1 2 it on the medical side, to your point, the screening for substance abuse, getting the right 3 4 referrals out for substance abuse, for mental 5 health issues. Because the huge cost in the healthcare system on the medical side has all 6 7 these psychiatric and substance abuse comorbidities. I just think that's the other 8 9 place to go, and I'll stop at that. 10 CO-CHAIR TRAVIS: Thank you. Wei. 11 MEMBER YING: My comment actually is 12 more to CMS. If we do support this measure, and 13 everyone already raised -- I wouldn't say 14 concern, but comment that this is not a perfect 15 measure, there may be other measures coming up. 16 If we do support it and it becomes part of the 17 program, please keep the program consistent for 18 some time. This reporting program hasn't been 19 out for long time, but just during its short life 20 span, it has already gone through major change. 21 A lot of measures -- I would say at least a 22 third, if not half of the measure has been pulled

from the initial report. It's very hard for us 1 2 to develop a program -- we actually developed a program with inpatient psych unit hospital 3 facilities in our network based on the initial 4 5 report, and then we have to pull it out, redesign This is not a perfect measure, but a measure 6 it. 7 step forward. Great, but then leave it for some time for us to work on it. 8 9 CO-CHAIR TRAVIS: Very good point. Ι 10 guess I'm a sucker, but these last two cards 11 really do need to be the last two cards, if you 12 all don't mind. Nancy, final comment from you? 13 Just one clarification MEMBER FOSTER: 14 because I want to make sure people knew that for 15 psychiatric hospitals, they already have a 16 screening measure in place, especially for those 17 that are Joint Commission accredited. It's not 18 about getting the initial screening. This 19 measure addresses referral going forward. But in 20 all sensibility, one might think about this 21 measure for non-psychiatric hospitals. 22 CO-CHAIR TRAVIS: Very good point.

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1	MEMBER FOSTER: It might be more there.
2	CO-CHAIR TRAVIS: Thank you for that.
3	Did I see any other cards up? David, is yours
4	still up?
5	Thank you. I'm sure there'll be a
6	time when that will be a very important
7	discussion for us to have. I think we will move
8	on to taking a vote.
9	MR. TILLY: The polling is now open
10	for substance abuse core measure set, Sub 3,
11	alcohol and other drug use disordered treatment
12	provided or offered at discharge, and Sub 3(a),
13	alcohol and other drug use disorder treatment at
14	discharge, MUC15-1065.
15	(Voting.)
16	The results are 71 percent support, 25
17	percent conditional support, 4 percent do not
18	support. The recommendation is support.
19	CO-CHAIR TRAVIS: All right, thank you
20	all for that good discussion. We'll now move to
21	the second measure in this calendar, which is
22	30-day all cause unplanned re-admission following

psychiatric hospitalization in an inpatient 1 2 treatment facility, and this was pulled by Nancy, so I'll turn it over to Nancy first. 3 MEMBER FOSTER: I know you will all be 4 5 I'm going to recommend that this surprised. re-admission measure be especially evaluated for 6 7 its sociodemographic impact. In this case, let me be a little bit more explicit. 8 9 I think that in addition to just the 10 general factors in the community that may exist, 11 one really has to look at the source of ongoing 12 treatment for psychiatric disorders/mental health 13 disorders in the community, whether it's through 14 the HRSA data on shortage areas or some other 15 data. 16 Because if you're discharging patients 17 who've been hospitalized in an inpatient facility 18 and there is a lack of resources in the 19 community, the chance that they'll come back to 20 the acute-care hospital or the psychiatric 21 facility go up enormously. 22

As states and communities dismantle

their support for ongoing treatment of mental 1 2 health disorders, the pattern here varies across the country, but it varies not with -- just with 3 4 the typical sociodemographic factors that one 5 might think of. It varies with accessibility of other services. So I encourage the NOF to make 6 7 sure that the committee thinks about that as they are assessing this measure. Otherwise, I would 8 9 support the conditional support. 10 CO-CHAIR TRAVIS: Okay, conditional 11 support with a look at the ongoing treatment for 12 psychiatric disorders in the community as part of 13 the SDS review when this measure comes in. 14 MS. MITCHELL: Just a word question. 15 Nancy, is there such thing as a planned 16 psychiatric re-admission? 17 CO-CHAIR TRAVIS: Or Ann Marie. 18 DR. SULLIVAN: Nowadays, that's very, 19 very rare -- very rare. Twenty years ago, maybe, 20 but right now, very rare that it's a planned 21 admission. Unfortunately, no. 22 CO-CHAIR TRAVIS: This is the measure,

as it's been -- I'm going to let our friends from
 CMS talk about that.

