## NATIONAL QUALITY FORUM

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## MEASURE APPLICATIONS PARTNERSHIP POST-ACUTE CARE/LONG-TERM CARE WORKGROUP

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## TUESDAY DECEMBER 15, 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., Carol Raphael and Debra Saliba, Co-Chairs, presiding.

**PRESENT:** 

CAROL RAPHAEL, MPA, Co-Chair DEBRA SALIBA, MD, MPH, Co-Chair JOSEPH AGOSTINI, MD, Aetna ROBYN GRANT, MSW, The National Consumer Voice for Quality Long-Term Care E. LIZA GREENBERG, RN, MPH, Visiting Nurses Association of America ROGER HERR, PT, MPA, COS-C, American Physical Therapy Association BRUCE LEFF, MD, Johns Hopkins University School of Medicine JAMES LETT II, MD, CMD, National Transitions of Care Coalition CARI R. LEVY, MD, PhD, CMD, AMDA -- The Society for Post-Acute and Long-Term Care Medicine SANDY MARKWOOD, MA, National Association of Area Agencies on Aging SEAN MULDOON, MD, Kindred Healthcare PAMELA ROBERTS, PhD, OTR/L, SCFES, CPHQ, FAOTA,

American Occupational Therapy Association

SUZANNE SNYDER KAUSERUD, PT, American Medical Rehabilitation Providers Association CAROL SPENCE, PhD, National Hospice and Palliative Care Organization ARTHUR STONE, MD, National Pressure Ulcer Advisory Panel JENNIFER THOMAS, PharmD, American Society of Consultant Pharmacists LISA WINSTEL, Caregiver Action Network SUBJECT MATTER EXPERTS (Voting): KIM ELLIOTT, PhD, CPH GERRI LAMB, PhD PAUL MULHAUSEN, MD, MHS EUGENE NUCCIO, PhD FEDERAL GOVERNMENT LIAISONS (Non-voting): ALAN LEVITT, MD, Centers for Medicare & Medicaid Services (CMS) ELIZABETH PALENA HALL, MIS, MBA, RN, Office of the National Coordinator for Health Information Technology (ONC) MAP DUAL ELIGIBILITIES WORKGROUP LIAISON: CLARKE ROSS, DPA NOF STAFF: ELISA MUNTHALI, Vice President, Quality Measurement MARCIA WILSON, Senior Vice President, Quality Measurement TAROON AMIN, Senior Advisor LAURA IBRAGIMOVA, Project Analyst ERIN O'ROURKE, Senior Project Manager KATHRYN STREETER, Senior Project Manager MARGARET TERRY, PhD, RN, Senior Director SARAH SAMPSEL, NQF Consultant

ALSO PRESENT:

ANDREW BAIRD, HealthSouth

MICHELLE BRAZIL, Centers for Medicare &

Medicaid Services (CMS)

LAURIE FEINBERG, MD, Acumen

TROY HILLMAN, Uniform Data System for Medical

Rehabilitation

TERESA LEE, MPH, JD, Alliance for Home Health

Quality and Innovation

TARA McMULLEN, MD, PhD, Centers for Medicare &

Medicaid Services (CMS)

KIM SPALDING-BUSH, Centers for Medicare &

Medicaid Services (CMS)

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Adjourn

1	P-R-O-C-E-E-D-I-N-G-S
2	9:02 a.m.
3	CO-CHAIR RAPHAEL: Before we begin
4	this morning's work, which involves several
5	measures related to the IMPACT Act and several
6	measures related to the Hospice QRP, a few people
7	have approached Deb and me with some questions
8	about the process that we are engaged in.
9	And I think everyone needs to
10	recognize that two things have occurred. First
11	of all, we're doing our work at a much earlier
12	stage in the development of measures than we
13	traditionally have.
14	And secondly, the National Quality
15	Forum has really tried to step back and
16	constantly assess how the process can be
17	improved. And to make adjustments.
18	So, as we're in this period of
19	evolution, I thought it would be valuable to have
20	Taroon, who is the staff to the MAP Coordinating
21	Committee, and I thought I there he is.
22	Taroon, I am calling on you to kind of

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just speak a little bit about the process. 1 And 2 then we can turn to CMS and kind of hear their perspective on the process as well. 3 4 So, Taroon, take it away. 5 Thank you, very much Carol. MR. AMIN: Good morning everyone. My name's Taroon Amin. 6 Ι 7 am an NQF consultant supporting the MAP Coordinating Committee, along with some of my 8 9 other colleagues here, in particular Erin, and 10 some other colleagues in the back. 11 So, we wanted to just raise a few 12 topics of conversation that seemed to emerge 13 during the discussion yesterday. It seems there's additional conversation over dinner with 14 15 the Committee yesterday -- or with the workgroup 16 yesterday around the measure under development 17 pathway. 18 And then also, the voting procedure. 19 And to see if there's any conversation among the 20 workgroup, or any concerns, outstanding concerns. 21 Just to make sure that we're all feeling comfortable about the decisions and the decision 22

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making process.

2 And also, that I can provide you as much context as possible in terms of how these 3 4 decisions are made. And where these decisions 5 are made. So, in particular, I'd like to sort of 6 articulate that the MAP in general, and the 7 Coordinating Committee, has really been 8 9 undertaking a significant amount of process 10 improvement activities over the last two to three 11 years, to really try to enhance the ability for the Coordinating -- for the various workgroups 12 13 and the Coordinating Committee itself, to focus 14 on the major issues that emerge in conversation. 15 And less -- reduce the over processing 16 if you will, given the number of measures that 17 are put in front of the various workgroups and 18 the Coordinating Committee during the time for

20 And make sure that there's 21 conversation around some of the key issues. And 22 so, with that said, one of the key enhancements

evaluation.

19

last year was the introduction of the consent
 calendars.

The purpose of introducing the consent calendar was not to limit discussion, by any means. Which is the intent of why any member of the workgroup is welcome to pull any of the measures for additional discussion.

And really focus and create sort of a 8 9 cohesive group of measures so that we're 10 discussing them in an efficient way. One of the 11 key elements, and also, I would just sort of 12 point out, that we are trying to continue to --13 we continue to try to ensure that there's a reduction of unneeded variation between the 14 15 different workgroups.

Granted, we're looking at different settings, where the different programs are, in various different stages. So, with all that being said, we're trying to make sure that the process is relatively consistent.

21 One of the key pieces of input that we 22 heard at the end of last year's pre-rulemaking,

1 from the various different workgroups, and 2 particularly the hospital workgroup and the 3 clinician workgroup that are -- the hospital 4 workgroup in the sense of how many programs that 5 they're evaluating, a significant number of 6 programs.

7 And last year with the clinician 8 workgroup, the number of measures was 9 significant. That the -- there were a number of 10 individual workgroup members that sort of counted 11 up the number of times that we asked them to 12 vote.

And given, you know, how much we respect and value the time that you're spending here with us, and providing this input to CMS, we realized that that was not necessarily the best use of time.

When there is general agreement, or
unanimous agreements on certain decisions, to
focus the discussion really more on the
conversation and less the voting procedure and,
you know, putting Laura through the pain of

finding the extra two votes that happen to be
 around the table.

And you know, going through that. 3 The extra minutes that we take to do these votes end 4 5 up actually taking a significant amount of time. So, with that, one of the questions 6 7 that had emerged, was whether there was a need for a final vote on the consent calendars after 8 9 the discussion. And one of the policy changes 10 that occurred was really, you know, asking the 11 Chairs to look to the Committee to see if there 12 was unanimous agreements on accepting the 13 workgroup -- or I mean, the preliminary analysis 14 recommendation from Staff. 15 And then, if any workgroup member 16 wanted to change that recommendation, open to 17 having that conversation. But, otherwise, there 18 was not a need to go through the formal clicking 19 process. 20 So, that was one issue I just wanted

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to clarify where that came from. That might not

be as much of an issue for this workgroup, given,

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you know, the type of measures and the programs
 and whatnot.

But, clearly we had a robust 3 4 conversation around all these topics yesterday. 5 But, that sort of explains why the Coordinating Committee and the workgroups, the other 6 workgroups had a little bit of a concern and 7 recommendation around improvements for this year, 8 9 around removing that element of the deliberation. 10 So, before I move on, I just wanted to 11 clarify that component. Ask the Chairs if that's 12 a sufficient response to that discussion. 13 And then I'll move onto the measure 14 under development pathway. Which is a little bit 15 more complicated. 16 CO-CHAIR RAPHAEL: Okay. Are there 17 any questions on that? Robyn? 18 MEMBER GRANT: I muted myself again. 19 Okay, I just wanted to make sure that we're on 20 solid ground legally. 21 That this, you know, holds. That it's 22 not something that could come back to bite us

later or be, you know, maybe a loophole could be 1 2 exploited down the road because we didn't technically vote. 3 4 So, I just wanted to --5 MR. AMIN: That's fair. And again, 6 any --7 MEMBER GRANT: Get some assurance there. 8 9 Any concerns that the MR. AMIN: 10 workgroup has, I mean, we're in an environment of 11 continuous improvement. I mean, the goal would 12 be not to try to change some of these processes 13 while we're in this rulemaking cycle. 14 But if there are concerns like, this 15 is why we what to have a conversation about it. 16 And you know, we can address them if they're 17 needed. 18 So, thank you for that. And you know, 19 from what I understand again, this particular 20 element of the decision making was broad. And we 21 had a conversation with the Coordinating 22 Committee, it's generally accepted with the

1	Chairs I should say, the Coordinating Committee.
2	And it was generally accepted. So,
3	you know, I'll just put that aside.
4	I think the second issue requires a
5	little bit more conversation and an
6	acknowledgment that there's a reasonable there
7	are reasonable concerns that have been raised by
8	commenters around the question of, and I would
9	welcome comments and reflections from our CMS
10	colleagues, around the measure under development
11	pathway.
12	So, for some historical context, you
13	know, when we started with MAP a number of
14	five years ago, you know, there was sort of a
15	viewpoint that a lot of what MAP would be doing
16	was looking at endorsed measures and making a
17	decision around selection of these measures for
18	programs.
19	As the MAP has evolved and these
20	programs evolved, and the statutory requirements
21	have evolved, MAP has found itself in a position
22	of actually commenting much more on measures much

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further upstream.

2	And basically what this translates to,
3	and this is what created the measure under
4	development pathway last year, which is why
5	there's this decision around continue further
6	development or do not continue further
7	development, was that there was a clear goal that
8	CMS asked for the MAP to provide early input on
9	measure concepts, given potentially a short
10	turnaround time for potential implementation.
11	Or that they wanted early input before
12	the significant investment was taken to continue
13	on measure testing. And so, the a large
14	number of measures sort of fell into this measure
15	under development pathway.
16	And we wanted to make it clear in the
17	MAP decision making that it wasn't just using the
18	same decision categories as fully developed
19	measures. Which is why we created this
20	different decision making categories for measures
21	under development.
22	Which is continue further development.

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Or do not continue further development.

2 I think one of the concerns that have been raised during the comment session last --3 yesterday, and is something that the Coordinating 4 5 Committee will be taking up during their January meeting. 6 7 Which, this will be an issue that's going to be spanning all of the workgroups. 8 Is 9 that this has created a potential concern in the 10 view and from the perspective of many 11 stakeholders. 12 Which is that some of these measures 13 that are very early in development, get a 14 decision from the MAP, which is go ahead and 15 continue development. And that may be perceived 16 as, you know, go ahead, this is approved with no 17 conditions, given that these measures may not 18 have even gone through the endorsement process. 19 And you know, again, one of the 20 challenge here, one of the challenges here is 21 that clearly the MAP is making recommendations to 22 And these recommendations are about CMS.

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measures, you know, these are about measures that
 are still under development.

And so this is a reasonable concern 3 4 that has been raised. I would just sort of 5 characterize that what the intent of the measure under development pathway was to clarify that 6 these are not measures that have enough 7 information, meaning the testing information in 8 9 the setting that they're intended to be used, for 10 the MAP to really make an up or down decision 11 fully. 12 And so, this was intended to create a 13 separate pathway. So, maybe I'll just stop 14 And sort of -- in terms of what the there. 15 context is. 16 I would welcome sort of comments or 17 reflections from our CMS colleagues or any other 18 MAP Staff. Or the Chairs if there's any place 19 else I can sort of expand. 20 CO-CHAIR RAPHAEL: Okay. Let me turn 21 to our CMS representatives. And ask if you have 22 any comments as we're shaping this new process?

1	MEMBER LEVITT: Well, first of all,
2	thank you. Thank you for the explanation. And
3	really, thank you for the workgroup.
4	I thought that we had a very, very
5	constructive meeting, and talking about very
6	important measures yesterday. Some of the
7	measures which have statutory time lines on them.
8	And other measures that don't.
9	And you know, at CMS we, you know, we
10	really try, and I think we're successful at being
11	as transparent as we can, possibly can, in terms
12	of, you know, discussing these measures and
13	getting feedback from you.
14	I think many of you came to me
15	yesterday and mentioned that you appreciated the
16	openness that we have in terms of some of the,
17	you know, issues going on. And the opinion that
18	we wanted from the MAP.
19	As we move forward with these
20	measures, if the measures are opposed for any of
21	the programs, certainly what's gone on here today
22	will be discussed and will be explained. And you

know, will not be ignored at all. 1 2 And as to, you know, what any sort of 3 future time line might be with the measures, that 4 really depends on, you know, our policy decisions 5 and decisions, you know, in terms of the importance of, you know, moving forward the 6 7 measures. But we always take the MAP's opinion and the importance of the NQF into account in 8 9 terms of these things. 10 CO-CHAIR RAPHAEL: Bruce? 11 MEMBER LEFF: Yes. Just a 12 clarification. I really appreciated that 13 explanation. And I too thought yesterday's conversation was terrific. 14 15 So, tell me if I'm still not 16 completely understanding this. But, it feels 17 that even within the measures under development 18 category, those that have statutory, you know, statutes standing behind them, seem to be in even 19 20 a different category. 21 Like that train is going to move 22 forward. Our role here is truly advisory input.

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Is that fair? 1 2 And if that's so, it may mean you need a slightly different designation for those. 3 Because I think it would help. I think that's 4 5 where I was really very confused yesterday. And also, if you could clarify for me, 6 7 I think I have it, but I'm not 100 percent sure. How the measure under development framework and 8 9 the endorsement framework ultimately come 10 together. 11 MR. AMIN: Okay. I will try to start 12 with the -- I'll start with the second. And then 13 I would actually ask some of my colleagues, maybe 14 Erin, or even the Chairs to reflect on the first. 15 Which is around the role of the MAP 16 sort of being advisory. And what the decisions 17 of the MAP sort of represent in terms of the 18 process that CMS uses. 19 I mean, inherently it is an advisory 20 -- in an advisory role. But, again, I'll take a 21 step back from that and ask others to sort of 22 reflect on that.

You know, this is another topic that 1 2 the Coordinating Committee is going to spend some time on in January. Because the relationship 3 4 between MAP and the consensus development 5 process, the endorsement process, is an evolving discussion. 6 7 So, with that being said, you know, when measures under development sort of come into 8 9 the MAP process, you know, the MAP is making a 10 decision on whatever information is available at 11 that time. 12 It may be because the measures are 13 still early in development. That's generally the And the definition, one of the main 14 reason. 15 reasons why measures go into the measure under 16 development pathway is because there's not 17 testing. 18 And that testing, not even the quality 19 of the testing, it's just whether it's fully been 20 tested for that setting and the data source. 21 Which is information we get from our colleagues 22 at CMS.

So, with that being said, that's why 1 2 NQF feels relatively strongly that it's difficult to really make a full -- a recommendation from 3 4 the MAP. Given the type of information that's 5 available at the current state. So, you know, that's the measure under 6 7 development pathway. That's the definition. That's how you get into it. There's just not 8 9 full testing. 10 And that's what the Staff uses to sort 11 of bifurcate the measures that go into this 12 It's the measures under development pathway. 13 pathway versus fully developed measures. 14 Now, how does that interact with the 15 endorsement process? The NQF endorsement process 16 really looks at measures that are fully 17 developed, fully tested, and fall into an 18 endorsement project cycle. 19 So, a measure that's sort of developed 20 in let's just say neurology, just using that as 21 an example, that's, you know, still a concept. It can be looked at by the MAP. 22

That information is then translated to 1 2 the Neurology Standing Committee that looks at all of the new fully developed measures and 3 4 tested measures. And they make a decision, a 5 scientific evaluation of the quality, of the reliability, validity of the measure, and the 6 evidence supporting the measure in summary. 7 And that endorsement information 8 9 ideally is then translated back to the MAP if 10 they are looking at measures that are fully 11 developed. And that information in turn is 12 provided back to you in terms of the preliminary 13 analysis. 14 Which is what Staff pulls from to 15 make, you know, for fully developed measures. If 16 you're considering fully developed measures. 17 So, they're relatively independent. 18 I mean, just because the MAP recommends continued 19 development, doesn't mean that the measure's 20 going to be endorsed. In fact, I mean it -- I 21 mean, it's sort of interesting information. 22 But, the endorsement process is

looking at a much more robust set of information. 1 2 And it's looking at it much more, you know, looking at all the scientific testing information 3 4 and all the evidence to support the measure. Which obviously, given the volume of 5 what you're looking at, would not be possible. 6 7 And, you know, the way that the Committees are seated is slightly different as well. 8 9 So, I don't know if that answers your 10 question. I don't want to just continue to sort 11 of --MEMBER LEFF: 12 No, it does. No. And 13 just a quick follow up, if we have a moment. So, 14 if you're a measure developer, is there an 15 advantage to first going through measure under 16 development as a lead to endorsement? 17 Or are they just independent that it 18 doesn't matter? 19 I mean, currently there's MR. AMIN: 20 really no, you don't have any insider path. 21 CO-CHAIR RAPHAEL: Clarke? 22 MR. ROSS: I wanted to speak about how

pleased I was that the National Quality Forum 1 2 developed this measure development process. Τ was a member, and am a member, for the last three 3 4 years, with a workgroup on persons dually 5 eligible for Medicare and Medicaid. And we continually were frustrated 6 7 because we do have very limited measures that are performed in isolated communities and States. 8 9 That address very important concepts that the 10 full duals workgroup supports. 11 And so, when the National Quality 12 leadership came up with this second process, 13 we're delighted that there's this opportunity to 14 elevate something that's not ready for full stage 15 implementation. But, is not ignored because it's 16 not ready for full time implementation. 17 So, I know there are some stakeholders 18 with financial interests who don't like that 19 But, from a consumer point of view, and status. 20 the majority of the duals workgroup, this is a 21 wonderful opportunity. 22 And we're excited. And we're

proposing different kinds of isolated measures 1 2 that we'd like to see brought to scale. CO-CHAIR RAPHAEL: All right. 3 Thank I don't know if anyone else from NQF Staff 4 you. 5 wants to weigh in. Oh, Bruce, you were asking --6 7 MEMBER LEFF: Was there an answer to 8 the question about the statutory issue on some 9 measures? 10 MS. O'ROURKE: So, I can try to take 11 that. And may look to Tara and Alan for some 12 help. 13 I think for a number of the programs 14 that were created by legislation that has some 15 fairly strict requirements about what's to go 16 into that program, and what measures are to be 17 used, MAP does have a more limited ability on 18 what input you could really provide. 19 I think the idea of perhaps an 20 alternate designation for those where you're more 21 looking at the -- how a certain measure might be 22 implemented, may be more useful than how we're

