NATIONAL QUALITY FORUM

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NEUROLOGY STANDING COMMITTEE MEETING

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TUESDAY APRIL 5, 2016

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The Neurology Standing Committee met at the National Quality Forum, 9th Floor Conference Room, 1030 15th Street, N.W., Washington, D.C., at 8:30 a.m., David Knowlton and David Tirschwell, Co-Chairs, presiding.

PRESENT:

DAVID KNOWLTON, MA, Co-Chair DAVID TIRSCHWELL, MD, MSc, Co-Chair DAVID ANDREWS, Patient Advisor, Georgia Regents Medical Center JOCELYN BAUTISTA, MD, Assistant Professor, Neurology Staff Physician, Quality Improvement Officer, Cleveland Clinic Neurological Institute Epilepsy Center KETAN BULSARA, MD, Associate Professor, Director of Neuroendovascular and Skull Base Surgery Programs, Neurovascular Section, Yale Department of Neurosurgery JAMES BURKE, MD, University of Michigan MICHELLE CAMICIA, MSN, RN, PHN, CRRN, CCM, FAHA, Director of Operations, Kaiser Foundation Rehabilitation Center VALERIE COTTER, DrNP, AGPCNP-BC, FAANP, Advanced Senior Lecturer, University of Pennsylvania School of Nursing BRADFORD DICKERSON, MD, MMSC, Associate Professor of Neurology, Director of the Frontotemporal Disorders Unit, Massachusetts General Hospital

DOROTHY EDWARDS, PhD, Director, Collaborative Center for Health Equity, University of Wisconsin Madison School of Medicine and Public Health

REUVEN FERZIGER, MD, Director, US Medical Affairs, Merck and Company*

DAVID HACKNEY, MD, Professor of Radiology, Harvard Medical School, Beth Israel Deaconess Medical Center

STEPHEN HUFF, MD, FACEP, Department of Emergency Medicine, University of Virginia Health Sciences Center

CHARLOTTE JONES, MD, PhD, MSPH, Director of Quality, Division of Pediatric Neurology, Nationwide Children's Hospital

MICHAEL KAPLITT, MD, PhD, Associate Professor, Associate Professor with tenure, Weill Cornell Medical College*

RONALD KOENIG, MD, Medical Director, Anthem, Inc.

LISA LINES, PhD, MPH, Health Services Researcher, RTI International

ALEXANDER RAE-GRANT, MD, Director, Cleveland Clinic Center for Continuing Education

MELODY RYAN, PharmD, MPH, Professor, University of Kentucky College of Pharmacy

PETER SCHMIDT, PhD, Senior Vice President and Chief Mission Officer, National Parkinson Foundation

JANE SULLIVAN, PT, DHS, MS, Associate Professor, Northwestern University

KELLY SULLIVAN, PhD, Assistant Professor, Department of Epidemiology, Georgia Southern University*

ROSS ZAFONTE, DO, Professor and Chairman,

Department of Physical and Rehab, Harvard

Medical School

NQF STAFF PRESENT:

ANN HAMMERSMITH, General Counsel WUNMI ISIJOLA, Administrative Director KAREN JOHNSON, Senior Director ELISA MUNTHALI, Vice President, Quality Measurement YETUNDE ALEXANDRA OGUNGBEMI, Project Analyst ANN PHILLIPS, Project Analyst, Health Information Technology CHRISTY SKIPPER, Project Manager MARGARET TERRY, Senior Director MARCIA WILSON, Senior Vice President, Quality Measurement

ALSO PRESENT:

AMY BENNETT, American Academy of Neurology SUSANNAH BERNHEIM, Yale-CORE SOO BORSON, University of Washington * JUDY BURLESON, American College of Radiology KRISTEN BUTTERFIELD, Pharmacy Quality Alliance KAREN DORSEY, Yale-New Haven Health System WOODY EISENBERG, PQA DIEDRA GRAY, PCPI KAREN KOLBUSZ, The Joint Commission JULIE KUHLE, PQA ANUP PATEL, American Academy of Neurology STEPHEN SCHMALTZ, The Joint Commission LEE SCHWAMM, MGH/Harvard DAVID SEIDENWURM, American College of Radiology SAMANTHA TIERNEY, PCPI Foundation ANN WATT, The Joint Commission

* present by teleconference

C-O-N-T-E-N-T-S

Welcome
Recap of Day 1
Consideration of Candidate Measures 2864: CSTK-01: National Institutes of Health Stroke Scale (NIHSS) Score Performed for Ischemic Stroke Patients
2865: CSTK-02: Modified Rankin Score (mRS) at 90 days
2866: CSTK-03: Severity Measurement Performed for Subarachnoid Hemorrhage (SAH)
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Adjourn

1 P-R-O-C-E-E-D-I-N-G-S 2 8:32 a.m. CO-CHAIR KNOWLTON: Welcome back. 3 I'm 4 going to promise you a rapid day. People have 5 schedules to keep, and we promise you a day without controversy today. 6 7 I was assured by Christy that all the 8 controversial measures were yesterday, so we 9 should just -- yes. You will be very shortly 10 issued a rubber stamp. 11 So David's going to give us a recap of 12 what happened yesterday, and then we're going to 13 pick up where we left off which is 2864, National Institutes of Health Stroke Scale. 14 15 CO-CHAIR TIRSCHWELL: All right, so 16 just to briefly review from yesterday kind of in order, and actually one of them I'm not exactly 17 18 sure that I have the right notes down. 19 But 0661 Head CT or MRI path, though 20 there was lots of debate about the 45-minute 21 rule. STK-01 venous thromboembolism, there was 22 low gap there. So I actually don't remember.

Did that one go to reserve? 0434. Oh, that was
 the no consensus one.

MS. KOLBUSZ: It's the one we have a 3 4 question about, David, because ---5 CO-CHAIR TIRSCHWELL: Yes. MS. KOLBUSZ: -- it was before the 6 7 reserved status was resolved. And since all the others went through the reserved status process 8 9 and you seem to have that under hand now, do you 10 want to revisit the STK-01 VTE Prophylaxis? 11 CO-CHAIR TIRSCHWELL: Is that where we 12 left it was that the gap was low and then we kind 13 of tabled it after that? It's a little different 14 because --15 That was the one where MS. JOHNSON:

16 the gap wasn't as -- the performance rates were 17 not nearly as high. So I think there was --

18 PARTICIPANT: -- I recall it. It 19 seemed that there wasn't consensus about how to 20 handle the reserve status. It was more 21 calculated --

MS. JOHNSON: No, I think it was more

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1 consensus of is there a gap or not --2 CO-CHAIR TIRSCHWELL: Right. 3 MS. JOHNSON: -- and you guys had the 4 disparities data, but you were going to bring 5 that back potentially at post-comment call. CO-CHAIR TIRSCHWELL: Yes, for the 6 7 other ones we were all in agreement that there was no gap and so they went onto reserve. 8 This 9 one, I think it was kind of split between maybe 10 there is a little gap and maybe there isn't. And 11 so that's --12 MS. KOLBUSZ: We did give the 13 disparities, though, data yesterday. 14 CO-CHAIR TIRSCHWELL: The data that, 15 right, the verbal data we want to give you guys a 16 chance to present your data in full and have the 17 chance to review it. So --18 MS. WATT: Is that true for all of 19 Are we looking for disparities data? them? 20 We're just trying to --21 CO-CHAIR TIRSCHWELL: No, the other, 22 The other ones have been moved to just that one.

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1 reserve. 2 MS. WATT: Okay. And so the 3 determination about that then is determined by 4 the disparities, right? 5 CO-CHAIR TIRSCHWELL: For STK-01? The first one, 0434. 6 MS. WATT: Yes. 7 CO-CHAIR TIRSCHWELL: Yes. Okay, thank you. 8 MS. WATT: 9 CO-CHAIR TIRSCHWELL: Okay, great. 10 Thanks for clarifying that. 11 0435, discharged on antithrombotic 12 failed on the low gap but was put on reserve, I 13 believe, and 2832 was thus, the eMeasure was not 14 discussed. 15 0439 discharged on statins were both 16 deferred again for data issues. They changed the 17 denominator. We were going to try to get the 18 first quarter of data or so, so we'll look 19 forward to hearing more about that one. 20 STK-04 0437, thrombolytic therapy 21 failed, and that was -- was that on gap as well? 22 Sorry, the eMeasure failed. 0437 passed, 2834

failed for insufficient feasibility. 1 2 0438, which is STK-05 antithrombotic 3 therapy, that one failed because there was no gap 4 so it went into reserve status. The eMeasure, 5 2835 was not reviewed. 0436, anticoagulation after AFib, no 6 7 gap again so it was put on reserve. The eMeasure was not discussed. 0441, STK 10, assessed for 8 9 rehab, again no gap, put on reserve, eMeasure not 10 discussed. 2863, CSTK-06, Nimodipine 11 12 administered, that passed and that's where we 13 And so today we're starting with 2864, are. 14 CSTK-01, NIH Stroke Scale score performed for 15 ischemic stroke patients. 16 Does the Joint Commission want to 17 introduce the measure? 18 MS. KOLBUSZ: Yes, good morning 19 everyone. This is CSTK-01, National Institutes 20 of Health Stroke Scale score performed for 21 ischemic stroke patients. 22 This is looking for ischemic stroke

patients for whom an initial NIHSS score is 1 2 performed prior to any acute recanalization therapy such as IV thrombolytic, t-PA, therapy, 3 4 or IA t-PA, or mechanical endovascular 5 reperfusion therapy in patients undergoing recanalization therapy and documented in the 6 7 medical record, or documented within 12 hours of arrival at the hospital emergency department for 8 9 patients who do not undergo recanalization 10 therapy.

