

### Agenda

Measure Applications Partnership
Post-Acute Care/Long-Term Care Workgroup
In-Person Meeting
December 13, 2017 | 8:30 am - 5:00 pm ET

### Participant Instructions:

Materials for all MAP Workgroup meetings are available on the <u>NQF Public SharePoint Page</u> as well as the project web pages.

#### **Streaming Playback Online**

• Direct your web browser to the following URL: http://nqf.commpartners.com/se/Meetings/Playback.aspx?meeting.id=457077 .

#### **Meeting Objectives:**

- Review and provide input on Measures Under Consideration for federal programs applicable to PAC/LTC settings
- Discuss strategic issues related to post-acute and long term care

| 8:30 am  | Breakfast   |
|----------|---|
| 9:00 am  | Welcome, Disclosures of Interest, and Review of Meeting Objectives Gerri Lamb, Workgroup Co-Chair Paul Mulhausen, Workgroup Co-Chair Erin O'Rourke, Senior Director, NQF Jean-Luc Tilly, Senior Project Manager, NQF Miranda Kuwahara, Project Analyst, NQF Elisa Munthali, Vice President, NQF |
| 9:15 am  | CMS Opening Remarks and Review of Meaningful Measures Framework Pierre Yong, CMS  |
| 9:35 am  | <ul> <li>MAP Rural Health Introduction and Presentation</li> <li>Karen Johnson, Senior Director, NQF</li> <li>Introduce and discuss the newly created MAP Rural Health Workgroup</li> </ul>   |
| 10:00 am | Update on Implementation of the IMPACT Act Stace Mandl, CMS Tara McMullen, CMS  • Measure alignment and future direction  |
| 10:30 pm | Update on the PROMIS Tool   |

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Stace Mandl, CMS Tara McMullen, CMS

Results of national field test

#### 11:15 am Applications of MIPS in PAC-LTC

#### 11:45 am Overview of Pre-Rulemaking Approach

Jean-Luc Tilly

- MAP will use a three step approach:
  - Provide program overview
  - Review current measures
  - Evaluate Measures Under Consideration (MUC) for what they would add to the program measure set
- Review of decision categories and guidance on refine and resubmit

#### 12:15 pm Lunch

#### 12:45 pm Skilled Nursing Quality Reporting Program (SNF QRP)

- Overview of the SNF QRP
- Opportunity for Public Comment: Measures under Consideration
- Pre-Rulemaking Input: SNF QRP Measures Under Consideration Consent Calendar
  - o CoreQ: Short Stay Discharge Measure (MUC ID: MUC17-258)
- Feedback on Gaps in the SNF QRP

#### 1:30 pm Hospice Quality Reporting Program (HQRP)

- Overview of the HQRP
- Feedback on Gaps in the HQRP

#### 1:45 pm Long-Term Care Hospital Quality Reporting Program (LTCH QRP)

- Overview of the LTCH QRP
- Feedback on Gaps in the LTCH QRP

#### 2:00 pm Inpatient Rehabilitation Facility Quality Reporting Program (IRF QRP)

- Overview of the IRF QRP
- Feedback on Gaps in the IRF QRP

#### 2:15 pm Home Health Quality Reporting Program (HH QRP)

- Overview of the HH QRP
- Feedback on Gaps in the HH QRP

#### 2:30 pm Opportunity for Public Comment

#### 2:45 pm Break

#### 3:00 pm Input on Measure Removal Criteria

PAGE 3

3:30 pm Review of NQF's Attribution Work and Guidance on Attribution Challenges in PAC/LTC

**Settings** 

Erin O'Rourke, Senior Director, NQF

Jean-Luc Tilly, Senior Project Manager, NQF

4:00 pm Update on Equity Program

Jean-Luc Tilly, Senior Project Manager, NQF

4:30 pm Opportunity for Public Comment

4:45 pm Summary of Day

Gerri Lamb, Workgroup Co-Chair Paul Mulhausen, Workgroup Co-Chair Miranda Kuwahara, Project Analyst, NQF

5:00pm Adjourn



## Measure Applications Partnership

PAC-LTC Workgroup In-Person Meeting

December 13, 2017

Welcome, Introductions, Disclosures of Interest and Review of Meeting Objectives

### **MAP Post-Acute Care/Long-Term Care Workgroup Membership**

### **Workgroup Chairs (voting)**

Gerri Lamb, PHD

Paul Mulhausen, MD, MHS

| Organizational Members (voting)                               | Organizational Representative                  |
|---|--|
| AMDA – The Society for Post-Acute and Long-Term Care Medicine | Dheeraj Mahajan, MD, FACP, CMD, CIC, CHCQM     |
| American Academy of Physical Medicine & Rehabilitation        | Kurt Hoppe, MD                                 |
| American Geriatrics Society                                   | Deb Saliba                                     |
| American Occupational Therapy Association                     | Pamela Roberts, PhD, OTR/L, SCRES, CPHQ, FAOTA |
| American Physical Therapy Association                         | Heather Smith, PT, MPH                         |
| Centene Corporation   | Michael Monson                                 |
| Compassus   | Kurt Merkelz, MD                               |
| HealthSouth Corporation                                       | Lisa Charbonneau, DO, MS                       |
| Families USA  | Frederick Isasi, JD, MPH                       |
| Kindred Healthcare  | Sean Muldoon, MD                               |
| National Association of Area Agencies on Aging                | Sandy Markwood, MA                             |
| National Consumer Voice for Quality Long-Term Care            | Robyn Grant, MSW                               |
| National Hospice and Palliative Care Organization             | Carol Spence, PhD                              |
| National Partnership for Hospice Innovation                   | Theresa Schmidt                                |
| National Pressure Ulcer Advisory Panel                        | Arthur Stone, MD                               |
| National Transitions of Care Coalition                        | James Lett, II, MD, CMD                        |
| Visiting Nurses Association of America                        | Danielle Pierottie, RN, PhD, CENP, AOCN, CHPN  |

### MAP Post-Acute Care/Long-Term Care Workgroup Membership

### **Individual Subject Matter Experts (voting)**

Constance Dahlin, MSN, ANP-BC, ACHPN, FPCN, FAAN

Kim Elliott, PhD, CPH

Caroline Fife, MD, CWS, FUHM

Eugene Nuccio, PhD

Thomas von Sternberg, MD

Ashish Trivedi, Pharm. D.

### **Federal Government Members (non-voting)**

Centers for Medicare & Medicaid Services (CMS)

Alan Levitt, MD

Office of the National Coordinator for Health Information Technology (ONC)

Elizabeth Palena Hall, MIS, MBA, RN

# MAP PAC/LTC Workgroup Staff Support Team

- Erin O'Rourke: Senior Director
- Jean-Luc Tilly: Senior Project Manager
- Miranda Kuwahara: Project Analyst
- Project Email: MAPPAC-LTC@qualityforum.org

## Agenda (Morning):

- Welcome, Introductions, Disclosures of Interest, and Review of Meeting Objectives
- CMS Opening Remarks and Review of Meaningful Measures
   Framework
- Overview of Pre-Rulemaking Approach
- Pre-Rulemaking Input:
  - Skilled Nursing Facility QRP
  - Hospice QRP
  - Long-Term Care Hospital QRP
  - Inpatient Rehabilitation Facility QRP
  - Home Health QRP

## Agenda (Afternoon):

- Lunch
- Update on Implementation of the IMPACT Act
- Review of NQF's Attribution Work and Guidance on Attribution Challenges in PAC/LTC Settings
- Update on Equity Program
- Input on Measure Removal Criteria
- Opportunity for Public Comment
- Summary of Day and Next Steps

## Meeting Objectives



Review and provide input on measures under consideration for use in federal programs



Finalize input to the MAP Coordinating Committee on measures for use in federal programs



Identify gaps in measures for federal PAC-LTC quality programs

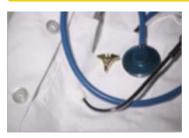
# CMS Opening Remarks Pierre Yong, CMS

## CMS Opening Remarks and Review of Meaningful Measures Framework





## **Meaningful Measures**







November 28, 2017

Jean Moody-Williams, RN, MPP Pierre Yong, MD, MPH, MS Theodore G Long, MD, MHS

### A New Approach to Meaningful Outcomes

Empower patients and doctors to make decision about their health care



Usher in a new era of state flexibility and local leadership

Support innovative approaches to improve quality, accessibility, and affordability

Improve the CMS customer experience

### **Meaningful Measures Objectives**

## Meaningful Measures focus everyone's efforts on the same quality areas and lend specificity, which can help:

- Address <u>high impact</u> measure areas that <u>safeguard public health</u>
- Patient-centered and meaningful to patients
- Outcome-based where possible
- Relevant for and <u>meaningful to providers</u>
- Minimize level of <u>burden for providers</u>
  - Remove measures where performance is already very high and that are low value
- Significant opportunity for improvement
- Address measure needs for <u>population based payment through</u> <u>alternative payment models</u>
- Align across programs and/or with other payers (Medicaid, commercial payers)

### **Meaningful Measures Framework**

### Meaningful Measure Areas Achieve:

- ✓ <u>High quality</u> healthcare
- ✓ <u>Meaningful outcomes for patients</u>

Criteria meaningful for patients and actionable for providers

#### Draws on measure work by:

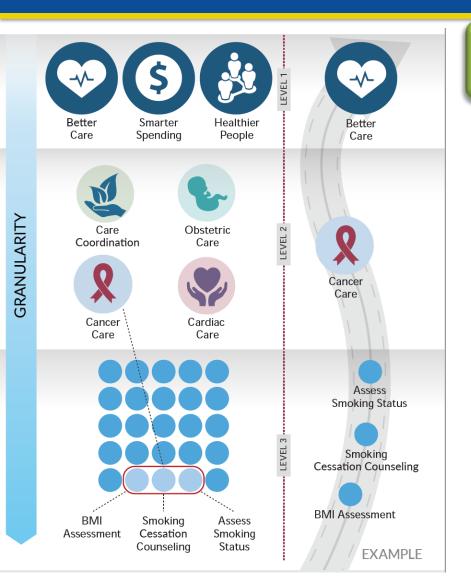
- Health Care Payment Learning and Action Network
- National Quality Forum High Impact Outcomes
- National Academies of Medicine IOM Vital Signs Core Metrics

### Includes perspectives from experts and external stakeholders:

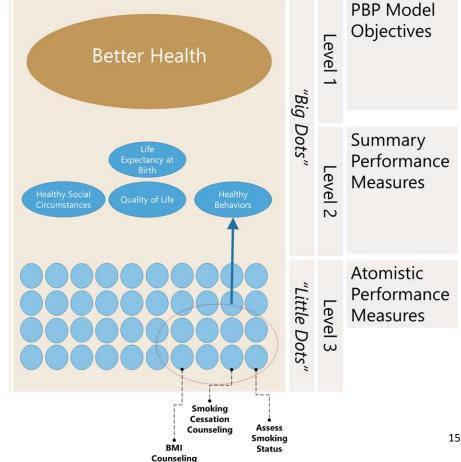
- Core Quality Measures Collaborative
- Agency for Healthcare Research and Quality
- Many other external stakeholders