currently putting it to you, since for some 1 2 there's not a lot of choice. There's some, you know, some of these 3 4 statutes as Joel was presenting yesterday, you 5 know, for the SNF EDP program, basically only one measure can go in there. 6 7 So, I think that would probably be another good item for the Coordinating Committee 8 9 to take up on how we can most handle --10 effectively handle those programs where MAP has a limited box to play in if you will. 11 12 That there's some fairly strict 13 requirements put on things by Congress. And how 14 you can weigh in, in the most effective manner. 15 Taroon, would you add anything? Tara? 16 Alan? 17 I think, I mean, every MEMBER LEVITT: 18 measure is different in terms of, you know, where 19 a particular measure might be in terms of its 20 development. Some measures may already be being 21 used in other programs and be NQF endorsed. 22 And you know, they may be brought

because they want to be considered for a 1 2 different program. So they're already endorsed measures, but yet they're under consideration for 3 4 a different or a new program. 5 So, they can be going there. Some measures that are -- have statutory mandates may 6 already have been, you know, fully developed. 7 For example, you know, Joel's -- one 8 9 of the measures for the Value-Based Purchasing 10 Program yesterday was already in. You know, a 11 measure that had gone through the endorsement 12 process. 13 So, it's a hard question to answer. 14 I mean, like I said originally, we value this 15 input. And we want to use it as best as we 16 possibly can, you know, within the -- within the 17 limits as to what the schedule can be here and 18 what schedule we, you know, need to go by as 19 well. 20 And I think that we've noticed, 21 thankfully that, you know, in continuing to try 22 to make this better and better that we need to

relook at this and say well, considering how 1 2 things are, and the schedules that are, you know, everyone's under, what is best to move forward? 3 4 So, I mean, I think it is a 5 constructive time to do it. CO-CHAIR RAPHAEL: Let me just check 6 7 and make sure that we accommodate any public So, let me ask the operator to see if 8 comment. 9 there are anyone on the line who wants to make a 10 comment on this issue around the process we're 11 engaged in. 12 OPERATOR: Okay. At this time if you 13 would like to make a comment, please press star 14 then the number one. 15 (No response.) 16 OPERATOR: There are no public 17 comments at this time. 18 CO-CHAIR RAPHAEL: Okay. Let me turn 19 to our audience. And see if there's anyone in 20 the audience who wants to weigh in on this. 21 DR. GIFFORD: Hello. So, I think that 22 the whole NQF MAP process is an incredibly

important process in this review process. 1 2 And actually in the IMPACT Act, we advocated really strongly that in the original 3 language there was nothing in there about NQF 4 5 review of IMPACT Act measures. And we advocated that that be inserted into the measure process. 6 7 And so we see this as a vital thing. I think you've heard a lot today from CMS about 8 9 statutory requirements and time lines. And they 10 are in a real bind. 11 If I was in their shoes developing the 12 measures that they're developing, I would do 13 exactly what they're doing. And I'd have the 14 exact process they're doing. 15 They are under staffed and under 16 resourced. And they have unrealistic time 17 frames. 18 However, NQF also has a statutory 19 requirement. And this body has a statutory 20 requirement to review the measures and provide 21 feedback. 22 And so while CMS is moving forward on

a fast time frame, the requirement, they do not -1 2 - this is a body and NQF is an advisory process. Their requirement is that what comes out of the 3 MAP process, they have to address in rules. 4 5 And they have to explain when they use measures that are not NOF endorsed measures that 6 7 have gone through the process. And so they just have to explain that. And they have to give the 8 9 rationale. 10 And so if there's concerns here, my 11 concern on the new process, of creating this 12 loophole of measure under endorsement, it allows 13 them to then just sort of say yes, let's go 14 forward. 15 And it diminishes the feedback and 16 concern that many of you have raised around that 17 to not having to necessarily be addressed in the 18 rulemaking as they go forward on these fast 19 measures. 20 So what Congress said, do these measures and do quickly. Congress also said, we 21 22 want a balancing entity, a consensus by the

entity to review and give feedback to the
 Secretary on these rules.

3 So, I would strongly urge you to think 4 about as you go through and vote on these 5 measures, to make sure it's clear what feedback 6 you want to address.

Because in the past, I think a lot of
these measures were used for quality improvement
purposes. And were just thrown up as reporting.
They are now being used fundamentally
differently. They are now being used in payment
models.

They're being used to create postacute care networks. They're being used to
provide information by providers to consumers on
making post-acute care decisions.

And so, some of these issues and
feedback for these measures, the denominator
definitions that are not fully specified, the
risk adjustment can really have profound impact,
unintended impacts that many people brought up.
So, I would strongly encourage you as

you go forward, to think about that. And the current process of measure and develop -- or not pursue, does not allow that sort of robust more feedback that the Secretary then has to address as it goes forward.

And so, I think as you think about the voting and reviewing process that you consider that more carefully. I also would, not being a lawyer, slept at a Holiday Inn last night, I would -- haven't been on a lot of boards.

I would recommend that, and I would agree with Robin's point, I would bundle at the end. And I agree that their intent was to decrease all the measures. And I support the consent calendar.

But usually a process is that consent calendars get a vote. And there's a process with Staff with consensus. There's not even a verbal vote going on here.

This is a small thing. And I don't want to take up extra time. Maybe you bundle it all at the end. Because, if not, it's

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technically there is not a vote on it. And 1 2 technically it's not clear. Now there doesn't have to necessarily 3 4 -- there's been a laid out vote process by the 5 But in the statute there is no voting MAP. 6 process. 7 So, I'm not sure where the legal issue is, but I think -- I'll just give you some 8 9 concern and pause about that. Then there is the 10 workgroup's or maybe it's the MAP's. It doesn't 11 matter. 12 And so I don't know. I defer to legal 13 counsel at NQF. But, I give you some pause to 14 think about how you go through and consent to it. 15 CO-CHAIR RAPHAEL: Thank you. Tara, Or was it Alan? 16 did you want to say anything? 17 MEMBER LEVITT: No. Thank you. And 18 thank you for the comment. 19 I do want to -- I do want to make a 20 couple of comments. First, we are developing 21 these measures based on certainly looking at 22 Congress' recommendations and Congress' vision.

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And Congress' time lines that they've 1 2 set up based on feedback that they've received from people in the room, in terms of some of the 3 4 needs that are here. We certainly do not 5 consider ourselves under-staffed or under-funded to meet these needs of the consumers as well as 6 our stakeholders. 7 We are proposing these measures for 8 9 the programs that we are proposing them in. As I 10 said the other -- said yesterday, these are 11 quality reporting programs. 12 These are programs that will be 13 reporting the measures that you gave us advice on 14 yesterday if they, you know, when it got proposed 15 in those programs. For the -- our consumers to be able to look at and for you to be able to use 16 17 in your quality activities. 18 If any type of Value-Based Purchasing 19 Programs were to be statutorily mandated, those 20 programs would use measures that I would assume, 21 I don't write the statutes, but I would assume be

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similar, would require a similar process too.

1	Which would include coming back to a
2	body a consensus body such as the MAP. So
3	that when you are viewing the measures, view them
4	to the program that the measures are being looked
5	at for.
6	Don't please don't assume anything
7	else. Because if other programs do come along in
8	the future, those programs would have their own
9	statutory requirements as to, you know, how
10	measures could be proposed or, you know, be part
11	of that program.
12	CO-CHAIR RAPHAEL: Thank you. And
13	we're going to hear from Paul. And then we're
14	going to close up this discussion and move onto
15	other business we need to conduct today.
16	So, Paul?
17	MEMBER MULHAUSEN: Yes, just in terms
18	of procedure. It's my understanding that we have
19	taken a vote on each of these consent calendar
20	deliberations.
21	We've essentially approved them
22	through affirmation. And if we wanted, any

individual one of us should have had the -- have 1 2 the opportunity to have asked for a formal vote. But, from my point of view, we have 3 voted on the consent calendar. And that each of 4 5 those action items were approved through affirmation. 6 7 So, I don't think it's a fair characterization to say we have not used this 8 9 opportunity to vote on the consent calendar. 10 CO-CHAIR RAPHAEL: And in line with 11 that, we just checked with the NQF Staff this 12 morning to affirm that everything we did was 13 consistent. Reflecting the processes that had 14 been put in place and legal. 15 So, just to give everyone a sense of 16 confidence in the process thus far. 17 MR. AMIN: Carol, can I just ask one 18 question? Sorry. 19 CO-CHAIR RAPHAEL: Sure. 20 I think Paul characterized MR. AMIN: 21 exactly the intent of the voting procedure. Ι 22 just wanted to clarify or ask if any of the
workgroups felt that, you know, the final 1 2 recommendations, which was essentially unanimous across the different consent calendars for 3 4 accepting this, you know, Staff recommendations. There was a number of measures that 5 were pulled off and voted separately. 6 But, if 7 anyone doesn't feel that we sort of reflected Paul's vision or Paul's discussion here of, you 8 9 know, I would ask you to raise those concerns. 10 We certainly don't want this to be a, 11 you know, process that doesn't reflect your 12 input. And we can do a separate vote on those 13 measures if it's required again. 14 But that is the -- that was the intent 15 if, you know, if the measures aren't being 16 pulled, you're accepting the Staff 17 recommendations. And that is your formal vote. 18 So, I just wanted to be clear about And I would really like to thank the 19 that. 20 public commenters on these issues. 21 They're certainly ones that need to be 22 considered more thoughtfully and across all the

So, it's certainly something we will 1 workgroups. 2 bring back to the Coordinating Committee for further discussion as well. 3 4 CO-CHAIR RAPHAEL: All right. I think 5 we are going to move onto the next part of our agenda, which has to do with measures on the 6 7 consideration for the IMPACT Act. This is one I'm particularly 8 9 interested in. Because when we did our core 10 measure set, I would have to say one of the areas 11 we grappled with was how to deal with costs. 12 And we had one of our core measures 13 had to do with cost and access. And so, let me 14 first ask the Operator to open the lines to see 15 if we have any public comments on this particular set of measures. 16 17 Operator? 18 **OPERATOR:** To ask a question, please 19 press star then the number one. 20 (No response.) 21 OPERATOR: There are no comments at this time. 22

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Thank you so much. 1 CO-CHAIR RAPHAEL: 2 Let me again turn to Members of the audience to see if anyone wants to make a comment on this. 3 4 Okay. 5 Thank you. Good morning. MR. BAIRD: My name is Andrew Baird from HealthSouth. 6 Thanks for your discussion yesterday on some of these 7 8 measures. 9 We are a post-acute care provider. Ι 10 think I've introduced myself as of yesterday. 11 I'll just note that as an avid observer of this 12 process, there is very little for us to provide a 13 comment on in way of this measure. 14 And since that the specifications are 15 relatively opaque, especially about when 16 particular accounting for a cost for different 17 types of post-acute care. Post-acute care 18 providers would begin what portions of different 19 post-acute episodes would be attributed across 20 the entirety of a post-acute episode. 21 AKA, when a patient's entire post-22 acute experience, and how that would be divided.

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Or if that would be divided at all.

2 So, I'd just like to reiterate for this group that the amount of specifications that 3 4 are currently published, are very opaque. And 5 it's been hard for anyone at least on the stakeholder side, to get an idea of what exactly 6 7 this measure looks like. We've heard from several people that 8 9 discussions at the TEP were also somewhat 10 ambiguous in terms of whether or not they settle 11 on the measure framework. But again, I just wanted to underscore 12 13 the fact that the amount of information that is 14 out there to say this is a good or a bad measure, 15 seems to be relatively low compared to the 16 measures that we discussed yesterday. Thank you. 17 CO-CHAIR RAPHAEL: Okay. Thank you. 18 DR. GIFFORD: I would amplify that in 19 that the measure specifications are not provided 20 for this. And I would encourage you to vote 21 insufficient information at this time. 22 This one can piece together what the

measure may look like from different pieces of 1 2 information out there. But, even the TEP itself has not received a measure -- a set of measure 3 specifications to work on on this measure. 4 5 So, I think this is an important I think it's an important issue to go 6 measure. 7 forward. It's specified in the IMPACT Act and 8 9 statute as a time frame. But there currently is 10 insufficient information at this time. I would 11 encourage you to vote on that level. 12 CO-CHAIR RAPHAEL: Okay. Okay, can 13 you please introduce yourself. We know David Gifford. 14 15 But we want to just be sure that each 16 person introduces herself or himself. 17 MS. LEE: Sure. 18 CO-CHAIR RAPHAEL: Okay. 19 Teresa Lee with the Alliance MS. LEE: 20 for Home Health Quality and Innovation. And 21 thank you again to this body, NQF and CMS for the 22 opportunity to comment.

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1	I agree with the former commenters.
2	We greatly look forward to seeing the specific
3	measure specifications for this measure.
4	We have in the past looked at the MSPB
5	measure for hospitals. And so, you know, my
6	comments are based on, you know, the assumption
7	that this might look somewhat like the MSPB
8	measure for hospitals.
9	And vis-a-vis that measure, I think
10	that our concerns are somewhat similar from a
11	home health perspective to the concerns about the
12	hospital MSPB measure. First and foremost, that
13	we continue to be concerned about just looking at
14	costs alone.
15	And that that might be confusing for
16	consumers. Because cost alone does not
17	necessarily mean anything vis-a-vis quality.
18	Low Medicare spending per beneficiary
19	might mean efficient care. But it might not. It
20	might just mean low spending. And that might
21	actually mean poor quality of care.
22	So, that continues to be an issue. If
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that track is pursued, we strongly urge 1 2 consideration of a measure that relates to access 3 to care. I definitely think that MSPB is a 4 5 significant consideration for payers, for the Probably increasingly for 6 Government. 7 accountable care organizations and those running bundled payment arrangements. 8

9 But likewise, I would think that for 10 consumers and patients, it's very much of 11 interest to have some kind of a measure that 12 relates to access to care.

So, those are probably my primary considerations. And just as with any measure, we believe very strongly in the need for adequate testing and validation of the measure.

And would urge sufficient time and
reporting to providers before making any measure
like this public. Thank you.

20 CO-CHAIR RAPHAEL: What do you mean by 21 that? 22 MS. LEE: You know, I think that what

we mean by access isn't, you know, we'd be very 1 2 interested in working with CMS on a measure that relates to access. Because I think that we 3 4 haven't given enough thought to it. 5 But, I remember at the inception of the Medicare Shared Savings Program, I want to 6 7 say that RAND did an analysis of what kind of measures should be developed in -- for the 8 9 Medicare Shared Savings Program. 10 And one recommendation and, you know, 11 identification of a gap, was that there needed to 12 be some kind of measurement that relates to 13 ensuring that patients have adequate access to 14 care. 15 Simply because in any kind of shared 16 savings arrangement or bundled payment paradigm, 17 there might be a concern about inadequate, I'll 18 just say, you know, under use as opposed to over 19 use. 20 So, that's a question that I think I 21 and many might have with these types of 22 arrangements. And when you're looking at

Medicare spending for beneficiary, you know, 1 2 there's clearly going to be an opportunity to use this measure as a way to select providers who are 3 4 spending lower over the course of an episode. CO-CHAIR RAPHAEL: 5 Okay. Let me see if Laura has anything in the chat box? 6 7 MS. IBRAGIMOVA: No, there is nothing. 8 CO-CHAIR RAPHAEL: Okay. So now, this 9 is I guess something where we really do want to 10 understand this measure. 11 Sarah, I'm going to turn to you to 12 start us off given that we have heard that the 13 measure spec is not very, very illuminating. 14 Okay. So, this is very MS. SAMPSEL: 15 much a -- all four of these are similar measures. 16 The Medicare spending per beneficiary post-acute 17 care and being on the MUC List for use in home 18 health QRP, inpatient rehab QRP, long term care, as well as skilled nursing facility. 19 20 These are all -- the preliminary 21 analysis are all very much similar in that we had 22 the information, you know, that we had when we

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received the MUC List this year.

2 And so it was very preliminary 3 information. So, the information in your 4 discussion guide would be the descriptions that 5 were available to us.

And through that information and 6 knowing that these measures all support and are 7 being offered forward as components of the IMPACT 8 9 Act and the statutory requirements as well as 10 overall and knowing there are other similar measures specifically for hospital, made us come 11 12 down to the side of recommending these measures 13 and encourage continued development as you've 14 seen previously.

15 I think I would also say, you know, in 16 light of our conversation this morning, this 17 would be -- these would be a great example of 18 where CMS is really early in the process of fully 19 specifying the measures, taking in information, 20 meeting this advisory input so that as they move 21 forward with testing and using the data they have available to them, that they do come up with the 22

1 best measure. 2 But, the staff recommendation for all four of these measures, is encourage continued 3 4 development. 5 CO-CHAIR RAPHAEL: Okay. Let me turn 6 now to CMS. MEMBER LEVITT: Okay. Well, thank 7 I'll just -- I'll start off. First of all, 8 you. 9 thank you again for the review and all the 10 comments. 11 I wanted to introduce Kim Spalding-12 Bush. Kim and her team have developed this 13 measure as well as the other Medicare spending 14 per beneficiary measures throughout the various 15 programs that we have. 16 I need to apologize I guess a little 17 bit to the workgroup and to Kim. Because you 18 know, historically we haven't given presentations 19 of measures prior to the measure being done. 20 We responded very much in the way that 21 we responded yesterday. In terms of, you know, 22 responding back to the comments.

1	And I apologize for the confusion that
2	that may have undertaken. Because there is more
3	to the measure than meets the eye.
4	And I'll turn to Kim now if she can
5	maybe give some of that. So, thank you.
6	MS. SPALDING-BUSH: Thanks Alan. I'm
7	Kim Spalding-Bush from CMS. And I apologize. I
8	don't have a placard either.
9	So, I do understand the importance of
10	providing more detail around the measure in order
11	to get more meaningful comment. And I think at
12	this point, the measure has been through a
13	Technical Expert Panel.
14	And we've gotten some really good and
15	meaningful feedback from the TEP members with
16	regard to exclusions and that type of thing. So,
17	one of the commenters mentioned the Medicare
18	spending per beneficiary on the hospital side,
19	which is the name of the measure, as Congress
20	gave us in the IMPACT Act.
21	So, these measures do look a lot like
22	the hospital level Medicare spending per

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beneficiary. I think there's an important 1 2 distinction that we've begun to explore with the TEP, which is what types of services will we want 3 to actually exclude from this measure? 4 So, for the hospital level measure, 5 it's all Part A and B. Everything's in. 6 For 7 this measure, we are taking a look at things like congenital, you know, treatment for congenital 8 9 issues that the beneficiary may have that could 10 be wholly outside of the scope, or the influence 11 of the post-acute care provider that we might 12 want to exclude. 13 The TEP also suggested issues that may 14 arise on the first day of a post-acute care stay. 15 Where they may actually reflect more or something 16 that could have happened in the hospital and then 17 a UTI maybe appears and they need treatment for 18 that in the post-acute care setting. 19 So, those types of things that we 20 received from the TEP, we are exploring. And we 21 will be providing the detailed measure 22 specifications after, you know, we receive your

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input and we do the public -- and get more 1 2 stakeholder and public comment on these measures. So, I also wanted to speak to the 3 4 concern that this is a resource use measure. And 5 I understand that as well. And that it was sort of delineated as 6 7 such in the law. But that CMS, you know, historically has used resource use measures when 8 9 they do become a part of any sort of a Value-10 Based Payment Program used alongside with quality 11 measures so that you do take the total picture as 12 more of a value. We understand that a resource use 13 14 measure just inherently is looking at costs. The 15 things that we could expect to recognize that, 16 you know, may reflect better quality within a 17 resource use measure are limited. So, things like improved care 18 19 coordination that reduces unnecessary services, 20 prevents readmissions, those types of things, 21 will show up as better performance in a resource 22 use measure.