11 The rationale for the measure is that 12 it's thought that all ischemic stroke patients 13 should have a rapid neurological examination when 14 presenting to the hospital department with 15 warning signs or symptoms of stroke to determine 16 the priority for treatment with t-PA.

17 The use of a standardized stroke scale 18 for scoring should be used. And the NIHSS is a 19 scale that has been recommended by the American 20 Heart Association, the American Stroke 21 Association, it is recommended in the guidelines 22 and it is widely accepted. Therefore that score

has been decided upon as the tool to be used for this particular measure.

The denominator population for the 3 measure are ischemic stroke patients who arrive 4 5 at the hospital emergency department. The numerator is ischemic stroke patients for whom a 6 7 NIHSS score is performed prior to any acute recanalization therapy in patients undergoing 8 9 recanalization therapy and documented in the 10 medical record, or documented within 12 hours of 11 hospital arrival for patients who do not undergo 12 recanalization therapy.

13 Excluded populations include patients 14 less than 18 years of age, patients who have a 15 length of stay greater than 120 days, patients 16 with Comfort Measures only documented on the day 17 of or day after hospital arrival, patients 18 admitted for a Elective Carotid Intervention, or 19 patients who do not undergo recanalization 20 therapy and are discharged within 12 hours of 21 arrival at the hospital.

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CO-CHAIR TIRSCHWELL: Great, any other

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comments?

2 DR. SCHWAMM: Yes, I just want to make three brief points, and we can talk about them 3 again at the end of the discussion. 4 The first is 5 just in terms of understanding why it's important to have this as an NQF-endorsed measure. 6 7 It is now guideline recommended by the American Heart Association that the NIH Stroke 8 9 Scale Score be performed in all ischemic stroke 10 patients. 11 Studies have shown that centers that 12 routinely perform the NIH Stroke Scale Score give 13 t-PA to a greater percentage of eligible 14 patients, so it clearly is part of a system, a 15 sort of systematic approach to assessing patients 16 with stroke. 17 And I think most importantly and only 18 released after these submissions, there is a new 19 AHA guideline related to thrombectomy, so 20 endovascular clot removal, which recommends that 21 the procedure be considered for patients with an 22 NIH Stroke Scale score of 6 or higher. So the

collection of the score now is predicated on the 1 2 appropriate triage of patients to comprehensive 3 centers. So I think for all of those reasons 4 5 there's a strong connection between the score, which isn't just for severity and risk 6 adjustment. It actually now is being used to 7 guide treatment decisions. 8 9 CO-CHAIR TIRSCHWELL: Okay, thank you. 10 So the discussants are Michelle, Mike, and Lisa. 11 Who's going to take the lead? 12 MEMBER LINES: I've been nominated. 13 CO-CHAIR TIRSCHWELL: All right. 14 MEMBER LINES: I assume Michelle will 15 jump in with any corrections to my work. 16 So this is a new measure. It's a 17 process measure to talk about the evidence. The 18 developer has talked about what they've laid out 19 in terms of the evidence. 20 And they say that presenting, that the 21 NIHSS assessment for ischemic stroke patients 22 increases early detection and diagnosis,

increases the identification of patients eligible 1 2 for treatment and helps predict outcomes. They did not present any systematic 3 review or QQC, but they did present the 4 5 The guidelines support neurological quidelines. testing, but there's no evidence on the 12-hour 6 7 time frame, and that was something that came up during the workgroup discussion. 8 9 So using an algorithm, you know, the 10 initial recommendation was that the evidence was 11 moderate. I would say moderate to low, because 12 evidence certainly exists that neuro testing is 13 important, but I wrote this somewhere in the 14 workgroup call as well, the NIHSS is an older 15 instrument. 16 There's a newer instrument available, 17 the modified NIHSS which, I mean, from a 18 measurement perspective it seems to me that it 19 would be a good idea to at least allow for some 20 innovation and allow the measure to be specified 21 both with either the NIHSS or the mNIHSS. 22 The mNIHSS is more reliable, it's

more, it's shorter, it's also something that can 1 2 be estimated from the claims. So it has some 3 advantages. And the other thing about that is that 4 5 the evidence exists but it's not necessarily any evidence about that 12-hour time frame. 6 7 CO-CHAIR TIRSCHWELL: Discussion from the group related to evidence? Ketan? 8 9 MEMBER BULSARA: You know what. Just 10 because Lisa brings it up, to the developers why not use the modified NIHSS? 11 12 DR. SCHWAMM: And there have been 13 several efforts to create alternative versions of 14 the NIH Stroke Scale score. There's also the 15 Canadian Stroke Scale score. There are other 16 measures of stroke severity. 17 The reality is I think that to a 18 certain extent these are arbitrary ways to try to 19 create a metric of stroke severity which would 20 just acknowledge that there's nothing magical 21 about the NIH Stroke Scale score. 22 In an area though, where things are

somewhat arbitrary, standardizing around a single instrument has proven to be extremely important. All the major societies endorse the use of the full NIH Stroke Scale score not the modified NIH Stroke Scale score.

Not really because there's any lack of
evidence to support its equivalence, but more
that there are training materials, standardized
approaches, people have a sense of what a 5, an
8, a 12 means on the standard score.

11 So I would argue that the data 12 supporting the use of just that alternative scale 13 would have been weaker, but certainly were this 14 measure to be approved it would be reasonable for 15 the next measure submission to think about 16 allowing alternative constructs for stroke 17 severity to be allowed.

18 CO-CHAIR TIRSCHWELL: Mike, you're on
19 the phone. Would you like to make a comment?
20 Mike Kaplitt. Can you open his phone line,
21 please?

OPERATOR: His line is open.

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1	MEMBER KAPLITT: Can you hear me?
2	Sorry, can you hear me?
3	CO-CHAIR TIRSCHWELL: Yes. Yes.
4	MEMBER KAPLITT: Okay, I apologize.
5	So yes, sorry I can't be there, but thank you.
6	So I, you know, I have no problem with the use of
7	the NIH Stroke Scale because I think there is
8	adequate evidence provided and there's a lot of
9	guidelines, et cetera.
10	And while there are newer measures, I
11	agree, there's a limit I think to how much we
12	can, you know, I think there's a limit to how
13	much we can sort of actively move with the
14	changing world when it comes to these types of
15	guidelines because they obviously do lag a bit.
16	And I think that the evidence is good
17	enough that there is value in the NIH Stroke
18	Scale as the developer said at the beginning and
19	as was in the evidence.
20	My problem is that as was said
21	earlier, the 12-hour thing, I see just no
22	evidence for that and I really need somebody to

explain to me what the basis is for that. 1 2 What the evidence is that doing an NIH Stroke Scale on someone who's not recanalized 3 within 12 hours of arrival, 12 hours of arrival 4 5 not 12 hours of last known well, which still has no basis. 6 7 So someone comes in, let's say, six or eight hours after the onset of symptoms could 8 9 wind up getting an NIH Stroke Scale essentially 10 20 hours or 18 hours after the last known well, 11 and somebody's got to tell me what the value is 12 of that other than voyeurism. 13 So what are we using it for to justify the effort? And if there is no evidence to 14 15 support that then my problem is that as we've 16 said over and over again, we have to evaluate the 17 measure before us not the measure we would want. 18 And I have absolutely no problem with 19 this measure without that 12-hour thing, just my 20 personal view. But once that 12-hour thing is 21 part of the measure and an absolute part of the 22 numerator, if there's no evidence, to me there's

not, if the evidence is low for that then the 1 2 evidence is low for the measure, period. CO-CHAIR TIRSCHWELL: 3 Does the 4 developer want to respond to that? 5 DR. SCHWAMM: So it's a very I think the measure reasonable concern. 6 construct was designed to be a compromise between 7 what would be too onerous and what would be 8 9 important in terms of understanding the processes 10 of care that occur in the emergency department 11 where the opportunities for intervention are 12 occurring in those first few hours after 13 emergency room arrival. 14 And were you to allow, let's say, 24 15 hours for measurement, if the patient came in and then deteriorated in the first 24 hours and then 16 17 you measure the NIH Stroke Scale score at the 18 end, your risk adjusted outcome for that patient 19 is deceptively better. Clearly, you need to 20 measure it before you do any intervention, acute 21 intervention, t-PA, thrombectomy, et cetera.