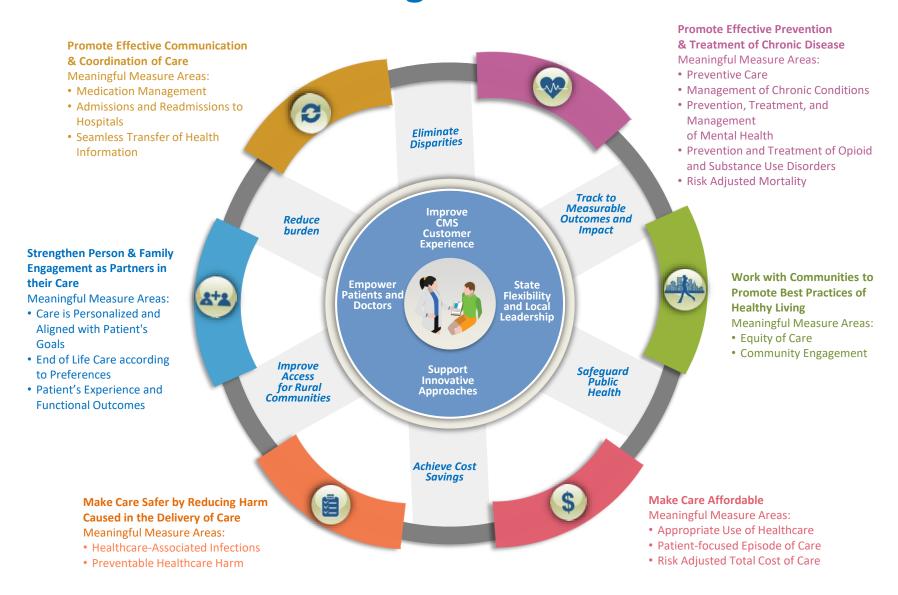
## Use Meaningful Measures to Achieve Goals, while Minimizing Burden



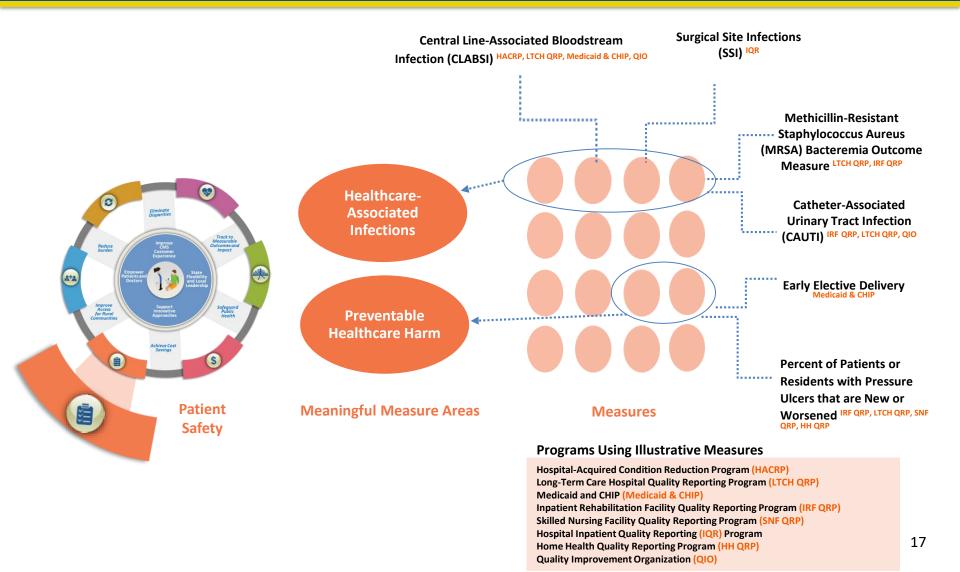
## Drawing from the HCP LAN "Big Dot" Work



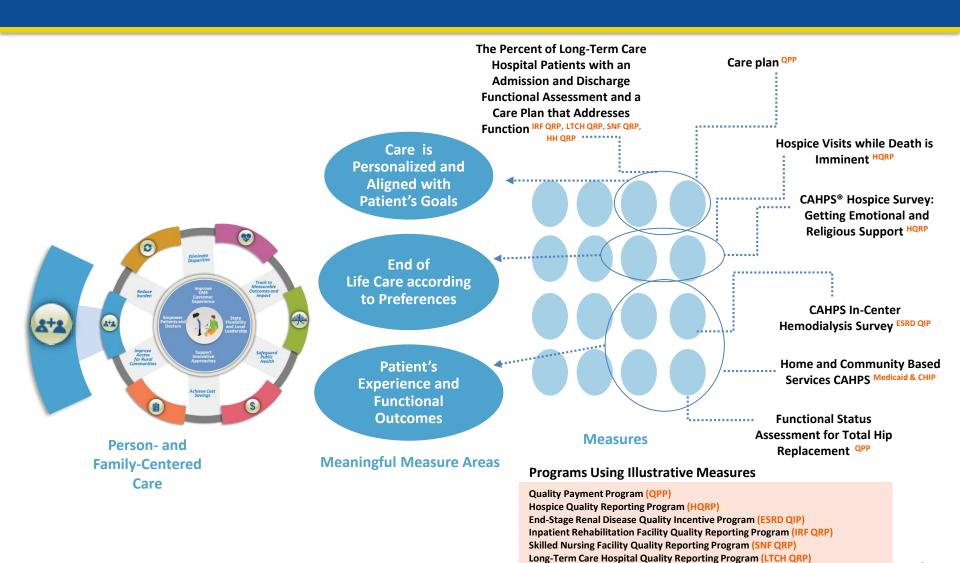
### **Meaningful Measures**



## Make Care Safer by Reducing Harm Caused in the Delivery of Care



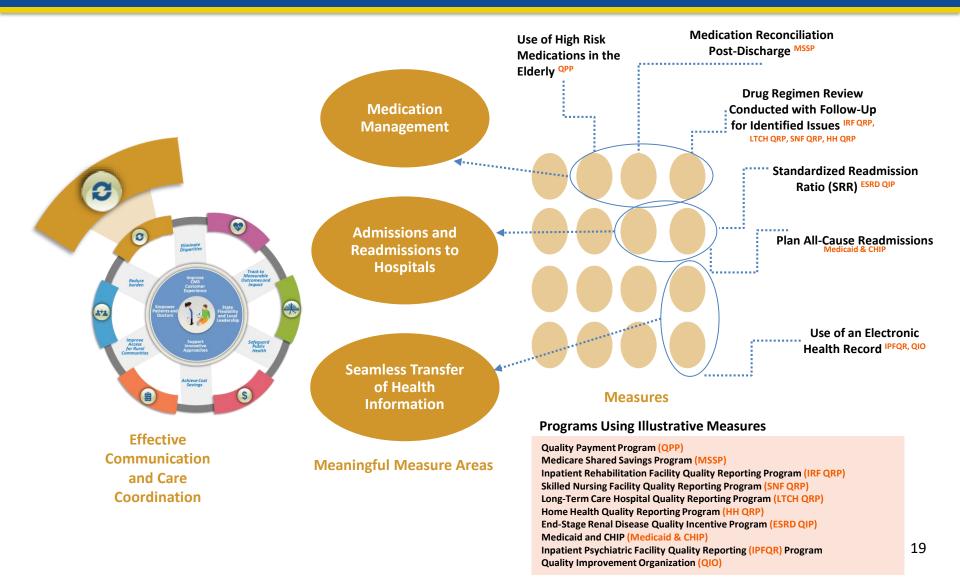
## Strengthen Person & Family Engagement as Partners in their Care



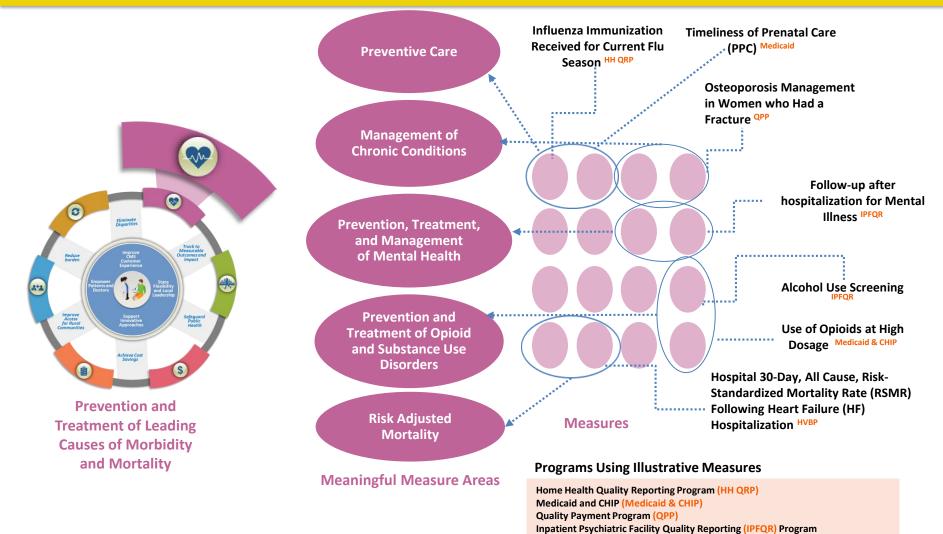
Medicaid and CHIP (Medicaid & CHIP)

Home Health Quality Reporting Program (HH QRP)

## Promote Effective Communication & Coordination of Care

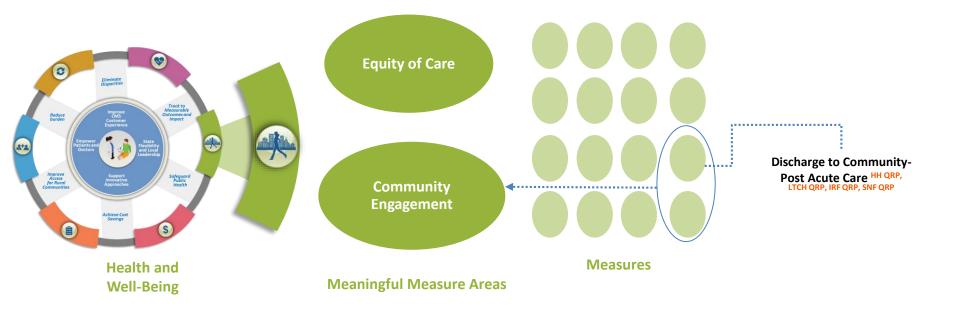


## Promote Effective Prevention & Treatment of Chronic Disease



Hospital Value-Based Purchasing (HVBP) Program

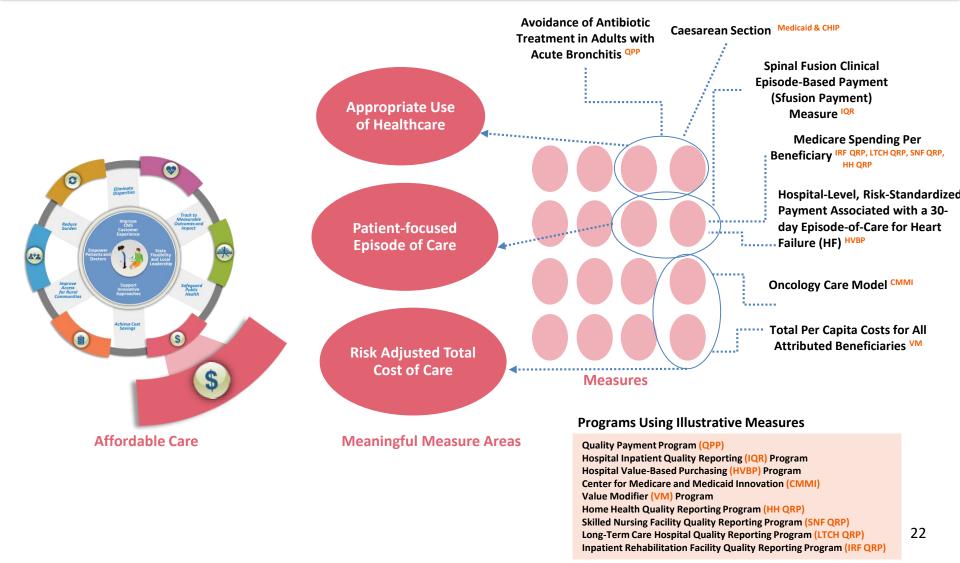
# Work with Communities to Promote Best Practices of Healthy Living



#### **Programs Using Illustrative Measures**

Home Health Quality Reporting Program (HH QRP)
Skilled Nursing Facility Quality Reporting Program (SNF QRP)
Long-Term Care Hospital Quality Reporting Program (LTCH QRP)
Inpatient Rehabilitation Facility Quality Reporting Program (IRF QRP)