1 But, we don't present the measure as 2 sort of an inclusive quality and cost measure. It is really a resource measure. And I think 3 with regard to the access of care issue that's 4 5 also an important one. While the measure itself isn't, as you 6 7 know, set up to consider that, it is something that we have done analysis on in a hospital 8 9 level. And we intend to continue that type of 10 monitoring analysis as we move forward with these 11 measures. 12 And we were able to look at things 13 like, was there a spike in resource use after the 14 end of this post-discharge window. Were 15 providers delaying needed care to try to avoid, 16 you know, those services being captured in the 17 measure. 18 And we have found in our analysis at 19 the hospital level, that that did not occur. But 20 it's something that certainly with post-acute 21 care setting, we will continue to monitor for. 22 And I think that's about all I have in

response to the comments that we've heard so far. 1 2 Alan, is there anything else that you might want to add about the measures? 3 4 I'll put you on the spot. 5 MEMBER LEVITT: No, I mean I guess maybe we'll turn to the workgroup and see how the 6 7 workgroup -- questions the workgroup may have. And maybe you can help. You and your 8 9 team can help in terms of clarifying the 10 questions. 11 CO-CHAIR RAPHAEL: Gene, you're our 12 lead discussant on this. So, before we turn to 13 the entire workgroup, do you want to weigh in? 14 MEMBER NUCCIO: Thank you. Again, I'm 15 not representing any particular provider. I am 16 one of the technical representatives. 17 Certainly, we support the idea of 18 measurement of cost across providers. And that's 19 clear that that's one of the charges that we all 20 have in terms of -- in addition to giving 21 quality. 22 I do have three concerns or concerns

in three parts. First, the concern of inherent
 differences among the four different post-acute
 care health group providers.

They clearly serve very different patient populations in terms of the medical needs and resources and interventions that need to be given. Why else would we have four different kinds of groups if we did not have at least four different kinds of patients.

The patients are served in quite
different physical environments. Quite notably,
home health is not in a bricks and mortar kind of
environment.

14 The three -- three of the groups have 15 a payment, the SNF, IRF, and LTC -- LTCH, excuse 16 me, LTCH. Have primarily a fee-for-service kind 17 of payment model.

18 Whereas home health has a perspective 19 payment model where people who have the same 20 diagnosis are -- the agency receives the same 21 payment. And so, there will be inherent 22 differences in terms of variation found within

1

these four different groups.

2 The second concern is the comparison While the methodology is guite clear, I 3 format. mean, it's very standardized of a 60-day period 4 5 with a provider and a 30-day post provider period. 6 7 The -- there's a -- some inherent differences in terms of the settings. And we 8 9 discussed this yesterday when we talked about 10 both readmission and discharge. 11 What does it mean to be discharged? 12 Or what's the likelihood of being discharged from 13 an IRF to a -- to the home setting? 14 And so, the payers that are likely to 15 occur in this 60-day period, and then the added 16 30-day period, will look quite different amongst 17 these four different groups. 18 There is something that we also 19 discussed yesterday, and excuse me, and also 20 parenthetically with that, there are also quite 21 clear empirical differences in region in terms of 22 what these care patterns are.

So, the regional differences are --1 2 could be within State, or it could it be across the ten CMS regions. So, those regional 3 differences would be of concern. 4 5 Yesterday, we discussed the role of risk adjustment in these models and the previous 6 7 models. And again, perhaps because it's such an early development phase, that -- the whole risk 8 9 adjustment process, and how the clinical case mix 10 is going to be addressed, is not quite clear in 11 these and needs to be much more explicit. 12 The third area is sort of psychometric 13 issues. And the language of the average of the 14 ratio of standardized episodes spending level, 15 and the expected episode spending for each 16 provider, is somewhat technical. 17 And maybe not exactly as accurate as 18 some of the technical people would like. What do 19 you mean by standardized? Not very clear. And 20 how would that differ from setting to setting? 21 You use the term expected episode 22 spending, which suggests some sort of a risk

model. Again, not clear in how this needs to be
 developed.

The exclusions, I was curious whether 3 4 or not dual eligibles would be included or 5 excluded in the setting. There is some language about whether or not, you have to be fee-for-6 7 service for the entire period of time. But, if you're -- and then there's 8 9 also language about your primary payer source. 10 And so, if you move from a Medicare to Medicaid 11 kind of model in that, you have a -- there might 12 be an issue. 13 In terms of the denominator, there is 14 a -- the description of a weighted median. And 15 while Alan certainly knows, I have no objection 16 to using the median in computations, I need to 17 know what the weighted is. 18 Also, with regard -- the third -- this third part, is the issue of unintended 19 20 consequences. And I think we've already heard 21 some of that. 22 And in fact it's called out in some of the descriptions that you provided. Notably, the
 cherry picking issue for -- in some care
 settings. But, I thought also there might be a
 positive.

5 That is, if we have this -- if a SNF 6 has a -- is on the hook if you will, for 60 days 7 in the SNF, and then 30 days elsewhere, they 8 might begin to partner with the most effective 9 home health agencies around. And so, there might 10 be some inherent positive in this 60 day/30 day 11 idea.

12 But again, -- again an unintended 13 consequence, we do have four measures. I am 14 concerned that there might ultimately be a 15 comparison of costs across each of these four --16 post-acute care settings that again, going back 17 to my first comment, we serve inherently 18 different patients. 19 And so I would, you know, be aware 20 that, you know, that this comparison across

groups as opposed to within groups, is an issue.

And one last comment just to

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1	summarize. You know, again I do support the idea
2	of measuring costs, costs of care.
3	But I want to ensure that the that
4	what we're really all about here is measuring the
5	value and the quality of care given to patients
6	first.
7	And understanding that that cost of
8	care involves both the integration of both
9	outcomes and processes that are delivered to
10	them.
11	So, sorry for it being so long.
12	CO-CHAIR RAPHAEL: Okay. So, I'm
13	going to turn now to workgroup members. And I
14	think the first thing we have to decide is if we
15	want to pull these from the consent calendar.
16	And I Gene, I'm going to ask you
17	your thoughts. You know, you said that you're in
18	favor of beginning to really measure costs.
19	But, you gave us a lot of caveats.
20	So?
21	MEMBER NUCCIO: Can I say that there's
22	a lot of work to do? I worry that if we use the

insufficient --1 2 CO-CHAIR RAPHAEL: Information. MEMBER NUCCIO: Information, which 3 there probably is. Okay, in reality there is 4 5 insufficient information. I don't want to discourage the amount 6 7 of work that needs to be done in order to bring this measure perhaps back to the MUC in a more 8 9 detailed and mature form. 10 I mean, I would say CO-CHAIR RAPHAEL: 11 that's something that I'm grappling with here in 12 the sense that I haven't found the house that I 13 would like to inhabit. 14 Because the house, you know, if 15 insufficient information doesn't feel like the 16 appropriate house because I think we as a 17 workgroup, have really tried to foster some work 18 on cost and access. 19 And so, this is the first time we have 20 seen some work in that area. And we want to kind 21 of continue that. 22 On the other hand, if we say encourage

continued development, to what extent are we 1 2 endorsing, in quotation marks, the road that 3 we're traveling? 4 So, that's just something that I'm 5 kind of trying to deal with here. So, if you have anything that's enlightening, that would 6 7 help. 8 MS. O'ROURKE: Sure. So, I don't 9 think I can really answer the question about what 10 to pull or how to vote. 11 But, I did want to clarify that we capture all of your discussions. And we do pass 12 13 that along in the Statement of Rationale that 14 goes along with whatever decision the workgroup 15 ultimately comes to about each measure. 16 So, your recommendations are not going 17 to CMS in a vacuum. There is a detailed 18 Statement of Rationale that captures all sides of 19 the workgroup discussion, and sends that along 20 with it. 21 So, if that helps you for your 22 decision making.

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1 CO-CHAIR RAPHAEL: Okay. Yes. Lisa? 2 MEMBER WINSTEL: I know that this has been addressed, so forgive me for asking it 3 4 But, I really would like just a really again. 5 direct, simple answer as possible on this. If this measure or any of these 6 7 measures are voted for continued development, after they have been developed more, will those 8 9 measures come back to this Committee? That's a 10 yes or a no question. 11 MEMBER LEVITT: I apologize. Can you 12 say it again? 13 MEMBER WINSTEL: Oh, if there -- if 14 any of these measures were to be voted for 15 continued development, will that measure come 16 back to this Committee for review before 17 implementation? 18 MS. SPALDING-BUSH: So, that may be 19 more of an NQF process question. 20 MEMBER LEVITT: No. Yes, again, I was 21 hoping before we kind of looked procedurally as 22 to how to vote, whether or not Kim could give the

1 workgroup some more answers to Gene's very 2 thorough analysis. I think you're seeing right now why it 3 4 was great to have Gene as a member of the 5 Committee. Because he really does a great job of looking at things. 6 7 And give Kim a chance to talk about it. 8 9 CO-CHAIR RAPHAEL: Okay. So, what I'm 10 going to do, Kim, I'm going to hold off. Because 11 I think we want to make sure we get the whole 12 range of issues. 13 And then I'm going to turn to you. 14 So, that's asking a lot of you. But, I think 15 you're up to it. 16 All right. Suzanne, you were first. 17 MEMBER KAUSERUD: I think you had 18 asked if we wanted to take it off of the consent 19 calendar for the discussion. And I would like to 20 move to do that. 21 I think it needs some more in-depth conversation. And I feel like there's going to 22

be some contention around this one. So, I think 1 2 it would be important to get those details. And then from the measure, from the 3 4 information, you know, as stated it's very 5 limited. It's hard to, you know, give a lot of input just because there's not a lot that we have 6 7 at this point in time. But I think looking to the inpatient, 8 9 or the acute care Medicare spent per beneficiary, 10 some of the things we would want is to make sure 11 that any of the risk adjustment done on severity 12 would be done off of the case mix groups instead 13 of DRGs. 14 Because the case mix groups in 15 inpatient rehab in particular, -- and I would 16 assume it's the same for skilled nursing, you 17 know, as well as home health. 18 And well, LTAC would be off the 19 inpatient. But, because the severity is captured 20 through those payment systems a little bit 21 better. 22 Also, risk adjustment on socioeconomic

status as well as other characteristics such as 1 2 availability of care giver and community supports would be important. Because that's a huge 3 4 variation at least in patient rehab, of whether a 5 patient is going to be able to return to the community with a lifelong disability. 6 Also, just some concerns, and this 7 might be a little selfish because I am in a 8 9 facility that takes a lot of unfunded and 10 underfunded patients. And so, our low income 11 provider adjustment is guite sizeable. 12 We're also a teaching facility. And 13 so, we have been told by our Medicare 14 Administrative Contractor before that per case, 15 we are the highest paid inpatient rehab facility 16 in their area. 17 And it's because of our facility 18 characteristics. So, I think that it would feel 19 wrong to me. 20 And it's just my opinion, but it would 21 feel wrong to be penalized as a provider who 22 takes low income patients and is a teaching

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1	facility, to be penalized for those
2	characteristics of our facility.
3	So, I think those would be important.
4	As well as any other, maybe a rural adjuster.
5	We're not rural.
6	But I think a rural facility gets an
7	increased payment as well because of their
8	setting. So, I think normalizing that would be
9	important if you're going to compare between
10	facilities.
11	And then the numerator description,
12	there's several terms. And this is why I'm kind
13	of thinking personally I'm thinking about
14	insufficient information.
15	Because a lot of the terms could go
16	there's terms that I'm not familiar with that
17	standardize episode spending, expected episode
18	spending, average standardized episode spending,
19	information about the weighting methodology.
20	And then the terms about planned and
21	planned care and routine screening. I think
22	we would need to know what planned care is.

1	And what routine what falls into
2	those categories to make intelligent decisions
3	about the measure. So, I'll stop at that point.
4	CO-CHAIR RAPHAEL: Liza?
5	MEMBER GREENBERG: Thank you, Suzanne.
6	I would like to amplify Suzanne's remarks.
7	I think we do need a lot of the
8	definition. And I agree that we should vote on
9	it individually.
10	I think it's a statutory measure.
11	It's an important measure. But, I feel like we
12	don't really have enough information to really
13	get into the weeds about what it's what's
14	going to happen with it.
15	I know I'm concerned about possible
16	double counting. And wonder if there's like some
17	way that we could, you know, have a couple of
18	models of patient pathways through post-acute
19	care.
20	Where we could, you know, look at a
21	patient that goes from a hospital to SNF and then
22	to home health. Or a patient that goes, you

know, different models like LTAC to SNF to home
 health.

3 So that we can kind of standardize 4 what is happening to the patients. Because 5 although I know that CMS will have every 6 intention of looking at costs paired with quality 7 that Congress might not.

8 And that might affect sort of how 9 different path providers are viewed in future 10 payment increases. So, the cost and quality 11 pairing I think is really critical.

I'm concerned about the safety net providers and what this might do to safety net, I think is also a very valid concern. And mainly also just more detail on how to interpret and understand the specs.

17 CO-CHAIR RAPHAEL: Roger? 18 MEMBER HERR: My first is a process 19 question. If one person requests a poll, are we 20 then polling? 21 CO-CHAIR RAPHAEL: Yes. 22 So then, I'm just MEMBER HERR: Okay.

making sure that was clear to everybody. 1 And my 2 second part is, I think we're having a really 3 rich discussion. 4 So, I hope if that's how we're doing 5 it, wonderful. I think all I'm hearing from the group are very important details that are needed. 6 7 But overall, these are measures that we were encouraging from the beginning. 8 And 9 we're finally getting some direction. Ι 10 understand Gene's issues of comparing settings. 11 But, if we're able to capture all of 12 our feedback here and give that as future 13 development in this area, I think we're going in 14 the right direction. 15 Okay. CO-CHAIR RAPHAEL: All right, 16 Jim? 17 MEMBER LETT: Oh, thank you. These 18 measures feel profoundly different to me than 19 anything I've ever discussed in this forum 20 before. 21 I mean, we are the National Quality 22 Forum. I feel very comfortable in hashing

through measures of quality. I am far less 1 comfortable in considering this the National Cost 2 Forum instead. 3 4 I think I support not only the ability 5 and right of CMS to understand what it costs to render care. As a taxpayer, I think they should 6 7 be obligated to do that. And I think it's an excellent thing. 8 9 I am having a hard time finding a bright line 10 between costs and quality in this discussion. 11 And I am concerned that cost may at 12 some point become more relevant. I'm reminded of 13 the famous and probably apocryphal story about 14 Gus Grissom, one of our first astronauts. 15 That they supposedly interviewed him 16 before he was blasted off into space. And they 17 said so, how do you feel, Astronaut Grissom, 18 about this? Are you nervous? 19 He said, how would you feel if every 20 part in your rocket was the lowest bidder. So, 21 I'm -- I want us to be clear what we're measuring 22 and why we're measuring it.

I again, firmly support the need to 1 2 have cost as part of the discussion. I'm worried about the blurring line with quality. 3 And I think there's insufficient 4 5 evidence both from the technical standpoint and from the moral standpoint as to where we're 6 7 headed with these measures. Thank you. CO-CHAIR RAPHAEL: 8 Robyn? 9 MEMBER GRANT: I have a couple of 10 things. And one of them is a process question. 11 And that's what does happen if we go 12 with insufficient information? Does it just 13 disappear off the books? 14 Or does CMS continue to work on it and 15 then bring it back? And we need to look at it 16 again. 17 MS. SAMPSEL: I'll start. And does it 18 fall off the books? No. 19 I mean, we feed back to NQF the full 20 list of all the measures discussed and your final 21 disposition, based on your votes and your 22 recommendations. Along with, as Erin has already

1	commented, all of the rationale behind them.
2	Past that, it's then up to CMS
3	internally to figure out, you know, what kind of
4	where that measure goes. The direction for
5	development as well as where it comes back. And
6	if it comes back to NQF.
7	CO-CHAIR RAPHAEL: Erin, do you want
8	to add anything?
9	MS. O'ROURKE: I would just echo that
10	Sarah's point, it would be up to CMS at that
11	point. They don't have an obligation to bring
12	things back to us, no matter what the disposition
13	is.
14	So, in an ideal world, yes, they would
15	bring it back the next year with the measure more
16	fully tested. And allow the group another chance
17	to weigh in.
18	And hopefully, that is what would
19	happen. But, from a process wise, we don't have
20	any guarantee.
21	CO-CHAIR RAPHAEL: Okay. So it goes
22	back to you Robyn.
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MEMBER GRANT: Okay, thank you. 1 So 2 just a couple of comments. One, is just from a consumer perspective, I think what matters is 3 4 that you get the care you need when you need it. 5 And that it's good care. And that quality -- that the cost of 6 7 it is not what the consumer is really thinking about and making a decision. And those other 8 9 factors are, I think, the real key ones. 10 I want to amplify or build on what 11 Gene said in terms of unintended consequences. 12 In addition to the cherry picking, I'm concerned 13 that, as he's mentioned, might result in 14 individuals getting less care then they need in 15 order to keep the cost down. Or look at 16 premature discharge. 17 Because again, that's the way the 18 provider to keep his cost down. So, I really 19 worry about that across the measures. 20 CO-CHAIR RAPHAEL: Cari? 21 MEMBER LEVY: Thank you. I just 22 wanted to ask a question about is there -- are
there any thoughts about characterizing provider 1 2 markets? And the reason I ask is I know we have 3 a number of rural communities where there's 4 5 really a substitution of home health for SNFs, where SNFs don't exist. 6 And so, if we're really doing a lot 7 more home health for example in an area that 8 9 doesn't have a SNF, will they be penalized 10 because they've ramped up those services to 11 substitute for no SNF? 12 I don't know if there will be. I know 13 there's a rural/urban adjustment. But that may not account for this rural substitution. 14 15 CO-CHAIR RAPHAEL: We'll hold off on 16 that one. Paul? 17 MEMBER MULHAUSEN: So, thank you. 18 This has been a really excellent discussion. 19 I guess I'm a little concerned that 20 we're contemplating the vote of insufficient 21 information. And I guess I want to speak to that 22 personally.

So, from my world, any time we 1 2 consider value in the delivery of services, we worry about the unintended consequences. Of the 3 4 cost side of that equation. So, I think it's an inherent concern 5 whenever any of us try to raise the issue of 6 7 value. But, I think anybody who contemplates the cost of care to our community, recognizes that we 8 9 simply have got to try to grapple with this 10 particular issue. 11 I think these are worthy measures. Ι 12 don't know if they fall into the framework of 13 quality as Jim has pointed out. 14 And I do think they are certain --15 there is certainly insufficient evidence here to 16 endorse them as an NQF endorsed measure. Which 17 in my world of trying to develop programs, 18 picking NQF measures means something. 19 But I'm also uncomfortable giving the 20 message to our colleagues at CMS and say to them, you know, there's not enough information here. 21 22 We can't even advise you to move forward on this.