3 DR. MEYYUR: Yes, there are planned 4 admissions, but they're very few. We did discuss 5 that with the technical expert panel when we 6 developed the measure. Kyle may be able to 7 expand more on that.

8 MEMBER FOSTER: Just jump in here. 9 This is all cause re-admission with, obviously, 10 appropriate exclusions. One might be planned to 11 be admitted to an acute-care facility for ongoing 12 treatment of a medical problem that you wouldn't 13 want counted in here, if you will, against the 14 hospital.

15 CO-CHAIR TRAVIS: I think we have the 16 developer on the phone, if we want to get your 17 input and insights into this issue, please.

DR. CAMPBELL: Yes. This is Kyle Campbell from Health Services Advisory Group. As CMS just mentioned, it is rare. I'm going to turn it over to my colleague, Karen Pace, who worked on the algorithm.

DR. PACE: Hello, this is Karen. 1 Just 2 as an example of what might be a planned re-admission, we started with the Yale algorithm 3 for the hospital-wide re-admission measures and 4 5 followed that process, and also consulted with the technical expert panel. Probably the best 6 7 example is plan to come back for electroconvulsive therapy was probably the 8 9 example that resonates with most people, in terms 10 of planned re-admissions, but agreed, and the 11 data bore out, it doesn't happen very often. The mention about re-admission for -- moving a 12 13 patient for a medical treatment, if the patient 14 moves from an IPF to an acute care hospital, for 15 example, for medical treatment that the IPF might 16 not be able to provide there, that would be 17 considered a transfer and would not be counted as 18 a re-admission. 19 CO-CHAIR TRAVIS: Okay, thank you very 20 much. David. 21 MEMBER ENGLER: Thank you. We offered 22 comments in support of this measure with the

proviso -- and we've published some data on this 1 2 -- that the adjustments really look at community-based support. It amounts to -- and 3 4 don't quote me right now, but I think it amounts 5 to about 40 percent of the variance that you see in this measure can be avoided if you have good 6 7 community support with those two provisions. Ι just wanted to mention that again. Thank you. 8 9 CO-CHAIR TRAVIS: Thank you. Not 10 seeing any other cards, I think we're ready to 11 move to a vote. 12 MR. TILLY: Polling is now open for 13 30-day all cause unplanned re-admission following 14 psychiatric hospitalization in an inpatient 15 psychiatric facility, MUC15-1082. 16 (Voting.) 17 The results are 43 percent support, 52 18 percent conditional support, 4 percent do not 19 The recommendation is conditional support. 20 support. 21 MS. O'ROURKE: I would say the 22 conditions we heard are that this is a measure

that needs particular attention paid to the 1 2 impact of SDS factors, and we'll make that recommendation to the standing committee when 3 4 they evaluate this measure for NQF endorsement, 5 with a particular attention given to the fact that there needs to be consideration of ongoing 6 7 treatment options for mental health disorders in the community. 8 9 CO-CHAIR TRAVIS: Great. Now I'll 10 turn it over to Ron. 11 CO-CHAIR WALTERS: We're on the last 12 I will turn it over first to Jean-Luc program. 13 to give an overview of the ASC program. 14 The Ambulatory Surgical MR. TILLY: 15 Centers Quality Reporting Program is a pay for 16 reporting program, where that data is currently 17 reported to CMS and is expected to be publicly 18 reported in the near future. ASCs that don't 19 report data receive a 2 percent reduction in 20 their annual payment update. The measures in 21 this program are designed to promote high-quality 22 care for Medicare beneficiaries and help