### Make Care Affordable



### **Meaningful Measures Next Steps**

- Get stakeholder input to further improve the Meaningful Measures framework
- Work across CMS components to implement the framework
- Evaluate current measure sets and inform measure development



### **Meaningful Measures Summary**



Meaningful Measure Areas

Guiding CMS's efforts to achieve better health and healthcare for the patients and families we serve

### Give us your feedback!

Pierre.Yong@cms.hhs.gov Theodore.Long@cms.hhs.gov



## **Meaningful Measures**

## **Question & Answer**

To ask a question, please dial:

1-877-388-2064



## MAP Rural Health Introduction and Presentation

## 2015 Rural Project: Purpose and Objectives

- To provide multistakeholder information and guidance on performance measurement issues and challenges for rural providers
  - Make recommendations regarding measures appropriate for use in CMS pay-for-performance programs for rural hospitals and clinicians
  - Make recommendations to help mitigate measurement challenges for rural providers, including the low-case volume challenge
  - Identify measurement gaps for rural hospitals and clinicians

## Key Issues Regarding Measurement of Rural Providers

- Geographic isolation
- Small practice size
- Heterogeneity
- Low case-volume

## Previous Rural Work: Overarching Recommendation

 Make participation in CMS quality measurement and quality improvement programs mandatory for all rural providers, but allow a phased approach for full participation across program types and explicitly address low-case volume

## Previous Rural Work: Supporting Recommendations for Measure selection

- Use guiding principles for selecting quality measures that are relevant for rural providers
- Use a core set of measures, along with a menu of optional measures, for rural providers
- Consider measures that are used in Patient-Centered Medical Home models
- Create a Measures Applications Partnership (MAP) workgroup to advise CMS on the selection of ruralrelevant measures

# Objectives for 2017-2018 MAP Rural Health Workgroup

- Advise MAP on selecting performance measures that address the unique challenges, issues, health care needs and other factors that impact of rural residents
  - Develop a set of criteria for selecting measures and measure concepts
  - Identify a core set(s) of the best available (i.e., "rural relevant")
     measures to address the needs of the rural population
  - Identify rural-relevant gaps in measurement
  - Provide recommendations regarding alignment and coordination of measurements efforts across programs, care settings, specialties, and sectors (both public and private)
  - Address a measurement topic relevant to vulnerable individuals in rural areas

# Interaction With Other MAP Workgroups and Coordinating Committee

- NQF staff will introduce the Rural Workgroup and represent rural perspective at Nov-Dec 2017 Workgroup and Coordinating Committee meetings
- The MAP Coordinating Committee will consider input from the MAP Rural Health Workgroup during prerulemaking activities
- MAP Coordinating Committee will review and approve the Rural Health Workgroup's recommendations before finalizing (August 2018)

## Progress to date

- Seated the Workgroup
  - 18 organizational members
  - 7 subject matter experts
  - 3 federal liaisons
- Convened orientation meeting on November 29
- Obtained initial guidance on criteria for identifying core set measures
  - NQF endorsement
  - Addresses low case volume
  - Cross-cutting
  - Several "must-have" topic areas/conditions

# Discussion Questions: Your Advice to the Rural Health MAP Workgroup

- What are the key issues measurement for PAC/LTC programs that you want to RH WG to keep in mind?
- Does the initial guidance from the RH WG concerning core measures (e.g., cross-cutting, etc.) ring true? Any concerns? Any additions?
- Going forward, what information/guidance/input from the RH WG be helpful to your work on MAP?
- What advice can you give this new WG vis-à-vis serving on a MAP Workgroup?

### Update on Implementation of the IMPACT Act

## The Improving Medicare Post-Acute Care Transformation Act of 2014 (IMPACT Act)

- Passed on September 18, 2014, and signed into law October 6, 2014.
- The Act requires the submission of standardized patient assessment data elements by:

  - Long-Term Care Hospitals (LTCHs): LCDS Skilled Nursing Facilities (SNFs): MDS Home Health Agencies (HHAs): OASIS Inpatient Rehabilitation Facilities (IRFs): IRF-PAI
- **Requires Standardized Patient Assessment Data that will enable:** 
  - Quality care and improved outcomes
  - Data Element uniformity
  - Comparison of quality and data across post-acute care (PAC) settings
  - Improved discharge planning
  - Exchangeability of data
  - Coordinated care
  - Inform payment models

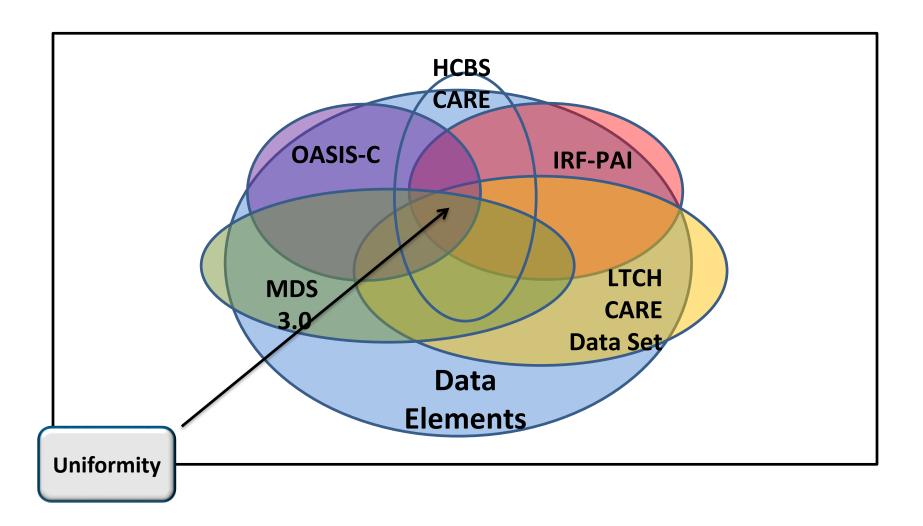
Improving Medicare Post-Acute Care Transformation (IMPACT) Act of 2014

# Requirements for Standardized Assessment Data

IMPACT Act added new section 1899(B) to Title XVIII of the Social Security Act (SSA)

- Post-Acute Care (PAC) providers must report:
  - Standardized assessment data
  - Data on quality measures
  - Data on resource use and other measures
- The data must be standardized and interoperable to allow for the:
  - Exchange of data using common standards and definitions
  - Facilitation of care coordination
  - Improvement of Medicare beneficiary outcomes
- PAC assessment instruments must be modified to:
  - o Enable the submission of standardized data
  - Compare data across all applicable providers

#### Data Elements: Standardization



### Addressing Critical Gaps: The IMPACT Act

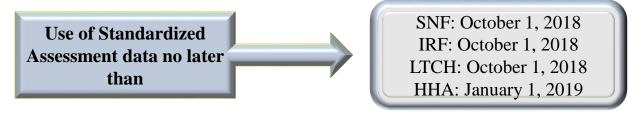
An opportunity to address complex goals



## The IMPACT Act: Standardized Patient Assessment Data

#### Requirements for reporting assessment data:

• Providers must submit standardized assessment data through PAC assessment instruments under applicable reporting provisions



• The data must be submitted with respect to admission and discharge for each patient, or more frequently as required

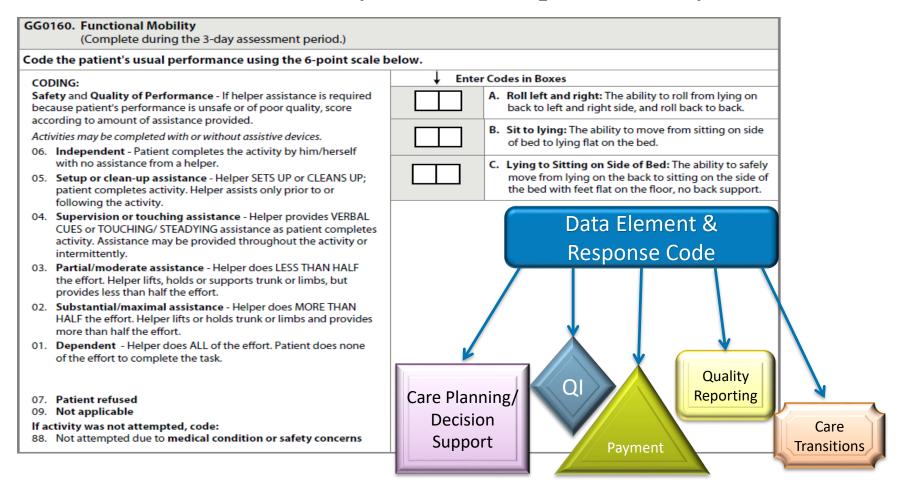
#### Data categories:

- Functional status
- Cognitive function and mental status
- Special services, treatments, and interventions

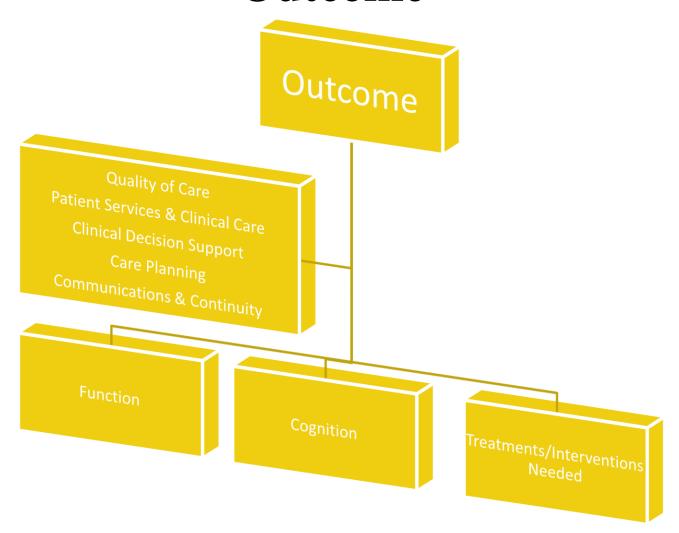
- Medical conditions and co-morbidities
- Impairments
- Other categories required by the Secretary

#### Standardized Assessment Data Elements

One Question: Much to Say → One Response: Many Uses



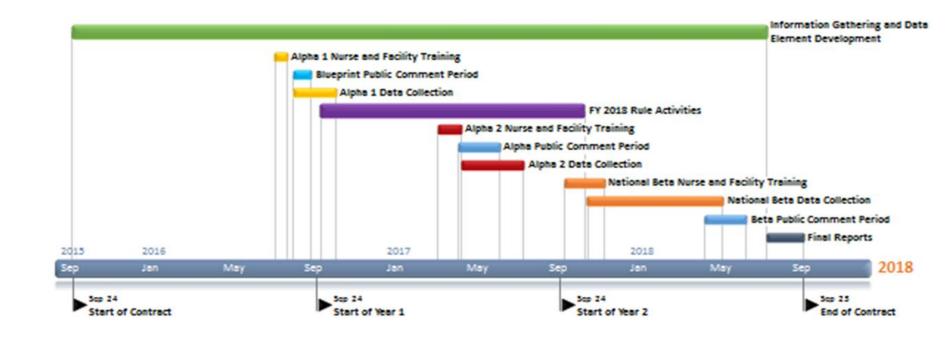
# Medical Complexity, Quality, and Outcome



#### Overview of the RAND Contract

- Project goal is to develop, implement, and maintain standardized PAC patient assessment data
- Project phases:
  - 1. Information Gathering: Sep 2015 Apr 2016
  - 2. Pilot Testing (Alpha 1 and Alpha 2): Aug 2016 July 2017
  - 3. National Beta Testing: Begins Fall 2017