And I think the major supporting claim

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for this is that it helps you communicate the 1 2 degree of severity and the expected course of that patient. Do they need an ICU? Are they 3 4 likely to be discharged home? 5 So clearly, you need to collect it acutely in patients in whom you're going to do 6 7 acute interventions. Twelve hours is enough time so that patients who arrive during the work day 8 9 can have it assessed during the work day. 10 Patients who arrive overnight or early 11 in the morning can have it assessed in the 12 morning, so that it gives flexibility if an 13 emergency physician performs it at one 14 institution but it's only the neurologist at 15 another institution. 16 It provides some room for flexible 17 assessment with the idea that for many patients 18 those first 12 hours, it will be a reasonable surrogate of their initial presentation. 19 20 But I would agree it's not a perfect 21 number and there's no study that looked at --22 MEMBER KAPLITT: I'd like to know

again, we're supposed to be judging evidence 1 2 That's the section we're on. So the here. first, you know, the first part of it which is 3 4 that there's evidence that you should do the NIH 5 Stroke Scale before any intervention or on a patient who's a candidate for intervention within 6 7 the time window of that intervention, I don't think there's a huge disagreement here. 8 9 I mean, people may argue as we heard 10 earlier about whether it's the best instrument 11 now, but I don't think anybody would argue about 12 the importance of an instrument. 13 But most of what you just said, you 14 know, again you're not giving us to my knowledge 15 any evidence for anything you've just said. It's 16 just an opinion, unless I'm missing something. 17 CO-CHAIR TIRSCHWELL: Any further 18 Yes, Peter. comments? 19 MEMBER SCHMIDT: Are we focusing on 20 the 12 hours when we should be focusing on the 21 before any intervention? What percentage of the 22 population is not, you know, would not fall into

the first part of the definition? 1 2 CO-CHAIR TIRSCHWELL: The majority of the population. 3 4 MEMBER SCHMIDT: The majority would 5 fall into the first part? CO-CHAIR TIRSCHWELL: 6 No. No, would not. 7 MEMBER SCHMIDT: Okay. 8 CO-CHAIR TIRSCHWELL: Only a minority 9 become eligible for these treatments 10 unfortunately. 11 And I just want to add one other 12 comment about the full version of the NIH Stroke 13 I realize there are some statistical Scale. 14 issues to suggest maybe the modified is a little 15 bit better, but there's a face validity issue 16 here where the NIH Stroke Scale is designed to 17 try to replicate a fairly comprehensive 18 neurologic exam. 19 And I realize that some of the 20 elements are a little bit less reliable, but that 21 probably just reflects reality in the way 22 neurological exams are done.

And I think the full version has 1 2 better face validity for sort of a more comprehensive neurologic exam, and you then start 3 peeling stuff off just on the basis of numbers I 4 5 feel like you undermine it. And I would agree with the comment 6 7 that there is so much inertia and really global acceptance of the full version of the scale that 8 9 to kind of change wholesale would really, I think 10 it would lead to a massive cost and reduplication 11 of efforts for training and other stuff. And I 12 don't think it's justified. 13 MEMBER EDWARDS: I'd like to speak to the rehabilitation value of the 12-hour 14 15 assessment with the full scale. Lengths of stay 16 for acute stroke are very short, and the entire 17 team uses these scores and these scales, 18 particularly the scale items. 19 So, on an acute stroke service there's 20 usually an OT/PT speech pathologist and often 21 maybe a psychologist who look at the scores, and 22 the rehabilitation decisions are made very, very

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early in the process given the short length of 1 2 stay. And so this is a very, very important 3 4 part of treatment that actually isn't listed in 5 the measure development that I think should be noted. 6 7 CO-CHAIR TIRSCHWELL: Great. Thank 8 you. Steve? 9 MEMBER HUFF: Point of clarification, 10 this is a marker for stroke center certification 11 and not for individual physician performance. Is 12 that correct? 13 MS. KOLBUSZ: That's correct. It's 14 for comprehensive stroke centers. 15 MEMBER HUFF: Just note that 16 anecdotally frequently my institution the CT scan 17 is ready, we're trying to get this patient to the 18 CT scanner and there's a hold-up while someone on 19 the team is performing a stroke scale. 20 So this is an unintended consequence. 21 You know, we're under a 45-minute timeline from 22 time of arrival to get CT to do this, so I would

just not think this should trickle down to
 individual physician performance in the acute
 setting.

You know, the Stroke Scale is used to guide treatment when it's convenient. When the person has disabling symptoms, and aphasia's the best example, often treatment is given regardless of what the Stroke Scale is.

9 So it's just another marker. You 10 know, NINDS used significant and enduring as the symptom to get t-PA treatment, and through the 11 12 years efforts to assign specific numbers for 13 treatment for the Stroke Scale have been revised. 14 They've been revised through the years. So as a 15 center performance I think this is fine. 16 CO-CHAIR TIRSCHWELL: Thanks.

17Dorothy, do you have another comment?18MEMBER EDWARDS: Just that I remember19that in the early days of t-PA administration20people with scores of greater, you know, people21with mild stroke were excluded from t-PA22treatment.

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And one of the advantages of going 1 2 down to a score of 6 is that there are people who are actually benefitting from treatment who are 3 4 not seen as having symptoms severe enough to 5 warrant the risk. Certainly the treatment 6 MEMBER HUFF: 7 of individual patients is in flux and no absolute number has been created and there's different 8 9 subscales within the larger scale. 10 So it's a number that gets used when 11 it fits. When it doesn't get used often 12 treatment happens anyway. So it's not really a 13 line in the sand. 14 CO-CHAIR TIRSCHWELL: It's not a hard 15 line in the sand, I would agree with that. And 16 there are trials going on to look at whether 17 there really should be any specific limit. 18 Okay, any other comments or discussion 19 related to evidence? 20 MS. KOLBUSZ: I think the measure 21 developer has one comment to make. 22 CO-CHAIR TIRSCHWELL: Please.

MS. KOLBUSZ: And this was raised 1 2 after the workgroup call when the evidence was questioned, because it was mentioned on the call 3 4 that there wasn't a systematic review that was 5 supplied for this particular measure and that is not exactly correct. 6 7 Under the section of the measure submission form, 1a.6.1, we did provide the 8 9 citation from Teale EA and Forster A, which was a 10 systematic review of case-mix adjustment models 11 for stroke. 12 There were other models also mentioned 13 in that review, but it was not mentioned as evidence and I think that it should be 14 15 represented. 16 CO-CHAIR TIRSCHWELL: Okay. And the 17 upshot was that the review suggested using the 18 NIH Stroke Scale in case-mix adjustment was 19 appropriate? 20 MS. KOLBUSZ: It did support the use of the NIH Stroke Scale for ischemic stroke 21 22 patients.

1	CO-CHAIR TIRSCHWELL: For case-mix
2	adjustment?
3	MS. KOLBUSZ: Yes.
4	CO-CHAIR TIRSCHWELL: Okay. All
5	right, any other comments? I say we move to vote
6	then on evidence, working on getting that up.
7	MS. SKIPPER: Good morning. We are
8	now voting on evidence for Measure 2864. One
9	high, two moderate, three low, four insufficient.
10	Voting is open.
11	CO-CHAIR TIRSCHWELL: Everybody make
12	sure you click your clicker.
13	MS. SKIPPER: And aim this way. We're
14	waiting on two more, three more. Two more, one
15	person out and we're voting on behalf of two
16	others on the phone.
17	CO-CHAIR TIRSCHWELL: One more time.
18	MS. SKIPPER: One more.
19	CO-CHAIR TIRSCHWELL: That's it.
20	MS. SKIPPER: Okay, regarding Measure
21	2864 evidence, zero percent high, 76 percent
22	moderate, 24 percent low, zero percent

insufficient. The measure passes on evidence. 1 2 CO-CHAIR TIRSCHWELL: Gaps? 3 MEMBER LINES: Okay. So according to data from 2015, the mean performance rate at 38 4 5 to 50 hospitals sampled was 84 to 85 percent and the national aggregate rate was 83 percent, so 6 7 certainly a gap. The developers presented also some 8 9 evidence on disparities, a retrospective chart 10 review, 574 patients, 25 percent of them were 11 African American. They were admitted to five 12 different certified primary stroke centers. 13 They found that 40 percent of whites 14 and 29 percent or 30 percent of blacks had a 15 documented NIHSS score and that was a p-value of 16 0.03. But after they adjusted for the greater 17 number of late arrivals in African Americans there was no longer a racial disparity for this 18 19 variable. 20 So it was p was 0.054. That was the 21 evidence presented on disparities, so certainly a 22 gap, limited evidence of any disparities at this

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point.

2	CO-CHAIR TIRSCHWELL: So a gap in that
3	there's an overall opportunity for improvement
4	but no clear disparity data presented. Any
5	comments or discussion from the committee?
6	Developer?
7	DR. SCHWAMM: Yes, I do want to point
8	out that starting in October of this year there
9	will be a new data element available in ICD-10 to
10	capture the NIH Stroke Scale score, and you'll
11	hear later today about CMS risk-adjusted
12	mortality and readmission measures that will hope
13	to leverage that NIH Stroke Scale score
14	documented in claims data.
15	CO-CHAIR TIRSCHWELL: Right. Yes,
16	Michelle.
17	MEMBER CAMICIA: A question for the
18	developer. On the prior measures you had more
19	representative sample of sites, and could you
20	explain why we have limited sites for this
21	measure?
22	MS. KOLBUSZ: Yes. I don't know if

our biostatistician is on the line, Stephen 1 2 Schmaltz, or if it can be opened for him. CO-CHAIR TIRSCHWELL: Part of the 3 4 lower number is that this is just comprehensive 5 stroke center, so it's a much smaller number of 6 hospitals. Is that what you were worried about? 7 Okay. MEMBER CAMICIA: 8 Yes. 9 DR. SCHWAMM: We have a lot of data 10 collected and get with the guidelines with rates 11 of completion that were originally around 40 12 percent when we started recommending collection 13 of this element and get with the guidelines, 14 which is almost 2,000 hospitals nationwide now. 15 Initially, rates were higher in 16 patients receiving t-PA compared to patients who 17 did not, but rates overall now are close to 80 18 percent. 19 So we still have a big performance 20 It doesn't get with the guidelines, which gap. 21 is a very nationally represented sample but it is 22 feasible. People have been collecting it more

and more systematically, and so I think there is 1 2 a broader sample of use available. It's not just being done in comprehensive centers. 3 4 CO-CHAIR TIRSCHWELL: And is the rate, 5 just off the top of your head, higher in the comprehensive stroke centers where it's required 6 7 as opposed to the primary stroke centers? DR. SCHWAMM: 8 Yes. 9 MEMBER CAMICIA: Thank you, important 10 information to have. It really does speak to the 11 measure. 12 CO-CHAIR TIRSCHWELL: Any other 13 comments or discussion on gaps or opportunities 14 for improvement? If not, let's go ahead and 15 vote. 16 MS. SKIPPER: We're now voting on gap 17 for 2864. One moderate -- one high, excuse me --18 two moderate, three low, four insufficient. 19 CO-CHAIR TIRSCHWELL: Fast, I saw it. 20 It went really quick. It was all high and 21 moderate. It did go by really quick. 22 MS. SKIPPER: So Measure 2864 on gap,