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establish a system for collecting quality data 1 2 that will eventually be reported to consumers. The only measure under consideration for ASCQR is 3 4 the toxic anterior segment syndrome outcome 5 This measure has not been submitted measures. for NOF endorsement. 6 7 CO-CHAIR WALTERS: Are there public comments in the room? 8 9 (No audible response.) 10 Seeing none, would the operator check to see if there's any public comments on the 11 12 phone? 13 OPERATOR: Yes, sir. At this time, if 14 you have a comment, please press star, then the 15 No. 1. There are no comments at this time. 16 CO-CHAIR WALTERS: Thank you very 17 much. There is one measure which was proposed on 18 the MUC list. Staff recommendation was do not 19 That led to it being pulled by Donna support. 20 Slosburg, who will now initiate her reason for 21 pulling it. 22 MEMBER SLOSBURG: I'm pulling this

measure because I think there's some
misunderstanding that may have impacted the
analysis. I want to try to correct those
misunderstandings. Toxic anterior segment
syndrome is an outcome measure that assesses the
number of anterior segment surgery patients
diagnosed with TASS within two days of surgery.

It includes cataract surgery, as well 8 9 as glaucoma surgery, as well as other surgeries 10 on the cornea and iris. I'm sure you all are 11 aware, but cataract surgeries are the No. 1 12 commonly performed procedure for Medicare 13 patients. The number is in the millions, and 14 that number is expected to grow. It's an acute 15 sterile inflammation of the anterior segment of 16 the eye that occurs following surgery.

17 It develops between 12 and 48 hours 18 after surgery. Studies in the literature have 19 reported TASS rates of 1.8 to 2.1 percent. The 20 measure was developed to fill MAP-identified gaps 21 in complications and surgical care quality. It's 22 a complication that can result in significant

anterior segment sequelae and ocular morbidity. 1 2 With intense topical corticosteroid treatment, most cases resolve over a period of weeks to 3 4 months, with the cornea eventually clearing. 5 However, there are severe cases that may result in permanent damage, and additional surgical 6 7 procedures may be required. While there are many potential causes, by far the most common 8 modifiable risk factor for TASS are related to 9 10 instrument cleaning and sterilization processes. 11 Because most cases of TASS are tied to 12 issues with instrument cleaning and sterilization 13 processes, when TASS is diagnosed in an ASC 14 patient, the surgeon is strongly motivated to 15 make the center aware of this complication to 16 prevent TASS in other patients. This assures the 17 measure outcome can be captured by the ambulatory 18 surgery center with a high degree of certainty. 19 Sorry, I just want to make sure because there's a 20 lot of misunderstanding.

21 Eye professionals agree that measure22 efforts should be focused on the prevention of

The American Society of Cataract and 1 TASS. 2 Refractive Surgery and the American Society of Ophthalmic Registered Nurses have published 3 recommended practices for cleaning and 4 sterilization of intraocular surgical instruments 5 aimed at the prevention of TASS, and these 6 7 practices were developed with guidance from the Association of Operating Nurses, the CDC, and the 8 9 FDA, in recognition that while product 10 manufacturer issues may rarely result in TASS, 11 preventing TASS by appropriate management of 12 intraocular surgical instruments is a challenge 13 that must be repeated with each cycle of cleaning 14 and sterilization.

15 The measure is a fully developed and 16 pilot tested facility measure. Reliability and 17 validity testing have been conducted, and the 18 results have been shared with CMS. This measure 19 has the support of the American Academy of 20 Ophthalmology, the American Society of Cataract 21 and Refractive Surgery, the Outpatient Ophthalmic 22 Surgery Society, and the Society for Excellence

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in Eye Care.

2	Inclusion of this measure in the
3	program will oblige surgery centers to maintain
4	meticulous adherence to best practices. Based on
5	the experience of ambulatory surgery centers that
6	participate in an outpatient ophthalmic surgery
7	centers benchmarking project, measurement
8	reporting and benchmarking of TASS rates has the
9	potential to reduce and sustain the occurrence of
10	TASS to near zero. The measure presents an
11	important opportunity in quality improvement to
12	essentially eliminate a preventable complication,
13	and I am asking the workgroup to please support
14	this measure.
15	CO-CHAIR WALTERS: Did anybody catch
16	any behind this? Karen.
17	MEMBER ROTH: I'm Karen Roth. I
18	represent purchasers and as, of course, everyone
19	in this room is concerned about the care of the
20	patient, I think that this is a very important
21	measure because TASS does have the potential to
22	cause blindness, and it does appear that there

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are preventive actions that can be taken to keep this from happening.