I'm pretty comfortable that I want to 1 2 give them the message. Yes, you grapple with this. Find the risk models. 3 Develop the details that Gene says are 4 5 missing. Because we can't endorse them as unique measures without that information. 6 7 But, I would be loath to vote that there's insufficient information to endorse 8 9 moving forward on this. That's my comment. 10 CO-CHAIR RAPHAEL: Thank you. Bruce? 11 Yes, thanks. MEMBER LEFF: So, just 12 another potential unintended consequence that 13 comes by having each of these measures on a 14 separate ledger as it were. 15 So, I wonder whether accounting for 16 these different venues each separately, could 17 actually lead to discouraging imaginative 18 partnerships within health systems? 19 So, if you think about at least in 20 theory perhaps, a lot of the fat in care delivery 21 being in the hospital, it could be that a good 22 home health agency would partner with a hospital

that's not particularly efficient. 1 2 Take some of those people out of the hospital earlier. Help the hospital keep their 3 4 costs down. Maybe raise the costs on the home 5 health side. And if they're engaging in some sort 6 7 of shared savings arrangements, that's something that by keeping separate ledgers might be 8 9 discouraged in this kind of system. 10 The other question I have is, are 11 costs that are not covered by Medicare captured 12 in this equation? 13 So, I don't know if anyone saw the 14 front page of the New York Times today, looking 15 at, you know, basically prices. 16 Price is God, right? People are 17 finally coming to the realization that you really 18 have to think about price of things. So, it seems like there was actually 19 20 very little relationship between Medicare costs 21 in the market and private insurer costs in the 22 market. And those needs depends a lot more on

the characteristics of the providers in the 1 2 market. So, I'm just wondering whether in any 3 4 way that was being captured. Is there price 5 shifting going on, you know, in the secondary -on the secondary side? Secondary insurer side. 6 7 Just some things to think about. And I would just endorse Paul's comments as 8 I agree. 9 well. 10 CO-CHAIR RAPHAEL: Okay. Sean? 11 MEMBER MULDOON: Clarify for me -- and 12 it matters more on this one because it is costs 13 where cost shifting is probably desirable under a 14 lot of these arrangements. 15 This only applies to fee-for-service 16 traditional Medicare. And therefore, creative 17 arrangements done under ACOs, bundles, and risk 18 sharing arrangements would be systematically 19 excluded from this. 20 Is that true? CO-CHAIR RAPHAEL: 21 I only know that 22 Medicare Advantage is excluded. And I don't want

to say that ACOs and bundled payments. 1 2 My assumption had been that they were excluded. But I would want to have that 3 4 confirmed. 5 MEMBER MULDOON: That was -- well, that would be the caveat to your concern. 6 7 Because we really do want post-acute care in the next five years to be saying, this use to be good 8 9 for me. 10 But not good for the whole episode. 11 And let's move those dollars around, so again. 12 And second question, I think is a 13 comment. And being that these are statutorily 14 required, these -- development is going to 15 continue regardless of what this Committee votes. 16 Correct? 17 So, if that's the case, then, you 18 know, we either just punt the thing and say too 19 messy, we don't want to mess with it. Or we get 20 on this slow moving train and say we'll figure it 21 out as part of the process. 22 So, that would -- if that is true, it

would lean towards a vote to -- with a lot of 1 2 reservations, to continue development. CO-CHAIR RAPHAEL: I think that's an 3 4 important point. Because to be realistic, if, 5 you know, we're not -- none of the votes that we would in fact engage in, would pull the train off 6 7 the track. The train is going to continue on the 8 9 So, we need to be aware of that. track. 10 This is tied to the IMPACT Act. It 11 has time frames dependent on it. So, just so 12 that we are doing this wide-eyed, if not bushy-13 tailed. 14 Okay. Deb? 15 CO-CHAIR SALIBA: So, this follows up 16 on some comments that folks have made. And Ms. 17 Lee made this comment as well. 18 I do want to -- I understand that the 19 MSPB is moving forward. And that's a good thing. 20 But, I want to make sure that in 21 parallel, there is consideration given to how 22 this translates into value measures. Because I

1	think that ultimately is where we want to head.
2	And it may be important as you're
3	developing these measures to bear in mind that
4	you want them to be part of a value-based
5	measure. It may influence some of the ways that
6	you set this up ultimately.
7	Because I do think we don't want to
8	just be going to the lowest bidder. I thought
9	Jim's I smiled because Jim always has great
10	stories to tell. So, thank you for another one.
11	Because we really don't want to be in
12	a position where it's just about cost. It's got
13	to be the combination of, you know, bang for the
14	buck kind of approach.
15	CO-CHAIR RAPHAEL: Cari and Suzanne,
16	do you want to add anything at this point? And
17	then we're going to turn it over to Kim.
18	MEMBER LEVY: In following on what Deb
19	said. And I know this will be accounted for, and
20	I guess I can't understand and I probably should
21	be able to.
22	But, will this be something that's

reported in real time? I mean, will this 1 2 potentially be a hot potato patient? Because we've had this happen where we 3 4 know that there's people who are spending a lot 5 in our system. And they suddenly become this hot potato where we didn't want them. 6 7 We didn't want to touch them anymore because they were spending so much. And we had 8 9 some who spent \$3 million over the span of a 10 year. 11 And they became a hot potato and no 12 service wanted them. Because they were causing 13 all these troubles. 14 And so, if it's going to be obvious to 15 anyone that this is one human being who's costing 16 them a lot, that is probably not a great 17 situation. 18 MEMBER MARKWOOD: My question was 19 primarily a process question too. I mean, it 20 sounds like because statutorily this will move 21 forward that the best value that we can have in this discussion, and we've had a lot of 22

discussion about concerns raised about elements
 of this moving forward.

Is, if we did vote to keep it under consideration, would there be other opportunities for this Committee to have to dig deeper into some of these issues that we've raised as major concerns?

CO-CHAIR RAPHAEL: Lisa?

9 MEMBER WINSTEL: I just wanted to 10 raise one more unintended consequence. Because 11 as people are discharged, whether it's from home 12 health or from an IRF or whatever, if they are 13 discharged sooner, if there is a goal of reducing 14 costs, the burden of care is going to fall on the 15 family care giver.

And that family care giver is going to ultimately, and we know this from comprehensive research, then be forced with a choice of whether or not they have to leave the workforce themself. They're going to be forced to either pay for care that is not covered. That is home helpers and aids. Hence, bringing on more out of

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pocket costs.

2 And then ultimately, and again, we know this from research, that family care giver, 3 who could also be a Medicare beneficiary, will 4 5 then have their own health issues. Because it is well documented that the 6 7 family care givers because of stress and the fact that they're taking care of somebody else and 8 9 ignoring their own issues, then becomes a 10 patient. 11 So, as we transfer the burden of care 12 out of the system and into the home, we might 13 ultimately be driving costs up. 14 CO-CHAIR RAPHAEL: Suzanne, back to 15 you. 16 MEMBER KAUSERUD: Thank you. I just 17 want to amplify Deb's comments about value. The 18 value conversation here. 19 And I know that we try to look at the 20 measures kind of in a vacuum. But, it's important to also put them in context. 21 22 The -- I think there's general support

for Medicare spend for beneficiary measure. 1 Ι 2 think it's a really important measure. But, I think it becomes pretty weighty 3 4 if -- in the inpatient rehab setting because our 5 one proposed measure for value-based purchasing, we have only one measure listed in the proposal. 6 7 And it is Medicare spent for beneficiary. So, for that setting, it's really 8 9 important that the measure be -- not be -- that 10 it be done well. 11 Because I would anticipate that if the 12 measure gets passed through as one of the quality 13 IMPACT Act measures, it would be the same one 14 that would be used in the Value-Based Purchasing 15 Program. 16 So, I do definitely, I don't want to 17 say that we're not supportive of them, the 18 I think just the details are very measure. 19 important. 20 CO-CHAIR RAPHAEL: Okay. Kim? 21 MS. SPALDING-BUSH: Okay. Thanks 22 everyone for all of your feedback.

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So, I think first I just want to speak 1 2 to something that I understand, I wasn't present That Alan addressed yesterday about 3 yesterday. whether or not we would be able to bring the 4 5 measures back with further information. Which is something we can't guarantee 6 7 we that we would do. But even if our statutory time lines don't permit us to do that, I just 8 9 want to assure the panel that we are held 10 accountable for your comments. 11 So, when these measure, you know, go 12 forward for further stakeholder feedback, we do 13 have to respond to the things that you have We do address all of those. 14 raised. 15 So, I don't want you to feel like even 16 if they don't come back that they won't be 17 considered. That they won't be taken into 18 account. 19 I mean, that we won't be responsive to 20 them. Either in adjusting the measure to address 21 them. Or explaining clearly why we weren't able 22 to, you know, given our construct here.

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1	So, just to start with that. And then
2	I think the other big point I want to make, is
3	that we are actually looking at setting specific
4	measures here.
5	So, I think a lot of the concerns that
6	were just raised, aside from that maybe a one
7	measure across all settings would actually
8	potentially in a sense some increased care
9	coordination.
10	But, I think there are some issues
11	with doing that. And at this point, we're
12	actually looking at setting specific measures.
13	So, there are things like that the
14	patients are inherently different in these
15	settings. That we may not be able to recognize
16	those differences in our claims.
17	So, therefore we wouldn't be able to
18	appropriately risk adjust for them. That's an
19	issue that we don't have to deal with because
20	we're doing setting specific measures here.
21	So, LTAC patients are compared to LTAC
22	patients. The risk adjustment is being done at

this case mix level because it allows us to 1 2 better predict what the spending would be for a patient within that setting that falls into a 3 4 certain case mix type group. 5 And then the rationale for not using the DRGs for the RUG codes, is that those are, at 6 7 least to some extent, under the influence of the When they do their assessments. 8 providers. 9 When they classify those patients. 10 When they predict what level of therapy they're 11 going to need in the SNF. They've set them into 12 a RUG group. 13 And so if we risk adjust based on 14 those, I mean, it's a less objective, I think 15 measurement. Whereas the, you know, the group 16 that they fall in based on their diagnosis is a 17 more objective way for us to estimate what we 18 expect the spending to be. 19 So I want to also apologize that we 20 didn't provide a little bit more background 21 information for you. I think it would have made 22 it a little easier to digest some of this.

I think we made an assumption about 1 2 what's out there around the hospital level And some of the information that we 3 measure. 4 provided to the panel, didn't get into those 5 technical terms that we used in that measure. But, so just to sort of explain, I 6 7 think some of the questions that I heard around expected spending, et cetera. So the numerator 8 9 of the measure is the observed spending divided 10 by the expected spending. 11 So, what that observed spending is, is 12 what we see within the treatment window. Which 13 is 30 days for most of the settings. It's 60 14 days for home health. 15 And we look at what we observed during 16 the window and the post-discharge set time frame. 17 We adjust for things like geographic wage index 18 differences. 19 So, we take out those urban/rural 20 payment differences that the Medicare program 21 imposes through our payment systems. We also 22 adjust for add on payments for teaching

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hospitals.

2	So, the IME payment comes out. You're
3	not looking more expensive because you're a
4	teaching hospital. Disproportionate share
5	payments come out.
6	So, the standardization kind of levels
7	the playing field so to speak. So, we take out
8	wage index, geographic practice cost index, and
9	some of those incentive payments that are in
10	there to support broader Medicare program goals.
11	So that the facilities and providers
12	who receive those aren't looking more expensive
13	just by virtue of providing those services that
14	CMS has decided are important.
15	It also takes out any other value-
16	based incentive payments that people may have.
17	So, if they're receiving a penalty for example,
18	under some program, they're not going to look
19	less expensive.
20	It sort of neutralizes all of that.
21	So, the numerator of the measure is that observed
22	spending, standardized payments divided by the

expected spending. Which is the risk adjusted
 amount.

3 So, that's how we get our risk 4 adjusted spending. We take a look at the 5 patient's diagnosis prior to the start of the 6 episode, as well as some other factors.

You know, and we'll provided detailed
specifications of course, you know, as the
measures move forward with what exactly is in the
risk adjustment methodology for each setting.
And then that's divided by the national weighted
median.

And what we mean by that is that it's case weighted. So a larger facility that has more cases for a given price, is going to weigh more into the denominator then a smaller facility that has fewer cases.

So, I hope that makes sense. It's sort of the facility or the agency's own spending amount divided by the national average. Where their own spending amount has been adjusted for the patient's severity of illness and their age

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and some other factors.

2	So we don't do socioeconomic status
3	adjustment as the measure is currently
4	constructed. We do hear the concern with that.
5	It's something that we're continuing
6	to explore. But we're cognizant of the work
7	that's going on in parallel in that space.
8	So that NQF has undertaken is in the
9	middle of this two year, you know, trial of
10	looking at socioeconomic status adjustment. The
11	Assistant Secretary for Planning and Education,
12	ASPE has also been required by the IMPACT Act to
13	take a look at socioeconomic status adjustments.
14	So, at this point as the measure is
15	currently constructed, it doesn't include an
16	adjuster for that. The idea being that we're
17	just looking at the patient's clinical status and
18	their clinical picture to describe how we expect
19	their Medicare costs to look.
20	And so, it becomes more incumbent on
21	the provider to manage some of those other
22	issues. But, we are willing and open to taking

into consideration any of the results that come out of the work that's going on concurrently in the socioeconomic adjustment space.

So, I think -- what are some of the other questions that I heard? We don't exclude the dual eligibles. They're in there because we have a full Medicare claims picture for them since Medicare would be their primary payer.

9 They don't appear to be less 10 expensive. Unlike a Medicare Advantage patient, 11 where we wouldn't have the Medicare Advantage 12 claims in our claim system.

13 And so for ease of implementing the 14 measure, you know, reducing the burden on the 15 providers, this is a claims-based measure. So, 16 we do exclude patients who become enrolled in 17 Medicare Advantage for part of this -- the 18 episode window.

19Because they would look less expensive20just because Medicare Advantage was paying for21some of the services. Which isn't the case with22the duals.

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1 CO-CHAIR RAPHAEL: So, before we move 2 to a vote here, let me just check. Pam, did you want to make a comment? 3 4 MEMBER ROBERTS: I just had a little 5 bit of clarification. You just mentioned, so the start of the episode is -- the diagnose for the 6 start of the episode is from their acute care 7 start diagnosis. Not from where they're going? 8 9 MS. SPALDING-BUSH: Can I -- and I'll 10 invite the Acumen Team on the phone to correct me 11 if I misspeak. Because they're the technical 12 experts. 13 But it's from prior to the start of 14 the episode, we take a look at claims submitted 15 for 90 days prior to the admission to the 16 setting. And then Acumen, is the diagnosis 17 billed at the actual post-acute care setting also 18 included in the risk adjustment model? Or if 19 Lori's here. 20 Yes, I'm -- hi, I'm DR. FEINBERG: 21 Laurie Feinberg. I'm a physician from Acumen. 22 And the 90-day look back is for the

risk adjustment. The post-acute care episode
 starts with admission to the specific post-acute
 setting.

It's in that way unlike the hospital
measure, which does three days before. We
thought that in this setting, our -- that it
would -- and the TEP agreed with this. That the
look back of three days is different.

9 So it starts with the admission. It 10 goes through the end of the admission. Or, in 11 the case of the home health agency, a 60-day 12 period, which would be the episode of care even 13 though the patient might have had less than 60 14 days.

And then it continues for 30 days
beyond that time of discharge, or the 60-day
episode.

18 CO-CHAIR RAPHAEL: All right, that -19 MEMBER ROBERTS: Wait, I have one more
20 question.
21 CO-CHAIR RAPHAEL: Oh, I'm sorry.

MEMBER ROBERTS: So, the other

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question is, for States that have nursing staff 1 2 ratios, is that included? Because that would increase their costs. 3 4 DR. FEINBERG: I'm sorry, could you 5 repeat that? MEMBER ROBERTS: Yes. For States that 6 7 have nursing staff ratios that have for different levels of care that will increase their costs. 8 9 Has that been adjusted for? 10 DR. FEINBERG: Remember we're looking 11 at Medicare expenditures. So the expenditures 12 are not their costs. 13 In other words, it's what Medicare 14 pays the facility. 15 MEMBER ROBERTS: Okay. Thank you for 16 the clarification. 17 CO-CHAIR RAPHAEL: Deb? 18 CO-CHAIR SALIBA: Thank you. Ι 19 understand that it's claims-based. And about 20 expenditures. 21 And I certainly understand the issues 22 with the RUGs being, you know, often based on

utilization as opposed to just the 1 2 characteristics of the individual. With that said, I think it's really 3 important to think about functional status as an 4 5 adjuster. I mean, you've got those data sets available to you. I know they're not in the 6 7 claims. But, it -- study after -- work after 8 9 work after work, these forward have shown that 10 that's a huge predictor of cost. So, I would 11 encourage you to think about it. 12 You're nodding, so. 13 MS. SPALDING-BUSH: Yes. Thank you 14 for that. And we are interested in learning a 15 little bit more about how the functional status 16 indicators impact cost. 17 As the measure is currently 18 constructed, we don't intend to use the 19 functional status indicators. It has a lot to do 20 with the way that the statute was written for us. 21 Which says that we can use claims 22 elements as well as standardized assessment

Which are currently in the works of CMS. 1 items. 2 So, it's certainly something that we'd be open to future refinements for the measure 3 when those become standardized. And then the law 4 5 would clearly allow us to use them to adjust our predicted cost for the measure. 6 7 So, yes. CO-CHAIR RAPHAEL: And I have three 8 9 concluding comments. And then we're going to 10 move to a vote. Liza? 11 This sounds MEMBER GREENBERG: 12 granular. But it will help me conceptualize the 13 measure a little bit more. 14 So, if a patient is admitted to a 15 hospital from home health, does it matter how 16 expensive that hospital is? Or is there like a 17 standardized, we're dinging you this much for 18 your admission. 19 It doesn't matter if you went to an 20 expensive university hospital or one that's not 21 going to do many interventions. And so, your 22 total cost for that would be lower.