27 percent high, 73 percent moderate, zero 1 2 percent low, zero percent insufficient. This 3 measure passes on gap. 4 CO-CHAIR TIRSCHWELL: Lisa, 5 reliability? So my script tells me 6 MEMBER LINES: 7 to go through the numerator and denominator and exclusions but we did that already, so I think we 8 9 can skip that. 10 The data source that was specified and tested is medical record abstraction, paper or 11 12 electronic. I don't have any concerns or issues 13 with the specifications, definitions or coding. 14 In terms of reliability testing, they 15 tested at the data element level. They did 16 interrater reliability testing. They tested the 17 14 data elements that are involved at 12 sites, 18 281 total records from 2013. 19 The calculated percent agreement for 20 the 14 data elements, and they range from 71.5 21 percent to 99.3 percent, they calculated a kappa 22 score for the initial NIHSS score performed, the

ED patient, the elective carotid intervention. 1 2 The kappas on the first two were The elective carotid intervention, the 3 great. 4 kappa was quite low. They suggested that is 5 because of the low prevalence of patients with elective carotid intervention in the testing 6 7 sample, so they relied on the percentage agreement value in their interpretation of the 8 9 reliability. 10 I would say caution. That if 11 testing's only done at the data element level 12 then the highest possible rating is moderate, but 13 I would say it's probably moderate is fine. 14 CO-CHAIR TIRSCHWELL: Comments or 15 discussion about reliability? Let's go ahead and 16 vote then. Don't vote yet. 17 MS. SKIPPER: We are now voting on 18 reliability for Measure 2864. One high, two 19 moderate, three low, four insufficient. 20 Measure 2864 on reliability, nine 21 percent high, 91 percent moderate, zero percent low, zero percent insufficient. The measure does 22

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pass on reliability.

2 CO-CHAIR TIRSCHWELL: Validity? 3 MEMBER LINES: Okay. So the question 4 is whether this classification's in line with the 5 evidence. As we've already discussed, they did 6 not provide evidence to support the 12-hour time 7 frame.

8 They tested validity at the measure 9 score level. Face validity of the elements was 10 reported, but they did not address face validity 11 of the measure score as a representation of 12 quality as required for the criterion.

Data element validity was assessed for accuracy and clarity by hospitals, but the data element validity criterion requires comparison to a gold standard and that was not done.

We discussed on the workgroup call the issues about missing data, and they then provided, there was a very high percent that were, one of them was off. It was not actually accurate data that was presented on missings, so they presented us with revised data and those are

fine. 1 2 Using the algorithm I would say the validity seems moderate to low. 3 4 CO-CHAIR TIRSCHWELL: Discussion? 5 Comment from the developer? I think part of the 6 DR. SCHWAMM: 7 challenge is there is no referenced standard against which to measure the score so, really, 8 9 you need to rely on interrater reliability or 10 intraclass correlation coefficients. 11 And the NIH Stroke Scale score has 12 been studied extensively in that regard. There's 13 a very large body of literature looking at 14 comparing two independent raters and more 15 recently comparing ratings over telemedicine to 16 ratings in person, and the vast majority of the 17 elements perform in the excellent or good 18 category in interrater reliability with only one 19 or two elements performing below that. 20 So I think the measure itself, unless 21 I'm misunderstanding the validity question, has 22 been thoroughly evaluated for validity.
CO-CHAIR TIRSCHWELL: I think some of 1 2 those things you referred to are probably more reliability than validity, the interrater 3 4 comparison. The validity, and I agree that there 5 is no better stroke severity measure gold standard to compare it to, but if you look at 6 7 predictive validity for example, and looking at its association with mortality and outcomes, like 8 9 a more evidence that you could ever want to read 10 in your lifetime to suggest that it is a valid 11 measure of stroke severity, but whether it's a 12 valid measure of quality is a slightly different 13 question, I guess. 14 Any other comments? Discussion? 15 This is Steve Schmaltz MR. SCHMALTZ: 16 from the Joint Commission. At 5 Validity we also 17 looked at the correlation of the measure score 18 with other measures in the CSTK set and they were 19 positive and significant. 20 CO-CHAIR TIRSCHWELL: So yes, you're 21 referring to the correlation with CSTK-02, so it's just the fact that it was done there was a 22

positive correlation between success in this 1 2 quality measure and success in another quality measure, right? 3 4 MR. SCHMALTZ: Correct. CO-CHAIR TIRSCHWELL: Okay, thank you. 5 Okay, let's go ahead and vote then, validity. 6 MS. SKIPPER: We are now voting on 7 validity for Measure 2864. One high, two 8 9 moderate, three low, four insufficient. 10 Just one more. Polling has closed. 11 High five percent, 68 percent moderate, 27 12 percent low. This measure does pass on validity. 13 CO-CHAIR TIRSCHWELL: Thank you. 14 Feasibility, Lisa? 15 MEMBER LINES: Okay. The medical 16 record review to abstract all data elements 17 required for this measure set averaged 45 minutes 18 per record. 19 As Melody mentioned yesterday, the 20 developer estimated that the cost per case for 21 abstracting this measure is approximately \$3.50, 22 which seems very odd.

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1	CO-CHAIR TIRSCHWELL: Can I just
2	interrupt for a second, because that 45 minutes,
3	3.50 thing is in a whole bunch of measures.
4	There must be, can you give us some clarification
5	on that?
6	MS. KOLBUSZ: Yes. I will give some
7	clarification
8	CO-CHAIR TIRSCHWELL: Thank you.
9	MS. KOLBUSZ: since we've been
10	referenced so many times in regards to the \$3.50.
11	This was a pilot test. During the
12	pilot test we try to get a handle on the burden
13	of abstraction and the time and the resources
14	that will be set forth to collect the measure
15	set.
16	During the pilot test of the measures,
17	which may not have been totally clear in the
18	submission, there were 13 measures collected. So
19	basically what we did when we went to our 12
20	pilot sites is we determined the level of
21	personnel who collected the data.
22	There were nurses collecting data,

data abstractors, administrative staff. We used 1 2 2012 labor statistics using the national rate, taking an average, taking a 45-minute of that 3 4 average and dividing it by the 13 measures in the 5 pilot test. CO-CHAIR TIRSCHWELL: So the 45 6 minutes is for all of them? 7 MS. KOLBUSZ: And so it's for a total 8 9 chart, correct, for all the measures. 10 CO-CHAIR TIRSCHWELL: Yes. That 11 wasn't, I was really not clear and so that makes 12 a lot more sense. 13 Lisa, go ahead. 14 MEMBER LINES: That was all I had for 15 feasibility. 16 CO-CHAIR TIRSCHWELL: Okay. So we 17 don't have quality reviewer slave camps anywhere 18 in the United States as far as we could tell, 19 which is good. It's very reassuring. Let's go 20 ahead and vote on feasibility. Oh, I'm sorry. Michelle, please. 21 22 MEMBER CAMICIA: So that was the

average of across all measures, so this measure
 might actually carry some of the greater burden
 of that 45 minutes.

DR. SCHWAMM: This is a very straightforward measure to abstract. The person conducting the evaluation documents, either the 14 subelements and the total or just the total, it's usually in the first few pages of the medical record.

I would estimate that this, just
speaking as a person who looks at charts for
these kind of things, it's one of the easiest
elements to abstract because you don't have to
make any judgments, you just have to find the
score and write it down. So it's quite
straightforward. That's the abstraction.