# Standardized Assessment Categories: General Timeline



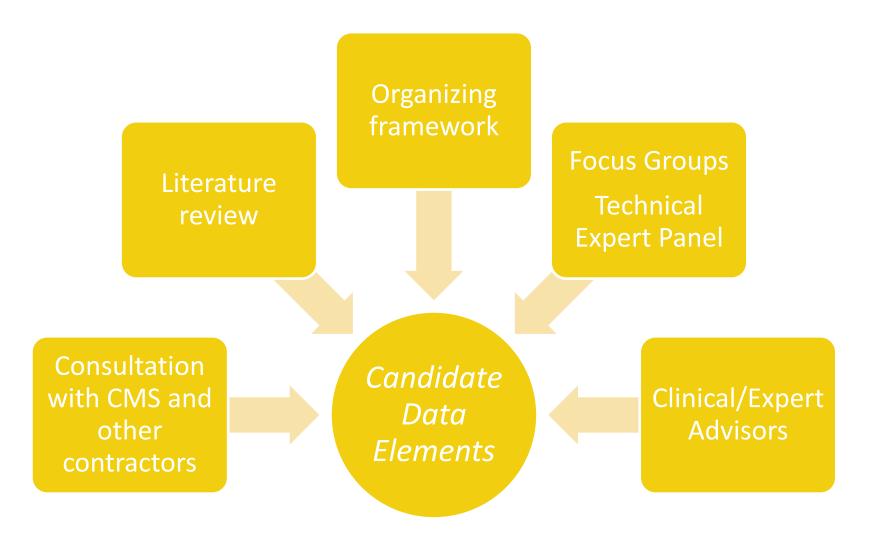
# The IMPACT Act Data Element Development and Activities

| Date             | Event   | Activity Type          |
|------------------|---|------------------------|
| Sept 28, 2017    | September SODF  | Stakeholder Engagement |
| Oct 2017         | National Data Element Testing (Beta) - Research nurse in-person training                    | National Field Test    |
| Nov 2017         | National Data Element Testing (Beta) - Begin field trainings in 14 markets                  | National Field Test    |
| Nov 2017         | National Data Element Testing (Beta) - All facilities recruited (est.)                      | National Field Test    |
| Nov 2017         | National Data Element Testing (Beta) - Data collection begins (through May 2018)            | National Field Test    |
| Dec 2017         | Public Comment Report published to CMS website  | Stakeholder Engagement |
| Dec 2017         | Data Collection Protocols for National Data Element Testing (Beta) published to CMS website | National Field Test    |
| Dec 2017         | Data Element Standardization FAQ page posted to CMS website                                 | Stakeholder Engagement |
| Dec 2017         | December SODF   | Stakeholder Engagement |
| Winter 2017-2018 | Alpha 2 Provider Debrief  | Alpha Testing          |
| Jan 2018         | Pilot Data Element Testing (Alpha) - Final report   | Alpha Testing          |
| Mar 2018         | SODF; Stakeholder webinar series  | Stakeholder Engagement |
| Mar 2018         | Beta participant survey   | National Field Test    |
| May-June 2018    | Public Comment Period   | Stakeholder Engagement |
| Jun 2018         | SODF; Stakeholder webinar series  | Stakeholder Engagement |
| Summer 2018      | Beta participant focus groups   | Stakeholder Engagement |
| Sep 2018         | TEP   | Stakeholder Engagement |
| Fall 2018        | Public Comment Period report published to CMS website                                       | Stakeholder Engagement |
| Winter 2018-2019 | National Data Element Testing (Beta) summary report   | National Field Test    |
|                  |   |                        |

# Standardized Patient Assessment Data Elements: The Framework

- Testing for standardized patients assessment data elements are for the clinical categories outlined in IMPACT Act:
  - Cognitive function
  - Mental status (e.g., mood)
  - Medical conditions (e.g., pain)
  - Impairments (e.g., incontinence and sensory impairments)
  - Special services, treatments and interventions (e.g., dialysis)
  - Other clinical topics (e.g., care preferences, medication reconciliation and global health)

### Information Gathering Identified Candidate Data Elements for Standardization



#### **Evaluation of Candidate Data Elements**

# Potential for improving quality

- Improve care transitions, person-centered care and care planning
- Improve care practices and patient safety
- Use for quality comparisons, including value based payment models
- Supports clinical decision making and care coordination

#### Validity and reliability

- Inter-rater reliability (consensus in ratings by two or more assessors)
- Validity (captures the construct being assessed)

#### Feasibility for use in PAC

- Potential to be standardized and made interoperable across settings
- Clinically appropriate
- Relevance to work flow

# Utility for describing case mix

- Potential use for payment models
- Measures differences in severity levels related to resource needs

# Two Tracks of Work for Candidate Data Elements

- Track 1 data elements with prior evidence
  - Existing evidence for cross-setting feasibility and performance (mostly from PAC PRD)
    - Cognitive Function and Mental Status
    - Special Services, Treatments and Interventions
    - Sensory Impairments
- Track 2 feasibility testing
  - Data elements that fill gaps but require more feasibility and performance testing
    - Cognition (executive functioning), pain, continence, care preferences, medication reconciliation

#### Track 1 Status

- Data elements identified for FY 2018 proposed rule (cognitive function and mental status, special services, treatments and interventions, impairments) were not finalized
- Reasons for this decision:
  - To be responsive to stakeholders' comments that the addition of standardized data elements "are too much, too soon."
  - To enable greater "recovery" for providers between major releases as expressed
  - To allow for additional reliability and validity testing, including testing on time points used in data collection
  - To allow more time with stakeholders and TEPs to build additional consensus on elements

#### Track 2 Status

- The majority of data elements were feasible to administer and showed adequate to excellent agreement between raters
- Some data elements did not perform well in alpha 1 and were modified and re-tested in alpha 2
- Qualitative feedback from assessors was used to help evaluate and improve training instructions and data element specifications
- Both qualitative and quantitative information was used to identify data elements that may be problematic or overly burdensome across PAC settings

### Next Steps

- Identify data elements from both tracks for national field testing (beta test)
- Outreach and consensus building activities for data elements being tested
  - Feedback sessions with facility staff and administrators participating in beta field test to gain understanding of workflow constraints and issues and identify ways to mitigate burden
  - Stakeholder webinars to report interim findings from beta test

#### National Beta Test

- Test reliability and validity of candidate data elements from both tracks of work in a national sample of PAC providers
- Field test taking place over a span of six months starting in November 2017
- 14 geographic/metropolitan areas were randomly selected and eligible providers have been randomly selected from within these 14 areas
- Eligible providers are being contacted and invited to participate
- Participation is voluntary

### Beta Patient/Resident Participants

• Beneficiaries selected will be Medicare only or dually eligible (Medicare-Medicaid) that are admitted to participating providers during the field period

| PAC<br>setting | Target<br>number of<br>patients per<br>facility | Target<br>number<br>of<br>facilities | Target number of admission assessments | Target<br>number of<br>discharge<br>assessments |
|----------------|---|--------------------------------------|--|---|
| LTCH           | 30  | 28                                   | 840                                    | 579   |
| IRF            | 30  | 28                                   | 840                                    | 772   |
| SNF            | 25  | 84                                   | 2100                                   | 1491  |
| ННА            | 25  | 70                                   | 1750                                   | 1103  |
| TOTAL          |   | 210                                  | 5530                                   | 4055  |

#### Beta Data Collection

- Completed electronically on handheld tablets provided to the facilities
- Protocol includes patient interviews, patient observation and record review items
- A subset of assessments will be coded by both facility staff and a project research nurse to evaluate inter-rater reliability
- Research nurses will also conduct repeat assessments on a subset of patients to identify optimal lookback for items

### Beta Assessment Categories

#### Assessment will focus on:

- Cognitive status
- Mental status
- Pain
- Impairments
- Special services, treatments and interventions
- Other categories
  - Care preferences
  - PROMIS: Global health
  - Medication reconciliation

# Beta Data Elements by Category: Cognitive Status

| Data Element                             | Data Element<br>Activities       | Beta Test Considerations                                |
|--|----------------------------------|---|
| Expression and Understanding             | PC1                              | Two versions will be tested; included in Day 3,5,7 test |
| Brief interview for mental status (BIMS) | PC1, draft rule                  | Included in Day 3,5,7 test                              |
| Signs and symptoms of delirium (CAM)     | PC1, draft rule                  | Included in Day 3,5,7 test                              |
| Behavioral signs and symptoms            | PC1, draft rule;<br>Alpha 2, PC2 | Included in Day 3,5,7 test                              |
| Staff assessment of mental status        | Alpha 2, PC2                     | For patients/ residents unable to communicate           |

### Beta Data Elements by Category: Mental Status

| Data Element                        | Data Element<br>Activities | Beta Test<br>Considerations                         |
|-------------------------------------|----------------------------|---|
| PHQ-2 to 9                          | PC1, draft rule; alpha 1   |   |
| PROMIS Depression                   | TEP/stakeholder review     | Two versions tested in beta                         |
| PROMIS Anxiety                      | Alpha 2, PC2               | Two versions tested in beta                         |
| Staff assessment of mood (PHQ-9 OV) | Alpha 2, PC2               | For patients/<br>residents unable to<br>communicate |

# Beta Data Elements by Category: Pain

| Data Element   | Data Element Activities | Beta Test<br>Considerations                             |
|--|-------------------------|---|
| Pain interview: presence,<br>frequency, severity, effect on sleep,<br>interference with therapy and non-<br>therapy related activities, relief | PC1; alpha 1, PC2       | Two versions will be tested; included in Day 3,5,7 test |
| Staff assessment of pain or distress   | Alpha 2, PC2            | For patients/<br>residents unable to<br>communicate     |

# Beta Data Elements by Category: Impairments

| Data Element   | Data Element<br>Activities | Beta Test<br>Considerations  |
|--|----------------------------|--|
| Ability to hear, ability to see                                    | PC1, draft rule            |  |
| Continence (bladder and bowel): Patient/resident perceived problem | Alpha 1, PC2               |  |
| Continence (bladder and bowel): Appliance use, frequency of events | Alpha 1, PC2               | Will be recorded on<br>admission Days 1, 3,<br>5 and 7; discharge<br>date and discharge<br>date -2 |

## Beta Data Elements by Category: Special services, treatments and interventions

| Data Element  | Data Element Activities | Beta Test<br>Considerations  |
|---|-------------------------|--|
| Services and treatments: Cancer, respiratory, other | PC1, draft rule         | Will be recorded on<br>admission Days 1, 3,<br>5 and 7; discharge<br>date and discharge<br>date -2 |
| Nutritional approaches: IV or feeding tube, diet    | PC1, draft rule         | Will be recorded on<br>admission Days 1, 3,<br>5 and 7; discharge<br>date and discharge<br>date -2 |

# Beta Data Elements by Category: Other

| Data Element  | Data Element<br>Activities | Beta Test<br>Considerations |
|---|----------------------------|-----------------------------|
| Care preferences: Decision making preferences, designated health care agent | Alpha 1, Alpha 2,<br>PC2   |                             |
| PROMIS Global health  | PC2, TEP2                  | Two versions will be tested |
| Medication reconciliation   | Alpha 1, Alpha 2,<br>PC2   |                             |

### Update on the PROMIS Tool

# Patient-Reported Outcomes and Information System (PROMIS)

- NIH and CMS staff participated in meetings to discuss capabilities and use of PROMIS.
- Project goals included to test PROMIS item domains of most interest for PAC assessment.
- PROMIS items from domains considered:
  - Cognitive Function
  - Anxiety
  - Physical Function and Mobility
  - Fatigue
  - Sleep Disturbance
  - Social Role Functioning
  - Depression
  - Pain
- TEP, expert/consumer survey, interviews of patients on item clarity, and, public comment.

# PROMIS: TEP, Cognitive Testing, and Public Comment

- Public comment and SME input on the PROMIS items suitability.
- Results used to create smaller item sets, which were subjected to cognitive testing with patients.
- Small-scale patient interviews on the clarity of PROMIS items.
  - Indicated variability in "time-frame" patients had in mind when evaluating different health concepts.
- Overall Public Comment on PROMIS, very brief summary:
  - Support: anxiety can improve person-centered care and prevention of readmission.
  - Concern: validity of PROMIS generally in PAC (patients unlike those with chronic conditions), increased burden, staff reluctance to diagnose mood, overlap with MDS/OASIS.