3	The one thing that I don't understand
4	is why NQF decided not to support this measure.
5	I'd just like to ask for clarification of that.
6	Also, I think that there's probably a reason why
7	CMS wanted to include it in the MUC list, so I'd
8	like to get some clarification from them why they
9	thought that this was important.
10	CO-CHAIR WALTERS: The process is not
11	foolproof. That's about the best answer.
12	MS. O'ROURKE: I can give you a little
13	bit of our thinking. We had found some studies
14	from the FDA that attributed TASS, in large
15	instances, to the device manufacturer, rather
16	than the ASC, so some concerns about attribution.
17	CO-CHAIR WALTERS: Karen.
18	MEMBER ROTH: Well, based on some of
19	the findings that Donna mentioned, and some other
20	things that I learned from various sources,
21	whether they were from insurance companies that
22	cover these surgeries and things like this, it

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almost invariably was attributed to the ambulatory surgery care center. The other thing that concerned me, though, was that they said that a lot of times, TASS is mistakenly diagnosed as endophthalmitis.

Endophthalmitis is actually a 6 7 bacterial infection that's treated with However, if it's misdiagnosed, then 8 antibiotics. 9 the TASS is not going to respond to the 10 antibiotics. It responds to steroids. That is 11 an issue. There seems to be a need, also, to 12 sort of make sure that this is diagnosed 13 properly, as well. The other thing that I read 14 was that NQF mentioned in the notes that they 15 thought that the cataract measure and the 16 transfer admission measure from an outpatient 17 facility would capture this. Given that TASS 18 develops within 12 to 48 hours, the cataract 19 measure appears to assess vision at 90 days. It 20 doesn't quite address the issue.

21 The other thing is the transfer 22 admission measure, it measures a patient that was

transferred or admitted right after they were 1 2 discharged from the ambulatory surgery care center, so it wouldn't give time for the TASS to 3 4 develop. I saw some deficits there, as well. 5 Those are my comments. I would also like to understand why CMS thought it was important to 6 include this metric. 7 8 CO-CHAIR WALTERS: Karen, could you 9 clarify who the measure developer is? 10 MEMBER SLOSBURG: I should have said 11 that. 12 DR. PHELAN: If I'm not mistaken, 13 wasn't there an ophthalmology and ENT TEP that 14 just finished their evaluative process in the 15 last six months at NQF? Why wasn't this measure 16 submitted during that TEP? 17 MEMBER SLOSBURG: It closed on March 18 27th, and we had not completed testing and 19 development to submit it at that time. 20 CO-CHAIR WALTERS: Helen. 21 MS. HASKELL: I just wanted to say I 22 think this seems to me like an important measure.

If 1.8 to 2.1 percent of cataract surgery 1 2 patients are developing this clearly devastating complication, it's something that we need to be 3 I think the fact that devices are 4 measuring. 5 involved, which happens in a lot of other instances, as well, it doesn't mean that we 6 shouldn't be capturing it. It's about the only 7 way you're going to capture it, and then go back 8 9 and deal with the device. 10 CO-CHAIR WALTERS: Brock. 11 MEMBER SLABACH: The measure is not 12 endorsed by NQF, is it? It said it was never 13 submitted on the sheet that I have. So is it 14 going to be submitted, and will it go through the 15 process of endorsement? MEMBER SLOSBURG: We can take it back 16 17 to our technical expert committee. That's what 18 we've done in the past. 19 CO-CHAIR WALTERS: Sean. I think 20 that's -- we'll probably take care of that in 21 just a second on the vote anyway. Sean. 22 DR. MORRISON: Yes, I am incredibly

uncomfortable endorsing something that has not gone through the NQF endorsement process. We are not the scientists. There's no reliability and validity measures. Let's make this go through the process -- I'm sorry, it's a long day. Let's take the time to have this go through the appropriate endorsement process.

8 CO-CHAIR WALTERS: Marty, did you -9 okay. Yes, Jeff.

10 MEMBER JACOBS: I just wanted to agree 11 that there's probably not a lot of experts about 12 eyeball surgery at this table and seems like 13 measures like this need to go through NQF 14 endorsement before this panel of experts here 15 weighs in on whether or not it's a good hospital 16 measure.