17 The performance of the score in a 18 patient who has a mild deficit can take a matter 19 of, you know, two to three minutes. In a patient 20 with complex deficits could take four to five 21 minutes. But this is a very brief screening 22 evaluation. It's not an in-depth neurologic

1 exam. 2 CO-CHAIR TIRSCHWELL: Thank you, anything else? Let's go ahead and vote on 3 4 feasibility then, please. 5 MS. SKIPPER: We're voting on feasibility for Measure 2864. One high, two 6 7 moderate, three low, four insufficient. Waiting on one more so, everyone, if you can just point 8 9 in my direction. 10 The voting has closed on feasibility for Measure 2864, 41 percent high, 50 percent 11 12 moderate, nine percent low, zero percent 13 insufficient. The measure does pass on 14 feasibility. 15 CO-CHAIR TIRSCHWELL: All right, 16 great. Usability and use. 17 MEMBER LINES: Okay. So it's used for 18 Joint Commission stroke center certification, so 19 thus far it's limited to about 50 hospitals not 20 currently reported to the public. 21 In the pilot data it was about 72 22 percent and improved to 83 percent or so in the

second quarter of 2015. I, at this point, should 1 2 ask the committee members whether they have any personal experience using this measure. I don't 3 personally have any experience. 4 CO-CHAIR TIRSCHWELL: I have personal 5 It was okay. You know, honestly, 6 experience. 7 again if you take care of stroke patients clinically, this is, you know, this is just part 8 9 of everyday activities. It's totally routine. 10 It only takes a few minutes. 11 And I think once you get used to it, 12 it's quite reliable and can convey quite a bit of 13 information in a very efficient fashion, so 14 tremendously widely used and accepted in the 15 clinical world. 16 DR. SCHWAMM: The only other comment I 17 would make is that I think it's a very important 18 tool for interprofessional communication, and so 19 it's a tool that increasingly is used by nurses 20 when they sign patients out to each other. 21 As was mentioned before, physical 22 therapists, occupational therapists, Dr. Zafonte,

you talked about its role in rehabilitation 1 2 medicine, but it is the currency of how we think about stroke severity and has, I think it has 3 profound benefit as a communication tool over and 4 5 above the severity measurement itself. CO-CHAIR TIRSCHWELL: With no further 6 7 -- yes, Ross. 8 MEMBER ZAFONTE: Let me just agree 9 with Lee on this one. We in the post-acute world 10 as Dorothy has said, use it in very much the way 11 nowadays in that in spinal cord the ASIA scale is 12 utilized. 13 So it's metric for tracking and an 14 important communication tool, and so I think it 15 has an existential long term value as well. 16 CO-CHAIR TIRSCHWELL: Let's qo ahead 17 and vote on usability and use, please. 18 MS. SKIPPER: We're now voting on 19 usability and use for Measure 2864. One high, 20 two moderate, three low, four insufficient. 21 On usability and use, Measure 2864, 68 22 percent high, 32 percent moderate, zero percent

low, zero percent insufficient. The measure does 1 2 pass on usability and use. CO-CHAIR TIRSCHWELL: So then we'll 3 4 just go on and vote on overall suitability for 5 endorsement. Polling is open for 6 MS. SKIPPER: 7 overall suitability for endorsement in Measure 8 2864, one yes, two no. 9 MEMBER KAPLITT: Can I say something 10 before we vote? This is Mike. Can you guys hear 11 me? 12 CO-CHAIR TIRSCHWELL: Go ahead, Mike. 13 MEMBER KAPLITT: Hello? 14 CO-CHAIR TIRSCHWELL: Go ahead. 15 You know, before we MEMBER KAPLITT: 16 vote I just want to make one final comment and 17 then we can all vote. 18 While I understand that the vast 19 majority voted moderate on the evidence, I just 20 want to remind everybody that as we vote on this 21 final measure if we approve it we will be 22 approving a measure for which not a single person

in this room or on the phone has disputed the 1 2 fact that there is zero evidence in support of a critical component of the primary measure of the 3 4 numerator, and that component for which there is 5 no evidence will wind up applying to the vast majority of patients for which this will be used. 6 7 So I just wanted to make that comment, and if anybody wants to dispute that that's fine. 8 9 But if it's not in dispute, I just want everybody 10 to keep that in mind as we vote. 11 CO-CHAIR TIRSCHWELL: Why don't you 12 ask him? 13 CO-CHAIR KNOWLTON: Mike, this is 14 David. I'm not following what the evidence piece 15 you're referencing. Maybe I've lost the 16 antecedent in what you're saying. 17 MEMBER KAPLITT: Okay. So, once again 18 as we discussed in the evidence part, and I 19 understand that everybody voted and decided that 20 it wasn't that important. 21 But I'm just reminding everybody that 22 the developer has stated that the numerator,

meaning the patients that will be included are those that receive an NIH Stroke Scale prior to undergoing therapy, or documented within 12 hours of arrival who do not undergo recanalization therapy. Okay.

And as we've said that second part of 6 7 the numerator will apply to the majority of patients because the majority will probably not 8 9 undergo recanalization therapy, and I have not 10 heard one word of evidence to support the 11 rationale for requiring 12-hour documentation of 12 the NIH Stroke Scale for patients who do not 13 undergo recanalization therapy.

And now we have this discussion and I 14 15 understand that we voted, I'm just reminding 16 everybody that despite the fact that everybody, 17 that the majority of people voted that there was 18 moderate evidence, this is, this part, this 19 documented within 12 hours of arrival if they 20 don't undergo recanalization therapy is the 21 developer's own essential component of this 22 measure.

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It's the essential component of the 1 2 numerator, and that's the part, that unjustified part that has no evidence. No one has argued for 3 evidence that there is evidence for a 12-hour NIH 4 5 Stroke Scale for anybody who's not undergoing recanalization therapy. That will apply to the 6 7 majority of patients for whom this measure is going to be used, so I'm just reminding everybody 8 9 of that.

10 CO-CHAIR TIRSCHWELL: Yes. This is 11 David Tirschwell. I'll just defend the measure 12 briefly and say that the time window thing is a 13 little bothersome, but at the end of the day you 14 do end up having to put some line in the sand. 15 Often it's a random line in the sand.

And I think we've heard from multiple members of the committee about the value of having this Stroke Scale score available on all of the ischemic stroke patients, regardless of whether they get intervention, as a means of communication to optimize patient care and outcomes.

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1	So, you know, I agree with you the 12-
2	hour thing is not supported by very specific
3	evidence, but I think there are bigger issues.
4	MEMBER KAPLITT: I know what you're
5	saying, but then we're just substituting our
6	opinion. I mean, you know, then we're not using
7	evidence, we're substituting our opinions for
8	what we'd like to do.
9	And that's fine, I mean we're all here
10	to vote our conscience and we're experts and
11	that's fine. But we're not basing it on
12	evidence. It's a randomly chosen number, you
13	know, I mean that we're ratifying here for the
14	entire country, which is okay if that's what we
15	want to do.
16	CO-CHAIR TIRSCHWELL: Okay. We've got
17	some more comments in the room. Ketan?
18	MEMBER BULSARA: You know, I hear what
19	Mike is saying, and I do agree with your line of
20	argument too. And, you know, as somebody like
21	many folks here that's actively involved in
22	dealing with these patients in the acute setting

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and within sort of the 12 to 24 hours, I think 1 2 one of the biggest sort of atrocities we have in the field is we don't have a way to standardize 3 4 reporting among different institutions. And it brings back, as Mike well 5 knows, the example of the Glasgow Coma Scale 6 7 where, I mean, people were rating folks with different severity. Everyone's sort of opinion 8 9 varied on how somebody was doing. 10 And I think though the 12 hours is not 11 ideal, it is a point. I think we do need a point 12 we do need some standardization, and because of 13 the overall good that I feel that measure would 14 provide I'm willing to support it. 15 MEMBER BAUTISTA: Yes, I totally understand Mike's concerns. But I think, you 16 17 know, the essence is that we need an initial NIH 18 Stroke Scale, an initial at some point after arrival, soon after arrival, and the 12 hours is 19 20 just our operational way of saying that. 21 CO-CHAIR TIRSCHWELL: Okay, let's go 22 ahead. Did the developer want to say anything

1	else? Okay, let's go ahead and vote then on
2	overall suitability for endorsement.
3	I don't know what, that's some ancient
4	results there we will ignore.
5	MS. SKIPPER: Just a moment, please.
6	Voting is open for overall suitability
7	for endorsement in Measure 2864, one yes, two no.
8	Measure 2864 regarding overall suitability for
9	endorsement, 86 percent yes, 14 percent no.
10	CO-CHAIR TIRSCHWELL: So it passes?
11	MS. SKIPPER: So this measure has been
12	recommended for endorsement.
13	CO-CHAIR TIRSCHWELL: Okay, thank you,
14	everybody. Good conversation.
15	The next measure, we're actually on to
16	today's real schedule, CSTK-02, modified Rankin
17	Score at 90 days, Number 2865. We invite the
18	Joint Commission to introduce the measure.
19	MS. KOLBUSZ: Okay. The next measure
20	is CSTK-02 which is the modified Rankin Score at
21	90 days. It's also used for a comprehensive
22	stroke certification program.

1	This measure captures the percentage
2	of ischemic stroke patients treated with
3	intravenous, IV, or intra-arterial, IA,
4	thrombolytic, t-PA, therapy, or who undergo
5	mechanical endovascular reperfusion therapy for
6	whom a 90 day, giving a range of greater than or
7	equal to 75 days and less than or equal to 105
8	days, modified Rankin Score is obtained via
9	telephone or in person.
10	The rationale for the measure is that
11	the modified Rankin Score is an accepted standard
12	for assessing recovering post stroke. At this
13	time it's the most widely used outcome clinical
14	outcome measure for stroke in clinical trials.
15	It may be conducted in person or over
16	the phone. It's been recommended in American
17	guideline recommendations from the American Heart
18	Association and American Stroke Association that
19	the interviews should be obtained and conducted
20	for acute stroke patients treated with IV or IA
21	t-PA or mechanical endovascular reperfusion
22	therapy within three months or 30 days post-

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discharge, although recovery may continue well
 beyond the three-month period for ischemic stroke
 patients.