#### PROMIS: The National Beta Test

- Beta Test will include:
  - PROMIS Global 10
  - Depression
  - Anxiety
- Global 10: Half of the national sample assessment protocols will include the following 10-item PROMIS® Global Health Assessment, while half of the national sample will include a slightly modified 10-item PROMIS® Global Health Assessment, which uses a reference period of 'in the past 3 days'.
- Depression and Anxiety: Half of the national sample assessment protocols will include PROMIS® Depression and PROMIS® Anxiety item sets that ask about mood over the past 3 days, and the other half will ask over the past 7 days.

#### PROMIS: The OASIS Field Test

- Abt Associates, Inc. conducted a comprehensive mixed methods field test of OASIS
  - 12 Medicare-certified home health agencies in four states
  - Total 213 participants enrolled (Aug 2016-Jul 2017)
- Testing included proof of concept study for patient reported outcomes
  - PROMIS® Global Health Survey v1.1
  - Among 213 field test participants: 56 completed PROMIS survey at both start/resumption of care (SOC/ROC) and at discharge (DC)

### PROMIS quantitative results

| Survey Respondents (n=56) |            |        |  |
|---------------------------|------------|--------|--|
| Age 65+                   | White race | Female |  |
| 76.9%                     | 79.8%      | 60.6%  |  |

- Compared to US reference population subgroup (age 65 +) survey respondents reported significantly worse global physical and mental health (GPH, GMH).
- A majority reported improvement in GPH (62%) and GMH (59%) from SOC/ROC to DC.
- Most notable improvements reported in pain, and ability to carry out physical activities.
- Completion of PRO survey feasible among cognitively intact home health patients.

### Applications of MIPS in PAC-LTC

- The Medicare Access and CHIP Reauthorization Act of 2015 (MACRA) requires CMS by law to implement an incentive program, referred to as the Quality Payment Program, that provides for two participation tracks:
  - The Merit-based Incentive Payment System (MIPS)
  - Advanced Alternative Payment Models (Advanced APMs)

- MIPS combined legacy programs into a single program:
  - Physician Quality Reporting System (PQRS)
  - Value-Based Payment Modifier (VM)
  - Medicare EHR Incentive Program (EHR) for Eligible Professionals

- Comprised of four performance categories in 2018:
  - Quality
  - Cost
  - Improvement Activities
  - Advancing Care Information

- Who is included:
  - Physicians
  - Physician Assistants
  - Nurse Practitioners
  - Clinical Nurse Specialists
  - Certified Registered Nurse Anesthetists
- Change to the Low-Volume Threshold for 2018. Include MIPS eligible clinicians billing more than \$90,000 a year in Medicare Part B allowed charges AND providing care for more than 200 Medicare patients a year.

# Workgroup Discussion

- What are the challenges PAC/LTC clinicians face to participate in MIPS?
- Are there gaps in the measure set that prevent PAC/LTC clinicians from being able to participate?
- Does the Workgroup have any guidance on ways to improve the measures to facilitate participation for PAC/LTC providers?

# MAP Pre-Rulemaking Approach Jean-Luc Tilly, Senior Project Manager, NQF

# Approach

The approach to the analysis and selection of measures is a three-step process:

- Provide program overview
- Review current measures
- Evaluate MUCs for what they would add to the program measure set

### **Evaluate Measures Under Consideration**

- MAP Workgroups must reach a decision about every measure under consideration
  - Decision categories are standardized for consistency
  - Each decision should be accompanied by one or more statements of rationale that explains why each decision was reached

# Preliminary Analysis of Measures Under Consideration

To facilitate MAP's consent calendar voting process, NQF staff will conduct a preliminary analysis of each measure under consideration.

The preliminary analysis is an algorithm that asks a series of questions about each measure under consideration. This algorithm was:

- Developed from the MAP Measure Selection Criteria, and approved by the MAP Coordinating Committee, to evaluate each measure
- Intended to provide MAP members with a succinct profile of each measure and to serve as a starting point for MAP discussions

## MAP Measure Selection Criteria

| 1 | NQF-endorsed measures are required for program measure sets, unless no relevant endorsed measures are available to achieve a critical program objective |
|---|---|
| 2 | Program measure set adequately addresses each of the National Quality Strategy's three aims   |
| 3 | Program measure set is responsive to specific program goals and requirements  |
| 4 | Program measure set includes an appropriate mix of measure types  |
| 5 | Program measure set enables measurement of person- and family-centered care and services  |
| 6 | Program measure set includes considerations for healthcare disparities and cultural competency  |
| 7 | Program measure set promotes parsimony and alignment  |

# **MAP Decision Categories**

| <b>Decision Category</b>           | Evaluation Criteria  |
|------------------------------------|--|
| Support for Rulemaking             | The measure is fully developed and tested in the setting where it will be applied and meets assessments 1-6 of the MAP Preliminary Analysis Algorithm. If the measure is in current use, it also meets assessment 7.   |
| Conditional Support for Rulemaking | The measure is fully developed and tested and meets assessments 1-6. MAP will provide a rationale that outlines the conditions (e.g., NQF endorsement) based on assessments 4-7 (reference Table 2 below) that should be met. Ideally the conditions specified by MAP would be met before the measure is proposed for use. However, the Secretary retains policy discretion to propose the measure. CMS may address the MAP-specified conditions without resubmitting the measure to MAP prior to rulemaking.  |
| Refine and Resubmit for Rulemaking | The measure meets assessments 1-3, but needs modifications. A designation of this decision category assumes at least one assessment 4-7 (slide 29) is not met. MAP will provide a rationale that outlines each suggested refinement (e.g., measure is not fully developed and tested OR there are opportunities for improvement under evaluation). Ideally the modifications suggested by MAP would be made before the measure is proposed for use. However, the Secretary retains policy discretion to propose the measure. CMS may address the MAP-specified refinements without resubmitting the measure to the MAP prior to rulemaking. CMS may informally, without deliberations and voting, review these refinements via the "feedback loop" with the MAP. These updates may occur during the web meetings of the MAP workgroups scheduled annually in the fall. |
| Do Not Support for Rulemaking      | The measure under consideration does not meet one or more of assessments 1-3.  |

### Guidance on Refine and Resubmit

- Concerns were raised about this category during the fall web meetings
- The Coordinating Committee created this category with the thought that MUCs receiving this designation would be brought back to MAP before implementation.
- HHS Secretary has statutory authority to propose measures after considering MAP's recommendations.
- The feedback loop was implemented to provide MAP members updates on measures on prior MUC lists.
- The Coordinating Committee will review the decision categories at their January meeting.

### Guidance on Refine and Resubmit

- The Coordinating Committee discussed the concerns raised by the Workgroups during its 11/30 meeting
  - Reiterated the intent of the decision was to support the concept of a measure but recognize a potentially significant issue that should be addressed before implementation
- The Committee suggested this category should be used judiciously
  - The Coordinating Committee recommended that the Workgroups use this decision when a measure needs a substantive change
  - The Committee also noted the need for Workgroups to clarify the suggested refinement to the measure

## Lunch

# **MAP Voting Instructions**

# **Key Voting Principles**

- MAP has established a consensus threshold of greater than 60 percent of participants.
  - Multiple stakeholder groups would need to agree to reach this threshold.
  - Abstentions do not count in the denominator.
- Every measure under consideration receives a decision, either individually or as part of a slate of measures.
  - All measures are voted on or accepted as parted of the consent calendar.
- Workgroups and will be expected to reach a decision on every measure under consideration. There will not be a category of "split decisions" that would mean the Coordinating Committee decides on that measure. However, the Coordinating Committee may decide to continue discussion on a particularly important matter of program policy or strategy.

# **Key Voting Principles**

- Staff will provide an overview of the process for establishing consensus through voting at the start of each in-person meeting.
- After additional introductory presentations from staff and the chair to give context to each programmatic discussion, voting will begin.
- The in-person meeting Discussion Guide will organize content as follows:
  - Measures under consideration will be divided into a series of related groups for the purposes of discussion and voting. The groups are likely to be organized around programs (Hospital and PAC/LTC) or condition categories (Clinician/Medicaid).
- Each measure under consideration will have been subject to a preliminary staff analysis based on a decision algorithm approved by the Coordinating Committee.
  - The discussion guide will note the result of the preliminary analysis (i.e., support, do not support, or conditional support, refine and resubmit) and provide rationale to support how that conclusion was reached.

Step 1. Staff will review a Preliminary Analysis Consent Calendar

 Staff will present each group of measures as a consent calendar reflecting the result of the preliminary analysis using MAP selection criteria and programmatic objectives

# Step 2. MUCs can be pulled from the Consent Calendar and become regular agenda items

- The co-chairs will ask the Workgroup members to identify any MUCs they would like to pull off the consent calendar. Any Workgroup member can ask that one or more MUCs on the consent calendar be removed for individual discussion. Workgroup members are asked to identify any MUCs to be pulled off for individual discussion prior to the in-person meeting, if possible.
- Workgroup members should clarify if they are pulling a measure for discussion only or
  if they disagree with the preliminary analysis and would like to vote on a new motion.
- Measures pulled for discussion will focus on resolving clarifying questions.
  - If during the course of discussion, a workgroup member determines the discussion has shown the need for a new vote a workgroup member can put forward a motion.
- Potential reasons members can pull measures:
  - Disagreement with the preliminary analysis
  - New information is available that would change the results of the algorithm
- Once all measures that the Workgroup would like to discuss are removed from the consent calendar, the co-chair will ask if there is any objection to accepting the preliminary analysis and recommendation of the MUCs remaining on the consent calendar
- If a measure is not removed from the consent calendar the associated recommendations will be accepted without discussion

### Step 3. Discussion and Voting on Measures Identified for a New Motion

- Workgroup member(s) who identified the need for discussion describe their perspective on the use of the measure and how it differs from the preliminary recommendation in the discussion guide.
  - If a motion is for conditional support or refine and resubmit the member making the motion should clarify and announce the conditions or suggested refinements.
- Workgroup member(s) assigned as lead discussant(s) for the relevant group of measures will be asked to respond to the individual(s) who requested discussion. Lead discussant(s) should state their own point of view, whether or not it is in agreement with the preliminary recommendation or the divergent opinion.
- The co-chair will then open for discussion among the Workgroup. Other workgroup members should participate in the discussion to make their opinions known. However, one should refrain from repeating points already presented by others in the interest of time.
- After the discussion, the Workgroup member who made the motion has the option to withdraw the motion. Otherwise, the Workgroup will be asked to vote on the motion.
  - If the motion is for conditional support or refine and resubmit the chair can accept additional conditions or suggested refinement based on the Workgroup's discussion.
  - If the named conditions or refinements directly contradict each other, the chair should ask for a separate motion after the original motion has been subject to a vote.

### Step 4: Tallying the Votes

- If the motion put forward by the workgroup member receives greater than 60% of the votes, the motion will pass and the measure will receive that decision.
- If the motion does not receive greater than 60% of the votes, the co-Chairs will resume discussion to develop another motion. To start discussion, the co-chairs will ask for another motion. If that motion receives greater than 60% of the votes, the motion will pass. If not, discussion will resume.
- If a no motion put forward by the Workgroup achieves greater than 60% the preliminary analysis decision will stand.
- Abstentions are discouraged but will not count in the denominator

# **Commenting Guidelines**

- Comments from the early public comment period have been incorporated into the discussion guide
- There will be an opportunity for public comment before the discussion on each program.
  - Commenters are asked to limit their comments to that program and limit comments to two minutes.
  - Commenters are asked to make any comments on MUCs or opportunities to improve the current measure set at this time
- There will be a global public comment period at the end of each day.
- Public comment on the Workgroup recommendations will run from December 21st 2016—January 11th, 2017.
  - These comments will be considered by the MAP Coordinating Committee and submitted to CMS.