17 CO-CHAIR WALTERS: Donna, as the 18 measure developer, you cannot vote on this 19 measure. I don't think there's anybody else who 20 has comments on that, but we do have to restrict 21 what you say. Are there any more questions or 22 comments? Yes. 1 MR. CLIFT: I'm Joe Clift. I'm the 2 measures lead for the HAC reduction program, and 3 I also support the outpatient and ambulatory 4 surgery center program. There was a few reasons 5 why CMS was particularly interested in this 6 measure.

7 The first reason, as Donna said, is that the number of anterior segment surgeries is 8 9 in the millions each year, so the 2 percent 10 incidence has a high number of patients that 11 could be impacted. These also occurs in 12 clusters, so as Donna said -- also, you might 13 have one patient with TASS, and there might be a 14 bunch of others that follow, so it's something to 15 really focus on.

16 It's a process of care measure. It's 17 something that should not occur in the ambulatory 18 surgery center, so identifying ways to improve 19 cleaning processes, care processes, etc., can get 20 this down to zero. When we looked at past data 21 on the number of -- specifically, I looked at the 22 2012, which is an all payer dataset, but teasing

out the ICD-9 for TASS was almost 60 percent of 1 2 TASS diagnoses were from Medicare and Medicaid patients. So it does have the potential to 3 4 impact this population, something that we were 5 very interested in. With the number of independent eye surgery centers that are opening 6 7 up, it is a -- could potentially be for a large volume impact, so that was our main reasons for 8 9 supporting this measure on this MUC list. 10 CO-CHAIR WALTERS: Brock, did you have 11 another comment? Michael. 12 DR. PHELAN: I understand this is a 13 gap, but I kind of agree with my colleague from 14 This isn't the appropriate body to make Hopkins. 15 It's where I get confused on I that decision. 16 don't want to say conditional support because I 17 want it to go through the NQF process, but I 18 don't want the impression to be gotten if we say 19 do not support until it goes through the NQF 20 process. 21 It's always given me great consternation that we don't have the fourth 22

option, which would be await NQF, bring back to 1 2 the MAP so we could review it then. Because it kind of gives a free pass on No. 2 for 3 4 conditional support. It's just like yes, it's a 5 great idea. Let's say in six months, after the data comes in and a technical expert panel 6 7 reviews it and says serious issues with this, this is a problem due to gaming or people are 8 9 calling things one thing, but it's really 10 another. I always really struggle with where to 11 put my vote on this because I really want it to 12 go through the NQF process and then be brought 13 back so I can hear what they actually said about 14 it. That's my --15 CO-CHAIR WALTERS: I think we actually did stick both of those on a measure yesterday, 16 17 actually. We did. 18 MS. O'ROURKE: We can't guarantee 19 things would come back to the MAP, but we could 20 certainly put it as a condition to request that 21 it come back to the MAP, but I do want to be 22 CMS is not obligated to do that. clear.

1	CO-CHAIR WALTERS: Okay, ready for a
2	vote? I knew you were going to have a comment.
3	MEMBER HATLIE: You're prescient. I'm
4	just struck by the sense of urgency here that
5	this is something that could harm a number of
6	patients quickly, especially if there's a
7	clustering and there's new players in the market
8	where this could be at risk. I'm hoping that our
9	conditions will express a sense of urgency, just
10	not go into a two or three or four-year process.
11	Is there something we can say to move it along if
12	the imminent harm is as strong as it is?
13	CO-CHAIR WALTERS: Jeff.
14	MEMBER JACOBS: I wanted to agree with
15	one comment to go about the problem with the
16	three voting choices because there really should
17	be a choice that says we're totally agnostic
18	about a measure and have no opinion about it,
19	whatsoever, until it undergoes evaluation through
20	a scientific review.
21	That's something that we don't have
22	the expertise about. There's surgical committees,

and there's medical committees, and there's 1 2 cancer committees that actually look at the science of the measures. Any of the choices here 3 4 say we either like it or we don't like it, but we 5 should be able to say we can't really judge it at all until the scientists have looked at it. 6 Ι think that was a very good point that was made. 7 8 CO-CHAIR WALTERS: There is an option 9 that covers that. It's the bottom one, although 10 it may not send the same message. 11 MEMBER JACOBS: But that has a little 12 bit of a negative connotation. That's what was 13 being brought up. That has a negative 14 That doesn't say we don't support connotation. 15 it because we're waiting on more information. 16 That just means we don't support it. What we're 17 saying is maybe in the future we should just have 18 a choice that says we don't want to say whether 19 or not we support it all until the scientists 20 look at it. 21 CO-CHAIR WALTERS: With those 22 comments, you get the opportunity to vote now.