1	MS. SPALDING-BUSH: We would include
2	that unless it was an excluded admission,
3	which we have some exclusions for planned
4	admissions that are consistent with the
5	readmission measure. That was the Yale RTI
6	Methodology.
7	So, if it was not a planned admission
8	that got excluded, or a treatment for a
9	congenital issue, but if the hospitalization is
10	included, we include all of the Part A and B
11	Medicare payments that occurred during that stay.
12	And we do take out the teaching
13	hospital adjustment, those kinds of things when
14	we standardized the cost. But, if they do go to
15	a hospital that provides them with more
16	treatment, more complex care, more expensive
17	care, it would be captured in the measure.
18	It's important to note too, though
19	that this measure also exists in the hospital
20	space, which is nice. I mean, we are now working
21	at aligning our incentives across our programs.
22	So, in the hospital Value-Based

Purchasing Program, the measure does exist. 1 So 2 there is that incentive there as well. But that hospital most likely would 3 4 generate an episode around this admission also. 5 So, we've got an incentive there for them to try to provide efficient and effective care that 6 7 would reduce their own downstream costs. So, they're sending the patient back 8 9 to that SNF, you know, with the hope that that 10 patient's healthy, isn't going to get readmitted. 11 And I guess healthy that's not a good choice of 12 words. 13 But, you know, the patient is stable. 14 You know, unlikely to be readmitted. You know, 15 and that they've managed the care well within a 16 hospital setting. 17 CO-CHAIR RAPHAEL: Bruce? 18 MEMBER LEFF: Yes. Another -- I'm 19 just trying to think of this here, and it's 20 fuzzy. 21 But is it possible another unintended 22 consequence since it's per beneficiary cost,

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1	could this scheme provoke say unsavory actors,
2	not so much from cherry picking, but taking more
3	easy cases to extend their denominator reduce per
4	beneficiary cost?
5	I'm just wondering about that. So,
6	you take people into home health or a SNF who,
7	you know, were kind of on the border.
8	But now, you know, now that's actually
9	good for me. Because I'm going to reduce my per-
10	bene cost. I might look bad in the claims. Or I
11	might just kind of sneak by in the claims.
12	So, could this actually one unintended
13	consequence be to actually increase unnecessary
14	utilization?
15	CO-CHAIR RAPHAEL: And Gene, the last
16	comment?
17	MEMBER NUCCIO: Just two quick
18	comments. One, I'd like to support Deb's comment
19	about conceptualizing this in terms of how it
20	might be used in a value-based model. Which we
21	are clearly all going to.
22	And the second part is, again is a

I was a member of the NQF TEP on sociodemographic 1 2 risk adjustment. And you need to think broadly beyond socioeconomic to more demographic issues. 3 4 Which includes health literacy and those kinds of 5 matters. And clearly that -- we were talking 6 about patient compliance, which we did yesterday, 7 in terms of these things. And you need to think 8 9 very broadly about that. 10 CO-CHAIR RAPHAEL: You know, as I've 11 listened, this is clearly more complicated than 12 trying to measure Medicare spending in a 13 hospital. I must say. 14 You know, I think we started with 15 different populations in the different settings. 16 You have patients who go to multiple settings 17 that you have to capture. 18 And that's expected. That's good. We 19 want them to go to multiple settings. 20 And I think the whole issue of what's

21 excluded to me is complicated. Because you bring 22 someone in who's had a hip replacement and

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they're depressed.

2 Their diabetes goes out of control. And they land back in the hospital. And how you 3 ferret through what's attributable, what's not 4 5 attributable, I think becomes very complicated for certain patient populations. 6 And I think functional status really 7 does become an important factor as well. 8 That 9 being said, I think for us the question is, given 10 that this train is on the track, given that we 11 would like to influence the station that it ends 12 up in, what is the message that we want to send 13 to CMS? 14 We have three options here in our 15 voting. To support continue, encourage continued 16 development, not encourage continued development, 17 or insufficient information. 18 I mean, two messages that I heard, but 19 I don't know that we can put this into our 20 categories, is this really needs to be connected 21 to value. Because it can't just be cost alone. 22 And the other thing is, there's just

a whole variety of unintended consequences that 1 2 we have identified. I think the panoply is 3 pretty broad. 4 So, we can -- I don't know if we have 5 the prerogative to recommend that CMS bring this There's no way we can ensure they're 6 back to us. 7 going to follow our recommendation. But, we can make a wholehearted 8 9 recommendation that they do bring it back to us. 10 So, those are just some thoughts that I have. 11 And I don't know if NOF Staff want to 12 say anything. But, I would like to see if we can 13 add a recommendation to whatever vote we take. 14 Right? 15 Absolutely. And we've MS. O'ROURKE: 16 been capturing all of the caveats and the lists 17 of unintended consequences that the group has 18 been discussing. 19 And we will summarize those and put 20 them in the rationale. And we can also include that these measures are a particularly unique 21 22 case.

1	And make a strong request for CMS to
2	bring them back for MAP review in the future.
3	With the caveat that that is CMS's decision.
4	That we can't guarantee anything.
5	CO-CHAIR RAPHAEL: Right. Okay. So
6	now, can you please all take your device. And we
7	are going to vote.
8	And can you just review the three
9	categories, Laura, so everyone is aware? One,
10	category one is
11	MS. IBRAGIMOVA: So, right now we'll
12	be voting on the recommendation for IMPACT Act
13	Medicare Spending Per Beneficiary, MUC15-1134.
14	Your choices are encourage continued
15	development, 1. Do not encourage continued
16	development, 2. Or insufficient information, 3.
17	(Voting.)
18	MS. IBRAGIMOVA: So today we only have
19	20 voters. So the results are 65 percent
20	encourage continued development. Five percent do
21	not encourage continued development. And 30
22	percent insufficient information.

CO-CHAIR RAPHAEL: So, given our rules 1 2 of 60 percent, then it's number one. Is that 3 correct? 4 MS. IBRAGIMOVA: Yes. So, combining 5 -- yes, so it's 65 percent. CO-CHAIR RAPHAEL: 6 Okay. So it's go 7 onto the next one. Laura, this is the second one. 8 Okay. 9 MS. IBRAGIMOVA: So now you'll be 10 voting on MUC15-287. Your choices are 1 11 encourage continued development, 2 do not 12 encourage continued development, and 3 13 insufficient information. 14 (Voting.) 15 So the results are 70 MS. IBRAGIMOVA: 16 percent encourage continued development. Zero 17 percent do not encourage continued development. 18 And 30 percent insufficient information. 19 CO-CHAIR RAPHAEL: Okay. So it's 20 number one, right? Onto our third one, 289. 21 MS. IBRAGIMOVA: So now you'll be 22 voting on MUC15-289. And your choices are 1

encourage continued development, 2 do not 1 2 encourage continued development, and 3 insufficient information. 3 4 (Voting.) MS. IBRAGIMOVA: So the results are 71 5 percent encourage continued development. 6 Zero 7 percent do not encourage continued development. And 29 percent insufficient information. 8 9 CO-CHAIR RAPHAEL: Okay. And now 10 we're at number four, the last one, 291. 11 All right, this is our last vote. 12 MS. IBRAGIMOVA: So now -- you are now 13 voting on MUC15-291. Your choices are 1 14 encourage continued development, 2 do not 15 encourage continued development, and 3 insufficient information. 16 17 (Voting.) 18 MS. IBRAGIMOVA: The results are 71 19 percent encourage continued development. Zero 20 percent do not encourage continued development. 21 And 29 percent insufficient information. 22 CO-CHAIR RAPHAEL: Okay. So let me

thank everyone. And we're going to break for ten 1 2 minutes. Forgive the shortened break. But we 3 are a little behind schedule. 4 5 Before we break, I just want to be sure I welcome Carol Spence, who was on the phone 6 7 yesterday. And I'm glad she can join us today in 8 person. 9 So, see you back at 11:50 -- 10:55. 10 (Whereupon, the above-entitled matter 11 went off the record at 10:45 a.m. and resumed at 12 11:03 a.m.) 13 MEMBER LEVITT: Okay. I'd like to 14 thank everybody for coming back from the break on 15 And we're going to ask the back of the time. 16 room to resume their seats, please. So I thank 17 everyone for coming back on time. And let's get 18 started. We're moving on to looking at the 19 Hospice Quality Reporting Program. Is the 20 Operator with us? Are we back online? 21 OPERATOR: Yes, you are. 22 CO-CHAIR SALIBA: Thank you. Can you

open the lines for public comment. 1 2 OPERATOR: If you wish to make a comment, please press star one. 3 4 There are no comments at this time. 5 CO-CHAIR SALIBA: Okay, thank you. The measures on the consent calendar are Hospice 6 7 Visits when Death is Imminent, and Hospice and Palliative Care Composite Process Measure. 8 I'd like to invite members of the audience to come to 9 10 the mic and make comments. Is there anyone? 11 Okay. 12 (No response.) 13 So hearing no one's at the mike, so we'll move on. Laura, is there anyone on the 14 15 chat box? 16 MS. IBRAGIMOVA: There are no chats. 17 CO-CHAIR SALIBA: Okay, great. So I'd 18 like to move on to ask Peg to give a brief 19 overview of the ORP and the measures that we're 20 talking about. 21 DR. TERRY: Can you hear me? So great. 22 So I'm going to start with the Hospice and
Palliative Care Composite Process Care Measure, and many people here may know about this measure. It is a composite of seven NQF-endorsed measures. And I'm going to just mention them, so you hear what they are. People in the world of hospice understand these measures quite well.

7 The first is treatment preferences, 8 the least values addressed, pain screening, pain 9 assessment, dyspnea screening, dyspnea treatment, 10 and patients treated with an opioid who are given 11 a bowel regime. This is, as both measures are, 12 encouraged to continue development.

13 The second measure is Hospice Visits 14 when Death is Imminent. And the death which is 15 imminent is one week prior to death. This is a 16 measure that measures basically -- let me scroll 17 down and find this real quickly -- it's a measure 18 that measures the visits by certain individuals, 19 certain professionals, as well as individuals who 20 are volunteers.

21 And included in the visits in the last 22 week before death are visits by nurses, licensed

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professional nurses, nurse practitioners, hospice 1 2 aides, physicians, physician assistants if acting as the attending physician, chaplains, spiritual 3 counselors, therapists, which includes physical, 4 5 occupational or speech therapy, medical social workers and volunteers. So it's a broad array of 6 7 professionals and volunteers that are included in visits in the last week prior to death. 8 As I 9 said, these are both measures that are encouraged 10 to continue development. 11 CO-CHAIR SALIBA: Thank you. CMS. 12 MEMBER LEVITT: Thank you. Thank you 13 very much. I guess the first comment is the 14 second measure that was mentioned, actually 15 there's been a change in the measure. I think we 16 sent the updated specs to NQF based on the 17 I apologize, Peg, if you didn't get the changes. 18 changed specs. But is it okay if I just explain 19 20 DR. TERRY: Sure. MEMBER LEVITT: So the second measure, 21 22 same concept that we are all -- I think that's

been a noted concern of the care giver community, 1 2 stakeholder community as well to ensure that, you know, visits are done prior to death being 3 4 present. And this has gone through care giver 5 It's gone through TEPs as well, and workgroups. even pilot testing of what would be some new 6 7 items that would be added to the hospice item set to account for and be able to look at these sorts 8 9 of visits.

10 And what came out of the testing and the TEP was that we need to have more than just 11 12 what was kind of listed initially as this one 13 single measure. And we've actually broken it up I'll have to 14 now into two different measures. 15 look a little bit at my notes. But the first 16 measure is a measure that's really looking more 17 at clinical care and care coordination. And 18 that's look at, specifically at a 3-day window. 19 And the visits on those would be from what you 20 would think they'd be from: physician, nurse, 21 nurse practitioner or physician's assistant that 22 we'd want to have a visit from one of those

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within the last three days prior to death. 1 2 And then we've also got then a second component to the measure. And the second 3 4 component is again this concept of the last week. 5 And that this would be more towards the individualized type of care that a person or a 6 7 family would want to have during that final week prior to death. And that would be for social 8 9 workers, chaplains, spiritual counselors, 10 licensed practical nurses and hospice aides. And 11 the requirement would be to have at least two 12 visits in the last week. 13 The volunteers was actually, was 14 actually taken out of the measure because during 15 the testing there were concerns of excess burden 16 for volunteers. So that was actually removed 17 from the measure. But it's absolutely the same 18 concept that was brought in the initial 19 specifications but just want it to be more, more 20 clear about it. 21 To us it's a very important measure.

It's a measure, like I said, that's really been

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asked of us multiple different ways. 1 It was 2 pilot tested, like I said, in the summer at nine different hospices. It will require more testing 3 4 now that we, you know, changed to have these two 5 different measure specifications. But and the TEP has been very favorable to everything that 6 7 we've done. In fact, we followed the TEP's recommendations on this. 8

9 The first measure is, as Peg said, is 10 a composite measure of the existing measures that 11 are on the hospice item set. They would -- again 12 those, that, there would be no excess burden 13 associated with that.

14 One thing just to note about that is 15 that in the midst of us developing this 16 composite, we are requesting, because we don't --17 we normally seem to own a lot of these measures, 18 but we don't own these measures in terms of being the measure steward on these measures. And as of 19 20 now, there's a length of stay restriction on 21 these measures in terms of 7-day exclusion that 22 we really think should be brought down to one

And so we're going to try to work with the 1 day. 2 steward while we're also having this composite, to work at changing what we think is an exclusion 3 4 that needs to be changed. That's it. CO-CHAIR SALIBA: Okay, thank you. 5 And Carol and Art were our reviewers on this. 6 7 MEMBER STONE: I would, I would defer to my eminent member of the panel, Carol, who is 8 9 the expert on this part of it. 10 MEMBER SPENCE: Thank you. So I'm not 11 sure which one to start with. Let's go with the imminently dying one. 12 This is a really, really 13 important area. And we're very happy to see that 14 CMS has focused on, on this, you know, care of 15 the dying patient, imminently dying patient. Not 16 only is it a critical time for symptom management 17 to the patient but, don't forget, the majority of 18 hospice happens in the patient's home or in their 19 residence, which could be a nursing home. 20 And that means the family is providing 21 the day-to-day hands-on care. So support for the

family is also a very critical piece.

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Patient/family is unit of care. You've heard me 1 2 say that in here before, but I can't, I can't emphasize it enough for hospice. So this is why 3 4 a broad look at everyone who is going in there is 5 really important, because the entire hospice interdisciplinary team is providing the care. 6 7 Each one has a role to play, especially at this And so to be able to take this broad look 8 time. 9 at everyone who's going in really does round out 10 the picture, not only of the care being provided, 11 but of the holistic approach to hospice care. 12 So having said that, there are a 13 couple of issues. However, I also didn't 14 understand the official update on the measure. 15 So that does address one of our concerns with the 16 length, you know, length of stay issue. 17 The other complication on this, and 18 you all may not all be that familiar with hospice payment, but payment reform for hospice was part 19 20 of the ACA, and that has been implemented in the 21 last final rule and will start January 1. And 22 part of this is an increased payment for RN and

social work visits in these last seven days. And
 so having a, you know, a look at most of this, - let's put it this way: that will have some
 influence in this too because there, you know,
 there may be an increase in RN and social work
 visits just because of the payment structure.

7 So there needs to be a focus on quality of care from this measure, measure 8 9 standpoint, with just the idea that payment piece 10 is in the background. So the other piece of this 11 is -- and this is what makes hospice care rather difficult to create quality measures for --12 13 hospice is not one size fits all, it is 14 individualized care. The patient and family have 15 a lot of say. They are partners in determining 16 their care; it is not prescriptive.

And so there is a possible unintended consequence, we've heard lots of those, for every single measure, of hospices wanting to look like they're providing -- they want to be outstanding when public reporting in the STAR system comes for Hospice Compare. We need to be careful that

the care provided is suited and matches the needs 1 2 and the wishes of the patient and family. And while this may sound a little silly, we don't 3 4 want care being provided or we don't want people 5 going in that the patient and family don't want. And we want those visits to be 6 meaningful, thoughtful, directed visits and not 7 somebody just stopping by so they can get the 8 9 check box that they, you know, had a visit by 10 each of these disciplines as it's being measures. 11 Should I go on and talk about the composite one 12 since you were talking about it earlier? 13 CO-CHAIR SALIBA: Yes, Carol, that 14 would be good. Thank you. 15 MEMBER SPENCE: Okay. So the 16 composite, as Peg pointed out, what it does is 17 take seven measures that are already in place. 18 Data collection is ongoing for those, creates a 19 composite. And there has been no public release 20 of data on performance on those measures. 21 However, we have reason to believe that these are 22 basic process measures, that performance on those

measures is probably pretty, pretty high. And,
 therefore, having a composite for those measures
 does make sense.

4 One of the problems here, length of 5 stay, though, comes into play. And in hospice there are -- there's a 48-hour window to have a 6 comprehensive nursing assessment. 7 There's a 5day window to have the rest of the comprehensive 8 9 assessment by the rest of the team. And so for a 10 third of the patients in hospice, you know, die 11 within, you know, within seven days.

12 So those length of stay restrictions 13 on the original measures could eliminate a third, 14 you know, of the patient population. On the 15 other hand, hospices that have even a more 16 significant proportion of their patient 17 population with a short length of stay, three 18 days, you know, less than three days -- three 19 days is not, you know, I can't give you the 20 proportion but it's also very high -- may not be 21 able to get all of those seven measures 22 accomplished.

And again, we don't want unintended 1 2 consequences. We don't want the check box being predominant because of the quality measure. 3 When you go into a home and that patient, on day of 4 5 admission is actively dying -- and I've had that as an admission nurse. It is not an unusual 6 In that situation, you are going to 7 occurrence. think about what parts of that assessment are 8 9 relevant to that patient and you are going to 10 want to be providing the care and addressing the 11 family's concerns and needs based on your 12 assessment of those needs, not the check box of 13 the quality measures that are supposed to be 14 So, you know, that is a concern. covered. 15 And then the other piece for public 16 reporting -- again these are process measures --17 the public is not familiar with hospice 18 processes. And then when you create a composite 19 measure, that complicates that even more. So 20 there's going to need to be a lot of succinct but 21 thoughtful and very explicit explanation of what

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these measures mean and the significance of them

1	when it comes to public reporting. Thank you.
2	CO-CHAIR SALIBA: Thank you very much.
3	Art, did you have anything to add? Art, did you
4	have anything to add?
5	MEMBER STONE: No.
6	CO-CHAIR SALIBA: Okay, thank you. So
7	these two items are on the consent calendar. Did
8	anyone want to request that they be removed from
9	the consent calendar for individualized voting?
10	(No response.)
11	Okay. So we'll proceed with
12	discussion of these two items. And the floor is
13	open, so anyone that would like to comment? Jim,
14	your tent is up.
15	MEMBER LETT: Thank you. Just a couple
16	of things. One is only it may be hard to fulfill
17	this because only in retrospect do you know the
18	last seven days of life. So I presume there is
19	some and if you know what those markers are,
20	let me know, because I'm going to be intensely
21	interested, personally
22	MEMBER SPENCE: It's a crystal ball

that each hospice nurse gets, you know, when 1 2 she's --(Laughter.) 3 MEMBER LETT: The second thing is, 4 5 putting on my SNF hat, skilled nursing facility hat, we in long-term care in the post-acute arena 6 7 see a fair number of hospice patients, both for respite and even for post-acute care. 8 9 So I would just ask as you all go 10 ahead with this measure -- part of it is what 11 personnel see them in the last seven days in 12 Well, in the nursing home you're going to life. 13 have all the same players that you do in hospice. 14 So which, does the SNF nurse count, does the SNF 15 chaplain count, does the SNF attending physician 16 count because we often take care of the instead 17 of the hospice medical director when they're in 18 long-term care? 19 So that was one. The other thing is 20 under the exclusions was asking what is meant by 21 general in-patient care? Does that include a

skilled nursing facility, as an in-patient care,

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or is it only hospitals? So some clarification I
 think would help.

And the other thing is maybe an 3 exclusion around if death occurs within a 4 5 predetermined amount of time from the hospice referral, that is, if the hospice gets the 6 referral and the patient dies that day, which 7 sadly is not all that rare, or within a few days, 8 9 is that really an adequate period of time to 10 fulfill this multi-headed other measure? Thanks. 11 CO-CHAIR SALIBA: Sean? 12 MEMBER MULDOON: Looking at the 13 numerator of the number of people who received, 14 essentially, any touch from a hospice person in 15 the last week of life, implies that a lot of 16 people are in hospice and aren't seen at least 17 once a week. Is that true? Because if it's not 18 true then the -- it is true? 19 CO-CHAIR SALIBA: So for folks on the 20 phone there was a head nod from some of the 21 content experts on that. So, Paul, did you want 22 to?