The denominator for the pet population are only the ischemic stroke patients treated with IV or IA t-PA therapy or who undergo mechanical endovascular reperfusion therapy.

The numerator are those ischemic 8 9 stroke patients for whom a 90-day modified Rankin 10 is obtained via telephone or in person. And the 11 exclusions for the measure are patients less than 12 18 years of age, patients who have a length of 13 stay greater than 120 days, patients admitted for 14 elective carotid intervention, or patients who 15 expired during the hospital stay.

16 DR. SCHWAMM: So I just, I want to 17 make a comment about this measure. I think for 18 us so many of our measures are process measures, 19 and to try to start introducing outcome measures 20 that will look at the outcomes of these therapies 21 and help to hold our centers who perform 22 reperfusion therapy, albeit in a small number of

patients so it's not an overly burdensome request 1 2 in terms of the number of patients any center will experience, but to hold them accountable to 3 4 measuring outcomes in those patients 5 systematically and routinely is an incredibly important step in making sure that these 6 therapies are used appropriately, that the 7 appropriate type of patients are being treated, 8 9 and that we can then look at outcomes across 10 centers adjusting for baseline severity and risk 11 and have a single standardized outcome measure at 12 a standardized time point in the clinical world 13 that can be compared effectively to the data we have from all the clinical trials which use the 14 15 90-day modified Rankin as the gold standard for 16 measuring outcome of the effectiveness of these 17 interventions. 18 CO-CHAIR TIRSCHWELL: Discussants are

Jim and Peter. Who's going to lead off? MEMBER SCHMIDT: So I'm going to lead off and Jim is going to jump in where he sees opportunities.

Evidence. 1 CO-CHAIR TIRSCHWELL: 2 MEMBER SCHMIDT: So evidence, so I want to start out by saying that I would love to, 3 4 I love outcome measures being included. I would 5 love to see an outcome measure, but I think that this needs some work and, but review it again. 6 7 I'm jumping ahead, but this measure cites expert, there really is no evidence 8 9 submitted for this measure. It cites expert 10 opinion from an article on telemedicine which 11 mentions 90 days. 12 In the submission I saw expert -- I'm 13 sorry you're shaking your head, but in the 14 submission I saw, the article cited was expert 15 opinion on an article about a telemedicine 16 measure where it acknowledged that a 90-day 17 follow-up was performed, but it didn't say that 18 90-day follow-up was important in any way, and 19 I'd love to see something that included that. 20 The 90 days, you've mentioned that 21 it's a standard, but I've not seen anything that 22 says -- so with the 12-hour window I was

comfortable because it was anywhere from zero to 1 2 12. This specifies a specific interval. If we were comparing outcomes that 3 4 would be very valuable, but I'd love to see one, 5 you know, it didn't have the, you didn't say 60 days is wrong and 90 days is right. 6 There's no 7 evidence for the time frame. So it really is just based on expert 8 9 opinion. And based on the algorithm the rating 10 for evidence was recommended to be insufficient, 11 and I think that that was our finding in the 12 workgroup. 13 CO-CHAIR TIRSCHWELL: Jim, do you want 14 to add anything to that? 15 I mean, I think the MEMBER BURKE: 16 trick here is just that there's, it's hard to 17 articulate the causal pathway through which 18 measuring this number changes things. 19 I mean, this is the thing we struggled 20 with in NIH Stroke Scale was a bunch of different 21 arguments going out there. None of it seemed 22 super decisive, but I think on balance people

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come on the whole decisive.

2	Here, you have this trick of when I
3	measure a number that per se does nothing for a
4	patient. That's not quality in the slightest.
5	The question is can that number be used to
6	improve quality over time and if so, how, and is
7	there evidence that can or it will be done?
8	And I think that this is where I agree
9	with Peter is there's not a lot of evidence here
10	that we can do that and that there's sort of, if
11	we'd get there, statistical problems once you do,
12	because you're talking about a small number of
13	cases.
14	We're fixing the denominator on people
15	treated with IV or IA, and now we're going to
16	measure a five-state outcome and try and make
17	comparisons across institutions with a lot of
18	moving parts.
19	It seems to me that even if we do,
20	even if we got past the evidence, which I agree I
21	don't see a whole lot here to support it, I think
22	we're going to get into other problems

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measurement wise downstream.

2	CO-CHAIR TIRSCHWELL: And so, and just
3	to clarify, although the modified Rankin Scale is
4	a measure of functional status we're not
5	measuring, this measure isn't the modified Rankin
6	Scale score, it's whether you measured the
7	modified. So it's actually a process measure not
8	an outcome measure, just to be clear about that.
9	Jocelyn. And then back to you, Peter.
10	MEMBER BAUTISTA: So I think the issue
11	is that if we don't require the measurement of
12	the outcome measure we'll never get to the
13	outcome, and I think that's the tricky part of
14	this. So you're never going to get a randomized
15	control trial of measuring the modified Rankin,
16	so where's the evidence going to ever come from?
17	MEMBER BURKE: I mean, I think you're
18	right. I totally agree. This is sort of like
19	the boot strapping problem, right. Like the
20	theoretical thing that we're going to argue about
21	when we get to adjusted mortality is we really
22	want adjusted function, and that if you don't

have this how are you ever going to get there? 1 2 But that's not what we're -- I think this is where we're stuck. The measure in front 3 4 of us, whether or not you report a modified 5 Rankin on these people it's not obviously going to do anything in outcomes other than through 6 7 this other next measure where it might be able to do it. 8 9 CO-CHAIR TIRSCHWELL: One rebuttal and 10 then Peter. MEMBER BAUTISTA: Well, there is this 11 12 pathway, right, to the exception, insufficient 13 evidence with exception that we could go down if 14 we wanted to. 15 CO-CHAIR TIRSCHWELL: Can we just have 16 NQF review that criteria exception for evidence? 17 MS. JOHNSON: Sure. So the idea 18 behind our exception to evidence is exactly this. 19 In some cases there probably never will be, you 20 know, hard empirical evidence to show, you know, 21 one thing or another. It happens a lot with care 22 coordination kinds of measures, those kinds of

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things.

2	So NQF does recognize that and we
3	offer a pathway if you find that there is
4	insufficient evidence to support a particular
5	measure then you can consider whether you want to
6	go ahead and pass the measure using the
7	exception.
8	That is the bottom portion of the
9	evidence algorithm there, and it actually asks
10	you a few questions to think about, and I think
11	they're there on the questions for the committee,
12	maybe if you go down just a little bit, Christy,
13	or Alexandra.
14	Are there or could there be
15	performance measures of health outcome or
16	evidence based intermediate clinical outcomes,
17	intervention or treatment? That's part of the
18	algorithm on that bottom piece there.
19	So let me be very clear. When we get
20	to the voting section you have to decide whether
21	or not you believe that there's insufficient
22	evidence. If we have a majority of folks who

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believe that there is insufficient evidence, then 1 2 we could go ahead and consider whether or not we would want to do an exception through this 3 4 measure. CO-CHAIR TIRSCHWELL: Charlotte, go 5 ahead. 6 7 MEMBER JONES: Procedural question. If we vote the exception to the evidence, if we 8 9 were to get to that point, do we then at the end 10 when we're talking about usability discuss the 11 burden that we are asking -- this comes back to 12 my previous comment about resources is every time 13 we ask someone to do something they're not doing 14 something else. 15 CO-CHAIR TIRSCHWELL: The burden will 16 be considered if we proceed through just like in 17 every other case. 18 MEMBER JONES: Okay. 19 CO-CHAIR TIRSCHWELL: Peter, go ahead. 20 MEMBER SCHMIDT: So I just want to add 21 that one other allowable value for the measuring 22 numerator is a modified Rankin Scale not

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were unable to do so.

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16 the values for the modified Rankin hoping that at 17 some day it can be converted. 18 So we collect the data elements for 19 the modified Rankin now. But there had to be 20 additional allowable values for situations where 21 the institution tried to obtain a modified Rankin

MS. KOLBUSZ: And they fail. They fail. They fail. It's the only way you fail the measure is that you didn't do it. This measure started out as an outcome measure and we scaled it back during the pilot test, but we left all the values for the modified Rankin hoping that at

6 collecting the modified Rankin Scale, or if we
7 say that there should be an exception that
8 collecting this information is valuable, not
9 collecting the information also goes into the
10 numerator.

collecting, if we say that there's evidence that

performed or unable to determine, which means
 that people will be, I mean this goes to
 reliability.

This is not, there's no evidence that

1	For whatever reason the patients lost
2	a follow-up, moved out of state or whatever, or
3	they just didn't do it, which would be value 7
4	and 8. But the only way you fail is you just
5	don't do it.
6	CO-CHAIR TIRSCHWELL: Okay. Yes. Any
7	other comments before we go back to the go
8	ahead, Lee.
9	DR. SCHWAMM: I think the issue here
10	is, you know, why three months, which is again a
11	very reasonable question. There's no evidence
12	provided to support that that was better than two
13	months, better than six months, better than one
14	year.
15	There is some data from the rehab
16	literature about the slope of the recovery curve
17	and its inflection point at three months. But
18	the reason why three months is it was chosen as
19	the standard in the NINDS-TPA trial in 1996.
20	And every trial in stroke reperfusion
21	therapy has used that outcome to establish the
22	efficacy or the lack of efficacy, and it's an FDA

requirement that trials that are conducted in this way include that functional assessment at three months.