# MAP Approach to Pre-Rulemaking: A look at what to expect

#### Nov

Workgroup web meetings to review current measures in program measure sets

#### Nov-Dec

Initial public commenting

#### Dec-Jan

Public commenting on workgroup deliberations

### Feb 1 to March

Pre-Rulemaking deliverables released



#### Nov

MAP Coordinating Committee to discuss strategic guidance for the workgroups to use during prerulemaking



### On or Before Dec

List of Measures Under Consideration released by HHS



#### Dec

In-Person workgroup meetings to make recommendations on measures under consideration



#### Late Jan

MAP Coordinating Committee finalizes MAP input

Recommendations on all individual measures under consideration

(Feb 1, spreadsheet format)

Guidance for hospital and PAC/LTC programs

(before Feb 15)

Guidance for clinician and special programs

(before Mar 15)

# Pre-Rulemaking Input

# Skilled Nursing Facility Quality Reporting Program

- Program Type: Penalty for failure to report
- Incentive Structure: Section 1888(e)(6)(A)(i) to the Social Security Act, as added by section 2(c)(4) of the IMPACT ACT, required CMS to reduce the annual payment update to SNFs that do not submit required quality data by two percentage points.

### SNF QRP Information:

- Facilities that submit data under the SNF PPS are required to participate in the SNF QRP, excluding units that are affiliated with critical access hospitals (CAHs).
- Data sources for SNF QRP measures include Medicare FFS claims as well as Minimum Data Set (MDS) assessment data.

# SNF QRP: Current Program Measure Information



Finalized in FY 2018 SNF PPS Final Rule

| Туре          | NQF ID           | Measure Title  | NQF Status     |  |
|---------------|------------------|--|----------------|--|
| Outcome       | Based on<br>0674 | Application of Percent of Residents Experiencing One or More Falls with Major Injury (Long Stay)   | Endorsed       |  |
| Process       | Based on<br>2631 | Application of Percent of Long-Term Care Hospital Patients with an Admission and Discharge Functional Assessment and a Care Plan that Addresses Function | Endorsed       |  |
| Outcome       | N/A              | Discharge to Community-Post Acute Care (PAC) Skilled Nursing Facility (SNF) Quality Reporting Program (QRP)  | Not Endorsed   |  |
| Process       | N/A              | Drug Regimen Review Conducted with Follow-Up for Identified Issues-Post-Acute Care Skilled Nursing Facility Quality Reporting Program                    | Not Endorsed   |  |
| Cost/Resource | N/A              | Total Estimated Medicare Spending per Beneficiary —Post-Acute Care Skilled Nursing Facility Quality Reporting Program                                    | Not Endorsed   |  |
| Outcome       | N/A              | Potentially Preventable 30-Day Post-Discharge Readmission Measure for Skilled Nursing Facility Quality Reporting Program.                                | Not Endorsed   |  |
| Outcome       | 0678             | Percent of Residents or Patients with Pressure Ulcers That Are New or Worsened (Short-Stay) (Removed effective 10/1/18 per FY 2018 SNF PPS Final Rule)   | Endorsed       |  |
| Outcome       | Based on<br>2633 | Application of IRF Functional Outcome Measure: Change in Self-Care Score for Medical Rehabilitation Patients   | Endorsed       |  |
| Outcome       | Based on<br>2634 | Application of IRF Functional Outcome Measure: Change in Mobility Score for Medical Rehabilitation Patients  | Endorsed 🛨     |  |
| Outcome       | Based on<br>2635 | Application of IRF Functional Outcome Measure: Discharge Self-Care Score for Medical Rehabilitation Patients   | Endorsed       |  |
| Outcome       | Based on<br>2636 | Application of IRF Functional Outcome Measure: Discharge Mobility Score for Medical Rehabilitation Patients  | Endorsed       |  |
| Outcome       | N/A              | Changes in Skin Integrity Post-Acute Care: Pressure Ulcer/Injury   | Not Endorsed 🜟 |  |

# CMS High Priority Domains for Future Measure Consideration – SNF QRP

Communication Patient and **Making Care** Family and Care Safer Coordination Engagement Functional Status Modifications to Timely transfer of and Functional current pressure information Decline ulcer measure

# **Previous Gaps Identified**

PAC/LTC WG 2016-2017 Identified Gaps

- Experience of care
- Efficacy of transfers from acute care hospitals to SNFs
- Transfer of information between clinicians

## **Public Comment**

# Skilled Nursing Facility Quality Reporting Program (SNF QRP)

### Consent Calendar:

MUC17-258: CoreQ: Short Stay Discharge Measure

# Workgroup Discussion

• Are there additional gap areas for this program?

# **Hospice Quality Reporting Program**

- Program Type: Penalty for failure to report
- Incentive Structure: The Hospice QRP was established under the Affordable Care Act. Beginning in FY 2014, Hospices that fail to submit quality data will be subject to a 2.0 percentage point reduction to their annual payment update.
- Hospice QRP Information:.
  - Data sources for Hospice QRP measures include the Hospice Item Set and Hospice CAHPS.

### Hospice QRP: Current Program Measure

Information



Finalized in FY 2018 Hospice PPS Final Rule

| Туре                           | NQF ID | Measure Title  | NQF Status   |
|--------------------------------|--------|--|--------------|
| Process                        | 1638   | Dyspnea Treatment  | Endorsed     |
| Process                        | 1639   | Dyspnea Screening  | Endorsed     |
| Process                        | 1637   | Pain Assessment  | Endorsed     |
| Process                        | 1634   | Pain Screening   | Endorsed     |
| Process                        | 1641   | Treatment Preferences  | Endorsed     |
| Process                        | 1617   | Patients Treated with an Opioid who are Given a Bowel Regimen                                    | Endorsed     |
| Process                        | 1647   | Beliefs/Values Addressed (if desired by the patient)   | Endorsed     |
| Patient<br>Reported<br>Outcome | 2651   | CAHPS Hospice Survey   | Endorsed ★   |
| Process                        | 9999   | Hospice Visits When Death is Imminent Measure 1  | Not Endorsed |
| Process                        | 9999   | Hospice Visits When Death is Imminent Measure 2  | Not Endorsed |
| Composite                      | 3235   | Hospice and Palliative Care Composite Process<br>Measure - Comprehensive Assessment at Admission | Endorsed     |

# Current Measures by High Priority Areas

**Hospice High Priority Areas for Measurement** 

Access to the healthcare team on a 24-hour basis

Avoiding unwanted treatments

**Existing Measures in the Hospice QRP** 

-Hospice Visits When Death is Imminent Measure 1 -Hospice Visits When Death is Imminent Measure 1

- Treatment preferences

| Experience of care                              | -Hospice Experience of Care Survey  |
|---|---|
| Comprehensive assessment                        | -Beliefs/Values Addressed (if desired by the patient) -Comprehensive Assessment at Admission  |
| Physical aspects of care                        | -Dyspnea Treatment -Dyspnea Screening -Pain Assessment -Pain Screening -Patients Treated with an Opioid who are Given a Bowel Regimen |
| Care planning                                   | -Treatment Preferences  |
| Implementing patient/family/caregiver goals     | -Beliefs/Values Addressed (if desired by the patient)   |
| Avoiding Unnecessary hospital and ED admissions |   |
| Psychological and psychiatric aspects of care   | -Beliefs/Values Addressed (if desired by the patient) -Hospice Experience of Care Survey  |
| Timeliness/responsiveness of care               | -Hospice Experience of Care Survey  |

# CMS High Priority Domains for Future Measure Consideration – Hospice QRP

Effective Prevention and Treatment **Symptom** management outcome measures

Making Care Safer

Timeliness and responsiveness of care

Communication and Care Coordination

Alignment of care coordination measures

Responsiveness to patient and family care preferences

# **Previous Gaps Identified**

PAC/LTC WG 2016-2017 Identified Gaps

- Medication
   management at the
   end of life
- Provision of bereavement services
- Patient care preferences

## Workgroup Discussion

• Are there additional gap areas for this program?

## Long-Term Care Hospital (LTCH) Quality Reporting Program

- Program Type: Penalty for failure to report
- **Incentive Structure**: The LTCH QRP was established under the Affordable Care Act. Beginning in FY 2014, LTCHs that fail to submit data will be subject to a 2.0 percentage point reduction of the applicable annual payment update (APU).

#### Program Information:

- Goal: Furnishing extended medical care to individuals with clinically complex problems (e.g., multiple acute or chronic conditions needing hospital-level care for relatively extended periods of greater than 25 days).
- New LTCHs are required to begin reporting quality data under the LTCH QRP no later than the first day of the calendar quarter subsequent to 30 days after the date on its CMS Certification Number (CCN) notification letter

### LTCH QRP: Current Program Measure Information

| Туре      | NQF ID           | Measure Title   | NQF Status    |
|-----------|------------------|---|---------------|
|           |                  | Percent of Residents or Patients with Pressure Ulcers That Are New or Worsened (Short Stay) Removed in FY 2018 IPPS   |               |
| Outcome   | 0678             | Rule  | Endorsed      |
|           |                  | Percent of Residents or Patients Who Were Assessed and Appropriately Given the Seasonal Influenza Vaccine (Short Stay)  |               |
| Process   | 0680             | (NQF #0680).  | Endorsed      |
| 1         | Based<br>on 0674 | Application of Percent of Residents Experiencing One or More Falls with Major Injury (Long Stay) (NQF #0674).*  | Endorsed      |
|           |                  | Percent of Long-Term Care Hospital (LTCH) Patients with an Admission and Discharge Functional Assessment and a Care   |               |
|           |                  | Plan That Addresses Function (NQF #2631).   | Endorsed      |
| 1         | 1                | Application of Percent of Long-Term Care Hospital (LTCH) Patients with an Admission and Discharge Functional Assessment   |               |
| Process   |                  |   | Endorsed      |
|           |                  | Functional Outcome Measure: Change in Mobility Among Long-Term Care Hospital (LTCH) Patients Requiring Ventilator   |               |
| Outcome   |                  | Support (NQF #2632).  | Endorsed      |
|           | 1                | Drug Regimen Review Conducted With Follow-Up for Identified Issues—Post Acute Care (PAC) Long- Term Care Hospital   |               |
| Process   | N/A              | (LTCH) Quality Reporting Program (QRP).*  | Not Endorsed  |
| Outcome   | 138              | National Healthcare Safety Network (NHSN) Catheter-Associated Urinary Tract Infection Outcome Measure (NQF #0138).  | Endorsed      |
| Outcome   | 139              | National Healthcare Safety Network (NHSN) Central Line-Associated Bloodstream Infection Outcome Measure (NQF #0139).  | Endorsed      |
| Outcome   | 1                | National Healthcare Safety Network (NHSN) Facility-wide Inpatient Hospital-onset Methicillin-resistant Staphylococcus aureus (MRSA) Bacteremia Outcome Measure (NQF #1716). | Endorsed      |
| Gattonic  |                  | National Healthcare Safety Network (NHSN) Facility-wide Inpatient Hospital-onset Clostridium difficile Infection (CDI)  | Liidoised     |
| Outcome   | 1                | Outcome Measure (NQF #1717).  | Endorsed      |
|           | 431              | Influenza Vaccination Coverage among Healthcare Personnel (NQF #0431).  | Endorsed      |
|           | _                | National Healthcare Safety Network (NHSN) Ventilator-Associated Event (VAE) Outcome Measure.*   | Not Endorsed  |
| Outcome   | <u> </u>         | All-Cause Unplanned Readmission Measure for 30-Days Post-Discharge from Long-Term Care Hospitals (LTCHs) (NQF   | 110t Endorsed |
| Outcome   |                  |   | Endorsed      |
| Cost/Reso |                  | Medicare Spending Per Beneficiary (MSPB)—Post Acute Care (PAC) Long-Term Care Hospital (LTCH) Quality Reporting   |               |
| 1 '       | I .              | Program (QRP).  | Not Endorsed  |
|           | _                | Discharge to Community—Post Acute Care (PAC) Long-Term Care Hospital (LTCH) Quality Reporting Program (QRP).*   | Not Endorsed  |
|           |                  | Potentially Preventable 30-Day Post-Discharge Readmission Measure for Long-Term Care Hospital (LTCH) Quality Reporting  |               |
| Outcome   | 1                | Program (QRP).  | Not Endorsed  |
| Process   | -                | Compliance With Spontaneous Breathing Trial (SBT) by Day 2 of the LTCH Stay 🤺   | Not Endorsed  |
|           |                  | Ventilator Liberation Rate  | Not Endorsed  |
|           | <u> </u>         | Changes in Skin Integrity Post-Acute Care: Pressure Ulcer/Injury  | Not Endorsed  |

## CMS High Priority Domains for Future Measure Consideration – LTCH QRP

Effective
Prevention and
Treatment
Ventilator use,

ventilator use, ventilatorassociated event and ventilator weaning rate

Mental health status

Making Care Safer

Modifications to existing Pressure Ulcer measure

Communication and Care Coordination

√fransitions and rehospitalizations

Medication reconciliation

## **Previous Gaps Identified**

PAC/LTC WG 2016-2017 Identified Gaps

- LTCH-specific CAHPS survey to assess experience of care
- Nutritional status measures
- Transfer of information between clinicians

## Workgroup Discussion

• Are there additional gap areas for this program?