MEMBER MULHAUSEN: So I'm a former 1 2 hospice medical director and attending physician. And we, you know, especially in the sphere of 3 4 dementia care and staged dementia care it would 5 be not unusual for a person to go a week and not be seen by one of the formal hospice providers 6 7 until nearing death. CO-CHAIR SALIBA: Lisa. 8 9 MEMBER WINSTEL: Thank you. Thank you 10 for the clarification, Alan, because I think that 11 some of the changes that you described addressed 12 many of my concerns. Because while all of the 13 different and varied hospice providers are 14 important, since some families prefer to not have 15 some, but medical care is different and the 16 visits, separating out the visits by a clinician, 17 by the doctor or the nurses as one group, and the 18 other hospice workers as another, I think is a 19 step in the right direction. 20 Because too often we hear that it was 21 really great that the volunteer came by, but 22 there was still a pain medication that was not

being delivered. So capturing those both I think 1 2 is very important. I also want to continue -encourage you to continue looking at that period 3 4 of time, that window, because it's limiting to 5 seven days you are actually not only just excluding a third of the population, but some of 6 the families and the patients who are in the most 7 distress. 8 9 CO-CHAIR SALIBA: So we've heard 10 seven's probably not what people want. Any, any 11 comments about what the alternative might be? 12 MS. BRAZIL: Hi. My name is Michelle 13 Brazil. I'm a lead for the Hospice Quality 14 Reporting Program. For the hospice visits when 15 death is imminent, we do not have a length of stay exclusion. 16 17 CO-CHAIR SALIBA: Liza? 18 MEMBER GREENBERG: I just wanted to 19 indicate support for both measures. I think 20 they're really important and will be important in 21 the sense of providing quality. I think there 22 are a few technical things to be addressed in

terms of, you know, requirements about when
 visits occur, when assessments occur, figuring
 out which touches count towards it.

4 And also, maybe, some finesse about 5 how exactly we want to impose accountability for those very urgent referrals that occur within 24 6 7 hours of death, or three days of death, when we really need to focus on making sure the patient 8 9 gets what they need, not necessarily hitting 10 certain metric and milestones. But I think it's 11 overall incredibly important measures, so thanks. 12 CO-CHAIR SALIBA: Tara? 13 DR. McMULLEN: Lisa, so the second part

14 of the death when imminent assesses patients 15 receiving at least two visits from the social 16 workers, chaplains, spiritual counselors within 17 the last seven days of life, where the exclusion 18 it seems to me to be the overall aim of that 19 intent, of that measure. I saw your face of 20 confusion, so I just wanted to clarify that for 21 you.

CO-CHAIR SALIBA: Alan?

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1 MEMBER LEVITT: I guess further 2 clarification, but also to answer a question. The measure, the measure that has the two 3 measures in it, it does exclude patients with one 4 5 day length of stay because the feeling is that the two visits that would be necessary for that 6 7 second component to the measure would not be able to occur in that. But otherwise there is no 8 9 length of stay exclusion. 10 As Tara just mentioned, there are 11 different time windows for both measures. And 12 that was the choice of the technical expert panel 13 that felt that if the care coordination and 14 clinical care one, which is actually three days, 15 you know, one visit within the last three days, 16 if that was extended out to seven days, we would 17 see, very quickly, a topped-out measure. 18 The technical expert panel felt that 19 we needed to have a shorter window on that first 20 component to the measure, whereas the second 21 component was the two visits within seven days.

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So it really is two different time windows, two

different purposes almost. The general in-1 2 patient care, I'm going to need to look at 3 Michelle Brazil for a nod on this, but that did 4 also include nursing homes; right? Nursing home 5 and in-patient hospice? Waiting for a nod. 6 Okay. 7 CO-CHAIR SALIBA: She's checking on that. 8 9 MEMBER LEVITT: Yes, yes. It also 10 excludes, if you didn't notice in your measure, 11 if you have continuous home care it would exclude 12 it as well, so. Michelle, you need to turn it 13 on. 14 MS. BRAZIL: For residential nursing 15 home visits it would be included. So if the 16 patient is receiving that residential level of 17 care that would, the nursing visits and the 18 hospice interdisciplinary team visits would be 19 included. 20 MEMBER LEVITT: And the other levels? 21 MS. BRAZIL: So if a hospice has a 22 contract to offer in-patient care, whether it's a

hospital, a nursing home or their own facility, 1 2 then it would be excluded from that piece. So 3 patients that are continuous home care, patients 4 that are receiving respite, and patients that are receiving in-patient care, because that care is 5 being provided around-the-clock for that patient. 6 MEMBER LEVITT: Does that answer your 7 question, Jim? 8 9 MEMBER LETT: It does. 10 MEMBER LEVITT: Okay. 11 CO-CHAIR SALIBA: Carol? 12 MEMBER SPENCE: I was just going to 13 back up a little bit from what Michelle said in 14 that I'm not sure everybody here even understands 15 the four levels of hospice care. These are 16 designated levels. It's not setting specific. 17 The level of care is an intensity, you know, so 18 to speak, designation. So that GIP, that general 19 in-patient care, there's a separate, there's 20 additional regulations that go with that. There 21 are additional requirements. 22 I can be provided in a nursing home.

You know, the setting is not the critical piece.
 It can be a, you know, a free-standing in-patient
 unit that the hospice owns. It can be a hospital
 that contracted that. It can be a nursing home
 contracted, but the main thing is that the
 hospice is responsible for this more intense
 level of care.

It's for acute management of symptoms 8 9 and then you move back to a less intense, you 10 know, level of care. So and the same things for 11 continuous care. It's one of those designations, 12 expressed as one of those designations. Though, 13 Alan, you just said respite. And how does this 14 measure fit or not fit? Is respite also not part 15 of this?

MEMBER LEVITT: That is correct.
 That's an exclusion for the first measure.
 CO-CHAIR SALIBA: Other comments?
 Questions? Thoughts? Any comments or thoughts
 about this exclusion window? Carol, did you - and there's different exclusion windows for the
 different items. Any comments that you wanted to

1 bring up about that? 2 MEMBER SPENCE: No, again I just because I haven't seen the second or the newest, 3 4 the latest version of this, the one-day exclusion applies to both measures, or just the imminently 5 dying one? 6 7 MEMBER LEVITT: It's to the measure If you have a length of stay of one day, 8 itself. 9 because you can't complete both measures, so. 10 MEMBER SPENCE: But it doesn't apply to 11 the composite? 12 MEMBER LEVITT: No. The composite 13 measure is not. The only exclusion for the 14 composite measure would be any exclusion from the 15 component measures. 16 MEMBER SPENCE: Okay, so you're 17 including those? Because that wasn't clear under 18 the exclusions. Again, the list said, you know, 18 years was the only exclusion, but it also said 19 20 that you had to be in the numerator from the 21 other measures. And those other measures -- six 22 of those other measures have a 7-day exclusion.

MEMBER LEVITT: Right. And again, that 1 2 one of the other discussion was that we'll was be working with the measure developer to change 3 that. 4 MEMBER SPENCE: To change that. 5 MEMBER LEVITT: Yes. 6 Yes. 7 MEMBER SPENCE: Yes, okay. All right. CO-CHAIR SALIBA: That's why I was 8 9 inviting comment, because since that is under 10 development and being considered, if there were 11 other comments about what that should be if it's 12 not set out. 13 MEMBER SPENCE: You know, it cuts both 14 ways because, again, you don't want to take out a 15 third of that patient population but you want to 16 be fair to hospices who, as the example I gave, 17 where you're walking in and that patient is dying 18 that day, you know, your bowel program opioid measure is not relevant. It wouldn't even begin 19 20 to address it. So some, some way to understand 21 that you still need to put the patient and family first and not measure box check-off first. 22

1	CO-CHAIR SALIBA: Thank you. Cari?
2	MEMBER LEVY: Just a quick
3	clarification. This might be in the updated
4	material. But it does say on this specification
5	that respite is not an exclusion. And I'm
6	assuming that the reason for having general, in-
7	patient and continuous is because they're in, the
8	staff are in there so frequently it wouldn't make
9	sense. But respite wouldn't necessarily be that
10	way. Would that be correct?
11	MEMBER SPENCE: That was why I was
12	double-checking on respite. Respites done in a
13	nursing home?
14	MEMBER LEVITT: Right. Correct me, but
15	my exclusions were patients receiving continuous
16	home care, in-patient respite care, and then the
17	general in-patient care.
18	MS. BRAZIL: That's correct. I'm
19	sorry, yes, it was in-patient respite care. My
20	mistake.
21	MEMBER SPENCE: Okay.
22	CO-CHAIR SALIBA: So, Carol, you

1	MEMBER SPENCE: So I'm still confused
2	about where a nursing home comes in in this
3	because in-patient respite is not the same as
4	GIP. Respite is done has to be in a facility.
5	MEMBER LEVITT: Right. And that's
6	true. It's in-patient respite
7	MEMBER SPENCE: That's what you're
8	calling it?
9	MEMBER LEVITT: Right.
10	MEMBER SPENCE: Okay. So respite is
11	off the table then.
12	MEMBER LEVITT: In-patient.
13	DR. McMULLEN: And, Carol, I think
14	there's a deep knowledge that a lot of these
15	measures, the population of case mix, will tie
16	into that nursing home setting. And so, since we
17	have the Nursing Home Quality Initiative and the
18	SNF Quality Reporting Program, we're looking at
19	those trends, and the confluence of data, what
20	those mean when you have that one patient who is
21	maybe in that nursing home setting whose using
22	that health benefit. We call it the hospice

benefit on the MDS, so we are looking into that. 1 2 And those are discussions we have at CMS a lot. 3 CO-CHAIR SALIBA: Yes. Okay, any other questions, comments? 4 5 (No response.) So, we have agreed that this 6 Okay. 7 was by assent, that it would stay on the consent calendar, and so there is not voting at this 8 9 point. So we'll move on to the next agenda item. 10 The next agenda item is looking at the, let's 11 see, we're looking at the -- oh, this is Erin. 12 Erin. 13 MS. O'ROURKE: Yes. 14 CO-CHAIR SALIBA: We wanted to have you 15 talk about the MAP and long-term care core 16 concepts discussion. 17 MS. O'ROURKE: Great. Thank you, Deb. 18 So, given how much has changed in the post-acute 19 care/long-term care world and the number of new 20 faces that we have around the table, I wanted to 21 give you a little bit of the history of the core 22 concepts, and then open it up for discussion to

see if these are something that we need to relook at, do they need to be refreshed? Does the group still agree with our core concepts, since they've really been a framework that the PAC/LTC Workgroup had used to guide their decisions about measures under consideration.

7 So to give you a little bit of the history, the PAC/LTC core concepts were a key 8 9 element of the coordination strategy that the 10 PAC/LTC Workgroup developed back in 2012. The 11 group realized at the time it was not possible to 12 align around a particular measure across settings 13 due to issues such as differing populations, 14 services provided, and data sources.

However, the group realized that a person-centered approach that assessed care across an episode could allow measurement to move beyond the current silo of -- or the sitespecific approaches and better integrate PAC/LTC measurement with hospital and clinician measurement.

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So the group identified six highest

leverage opportunities for measurement for post-1 2 acute care and long-term care providers. And within these areas the group identified a set of 3 13 core measure concepts. And the group has used 4 5 these measure concepts to unify their work across the various settings where they review measures, 6 7 recognizing that while aligning at the measure level might not be possible, progress can be made 8 9 by assessing the same concepts across types of 10 care.

11 So if you take a look at this slide it 12 shows you the high-leverage areas and the 13 associated core concepts. It's a little bit 14 small, so I will read them out for everyone. 15 You'll see the core concepts are functional and 16 cognitive status assessment, mental health, 17 establishment of patient/family care giver goals, 18 advanced care planning and treatment, experience 19 of care, shared decision making, transition 20 planning, falls, pressure ulcers, adverse drug 21 events, inappropriate medicine use, infection 22 rates and avoidable admissions.

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So on this slide you will see where 1 2 each of these core concepts are currently addressed in the Quality Reporting Program for 3 each setting. If the box is gray, there is at 4 5 least one measure addressing the concepts for So there are still some fairly 6 that program. 7 significant gaps in the programs around the PAC/LTC core concepts, particularly around some 8 9 of these more challenging to measure issues. 10 Next slide. So with that, I'm happy 11 to take any questions or welcome any reflections 12 from some of the longstanding workgroup members 13 who were around when we developed these, if 14 anyone wanted to jump in. If not, we can turn 15 back to Deb for discussion. CO-CHAIR SALIBA: Don't worry about 16 17 showing your age by commenting. Can we go back 18 to the slide that shows the core concepts? Back 19 That shows that. I think that will one more. 20 help if people can reference that as we're, as 21 we're talking. Jim, you have your tent up. 22 MEMBER LETT: Yes. I'd be remiss as a

representative of the National Transitions of 1 2 Care Coalition not to point out that we do not have care transitions called out. We talk about 3 4 transition planning, which is not the same as 5 actually by gum doing it. So I think either effective, or quality, or whatever other 6 7 adjectives we want to put with it, but I think 8 that's a big gap and a big hole, personally. 9 Thanks.

MEMBER LAMB: I think when we started this -- and I'm not afraid to say I was here in the beginning -- was that care transitions really was a huge priority, and that we needed to get a handle on that before we looked more broadly at the concept of care coordination.

16 Since that time there has been a 17 measurement gaps group that has re-looked at the 18 whole framework for care coordination. And I 19 think it might be a good time for this group to 20 re-look at the care coordination framework and 21 think beyond just transitional care, and to look 22 more broadly at the whole framework. Because I

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think a lot of the discussion that we've been 1 2 having over the last day-and-a-half really is it has a transitional care and a lot of the 3 4 unintended consequences were related to that, but 5 I think we could have a bigger frame that is much more consistent with the current thinking that 6 7 came out last summer. CO-CHAIR SALIBA: Gene. 8 9 MEMBER NUCCIO: Perhaps because I'm 10 part of the new group, can you go to the next 11 slide that shows the coverage area? There is 12 experience with care, there is the CAHPs measures 13 that are out there. Have they not come through 14 NOF for endorsement? 15 MS. O'ROURKE: So they've come through 16 NOF for endorsement. This slide shows where 17 they're being currently used in each of the 18 quality reporting programs, so a little different 19 from their endorsement status or what MAP has 20 reviewed. So this is actually used in a program. MEMBER NUCCIO: Thank you for the 21 22 clarification.

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1 CO-CHAIR SALIBA: Other -- yes, go back 2 to the other slide. There you go. Thank you. 3 So, were there any other comments or questions? So let's start with just asking, from these high-4 5 leverage areas, are we good on those? Robyn. MEMBER GRANT: So under goal attainment 6 7 it talks about establishing the goals and advanced care planning and treatment, but there's 8 9 not necessarily anything there about attaining 10 the goals. So you could establish them, but not 11 necessarily achieve them. 12 CO-CHAIR SALIBA: Okay, thank you. Ι 13 noticed that too. Okay, other thoughts about the 14 high-leverage? Yes, Gerri. 15 MEMBER LAMB: Along the same lines that 16 Robyn was just talking about, one of the areas 17 that's being looked at in care coordination as a 18 meaningful outcome is not related to goal 19 attainment, and if you look at the new framework 20 it's not framed that way. But the other one is 21 unmet need, and that seems really very 22 appropriate to our discussions here, so we may

want to look at kind of the shifts in concepts and focus.

CO-CHAIR SALIBA: And for unmet need, are you thinking of that as a high-leverage area or as a concept that would go within one of those high-leverage areas?

MEMBER LAMB: You know, it's not clear 7 to me because goal attainment is an outcome. 8 But 9 that one in the care coordination framework is --10 there was huge discussion about whether that was 11 the relevant way to frame it. And so it could go 12 under an outcome for the leverage area of care 13 coordination, but it may be also worthwhile to 14 look at goal attainment and whether it is high 15 leverage, or whether that needs to be re-looked 16 at.

CO-CHAIR SALIBA: Liz.

MS. PALENA HALL: So under the category again of care coordination I just wanted to point out that one of the IMPACT areas that is required is also around the area called accurately communicating health information and care

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preferences when a patient is transferred. I just wanted to point out to you that, you know, in terms of IMPACT -- and another key point of IMPACT is around interoperability.

So we, I think there are a number of 5 -- this is also an area under 1.C and I think 6 also through other HHS programs where we're 7 certainly looking at transitions of care and how 8 9 health IT can support that. So there's a lot of 10 work that's going on through our -- our work, at 11 least 12 states that are looking at post-acute 12 care settings and those transitions and how --13 and the information that's needed to be 14 exchanged, as well as the work flow and 15 processes.

So I think as measures such as this come forth there will be some information to share. I just wanted to point out, though, that that is an area that is an area that is taught out by IMPACT.

21 CO-CHAIR SALIBA: Thank you. Jim.
22 MEMBER LETT: One area that I think

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might be worth expanding is education. That is, 1 2 as -- of the family/patient unit. As we move further into establishment of their goals, 3 4 advanced care planning, experience of care, 5 shared decision making as we move more and more towards a patient engagement empowerment role, we 6 7 have to give them the tools to make those good decisions. 8

9 I don't want them flipping the coin as 10 to whether or not they should put in a feeding 11 tube. We have to at some point educate them on 12 what is good and what is not good about that, and 13 then engage them in, okay, help me with your 14 goals, help me with your decision and we'll 15 follow it. So I'm not seeing education anywhere 16 there.

17 CO-CHAIR SALIBA: And are you thinking 18 of that as a core measure concept that would go 19 under one of the high-leverage areas? Safety? 20 MEMBER LETT: I'm not sure. I don't 21 see a high level -- high-leverage area that it 22 fits under well. Maybe goal attainment, or

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patient engagement. Oh, thank you.

2 CO-CHAIR SALIBA: Great, thank you, 3 Jim. Paul.

4 MEMBER MULHAUSEN: I had a couple of 5 I don't know how helpful they'll be, thoughts. but I thought rather than not share them I would 6 share them, as my error. 7 So the first one would be symptom management, and I think about what I 8 9 do as a physician in long-term care settings 10 besides helping achieve these goals. Symptom 11 management to me is a very important area in 12 which I think it would be helpful to get feedback 13 on how we're doing. Although I think you could 14 potentially put that under goal attainment, the 15 two core measure concepts here in my mind don't 16 quite capture that.