So I think it is a de facto standard. And so when sites want to look at the results they are achieving and compare them to the available literature, that is the time period at which there is a community of consensus that there's a, that provides the comparator.

10 So I think the question about evidence 11 here really ought to be, is there evidence that 12 this time frame is an appropriate time frame for 13 which a comparator is available?

14 CO-CHAIR TIRSCHWELL: And I'll just 15 comment. As far as the possible criteria for the 16 exception from evidence, sort of the last one 17 there perhaps rings true for me at least.

Does the steering committee agree that it's acceptable or beneficial to hold providers accountable for this process of care even if there's not evidence that just measuring it affects the outcome?

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And I think it's that lead to the next 1 2 step that these are the outcomes and that we'll be comparing outcomes that makes me want to do it 3 4 even without the evidence linking it directly to 5 outcomes. Go ahead, Jane. 6 7 MEMBER J. SULLIVAN: So just a procedural question. Does the evidence get 8 9 ranked first before, and then if the evidence 10 ranks low then there's this question about 11 whether this applies or qualifies for the 12 exception to the evidence. Okay, thank you. 13 CO-CHAIR TIRSCHWELL: First we have to 14 vote it majority insufficient, then we can go to 15 the exception question. 16 All right, comments or discussion 17 related to evidence? Let's go ahead and vote 18 then, please. 19 MS. SKIPPER: We're now voting on 20 evidence for measure 2865. One high, two 21 moderate, three low, four insufficient. 22 Voting has closed. Measure 2865 on

1	evidence, zero percent high, nine percent
2	moderate, 14 percent low, 77 percent
3	insufficient. So we would move to voting on
4	taking exception to the evidence.
5	So measure 2865, we're voting on
6	potential exception to empirical evidence, one
7	insufficient evidence with exception, two no
8	exception.
9	So on potential exception to empirical
10	evidence for measure 2865, 59 percent
11	insufficient evidence with exception, 41 percent
12	no exception.
13	CO-CHAIR TIRSCHWELL: Huh.
14	MS. JOHNSON: So we are in a very iffy
15	place, and I don't know if I should have said
16	this beforehand or not. This is an exception to
17	how we do our voting counts.
18	As you know, to pass a must-pass
19	criterion we say you have to have greater than 60
20	percent, right. That's our limit. And in some
21	cases we allow this gray zone and we continue on.
22	The exception to the evidence piece is

one where we do not have a gray zone. 1 So 2 basically what we are saying with this one is you 3 need more than 50 percent for this to go forward. 4 Sorry, more than 60 percent for this to go 5 forward. So with that, and I realize I did not 6 tell you that before you voted, so if you would 7 like to re-vote we can certainly do that now that 8 9 you have that extra information. 10 CO-CHAIR TIRSCHWELL: Sorry. Jocelyn, 11 qo ahead. 12 MEMBER BAUTISTA: Yes, and I do wonder 13 if everybody really understood what we were 14 I mean it's different than anything we've doing. 15 done. 16 CO-CHAIR TIRSCHWELL: Okay. And Ross, 17 did you want to say something? 18 MEMBER ZAFONTE: Can you restate that? 19 This is one of MS. JOHNSON: Sure. 20 the criteria where we do not have a gray zone. 21 So in order to actually go forward with the 22 exception we need you to have a more than 60

That's where it needs to land, 1 percent vote. 2 more than 60 percent. 3 CO-CHAIR TIRSCHWELL: Sixty percent or more, or more than 60 --4 More than 60. We've had 5 MS. JOHNSON: conversations about this, more than 60. 6 7 CO-CHAIR TIRSCHWELL: Thank you. MS. JOHNSON: 8 Yes. And Michael, 9 CO-CHAIR TIRSCHWELL: 10 you're on the line. Do you have a comment? 11 MEMBER KAPLITT: Yes, I just want to 12 say that, I mean if we're going to re-vote I 13 just, you know, because I haven't, you know, been 14 able to break in before, but if we're going to 15 re-vote on this I just wanted to make the comment 16 that unlike the last thing where I had, you know, 17 issues with the evidence, at least that wasn't a 18 major burden. You know, I didn't hear, maybe 19 somebody raised this. But, you know, this is a 20 significant burden that we're putting on people. 21 And so if we're going to vote, 22 because, you know, for making sure that you can

contact patients again at 90 days, of course that 1 2 would be nice. We all hope we can do it, but you 3 can't quarantee it. It's not like when they're 4 in the hospital and you just have to go and 5 examine them. So that's a major burden we're placing 6 7 on people in terms of --CO-CHAIR TIRSCHWELL: So this vote here 8 9 is not about burden. That's part of the later 10 assessment and probably should not be included in 11 your interpretation of this particular issue 12 here. Alex? 13 MEMBER KAPLITT: Algorithm -- no. If 14 you look at the algorithm for the exception, 15 Number 12, it says, does the steering committee 16 agree that it's, to hold providers accountable for empirical evidence in the absence of 17 18 empirical evidence to benefit patients. 19 And then in parentheses it says 20 consider potential detriments to endorsing the 21 measure. Example --22 CO-CHAIR TIRSCHWELL: Sorry, I'm not

seeing that part in front of me right now, that 1 2 you have the more complete listing there, so I apologize, Mike. 3 MEMBER KAPLITT: And that if we're 4 5 going to be doing this based on rating the evidence as insufficient with exception that 6 7 criteria should be considered, which as it says that if we're going to be doing it with exception 8 9 we should be considering the other impacts of the 10 consequence of this. 11 CO-CHAIR TIRSCHWELL: Sorry, did 12 somebody else have a comment? Alex, did you want 13 to say something? 14 MEMBER RAE-GRANT: Just that we're 15 kind of up to lobbying time here. 16 CO-CHAIR TIRSCHWELL: Yes. 17 MEMBER RAE-GRANT: You know we need to 18 have measures or move toward outcome measures. Ι 19 think that's a critical element. This is a well-20 defined outcome measure. There's never going to 21 be the kind of evidence you have for a treatment 22 trial.

And this pushes us as a field towards 1 2 measuring what we do institutionally, and I think that's the only way we're going to move forward 3 on this kind of issue. 4 I don't know why we're going on and on 5 about this. It's not a big deal. 6 It's a 7 standard measure. And I think we should just move forward, and whatever way we can to allow it 8 9 to continue I would recommend we do that. That's 10 my lobbying. 11 CO-CHAIR TIRSCHWELL: And just to 12 comment on the burden thing. This is probably 13 even in the best centers only about ten to 14 fifteen percent of all ischemic stroke patients 15 that you have to collect it on. 16 Peter? 17 MEMBER SCHMIDT: This was submitted as 18 a process measure not as an outcome measure. 19 MEMBER RAE-GRANT: It's a weigh 20 station to outcome measures, and if you don't 21 even get this far you'll never get to the outcome 22 measures. That's the point that you guys are

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making.

2	DR. SCHWAMM: I just wanted to clarify
3	the, to be in the numerator for this measure you
4	either have to have collected the value or
5	demonstrate that you made multiple attempts to
6	reach the patient and were unsuccessful.
7	So it's not, it doesn't penalize
8	centers who have patients who are lost to follow-
9	up, arbitrarily. There is guidance in the coding
10	instructions around how many times you have to
11	try and what you have to document, but I think it
12	really is a very reasonable approach to what
13	center's making a good faith effort to collect
14	the data.
15	MEMBER SCHMIDT: Just, I was not going
16	to bring it up again. I had accepted your
17	response ever since.
18	CO-CHAIR TIRSCHWELL: So in front of
19	us on the screen, although not nationally
20	broadcast, or yes nationally broadcast? Just in
21	the room is the more detailed bit about the
22	exception, and I'm just going to read through it

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so that we're clear about it.

2 Are there or could there be performance measures of a related health outcome 3 4 or evidence based clinical outcome process? 5 Thank you. I'm struggling with trying to figure 6 out whether that fits for this becoming an 7 outcome measure. Performance measure, related 8 9 health outcome or evidence based -- for example, 10 proposed measure where the BP is assessed each 11 visit instead of BP control or the use of 12 effective treatment. 13 So I mean if the -- yes, Jocelyn. Do 14 you want to comment on this? 15 MEMBER BAUTISTA: Never get to the 16 measurement of the outcome you'll never get to 17 the outcome. So I think we have to say, I mean, 18 I think no would be a reasonable response to that 19 question. 20 CO-CHAIR TIRSCHWELL: Okay. That the 21 benefits -- so is there evidence from a systemic 22 review, I think, or a systemic assessment of

expert opinion that benefits of what is being
 measured outweigh the potential harms, I think
 there is expert opinion.

And does the steering committee agree that it is okay or beneficial to hold the providers accountable in the absence of empirical evidence?

8 And here's the thing that Michael was 9 referring to, consider potential detriments to 10 endorsing EG. Focus attention away from more 11 impactful practices, more costly without 12 certainty of benefit, divert resources from 13 developing more impactful measures.

14 And I think we've heard some 15 arguments. Some people have worried about 16 resources. Okay, I can see we're going to have 17 some more discussion. And others have thought 18 that this assessment in the small proportion of 19 patients is an important vital step in moving to 20 the true outcome measure and so is worthy of the 21 burden.

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Charlotte, Michelle, James.