## Inpatient Rehabilitation Facility Quality Reporting Program

- Program Type: Penalty for failure to report
- Incentive Structure: The IRF QRP was established under the Affordable Care Act. Beginning in FY 2014, IRFs that fail to submit data will be subject to a 2.0 percentage point reduction of the applicable IRF Prospective Payment System (PPS) payment update.

#### Program Information:

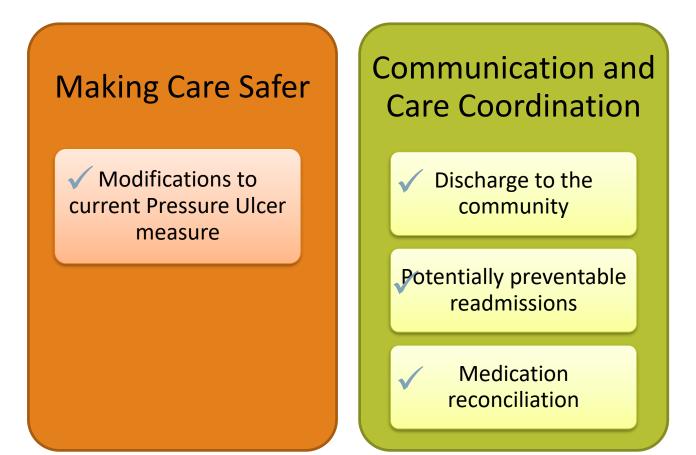
- Goal: Address the rehabilitation needs of the individual including improved functional status and achievement of successful return to the community postdischarge.
- Applies to all IRF facilities that receive the IRF PPS (e.g., IRF hospitals, IRF units that are co-located with affiliated acute care facilities, and IRF units affiliated with critical access hospitals [CAHs]).
- Data sources for IRF QRP measures include Medicare FFS claims, the Center for Disease Control's National Health Safety Network (CDC NHSN) data submissions, and Inpatient Rehabilitation Facility - Patient Assessment instrument (IRF-PAI) records.

## IRF QRP: Current Program Measure Information

|                      |  | 0   |              |
|----------------------|--|---|--------------|
| Type                 | NQF ID   | Measure Title   | NQF Status   |
| Process              | 0680   | Percent of Residents or Patients Who Were Assessed and Appropriately Given the Seasonal Influenza Vaccine (Short-Stay)                                      | Endorsed     |
| Outcome              | 1717   | National Healthcare Safety Network (NHSN) Facility-wide Inpatient Hospital-onset Clostridium difficile Infection (CDI) Outcome Measure                      | Endorsed     |
| Process              | 0431 Influenza Vaccination Coverage Among Healthcare Personnel   |   | Endorsed     |
| Outcome              | National Healthcare Safety Network (NHSN) Facility-Wide Inpatient Hospital-onset Methicillin-resistant Staphylococcus aureus (MRSA) Bacteremia Outcome Measure |   | Endorsed     |
| Outcome              |  |   | Endorsed     |
| Outcome              | 2502   | All-Cause Unplanned Readmission Measure for 30 Days Post Discharge from Inpatient Rehabilitation Facilities (Removed in FY 2018 IRF PPS Final Rule)         |              |
| Outcome              | 2634   | IRF Functional Outcome Measure: Change in Mobility Score for Medical Rehabilitation Patients  | Endorsed     |
| Outcome              | 2633   | IRF Functional Outcome Measure: Change in Self-Care Score for Medical Rehabilitation Patients   | Endorsed     |
| Outcome              | Based<br>on 0674   | An Application of Percent of Residents Experiencing One or More Falls with Major Injury (Long-Stay)   | Endorsed     |
| Process              | Based<br>on 2631   | An Application of Percent of Long-Term Care Hospital Patients With an Admission and Discharge Functional Assessment and a Care Plan that Addresses Function | Endorsed     |
| Outcome              | 2635   | IRF Functional Outcome Measure: Discharge Self-Care Score for Medical Rehabilitation Patients   | Endorsed     |
| Outcome              | 2636   | RF Functional Outcome Measure: Discharge Mobility Score for Medical Rehabilitation Patients   | Endorsed     |
| Outcome              | N/A  | Discharge to Community: Discharge to Community-Post Acute Care Inpatient Rehabilitation Facility Quality Reporting Program                                  | Not Endorsed |
| Process              | N/A  | Drug Regimen Review Conducted with Follow-Up for Identified Issues  | Not Endorsed |
| Cost/Resource<br>Use | N/A  | Medicare Spending Per Beneficiary-Post Acute Care Inpatient Rehabilitation Facility Quality Reporting Program   | Not Endorsed |
| Outcome              | N/A  | Potentially Preventable 30-Day Post-Discharge Readmission Measure for Inpatient Rehabilitation Facility Quality Reporting Program                           | Not Endorsed |
| Outcome              | N/A  |   | Not Endorsed |
| Outcome              | 0678   | Percent of Residents or Patients with Pressure Ulcers That Are New or Worsened (Short-Stay) (Removed in FY End 2018 IRF PPS Final Rule)                     |              |
| Outcome              | N/A  | Changes in Skin Integrity Post-Acute Care: Pressure Ulcer/Injury  | Not Endorsed |
|                      |  |   |              |



## CMS High Priority Domains for Future Measure Consideration – IRF QRP



## **Previous Gaps Identified**

PAC/LTC WG 2016-2017 Identified Gaps  Experience of care measures related to patient and family engagement

## Workgroup Discussion

• Are there additional gap areas for this program?

## Home Health Quality Reporting Program

- Program Type: Penalty for failure to report; Data are reported on the Home Health Compare website.
- Incentive Structure: The HH QRP was established in accordance with section 1895 of the Social Security Act. Home health agencies (HHAs) that fail to submit quality data are subject to a 2 percentage point reduction in their annual HH market basket annual payment update.
- Program Information: Data sources for the HH QRP include the Outcome and Assessment Information Set (OASIS), the CAHPS survey, and Medicare FFS claims.

#### HH QRP: Current Program Measure Information

| Туре    | NQF ID           | Measure Title  | NQF Status   |
|---------|------------------|--|--------------|
| Outcome | 0171             | Acute Care Hospitalization During the First 60 Days of Home Health   | Endorsed     |
| Outcome | 0173             | Emergency Department Use without Hospitalization During the First 60 Days of Home Health   |              |
| Outcome | 0167             | Improvement in Ambulation/Locomotion   |              |
| Outcome | 0174             | Improvement in Bathing   |              |
| Outcome | 0179             | Improvement in Dyspnea   | Endorsed     |
| Outcome | 0176             | Improvement in Management of Oral Medication   | Endorsed     |
| Outcome | 0177             | Improvement in Pain Interfering with Activity  |              |
| Outcome | 0178             | Improvement in Status of Surgical Wounds   | Endorsed     |
| Process | 0526             | Timely Initiation Of Care  | Endorsed     |
| Process | 0518             | Depression Assessment Conducted  | Endorsed     |
| Process | 0522             | Influenza Immunization Received for Current Flu Season   | Endorsed     |
| Process | 0525             | Pneumococcal Polysaccharide Vaccine Ever Received  | Endorsed     |
| Process | 0537             | Multifactor Fall Risk Assessment Conducted For All Patients Who Can Ambulate   | Endorsed     |
| Process | 0519             | Diabetic Foot Care and Patient/Caregiver Education Implemented during All Episodes of Care   | Endorsed     |
| Outcome | 0175             | Improvement in Bed Transferring  | Endorsed     |
| Outcome | 2380             | Rehospitalization During the First 30 Days of Home Health  | Endorsed     |
| Outcome | 2505             | Emergency Department Use without Hospital Readmission During the First 30 Days of Home Health  | Endorsed     |
| PRO     | 0517             | CAHPS Home Health Care Survey (experience with care)   | Endorsed     |
| Process | N/A              | Drug Education on All Medications Provided to Patient/Caregiver during All Episodes of Care  | Not Endorsed |
| Process | N/A              | Drug Regimen Review Conducted with Follow-Up for Identified Issues-Post Acute Care (PAC) Home Health Qualit<br>Reporting Program                         |              |
| CRU     | N/A              | Total Estimated Medicare Spending Per Beneficiary (MSPB)—Post Acute Care (PAC) Home Health (HH) Quality Reporting Program (QRP)                          | Not Endorsed |
| Outcome | N/A              | Discharge to Community-Post Acute Care (PAC) Home Health (HH) Quality Reporting Program (QRP)  | Not Endorsed |
| Outcome | N/A              | Potentially Preventable 30-Day Post-Discharge Readmission Measure for Home Health Quality Reporting Program  | Not Endorsed |
| Outcome | 0678             | Percent of Residents or Patients with Pressure Ulcers That Are New or Worsened (Short-Stay) (Removed in CY 2018 HH PPS Rule)                             | Endorsed     |
| Outcome | N/A              | Changes in Skin Integrity Post-Acute Care: Pressure Ulcer/Injury   | Not Endorsed |
| Outcome | Based<br>on 0674 | Application of Percent of Residents Experiencing One or More Falls with Major Injury   | Endorsed     |
| Process | Based on<br>2631 | Application of Percent of Long-Term Care Hospital Patients with an Admission and Discharge Functional Assessment and a Care Plan That Addresses Function | Endorsed     |



## CMS High Priority Domains for Future Measure Consideration – HH QRP

Patient and Communication **Making Care** and Care Family Safer Coordination Engagement **Functional Status Major Falls** Discharge to the and Functional community Decline Pressure Ulcers **Potentially** ✓ preventable readmissions Pain Medication **F**unctional Decline reconciliation

## **Previous Gaps Identified**

PAC/LTC WG 2016-2017 Identified Gaps

 Measures to drive adoption of congestive heart failure care plans

## Workgroup Discussion

• Are there additional gap areas for this program?

## **Public Comment**

### Break

## Input on Measure Removal Criteria

#### **Considerations for Measure Removals**

#### Meaningful to patients and providers

 Patient-centered high priority quality measures current with clinical guidelines. May also need to meet specific statutory requirements.

#### Measure Type

Outcome measures are preferred.

#### Variation in performance

Measure should demonstrate variation in performance.

#### Peformance trend

Should consider trends in performance.

#### CMS Criteria for Measure Removals

#### Burden

 Consider amount of burden associated with the measure.

#### Unintended consequences

 Consider unintended consequences from use of the measure.

#### Operational issues

 Consider operational issues that may impact the measure.

#### Alignment

 Consider alignment of similar measures with private payers, and across and within CMS programs while minimizing unnecessary duplication of measures and measure concepts.