Push the four button and see what happens. 1 2 MR. TILLY: The polling is open for 3 toxic anterior segment syndrome, TASS outcome, 4 MUC15-1047. The options are support, conditional 5 support, and do not support. There is no fourth option. 6 (Voting.) 7 The results are 13 percent support, 65 8 9 percent conditional support, 22 percent do not 10 support. The recommendation is conditional 11 support. 12 CO-CHAIR WALTERS: Erin. 13 MS. O'ROURKE: The conditions we heard 14 are that this measure needs NOF review and 15 endorsement and, ideally, for CMS to bring this 16 back to the MAP so that MAP has a chance to weigh 17 in after they have data from experts in the 18 subject matter. 19 MEMBER HATLIE: Could we say something 20 about urgency and an expedited process? MS. O'ROURKE: Of course. We can 21 22 recognize the importance and the urgency of this

issue.

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CO-CHAIR TRAVIS: I think we know what 3 to do.

4 CO-CHAIR WALTERS: There is an 5 opportunity for public comment again. Are there any public comments in the room about anything? 6 7 CO-CHAIR TRAVIS: Well, on this list. Operator, is there 8 CO-CHAIR WALTERS: 9 anybody on the phone with public comments about 10 any of the programs we've talked about? 11 OPERATOR: Once again, to make a 12 comment, please press star, then the No. 1. There are no comments at this time. 13 14 CO-CHAIR WALTERS: I would personally 15 like to thank everybody for their involvement. 16 The discussion, again, has been very rich. Ι 17 hope everybody leaves feeling that they got an 18 adequate chance to contribute and contribute 19 significantly to the discussion and to the 20 recommendations we give to CMS, so thank you 21 again.

CO-CHAIR TRAVIS: I want to add my

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thanks to everybody in the room. Please note the 1 2 time. It's 1:37. Thank you all very much. We were able, I think, to give it the time it 3 4 needed, but to still end early, so that's really 5 a tribute to everybody in the room, so thank you I want to add my personal thanks, and 6 for that. 7 I'm sure Ron's, as well, to the staff. They actually get the last words here. 8 9 But before I hand it over to them, I do also want 10 to thank, Pierre, you and your team and the 11 developers that have been on the line. It's 12 always helpful to have you here because it helps 13 us be sure that we understand CMS, why measures 14 were put here, some of the details of the 15 measures that we need to go through, so thank you 16 all so much, as well. 17 DR. YOUNG: Thank you for that, and 18 thank you to all the committee members for all 19 the input you've provided and time taken, and 20 thank you, also, for putting me and my staff 21 through our paces. As I mentioned, we start this 22 training in the spring. I do want to thank,

particularly, my staff and our measure developers for all the support they've provided here. Thank you.

4 CO-CHAIR TRAVIS: Thank you, Pierre,
5 and your team. I'm going to turn it over to
6 Zehra.

7 MS. SHAHAB: I just wanted to do next steps, and I don't want to have the last word. 8 Ι 9 want everyone else to have the last word. I just 10 wanted to run through the next steps really 11 quickly. This is the same timeline you've seen, 12 but on the next slide, you will see some 13 important dates.

14 After this, we are going to be opening 15 up for a member and public comment, which will 16 start December 23rd from January 12th. This will 17 include the Excel and a draft version of the 18 report, as well, that we are going to write 19 quickly after today, so starting tomorrow and 20 later today. Then the coordinating committee is 21 going to review the recommendations on January 22 26th, so the chairs will be representing the

workgroup, and we would welcome all of you
 workgroup members to dial in and listen to our
 summary and description of the coordinating
 committee. The final spreadsheet of
 recommendations on all these individual measures
 under consideration is going to be released
 February 1.