And then the other one is a reflection on what I think is happening in long-term care which is intensification of the medical side of care in the spirit of improved efficiency, and I worry that it might lead to some degradation of quality of life. And I know that's a nebulous

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kind of concept, but -- and you could even wrap 1 2 all those into, well, if you achieve those things, the quality of life is better. 3 But are we capturing the quality of 4 5 just living out one's life in these settings that we're discussing as we feel the pressure to make 6 7 it part of a more efficient care flow? 8 CO-CHAIR SALIBA: Thank you. Joe, 9 Joseph. 10 MEMBER AGOSTINI: Yes, it strikes me in 11 looking at these that even though inherently a 12 team-based care is required to achieve a lot of 13 these performance areas, you don't explicitly 14 mention interdisciplinary expertise, whether it's 15 physical therapy, behavioral health, nursing, you 16 know, all experts working together to achieve 17 some of these performance areas and goals. 18 CO-CHAIR SALIBA: Thank you. Tara. 19 DR. MCMULLEN: Yes. I was going to 20 note that these type of conversations really, really -- it's productive, it's important to CMS. 21 22 We like to hear what's important to NQF and our

And I was wondering if after the 1 stakeholders. 2 conversation today and receiving feedback in the summary report, if panel members had any 3 recommendations for measures, primarily goal 4 5 That's something that definitely attainment. stands out to me as something that's a very 6 7 important concept. So are there measures that are being 8 9 developed or are currently used as your gold 10 standard in your setting or your practice or 11 whatnot that, you know, would be a good concept 12 to assess? I think that would be most helpful. 13 I don't know if that's what this is about, but. 14 CO-CHAIR SALIBA: Bruce. 15 MEMBER LEFF: Yes, just to -- I would 16 amplify Paul's comments regarding, you know, 17 potentially quality of life as a high-leverage 18 area might be something to add to that list.

CO-CHAIR SALIBA: Carol.

20 CO-CHAIR RAPHAEL: I just wanted to 21 also affirm what Paul said. One of the things 22 that I often think about is how to not over-

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medicalize goal attainment, because as we try to
 work on metrics, I think we often move toward
 things that are quantifiable.

4 So that if someone's goal is to get to 5 their grandson's graduation, or to be able to meet for coffee with his or her buddies in the 6 morning, that's what they want to do, you know, 7 and mobility is kind of on the road, and 8 9 functional status is on the road to doing it. To 10 me it's how do you capture those things that 11 really matter to people that's part of the fabric 12 of their quality of life that we never think 13 about as we think about what are the goals that 14 we can count and really weigh?

15 So that's just something that I want 16 to be sure we don't lose sight of as we move 17 along on that path to goal attainment. And that 18 is what motivates people. That's what's going to 19 help them to recover. That's what's going to 20 lower the cost of care and produce a better 21 quality of life and patient experience. 22 CO-CHAIR SALIBA: Thank you. Other

thoughts, comments? Oh, I'm sorry. 1 Ι 2 hemianopsia here. 3 (Laughter.) 4 MEMBER MARKWOOD: That's okay. We're 5 sitting over here in the corner. I just wanted to echo those thoughts as well. 6 And just to 7 ensure that the social determinants of health get incorporated into, directly into the work. 8 9 Because I think that, you know, to echo Carol's 10 comment, I mean oftentimes the goal attainment is 11 to be able to walk my dog rather than it is to be 12 chronically free of pain. So I think the thing 13 is is just to have that as an overlay into the 14 work that we do. 15 MEMBER WINSTEL: Well, Carol and Sandy 16 have been very, rather, eloquent about this but I 17 want to add to it the other issue of perhaps we 18 need to, as facility-focused as we are, look at 19 that perhaps a patient and family's choice is 20 that the patient wants to stay at home, for 21 example, as long as possible. And that if the

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goal is to age in place, the goal is to not go

into a facility, then measuring the days in inpatient rehab, for example, starts to take on a different measure. Of if a patient declines an in-patient setting and prefers more home health, and taking that and sort of translating that into the facility outcome.

CO-CHAIR SALIBA: Liza.

MEMBER GREENBERG: I think in looking 8 9 at this list it's extremely important, and very 10 patient centered, and I really like the direction 11 it's going. If we could develop our measurement 12 approach around these, I think we would move the 13 system towards more patient-centeredness. Τ 14 wanted to amplify two suggestions from the room. 15 One was around symptom management, which I think 16 is also palliative care, and I think that's a 17 very important component to many patients.

18 And unmet need was called, but which
19 is also access. And I think not having access
20 drives patients to higher levels of intensity,
21 which can potentially be around higher cost
22 levels as well.

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So I think putting those in there, 1 2 plugging them in, could be an important element. And I think once that list is in place, you know, 3 4 if CMS can look at it in terms of alignment of 5 benefit coverage as well, I think that would be real important. Because a lot of times we drive 6 7 things to really perverse directions because we don't have the right benefit coverage, and so 8 9 patients have to seek, you know, meeting their 10 needs in other places. So that's another 11 element. 12 And I just wanted to return to the 13 first slide which said the LTC Workgroup said it 14 was not possible to development an alignment 15 strategy due to differing populations, services 16 provided and data sources, and point out that the 17 IMPACT Act has really transformed that equation. 18 And with 75 million bucks and some legislation 19 you can go there. 20 So I think that's pretty awesome. And 21 maybe the care coordination might be the next

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thing that we could tackle with one of those

incredibly complicated statistical measures that 1 2 does capture a lot of elements, so. CO-CHAIR SALIBA: Thank you, Liza. 3 Kim. 4 MEMBER ELLIOTT: I think one thing that 5 we just really need to specifically state in 6 7 there is family involvement, family engagement. MEMBER LAMB: I wanted to go back to 8 9 what Sandra was saying. You know, when I look at 10 the high leverage areas I don't know that it quite fits, but I think it's really critical that 11 12 we -- particularly for this group, that the 13 social determinants be called out in some way. 14 I was at a meeting last week where I 15 was hearing about new measures of social 16 complexity. And for the first time they were 17 beginning to really pull out the stuff that we 18 deal with in the community really that makes it 19 difficult or easier to achieve outcomes. And 20 while it's not sort of the pillar, it's a cross-21 cutting. And I'd hate to lose what Sandra was 22 talking about. And I thought that whole construct

of social complexity that folks are beginning to 1 2 deal with is really a critical one for us to consider. 3 4 CO-CHAIR SALIBA: And we might could 5 see it as something that's a concept under cost It's certainly an access issue, so. 6 and access. Other -- Liza, did you have more 7 thoughts? 8 Okay. 9 Anyone else that had thoughts or 10 comments? This has been really, really helpful, 11 and great ideas. Is there anything? And as Tara 12 said -- Clarke. 13 MR. ROSS: I just wanted to share with 14 the group two measurement systems used in the 15 world of intellectual disability that might be 16 helpful in making some of these concepts come to 17 life. And one is the National Core Indicators 18 and the other one is the Personal Outcome 19 Measures. Both of these systems are 20 years in 20 operation. 21 And the National Core Indicators just 22 in the last two-and-a-half years has been

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expanded through the National Association of States United for Aging and Disability to apply to persons with physical disabilities and people who are aging. And I just will read the three major domains in both of these areas to give you how important some of these concepts are and how less important some other concepts are.

8 So in the National Core Indicators we 9 have a whole bunch of measures around individual 10 outcomes, how the individual beneficiary sees 11 their world and how the world responds to them.

We have family outcomes, how the family who supports the individual beneficiary sees the world and how they can be helpful and supportive to the individual.

And then we have the more traditional health and wellness and systems kinds of measures that most of you are very comfortable with.

19 In the area of personal outcome
20 measures, similar -- slightly different concepts
21 but similar three domains.

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Myself. And so these are a series of

person interview questions around the individual about how the person views themself in the daily world.

My world. My world is more where I live and how the structure of who I live with and the rules of where I live and what rights and freedoms I have to get a beer at four o'clock in the afternoon or have a guest spend the night or something like that. So my world domain questions.

11 And then personal outcome measures 12 have my dreams. Given where you're at today and 13 then these are measures for all adults who have 14 intellectual disabilities, so we're talking about 15 young adults, you know, 20, 21 through 80 and 90-16 year-old folks. But my dreams are you have a 17 reality of where you live and how that's 18 structured today, but where do you want to live 19 in the coming five years? And how do you want to 20 get there? And can we help you get there? 21 So I just wanted to report that there 22 is 20 years of operational experience in the

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intellectual disability world with two different 1 2 measurement systems. And we are experimenting and piloting them with the Administration on 3 4 Community Support Financing in the area of 5 physical disability and aging. CO-CHAIR SALIBA: Thank you. 6 7 Robyn. MEMBER GRANT: I wanted to thank Clarke 8 9 for raising those points because I think that's 10 very helpful. And as you were saying that, that 11 made me think of a core concept that comes up in 12 our work with consumers all the time, and that's 13 autonomy and control. And I guess, you know, you 14 could work that into some of these. But it seems 15 to me that it's so important that it might rise 16 into a highest level or a organizational concept. 17 CO-CHAIR SALIBA: Thank you, Robyn. 18 MR. ROSS: Can I respond to that? 19 CO-CHAIR SALIBA: Yes. 20 MR. ROSS: So I was going to wait till 21 we discussed the next topic, measure gaps, that 22 the Duals Workgroup has developed seven measure

1	gaps that we developed in 2013 that were
2	reaffirmed in '14 and reaffirmed in 2015. But
3	three of them are exactly three of the seven
4	are exactly what Robyn has identified.
5	The first is goal-directed person-
6	centered planning and implementation.
7	The second is shared decision making.
8	And the third is beneficiary sense of
9	control, autonomy and self-determination.
10	And, again, we do have, through the
11	National Core Indicators and the Personal Outcome
12	Experience, questions and measures on how to get
13	to these. But we don't have it for the broader
14	population. That's why it's a measure gap.
15	And that's why this morning I spoke
16	about how important measure development is
17	because we have these little I mean there are
18	hundreds of thousands of people that are
19	affected, but we have these population-targeted
20	measures. And we need to pilot them and adapt
21	them for the larger population.
22	But three of the seven measure gaps in

the Duals Group are the points Robyn raised. 1 2 CO-CHAIR SALIBA: Thank you. So to recap, and we have a lot of 3 4 great ideas. I took two pages of notes while 5 everyone was talking. So thank you. And to echo what Tara said, if you have other ideas, please 6 7 let the MAP work team know and/or Tara. Thank 8 you. 9 So that was a great transition to the 10 next item on the agenda which is identifying gaps 11 or discussing gaps. So, Sarah, would you like to 12 pick up? 13 MS. SAMPSEL: Sure. And I feel like 14 we've already crossed over this -- into this 15 quite well. But I think what we wanted to do in 16 this portion is kind of review not only the 17 measures that had previously gone through 18 rulemaking and the gaps and the core concepts 19 that have been filled previously in multiple 20 areas, but also these tables don't reflect 21 anything that's in this current rulemaking cycle. 22 So it doesn't reflect anything that has not yet

gone through the Coordinating Committee and out
 for public comment, et cetera.

3 So in some cases you are going to have to shade in your head in where we filled in some 4 5 But we wanted to use these, too, to holes. continue to draw out those gaps and those 6 7 measurement ideas. And I think we really heard in the discussion about the core concepts some of 8 9 But we wanted to open the floor, those areas. 10 too, to exactly what Tara asked is where are 11 there measures in development that we may not 12 know about, that CMS may not know about, that we 13 could really start doing some outreach and some 14 follow-up?

15 Because you also heard Chris talk 16 about, you know, NQF really working on getting 17 the measure incubator up and going. And so this 18 is an ideal opportunity for us to look for 19 additional partners on filling those gaps and 20 what might be the NQF/CMS role, et cetera. 21 So, Erin just showed you this slide. 22 This slide identifies across the four QRP

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programs where the core concepts have been 1 2 identified previously and where we'll obviously do some morphing of this based on our most recent 3 4 conversation. But, you know, is anybody aware 5 right now of any measures that we're missing in these areas that could give a leg up to the next 6 7 step towards measure development and testing? Clarke. 8

9 MR. ROSS: Well, one, most everybody 10 around the table probably is aware it's 11 happening, that's the CMS Home and Community-12 Based Service Experience Survey which is an 13 adaptation of the CAHPS measures. So sitting on 14 the Duals Workgroup we have learned for three 15 years how the survey is designed but we haven't 16 seen any results. And so we're getting antsy 17 because this holds tremendous potential.

And they've interviewed thousands of people in 13 states or something, and experimented with how to frame the questions and which questions work in what environments. So we just want results as quickly as possible.

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And the other area, the National 1 2 Institute of Disability funds a universityaffiliated program at Westchester Institute in 3 New York. And the Westchester Institute people 4 5 have taken the CAHPS survey for clinicians and adapted it for people with severe intellectual 6 7 disability. So the assumption that certain people can't answer their own questions, there's 8 9 a lot of work being done to demonstrate they can. 10 But this is three years and we still have -- we 11 have findings of how adaptations have been made 12 but not any recommended CAHPS changes. 13 But those are two very important 14 things that are happening that we're hoping we 15 can translate into delivery one of these days. 16 CO-CHAIR SALIBA: Thank you. 17 Lisa. 18 MEMBER WINSTEL: I am sure that many of 19 you around the table are familiar with the 20 current PCORI-funded project, Project ACHIEVE, 21 which is looking extensively at transitions of 22 care, at patient-reported outcomes, at caregiver

experience. It's a multi-year project. 1 We're 2 not going to have outcomes from the project for a 3 while. But I do believe that since they are 4 going to be looking at many of the things that 5 we're looking at here, that it's going to be able to either recommend or inform some very 6 substantive and well-informed measures around 7 this. 8 9 CO-CHAIR SALIBA: Will you spell out 10 that acronym, please? 11 MEMBER WINSTEL: Oh, P-C-O-R-I. 12 CO-CHAIR SALIBA: No, not PCORI. 13 MEMBER WINSTEL: Oh, sorry. Oh, 14 Project ACHIEVE. Oh, the acronym for ACHIEVE. 15 Oh, I pulled this up here. It is 16 Achieving Patient-Centered Care and Optimized 17 Health in Care Transitions by Evaluating the 18 Value of Evidence. 19 CO-CHAIR SALIBA: The brainpower that 20 went into that. Thank you. I just wanted to make sure I heard you correctly. 21 22 MEMBER WINSTEL: Yeah. ACHIEVE.

CO-CHAIR SALIBA: Okay. All right, 1 2 thank you. Kim. MEMBER ELLIOTT: Along with what Clarke 3 4 was talking about, there is also a functional 5 assessment that's being tested in the home and community-based setting by many states. 6 So that 7 might also be beneficial. CO-CHAIR SALIBA: Thank you. 8 9 And I think I jumped the gun. 10 Apparently Sarah has more slides. Sorry, Sarah. 11 MS. SAMPSEL: It's totally fine. Why 12 don't we just go ahead and go through the slide -13 - the next slide. 14 So, you know, just as another exhibit. 15 And, of course, this is the great example of 16 where there are some more holes that we could be 17 filling in this slide in the near future. And as 18 -- certainly as CMS is taking into consideration 19 the feedback that you've all provided them in the 20 additional development of their measures but, you 21 know, we felt it was important to bring up the 22 IMPACT Act domains.

And as you've rightly identified 1 2 earlier, you know, the core concepts came out before the IMPACT Act. So now we're kind of 3 4 seeing everything come together. And one of the 5 things I think we'll have to consider as a workgroup and with staff and with CMS, is do we 6 need both the core concepts and the IMPACT Act? 7 We certainly have heard from Tara and 8 9 Stacy in our fall webinar that while these are 10 the main IMPACT Act domains right now, we're not 11 limited to those domains, and CMS is not limited 12 to those domains. So they really do want to 13 think broadly. 14 So we just -- we wanted to bring this 15 up as an additional exhibit of, you know, where 16 work is being done, where some focus is being 17 And, obviously, we've talked about many of made. 18 these areas so far today. 19 Next slide. 20 And then with the Hospice QRP which is 21 a little bit different since it's not falling 22 under the IMPACT Act, these again are areas that

have been identified as high priority areas for 1 2 measurement, and then where we can map across where there are existing measures in the Hospice 3 4 You know, this is an example of a program ORP. 5 that does have the CAHPS survey in it already with the Hospice Experience of Care survey. 6 And 7 that recently came through as an endorsed measure as well through the person- and family-centered 8 9 work. care

10 But there continues to be holes here. 11 And you see at the bottom there's not only what 12 we've talked about is the unmet need, but then 13 there's the unwanted treatments. And so how do 14 you change that dynamic when we're talking about 15 the hospice patients? And I really do think that's a different discussion to have. 16 17 And I think Karen is still here.

18 Karen Johnson in the back, who will be leading
19 NQF's palliative care work for consensus
20 development coming up in the spring and in next
21 year, so that we will be seeing more measures
22 coming out there.

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1	Next slide.
2	So before we go to public comment,
3	just again this is our last call well, not
4	last call, you are welcome to email us at any
5	time. But really want to know did this generate
6	any additional ideas for measures, measure
7	concepts that should be prioritized that we can
8	make sure get into our final report to CMS?
9	CO-CHAIR SALIBA: So now discussion.
10	Jim.
11	MEMBER LETT: Well, I'm going to be the
12	one-trick pony around care transitions again.
13	Thirty-day re-admissions is not a particularly
14	good quality measure. Hasn't been. Won't be,
15	according to the experts that I've talked to and
16	read from.
17	So I'd like to see us go more to
18	measuring did your transition actively give the
19	correct information in a timely fashion, in the
20	proper way to the next site of care? And does
21	that site of care then respond to the sending
22	entity that says, hey, I got it, I have a few

questions. Or, I didn't get it. Or, Ms. Jones 1 2 got here and things are fine. We have a very passive, I think, 3 posture in terms of measures around transitions. 4 5 Did Site A send all the information they should Not did Site A ensure Site B got that 6 to Site B? 7 information, ask for feedback and be responsive to questions? And then did Site B take that 8 9 information and act on it? 10 So it's a difference between hearing 11 That is, just sending a package and listening. 12 of information to Site B from Site A doesn't 13 ensure any action, doesn't improve quality, 14 doesn't even mean anybody read it. So I would 15 like to see us create measures that reach across 16 those divides. And God forbid practitioners 17 actually talk to each other about patients as 18 they move through sites of care, and of course 19 involving the patient and family with it. 20 The other piece of that is if there is 21 some way NQF -- I know that we are not a 22 measurement development organization -- is there

some way you can connect organizations who want 1 2 to develop measures? I have the part of two of them that would love to. But it is just 3 4 prohibitive in terms of resources and time in 5 volunteer organizations to try and pony up cash and get the statistical work done behind them. 6 7 So if you can find an organization that will fund or assist, hook it up, put it out 8 9 there so that other organizations with great 10 ideas can put them into action. I think it would 11 help a lot with the gaps. 12 CO-CHAIR SALIBA: Thank you. 13 Alan. 14 MEMBER LEVITT: I may be hastening my 15 departure from CMS, but I just wanted to make 16 sure, I know it just came up about should we 17 still be doing our work here because the IMPACT 18 Act is out there. And does measurement gaps, 19 core concepts, does any of that matter? 20 I mean I just want to reinforce that 21 the answer is yes. That, you know, I think 22 Congress did get it right in terms of the IMPACT

Act and the domains it has chosen. And we can
 argue about the time lines. But, again, I think
 that's all important.

4 But what this represents is what we 5 all in the post-acute care community -- now I'll put on my post-acute care hat -- feel is really 6 important as well and that, you know, we need to 7 continue to promote what we think our core 8 9 concepts are, what the gaps are. Because we 10 shouldn't just cede the entire quality of the 11 programs that are so important to us to Congress. 12 This is our job and it's an important job. And, 13 you know, in both my hats I find that this sort 14 of dialogue is really important, so. 15 CO-CHAIR SALIBA: Thank you. And the

16 long-term care piece as well, I think -- I'll
17 have to think about.

Gene.