#### **Workgroup Discussion**

What criteria should CMS consider as it reviews the measure sets for its quality reporting and value-based purchasing programs? Review of NQF's Attribution Work and Guidance on Attribution Challenges in PAC/LTC Settings

### Phase 1 Work

## **Current Landscape**

- Recent legislation such as IMPACT and MACRA demonstrate the continued focus on value-based purchasing to drive improvements in quality and cost by re-aligning incentives.
- Implementing pay for performance models requires knowing who can be held responsible for the results of the quality and efficiency measures used to judge performance.
  - Increasingly challenging as quality is assessed on outcome measures rather than process or structural measures.
- Attribution can be defined as the methodology used to assign patients, and their quality outcomes, to providers or clinicians.
  - Attribution models help to identify a patient relationship that can be used to establish accountability for quality and cost.
- Moving the system away from fee-for-service payment to alternative payment models has highlighted the need to better understand how patient outcomes and costs can be accurately attributed in a system increasingly built on shared accountability.

## **Environmental Scan Highlights**

- Models categorized by:
  - Program stage
  - Type of provider attributed
  - Timing
  - Clinical circumstances
  - Payer/programmatic circumstances
  - Exclusivity of attribution
  - Measure used to make attribution
  - Minimum requirement to make attribution
  - Period of time for which provider is responsible

- 163 models in use or proposed for use
  - 17% currently in use
  - 89% use retrospective attribution
  - 77% attribute to a single provider, mainly a physician

## **Commissioned Paper Findings**

- Best practices have not yet been determined
  - Existing models are largely built off of previously used approaches
  - Trade-offs in the development of attribution models should be explored and transparent
- No standard definition for an attribution model
- Lack of standardization across models limits ability to evaluate

## **Challenges**

- Greater standardization among attribution models is needed to allow:
  - Comparisons between models;
  - Best practices to emerge.
- Little consistency across models but there is evidence that changing the attribution rules can alter results.
- Lack of transparency on how results are attributed and no way to appeal the results of an attribution model that may wrongly assign responsibility.

## **Addressing the Challenges**

- To address these challenges the Committee:
  - Developed guiding principles
  - Made recommendations
  - Created the Attribution Model Selection Guide
- These products allow for greater standardizations, transparency, and stakeholder buy-in:
  - Allow for evaluation of models in the future
  - Lay the groundwork to develop a more robust evidence base

## **Guiding Principles Preamble**

- Acknowledge the complex, multidimensional challenges to implementing attribution models as the models can change depending on their purpose and the data available.
- Grounded in the National Quality Strategy (NQS) as attribution can play a critical role in advancing these goals.
- Recognize attribution can refer to both the attribution of patients for accountability purposes as well as the attribution of results of a performance measure.
- Highlighted the absence of a gold standard for designing or selecting an attribution model; must understand the goals of each use case.
- Key criteria for selecting an attribution model are: actionability, accuracy, fairness, and transparency.

## **Guiding Principles**

- Attribution models should fairly and accurately assign accountability.
- Attribution models are an essential part of measure development, implementation, and policy and program design.
- Considered choices among available data are fundamental in the design of an attribution model.
- Attribution models should be regularly reviewed and updated.
- Attribution models should be transparent and consistently applied.
- 6. Attribution models should align with the stated goals and purpose of the program.

### **Attribution Model Selection Guide**

#### Current state:

- Tension between the desire for clarity about an attribution model's fit for purpose and the state of the science related to attribution
- Desire for rules to clarify which attribution model should be used in a given circumstance, but not enough evidence to support the development of such rules at this time.

#### Goals of the Attribution Model Selection Guide:

- Aid measure developers, measure evaluation committees, and program implementers on the necessary elements of an attribution that should be specified.
- Represent the minimum elements that should be shared with the accountable entities

### The Attribution Model Selection Guide

| What is the context and goal of the accountability program?             | <ul> <li>What are the desired outcomes and results of the program?</li> <li>Is the program aspirational?</li> <li>Is the program evidence-based?</li> <li>What is the accountability mechanism of the program?</li> <li>Which entities will participate and act under the accountability</li> </ul>   |
|---|---|
| How do the measures relate to the context in which they are being used? | ,   |
| Who are the entities receiving attribution?                             | <ul> <li>Which units are eligible for the attribution model?</li> <li>Can the accountable unit meaningfully influence the outcomes?</li> <li>Do the entities have sufficient sample size to meaningfully aggregate measure results?</li> <li>Are there multiples units to which the attribution model will be applied?</li> </ul>   |
| How is the attribution performed?                                       | <ul> <li>What data are used? Do all parties have access to the data?</li> <li>What are the services that drive assignment? Does the use of those services assign responsibility to the correct accountable unit?</li> <li>What are the details of the algorithm used to assign responsibility?</li> <li>Has the reliability of the model been tested using multiple methodologies?</li> <li>What is the timing of the attribution computation?</li> </ul> |

## Recommendations for Attribution Models

- Build on the principles and Attribution Model Selection Guide.
- Intended to apply broadly to developing, selecting, and implementing attribution models in the context of public and private sector accountability programs.
- Recognized the current state of the science, considered what is achievable now, and what is the ideal future state for attribution models.
- Stressed the importance of aspirational and actionable recommendations in order to drive the field forward.

# Use the Attribution Model Selection Guide to evaluate the factors to consider in the choice of an attribution model

- No gold standard; different approaches may be more appropriate than others in a given situation.
- Model choice should be dictated by the context in which it will be used and supported by evidence.
- Measure developers and program implementers should be transparent about the potential trade-offs between the accountability mechanism, the gap for improvement, the sphere of influence of the accountable entity over the outcome, and the scientific properties of the measure considered for use.

### Attribution models should be tested

- Attribution models of quality initiative programs must be subject to some degree of testing for goodness of fit, scientific rigor, and unintended consequences.
  - Degree of testing may vary based on the stakes of the accountability program, attribution models would be improved by rigorous scientific testing and making the results of such testing public.
- When used in mandatory accountability programs, attribution models should be subject to testing that demonstrates adequate sample sizes, appropriate outlier exclusion and/or risk adjustment to fairly compare the performance of attributed entities, and sufficiently accurate data sources to support the model in fairly attributing patients/cases to entities.

# Attribution models should be subject to multistakeholder review

- Given the current lack of evidence on the gold standard for attribution models, perspectives on which approach is best could vary based on the interests of the stakeholders involved.
- Attribution model selection and implementation in public and private sectors, such as organizations implementing payment programs or health plans implementing incentive programs should use multistakeholder review to determine the best attribution model to use for their purposes.

# Attribution models should attribute care to entities who can influence care and outcomes

- Attribution models can unfairly assign results to entities who have little control or influence over patient outcomes.
- For an attribution model to be fair and meaningful, an accountable entity must be able to influence the outcomes for which it is being held accountable either directly or through collaboration with others.
- As care is increasingly delivered by teams and facilities become more integrated, attribution models should reflect what the accountable entities are able to influence rather than directly control.

# Attribution models used in mandatory public reporting or payment programs should meet minimum criteria

- In order to be applied to mandatory reporting or payment program attribution models should:
  - Use transparent, clearly articulated, reproducible methods of attribution;
  - Identify accountable entities that are able to meaningfully influence measured outcomes;
  - Utilize adequate sample sizes, outlier exclusion, and/or risk adjustment to fairly compare the performance of attributed entities;
  - Undergo sufficient testing with scientific rigor at the level of accountability being measured;
  - Demonstrate accurate enough data sources to support the model in fairly attributing patients/cases to entities;
  - Be implemented with adjudication processes, open to the public, that allow for timely and meaningful appeals by measured entities.

### **Current Phase**

# Project Purpose and Objectives

 Develop a white paper to provide continued guidance to the field on approaches to attribution



# To accomplish these goals, NQF will:

- 1. Convene a multistakeholder advisory panel to guide and provide input on the direction of the white paper
- 2. Hold two webinars and four conference calls with the panel
- 3. Conduct a review of the relevant evidence related to attribution
- 4. Perform key informant interviews
- Develop a white paper that summarizes the evidence review, interviews, and recommendations
- 6. Develop a blueprint for further development of the Attribution Selection Guide
- 7. Examine NQF processes for opportunities to address attribution in measure evaluation and selection

# Workgroup Discussion

- Doe the Workgroup have any guidance for how to consider attribution issues in post-acute and long-term care settings?
- Are there special attribution challenges in home health that should be considered?

## **Update on Equity Program**

# NQF work on Health Equity, Disparities, and SDOH

#### Measure Selection and Endorsement

- Healthcare Disparities & Cultural Competence
- Health and Wellbeing
- Prevention and Population Health
- MAP Adult and Child Core Sets
- Measure Prioritization

### Measurement Frameworks

- Population Health
- Rural Health
- Home and Community-Based Services
- Food Insecurity and Housing Instability
- Cultural Competency

# Principles and Best Practices

- Disparities-Sensitive Measure Criteria
- Guiding Principles for Culturally Competent Care
- Community Action Guide
- Risk Adjustment for Socioeconomic Status (SES)

# Implementation Guidance

- Approach for Taking Action on Social Determinants of Health (SDOH)
- Roadmap to Promote Health Equity and Eliminate Disparities

# NQF's Health Equity Program



IDENTIFY disparities and at-risk populations

INFLUENCE performance measurement

INSPIRE implementation of best practices

INFORM payment

# Identify Disparities and Those Affected Health Inequity

#### OENTIFY disparities and at-risk populations

#### **NQF Will:**

- Promote a common understanding and standardized language around health equity to address data and infrastructure challenges
- Gather innovative strategies for social risk factor data collection and use

- Approaches to address data challenges
- Identification, showcase of innovative examples from the field
- SDOH measurement frameworks

#### Influence Performance Measurement



#### **NQF Will:**

- Facilitate development of needed measures to promote health equity and reduce disparities
- Drive toward the systematic approach laid out in the NQF Health Equity
   Roadmap for using measures to eliminate disparities and promote health equity

- Measure concepts to fill measurement gaps
- Facilitation of measure development and testing
- Technical expertise on high priority measures

# Inspire Implementation of Best Practic of Best Practice of Best Practices of Best Pr

#### **NQF Will:**

- Lead and engage strategic partners to implement effective interventions and best practices
- Disseminate effective interventions, best practices, and lessons learned
- Facilitate use of innovative, successful interventions

- Practical, applied implementation guidance
- Education and peer forums to share resources and solutions

# Inform Payment



#### **NQF Will:**

- Convene experts to address the impact of payment on health equity
- Spur resource allocation to those meaningfully affecting change
- Create tools and resources to facilitate uptake of payment models that promote health equity
- Explore emerging issues related to risk adjusting performance measures for social risk factors

- Continuing work on SDS Trial
- Convening experts to develop payment guidance

# Questions?

### **Public Comment**

# Summary of Day and Next Steps

# MAP Approach to Pre-Rulemaking

#### A look at what to expect

Nov

Workgroup web meetings to review current measures in program measure sets

Nov-Dec Initial public commenting Dec-Jan
Public
commenting on

Workgroup

deliberations

Feb 1 to March 15
Pre-Rulemaking
deliverables released















On or Before Dec

1

List of Measures Under Consideration released by HHS Dec

In-Person Workgroup meetings to make recommendations on measures under consideration Late Jan

MAP Coordinating Committee finalizes MAP input

Recommendations on all individual measures under consideration

(Feb 1, spreadsheet format)

Guidance for hospital and PAC/LTC programs

(before Feb 15)

Guidance for clinician and special programs

(before Mar 15)

### **Next Steps: Upcoming Activities**

#### **In-Person Meetings**

- Clinician Workgroup December 12
- PAC/LTC Workgroup December 13
- Hospital Workgroup December 14
- Coordinating Committee January 25-26

Public Comment Period #2: December 21<sup>st</sup> 2016—January 11<sup>th</sup>, 2017

# Adjourn