The guidance for hospital and PAC/LTC 8 9 programs will be released February 15th, and the 10 final guidance for clinician and special programs 11 will be March 15th. Those are just some upcoming 12 dates to look forward to. I want to start, on 13 behalf of the staff, and thank all of you for all 14 of your hard work and rich discussions. We have 15 gathered a lot, and we can't thank you enough. I 16 want to make sure that Taroon and the rest of my 17 team has a time to say more, as well.

MS. O'ROURKE: I'll jump in. Thank you, as Zehra said, to the committee for taking the time to participate in this meeting. We greatly value your input. This is my fifth time now, and it's remarkable to watch how the process

has grown and the input we've received over the 1 2 years and how valuable it's been. A special thank you to Pierre and the CMS staff and the 3 4 developers for their open participation and being 5 willing to take so many questions and be such active, involved participants in this process. 6 7 It really, I think, adds a richness. The more they are willing to participate, the better our 8 9 recommendations can be. A special thank you to 10 Ron and Cristie for their amazing leadership for 11 the past few days and for setting a MAP hospital 12 workgroup record of getting us out about an hour 13 and a half early.

14I know. I'm going to be double15checking that. You might be getting frantic16emails from me later to come back. We did not.17Just joking. Thank you to everyone. We greatly18appreciate everything you've done to make this a19reality.

20 MS. MARINELARENA: I just want to 21 thank everyone, as well. I feel spoiled because 22 it was my first MAP. I feel that apparently,

we've come a long way, so I feel very lucky, and I'm thankful to all of you for all of your hard work, CMS, my co-workers, and we look forward to 4 putting this report out and getting all the comments and finishing up this process so Pierre can get started with his spring training in April.

I also wanted to make 8 MS. SHAHAB: 9 sure that if any of you would want to say any 10 closing remarks -- I know Cristie and Ron got a 11 chance, as well, but if any of you would like to 12 provide us feedback, improvements, any last 13 words? You don't have to raise your cards. You 14 can just speak up. Go ahead.

15 MEMBER HATLIE: Just a general comment 16 about the base of our activity. One of the 17 things that I'm noticing -- and it's a 18 frustration I've had with this group because I 19 feel like I'm at the end of a process where I 20 wish patients were engaged in measure development 21 more, but that is happening more and more. 22 I think PCORI gets a lot of the credit

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1 for it, honestly. We're starting to see 2 different metrics come out that are different from a crude metric for mortality, so days out of 3 4 hospital, days not in the healthcare system, 5 things like that that I think are attributable to engaging patients early on. For the measurement 6 7 developers in the room, I just think that's a really great area to think about is pulling in 8 9 people who suffer from the conditions or are 10 acquainted with the conditions that you're 11 developing measures from. I think that you'll 12 find a lot of patients will be eager to be part 13 of a process like that. Thank you for my soap 14 box at the end of the day. 15 MS. SHAHAB: Thank you. Anyone else? 16 Dolores, Nancy, anyone? 17 MEMBER FOSTER: Sure. Now that I'm 18 called upon, thank you all. I think this process 19 worked a lot more smoothly. I miss a little bit 20 of the opportunity to really go back to what -- I 21 can't even remember -- somebody else was 22 commenting before that we need to, again, be able

to identify gaps that really are important in the care.

When we're so focused on the list in 3 4 front of us, it's hard to think more broadly, but 5 I think we're kind of missing that, and I hope we can talk about how we get to that point later on. 6 I also would welcome -- as you craft the report, 7 NQF staff, in your great skill, I think there are 8 9 a number of themes that ran throughout the 10 discussions of individual measures. Calling 11 those out and helping us all to get better by 12 thinking about what those themes are and how we 13 can address them going forward would be really, 14 really constructive for all of us. I'd love to 15 hear the themes from the other workgroups, too. 16 MS. O'ROURKE: Please, if you do have 17 additional suggestions for improvement or what 18 worked well or what didn't, please feel free to 19 email us at any time, so that we can keep getting 20 better for next year. 21 (Whereupon, the above-entitled meeting 22 went off the record at 1:43 p.m.)

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CERTIFICATE

This is to certify that the foregoing transcript

In the matter of: Measure Applications Partnership Hospital Workgroup

Before: NQF

Date: 12-17-15

Place: Washington, DC

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

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Court Reporter

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