MEMBER NUCCIO: I'd just like to ask
that NQF look at or encourage measure developers
to think more integratively, if you will, joining
process and outcome. Much like we talked about

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yesterday with the falls measure where what the 1 2 provider does and the outcome of that. If I can coin a term or semi-3 4 officially, I would call that an efficacy class 5 of measures which joins process, outcome and perhaps even cost, and when they begin developing 6 7 these measures within the domains that you've already provided. 8 9 So just as we've seen our process 10 measures come to NQF historically as, did you 11 Did you put it in a plan to make a assess? 12 difference? And did you do something? And have 13 each of those individual ones endorsed by NQF, 14 we've now seen today -- in these last two days, 15 composite measures where you take the entire set 16 of steps and put them into a position. 17 I encourage that the measure 18 developers think to integrate both process and 19 outcome, okay, in the future set of measures that 20 we begin to consider. 21 CO-CHAIR SALIBA: Thank you.

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Liza.

MEMBER GREENBERG: Whenever I hear 1 2 anyone ask for what more measures do we need, it sort of strikes fear in my heart from the 3 4 provider's side because being new in my job I've 5 had to learn about the 26 Home Health Compare measures and all the value-based purchasing 6 7 measures and the, you know, coordinated care for joint replacement measures. And there's a lot of 8 9 measures out there. 10 So I would just also urge us to maybe

11 consider as part of the MAP role, you know, 12 working towards NQF submission of parsimony, and 13 trying to think about what needs to come off the 14 table or what can be clustered in a composite 15 measure.

Because, again, not only is it burdensome to agencies to -- it's not that the reporting is as burdensome as it used to be, but thinking about them all and improving them all, especially when they've topped out. But it's confusing to consumers. You know, to a consumer when you try to go through Home Health Compare

and you're like, you know, expanding and 1 2 contracting the little buttons to figure out I think that the stars are a huge what's what. 3 4 step forward. But you know, then really looking 5 at what we can retire. CO-CHAIR SALIBA: Thank you. 6 7 Gerri. MEMBER LAMB: Two things. Wanted to 8 9 just reinforce what Liza and Jim were saying in 10 terms of working on more composite measures that 11 really close the loop. That's been a real issue 12 for the care coordination domain of getting these 13 one-part check-listing things coming forward, 14 plus not getting anything coming forward in the 15 last year. 16 So I really would just support what 17 Liza was saying is maybe this can be a focus area 18 as we look at more complex measures in the 19 future. 20 The other was to go back to what 21 Joseph was talking about with teamwork and 22 interprofessional care. And the National Center

for Interprofessional Practice and Education is 1 2 really looking at kind of best in class measures. And there is a new measure of teamness that folks 3 4 at the University of Oregon, Virginia Tilden, has 5 been developing, and the psychometrics are quite And so we may be on the verge of looking 6 qood. at better measures for how teams perform as a 7 process measure for linking to outcomes. And 8 9 that may be really important as we get to 10 attribution. 11 CO-CHAIR SALIBA: So, Gerri, National Center for Interprofessional --12 13 MEMBER LAMB: -- Practice and 14 Education. 15 CO-CHAIR SALIBA: -- Practice and Education. Okay. 16 17 Sean. 18 MEMBER MULDOON: I'll take some risk at 19 piling on with the providers' viewpoint. But I 20 would like to reiterate that providing people 21 with data is just the first step of a long 22 process of interpreting the data, troubleshooting

the data, developing plans, and then starting
 your own PDCA cycle.

And it reminds that when balanced score cards are discussed, one of the -- one of the key components is the fact that if you've got 30 elements on your balanced score card, you don't have anything that people will ever respond to.

9 So if ultimately we're trying to help 10 consumers make better decisions, and providers do 11 some QI and ultimately use some of that for VBP. 12 Just recognize that at some point the pendulum 13 goes the other way, and the more you know, the 14 less you actually can act on. 15 CO-CHAIR SALIBA: Thank you. 16 Cari.

17 MEMBER LEVY: Yeah, and following on 18 that, I'm just thinking of I review a lot of 19 post-acute care charts, and 98 percent of what I 20 look at has nothing to do with the human being, 21 it has everything to do with meeting 22 requirements. Right? And it's checking a box

and it's generating paper. And there's so little
 about the human in a chart.

And so to the extent that what we're 3 4 doing here can increase the amount of attention 5 we pay to the person that's there, I think that would be a wonderful thing to be able to do with 6 7 what we're trying to accomplish. 8 CO-CHAIR SALIBA: Thank you. 9 Carol. 10 CO-CHAIR RAPHAEL: I just wanted to

11 kind of follow up on what Sean said, because I 12 always try to think about what can we do that's 13 actionable and that sort of really moves the bar 14 for quality upwards.

And, you know, AARP, the SCAN Foundation and the Commonwealth Fund have done this score card on long-term care. And it takes the states and it scores them. And I think it's five domains: access, affordability, something on quality, there was caregiver support. And I can't remember the fifth.

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And they first did it in 2011. And I

have to tell you I got calls from four different governors' offices like, how could this be? What does this mean? You know, how could we be 41 on, you know, the list of states here? Because Americans, I've discovered, love rankings. And then they just re-did it this past year in 2015, and almost every state improved.

8 So, you know, I do think there is 9 something to be said for kind of keeping it in a 10 manageable group that you can really digest and 11 act on. Doesn't mean, you know, that we don't 12 have many roads to travel here, but I think the 13 core should be really what is consequential.

CO-CHAIR SALIBA: Clarke.

MR. ROSS: I wanted to report on one
other measure gap identified by the Duals
Workgroup. And this will make Sandy's day too.

One of the measure gaps is the
absolute importance of non-medical, frequently
non-profit community-based organizations for both
people with disabilities and elders. And they
get neglected by both CMS and the National

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Quality Forum because the funding are hospitals and the four IMPACT groups and, fortunately, home- and community-based services. But they're all siloed. And they're siloed at the National Quality Forum.

And so one recognized the absolute 6 7 importance of these non-profit community organizations, thousands and thousands of them 8 9 across the country. That's the daily interface 10 that most people who are outside an institutional 11 setting have who are disabled and elderly are 12 with those organizations, not with the ones that 13 we're focused on.

14 And then related to that concept, I 15 don't know how many of you know that ONC and ACL 16 have a long-term care electronic record 17 discussion group that has been going on every 18 week for almost a year. And it's one little 19 domain, the domain of electronic health records, 20 and how do we make this link between medical 21 facilities and the non-profit community-based 22 organizations?

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So there's this little network that 1 2 has no official standing, it's just whoever wants But there are a lot of state disability 3 to join. 4 and elderly -- aging folks on the calls who just 5 brainstorm about this linkage issue through the vehicle of the electronic health record. 6 CO-CHAIR SALIBA: Liz. 7 MS. PALENA HALL: I'll elaborate a 8 9 little bit more on that because I am one of the 10 federal leads for that effort. And so behind 11 that is actually some CMS Medicaid work. And so 12 there's a grant called TEFT as we affectionately 13 know, and part of that -- so there's four 14 components of TEFT, some of which is the CAHPS --15 the CAHPS tool that was discussed, the care 16 assessment and modifications to that, and also 17 the standards work. 18 So in partnership with CMS we have a

10 weekly group. It's through the ONC Standards and 20 Interoperability Framework. And so there are 21 seven states that participate in that work, 22 they're grantees. And so they are required to,

as part of their grant work, to pilot standards
 that are being identified.

And so we also coordinate quite a bit with the NQF HCBS Workgroup. And so right now the standards work is in a phase where we are starting pilots. So it's not only states but also non-private sector entities that are beginning to pilot some of this work.

9 So I think we certainly would have -10 I think there was some discussion about
11 potentially presenting to one of the other
12 workgroups on where those pilot organizations are
13 at. And so we can share some of that, inform,
14 you know, some of the NQF workgroups.

So but there is -- and I would say that in terms of the standards work, it will go through a number of phases of piloting. So it will not only -- they'll not only be piloting this year but also through 2017.

20 CO-CHAIR SALIBA: Thank you. And the 21 other part of your comment, we -- our center at 22 the VA just got a large grant from the VA to do a

better job of integrating at the point of 1 2 discharge from the hospital, integrating our veterans with community-based organizations and 3 So I think that's also an area that is 4 services. 5 coming along but, correct, it's still a gap. So any other? So I think there was 6 one -- there were three topics that Sarah brought 7 up that she wanted us to think about. 8 And I 9 think we've covered some of them: measure gaps 10 and domain, domain sufficiency from the IMPACT 11 But we didn't talk about Hospice QRP. Act. Did 12 anyone have any comments that they wanted to talk 13 about in terms of the Hospice QRP? 14 Lisa. 15 MEMBER WINSTEL: Just to really 16 encourage development around the timeliness and 17 responsiveness of care. 18 CO-CHAIR SALIBA: Anyone else? 19 Clarke. 20 MR. ROSS: My brother-in-law died in 21 May and was the recipient of hospice. But the 22 thing I want to share is that the professional --

the professions were great, the nurses and social workers. The support personnel, the people who were supposed to come and help with bathing and toileting, were absolutely horrible and not dependable.

6 So when we think about quality 7 measures we tend to focus what should the nurse 8 do and that's great. But the day-to-day grunt 9 work that makes quality of life is frequently the 10 non-professional aide kind of person. And so 11 please remember that.

12 CO-CHAIR SALIBA: And I was assuming, 13 Lisa, that your interprofessional group included 14 that type of --

MEMBER WINSTEL: Well actually, most specifically I was referring to medical assistants, talking about end of life when there's an absolute need for pain relief and the next time you see somebody is 36 hours later. That's not acceptable.

21 CO-CHAIR SALIBA: Earlier when you 22 mentioned the National Center for

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1	Interprofessional Practice and Education, was
2	that you? Maybe that was Gerri.
3	All right, any other comments,
4	thoughts about Hospice QRP?
5	(No response.)
6	Okay, thank you, guys.
7	So we'd like to open the floor now for
8	public comment. Can we check have the operator
9	check on the line and see if there's anyone that
10	would like to contribute online, on the phone?
11	OPERATOR: Okay, and at this time if
12	you would like to make a comment please press
13	star then the number one.
14	There are no comments at this time.
15	CO-CHAIR SALIBA: Thank you.
16	And in the audience here today, is
17	there anyone that would like to make a comment,
18	please?
19	MS. LEE: Teresa Lee with the Alliance
20	for Home Health Quality and Innovation.
21	I want to thank this group again.
22	You're clearly just a really thoughtful group.

And I appreciate the candor and openness from CMS
 as to where things are today.

And, you know, the one thing that 3 occurs to me in this conversation about 4 5 measurement gaps is that there's just been a lot of ground covered today. I've just heard so many 6 7 different comments, all really meaningful, all really constructive. And we've sort of focused 8 9 in today mostly on the IMPACT Act domains that 10 are enumerated. But it is contemplated in the 11 IMPACT Act that there might be future domains 12 identified and pursued.

And I think that this body could be a good one to sort of think comprehensively and in a streamlined, meaningful fashion about what further domains CMS might wish to take up once they get past the enumerated domains that have specific statutory deadlines.

So it's just something to think about
for the future. Certainly something that I would
want this group to be very careful about. I, like
Liza, you know, worry about just more measures.

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You know, there -- home health, we're the poster 1 2 child for lots of measures. We've got lots and lots of measures. And it's, you know, there's 3 4 not -- I think that a lot of them are meaningful, 5 but now we worry that, you know, how do we focus our quality improvement activities when there are 6 7 so many measures? So if there's a way to think about it 8 9 comprehensively to give CMS some recommendations 10 about, you know, what's the way forward, I think 11 that all of us would be very interested in 12 helping to support those activities. Thank you. 13 MR. HILLMAN: Thank you to the 14 committee again. 15 This is Troy Hillman from the Uniform 16 Data System for Medical Rehab. We represent 17 roughly 900 subscribers, both in the in-patient 18 rehab skilled nursing facility and long-term 19 facility that are collecting data utilizing the 20 FIM instrument as well as all of these quality 21 initiatives and measurements that are being 22 examined by the NQF and created by CMS and other

measure developers.

2	A lot has been stated today about the
3	IMPACT Act and about the specific deadlines. And
4	one of the things I really question is, at what
5	point do we require that these measurements that
6	we're all being held up to and that we need to
7	consult, educate, train, and have each of these
8	providers the ability to collect the data and
9	examine their when do we require that these go
10	through a fully developed and tested process?
11	A number of you on the panel today
12	asked whether these measures would come back
13	through the NQF process for endorsement. Now,
14	while we know that there are specific deadlines
15	stated within the IMPACT Act, there's also
16	provisions that the Secretary can remove and/or
17	suspend any of these measures at any time through
18	justification in the Federal Register. Do we, as
19	part of this NQF process request, as part of our
20	recommendations forward, that the Secretary
21	examine the potential for removing or suspending
22	these requirements until such a time as they can

answer your questions that you've asked today? 1 2 We truly appreciate all of the consideration given by this committee and by this 3 panel, and especially for CMS and their measure 4 5 developers in the process. But, again, we come back to the question of we have measures that 6 7 look to be implemented this coming October or the next October or, depending on which program 8 9 you're in, being implemented where you begin 10 collecting the data. 11 At this stage we're becoming the data 12 collectors for the validation of measures that 13 have not met these requirements yet. And at what 14 point do we, as a committee, or you, as a 15 committee, and we, as an industry, begin to ask 16 that these measures go through these fully 17 developed and tested measurement endorsement 18 processes?

Again, thank you so much for your
time. I hate being the last one, as I was
yesterday as well. But again, thank you so much
for your time, for your consideration and for

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1 your thoughtfulness. Thank you. 2 CO-CHAIR SALIBA: Are there any other comments from the audience so that Troy's not the 3 last one? 4 5 (No response.) Okay, thank you so much. So I think 6 7 we're now going to talk -- just summarize the meeting for the day. Carol, do you want to? 8 9 CO-CHAIR RAPHAEL: Well, let me just 10 very briefly -- first of all I want to thank CMS 11 and Alan and Tara. Really, you know, you do not 12 need to go through a multi-stakeholder process. 13 You are not required to. You chose to. And I 14 think you have exhibited the fact that you really 15 value the guidance and input that this group has 16 provided. 17 So I really want to thank you. And, 18 you know, you have -- we have seen a real 19 evolution in that partnership over the time that we have all been involved in this. So thank you 20 21 for that. 22 Secondly, we are involved in a new

process that, you know, I don't know if I would call it its infancy, but maybe it's even before giving birth. Who knows what stage we're in, but we're in an early stage in developing a process that really works, when measures are kind of not yet crystallized and not at the scientific level that we have historically been accustomed to.

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So we have used something that we've 8 9 been doing in other workgroups with the consent 10 I'm assuming, unless someone raises a process. 11 hand at this juncture, that everyone understands 12 the process, that you have assented in all 13 instances to the actions that we've discussed and 14 agreed upon. And that we still continue to wish, 15 and particularly in certain areas, that we will 16 have more involvement and ability to shape the 17 final measures that emerge and that will be 18 worked out. 19 I wanted to just ask Erin to review 20 next steps. Where do we go from here?

21 CO-CHAIR SALIBA: One person has their
22 tent up. So, Jim.

MEMBER LETT: Tell me if this is the
 appropriate time. Just a suggestion for process
 for next time.

4 I really backed into liking the Lead 5 Discussant concept. When I got the agenda and I saw I was the Lead Discussant for a number of 6 those, I first panicked. And it -- but it made 7 me really in depth read the measures, look at the 8 9 exceptions, even do some research, background 10 research about them, which I think helped me 11 understand these measures a great deal more.

12 There are, frankly, I think too many 13 for any one person, who also has a job, to be 14 able to go through them in significant depth. Ι 15 would probably suggest that next time that we 16 meet, when you assign Lead Discussants, as you 17 obviously have topic based on the organization or 18 the person involved, to make them responsible 19 basically for knowing that core set of measures 20 they're going to comment on so that they can 21 really make some terrific refinements, 22 suggestions to this panel, as well as to CMS and

our other partners.

2 CO-CHAIR SALIBA: Thank you. Erin, I'll hand it back. 3 4 MS. O'ROURKE: Thanks, Deb. So just to briefly run through the 5 upcoming steps. 6 We'll be releasing the draft 7 recommendations for public comment on December 8 9 23rd. And that will run I believe through 10 January 12th. January 12th. So please be on the 11 lookout for that if you'd like to make any formal 12 written comments on the draft deliverables. Τ 13 will be putting out the workgroup recommendations 14 as well as the draft programmatic guidance. So 15 we'd appreciate any feedback and input from the 16 public or from members of the workgroups. 17 The MAP Coordinating Committee will be 18 meeting on January 26th and 27th to review and 19 finalize the MAP pre-rulemaking input. So we'd 20 welcome anyone who is interested in following 21 that meeting to attend as a member of the public 22 or dial in. You can see the MAP webpage for more

information.

2	And then, finally, February 1 we'll be
3	releasing the spreadsheet of every measure, with
4	the recommendation and rationale. And on
5	February 15th, we'll be releasing the
6	programmatic guidance, or the written deliverable
7	that goes a little bit more into the workgroups'
8	guidance and more cross-cutting issues.
9	CO-CHAIR RAPHAEL: Are there any
10	questions about the process moving ahead here?
11	CO-CHAIR SALIBA: I just want to thank
12	everybody for their input today and yesterday. I
13	think we heard a wide range of input and very
14	constructive and extremely helpful. So I just
15	wanted to thank you all. It was a pleasure
16	working with you.
17	Alan.
18	MEMBER LEVITT: I really wanted to
19	thank everybody again. I can't thank you enough
20	for the support you give us, for the input you
21	give us. We have differences sometimes, but we
22	actually really we have the same goal in

heart, so to speak, at hand here.

2 We need to think back, as Carol was saying, you know, where we were and where we are 3 4 now, and how much progress we've really made, and 5 how good the future looks too. I know we talked all about the IMPACT Act measures. 6 But as I was mentioning to Teresa and Liza I guess a week ago, 7 the IMPACT Act also has all standardized 8 9 interoperable data that's going to be able to be 10 used and useful for our patients longitudinally 11 across settings. And that's such a remarkable 12 feat to see that beginning. 13 And that is a beginning for us. And 14 it's going to be so important to implement that 15 and, hopefully, implement it not beyond this workgroup into other settings as well. 16 17 But, again, we hope to continue the 18 dialogue, to be back, to continue, you know, 19 discussing future measures with you. And thank 20 you again. 21 CO-CHAIR RAPHAEL: To everyone a happy, 22 happy holiday. And thank you so much for going

above and beyond the call of duty. 1 2 MS. SAMPSEL: And just real quick. 3 Lunch will be here. It's on its way. 4 And on behalf of NQF, obviously we 5 want to thank everybody as well. And we are open, Jim and everybody, to suggestions. 6 You 7 know, right, MAP has been around for a while, but year to year we are trying to improve and we'd 8 9 like to hear what thoughts that you have as we 10 prepare. 11 And we'd just like to recognize not 12 only the staff on this team, but there's a lot of 13 behind-the-network folks working on MAP for NQF 14 that pulled this all together. Amber and Wunmi 15 specifically in the back, who try to bring all 16 the staff together and promote consistency. 17 So thank you all. And we'll look 18 forward to talking to you in the future. 19 (Whereupon, the above-entitled matter 20 went off the record at 12:38 p.m.) 21 22

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This is to certify that the foregoing transcript

In the matter of: Post-Acute Care/Long-Term Care

Before: NQF

Date: 12-15-15

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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