MEMBER JONES: Hi. I understand that 1 2 people feel that this is an important next step, but as the steering committee from the National 3 4 Quality Forum, we carry a much higher reputation 5 for being evidence based. Local committees, other guideline 6 7 writers don't carry a, "We are going to use the evidence to base our opinions," that we do. 8 If 9 we go to an exception, we should recognize not 10 only are we utilizing resources but we are saying 11 that we are backing away from evidence. 12 It's an exception for good reasons, 13 but I think it has ramifications beyond this one 14 measure. And people are talking about lobbying. 15 I think this is a slippery slope. 16 CO-CHAIR TIRSCHWELL: Michelle? 17 MEMBER CAMICIA: Since we're not 18 talking about feasibility yet but we sort of are, 19 I think it's relevant to provide the information 20 on the uniform assessment and functional measures for post-acute care that will be measured on all 21 22 That will patients who utilize post-acute care.

provide outcome data related to function. 1 2 CO-CHAIR TIRSCHWELL: Jim, did you 3 retract your statement? 4 Okay, Dave. CO-CHAIR KNOWLTON: I get a little 5 confused here because I'm at least one of the 6 7 non-clinicians here so I don't fully understand this perhaps, but I was a stroke patient. 8 9 And I'm trying to understand from a 10 patient perspective what the implications of this 11 are and it's not clear to me. Usually these things are clear, but this isn't clear to me. 12 13 I agree that we want to get to outcome 14 Does this block, because it's the one measures. 15 that gets accepted use without evidence, I go to 16 Charlotte's point. Does this block the 17 development of a more robust measure? I think that's asked in the evidence assessment. 18 Up on 19 the screen it's Number 12. 20 You know, absent empirical evidence do 21 we consider this? Does it then become a 22 roadblock towards development of other measures

1 that might be more robust and more helpful to 2 patients?

So I'm looking at this from a patient 3 4 perspective and I'm asking those of you who are 5 clinicians maybe you have a judgment that this is important anyway that it will not create a block 6 7 to an impetus to a more robust measure, because follow-up with stroke patients in my experience 8 9 was important and was not done very well. 10 And so I wonder, clinically, what are the implications. I felt we voted quickly 11 12 without fully understanding what the implications 13 are. 14 If we're going to get a more robust 15 measure and this is a weigh station as it's been 16 called on the way I'm done with that. But if 17 not, then I don't want it to block. 18 CO-CHAIR TIRSCHWELL: I would say just 19 the opposite that it doesn't block. This is a 20 stepping stone and facilitates the development of 21 a better outcome measure. 22 Jim?

I mean, I think this 1 MEMBER BURKE: 2 seems like a place where we've like fallen through the process cracks, right. 3 I mean what 4 we're hearing here is sort of two different 5 perspectives. One perspective says that there's 6 7 substantial support for the idea that this could be a very useful outcome measure in the future, 8 9 and then there's a separate framework here which 10 says, but should you measure it today as this 11 measure. And it seems like people are pulling 12 apart on those two things. 13 It almost seems like an NQF process 14 where we could say something different rather 15 than this measure need exist as a weigh station 16 that the broad target to which their aiming makes 17 sense, and it doesn't seem like we have, that's 18 not what this vote is. I mean, this vote is different than

I mean, this vote is different than that. This vote is, you know, we're going to get stuck on the third box, I think. And, you know, right now it's a question of, and we've got those

two sort of operative or divergent perspectives here, and I'm not sure how to reconcile that when we vote.

4 CO-CHAIR TIRSCHWELL: I think we're 5 going to have to vote and we'll get the through 6 the third box by a vote because I don't think 7 there's any other way to move forward.

8 I think we've clarified the issues 9 that are on the table and I'd like to go ahead 10 and suggest that we re-vote on the question of 11 exception to the evidence criteria.

MS. SKIPPER: We're voting on Measure
2865 potential exception to empirical evidence,
one insufficient evidence with exception, two, no
exception.

Okay. Polling has closed for
exception to empirical evidence for Measure 2865.
Fifty percent insufficient evidence with
exception, fifty percent no exception.

20 CO-CHAIR TIRSCHWELL: So if I'm 21 interpreting the rules correctly, this measure 22 does not pass and we move to the next measure.

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Okay, the next measure is CSTK-03,
 severity measurement for hemorrhage types of
 strokes.

MS. KOLBUSZ: This is also collected for the comprehensive stroke program and it's a severity measurement for the hemorrhagic stroke patients.

The description for the measure is 8 9 that it captures the percentage of subarachnoid 10 hemorrhage patients and intracerebral hemorrhage 11 patients for whom a severity measurement, a Hunt 12 and Hess Scale performed for the subarachnoid 13 hemorrhage patients, or an ICH score performed 14 for the ICH hemorrhage patients, is performed 15 prior to surgical intervention, specifically 16 treatments for aneurysm such as clipping, 17 coiling, however any surgical intervention it 18 would be expected to be performed before in 19 patients who are undergoing a surgical 20 intervention and documented in the medical 21 record, or if the patient does not undergo a 22 surgical intervention then the expectation is

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intracerebral stroke patients to determine if

they had the appropriate measurement of an ICH

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5 measure, it is a stratified measure so it is an overall rate. We do have several subcomponents. 6 7 The denominator is the subarachnoid in intracerebral hemorrhage stroke patients who 8 9 arrive at the hospital emergency department. 10 However, the numerator is actually stratified into three components. 11 There is the 12 overall rate numerator which is combining the 13 number of SAH and ICH stroke patients for whom a 14 severity measurement is performed as I just had 15 described. 16 The 03 measure looks only at the 17 subarachnoid patients and assesses whether or not 18 they had the appropriate severity measure of Hunt and Hess Scale performed. 19 20 And the 03b measure looks at only the

hours of arrival at the hospital emergency department. The denominator for this particular

that it would be done and documented within six 1 2 3

score performed within the time frame specified for the measure.

For the exclusions for this particular 3 measure similar to our other measure STK-01, 4 5 CSTK-01, excuse me, it's the patients less than 18 years of age, the patients who have a length 6 7 of stay greater than 120 days, patients with comfort measures only documented on the day of or 8 9 day after hospital arrival, nonsurgical patients 10 who are discharged within six hours of arrival at 11 the hospital, and then there's also an exclusion 12 for patients with an admitting diagnosis of 13 traumatic brain injury, unruptured arterial 14 venous malformation, nontraumatic subdural 15 hematoma as specified by co-Table 8.2F, so that 16 we do not mix in trauma cases and what not into That's it. 17 the mix. 18 CO-CHAIR TIRSCHWELL: Great. Thank 19 you very much. So our discussants are Jane and

20 Kelly, the Sullivans.

21 MEMBER J. SULLIVAN: So this is the 22 Sullivan's measure. Kelly and I talked about

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this last night. I'm going to lead this off and 1 2 she is going to weigh in when she sees performance gaps in what I'm saying. 3 4 So to the evidence the developer 5 offers the support of three clinical practice guideline recommendations from American Heart, or 6 American Stroke with Class I levels A and B 7 evidence, a systematic review and three 8 9 randomized control trials that support the 10 measure that support the usefulness of a severity 11 measure based on the fact of the rapid evolution 12 of the condition and that the score can be useful 13 in providing prognostic information. 14 The workgroup committee agreed with 15 the preliminary assessment of NQF that the 16 evidence was moderate. 17 CO-CHAIR TIRSCHWELL: Any discussion 18 for the evidence issue? Ketan? 19 MEMBER BULSARA: You know we have the 20 same issue regarding the timing for six hours. 21 And so I guess the question is, I mean, if you 22 have a patient that comes in with a, yes,

subarachnoid hemorrhage, so let's just focus on
 subarachnoid hemorrhage.

I would think that all of those
patients would need an initial Hunt/Hess score or
some sort of grading in terms of the severity,
and so why the six hours?

7 And then sort of the alternative of 8 that is many times when these patients come in 9 they're admitted. They're admitted to the neuro 10 intensive care unit because they have an aneurysm 11 that's likely to rehemorrhage. The highest rate 12 is within the first 24 hours.

13 These patients are sedated so you 14 really don't have much of an exam. And probably 15 the only exam you have is, is that you're doing 16 pupil checks.

17And so the question of the exam18immediately before like the microsurgical19clipping or intravascular treatment at the20aneurysm, I'm not sure that that is a reliable21exam.

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So again, which -- I think the couple

as we, what time frame should we use? 1 I don't 2 think the six hours is a reasonable time frame. I don't think immediately before the procedure is 3 4 a good time frame, because again the current 5 practice is we keep these patients sedated, we don't have an exam. 6 7 So I would have trouble with the sixhour point. 8 9 CO-CHAIR TIRSCHWELL: Any other 10 comments or discussion? I mean, I wonder if just 11 like the 12 hours wasn't particularly evidence 12 based, this six hours doesn't have exact evidence 13 but we have to make some assessment. 14 In fact as you argued, I think the NIH 15 Stroke Scale score and as hemorrhages are more 16 severe in general and perhaps a little bit more 17 urgently treated, I think they decided on a 18 slightly tighter time window as it relates to so 19 when to measure it. 20 But Steve, do you have a comment? 21 MEMBER HUFF: It just occurs to me it 22 would read simpler if it just said arrival at the

1	hospital, period. Many of these patients are
2	interfacility transfers and won't be seen in the
3	emergency department of the institution where the
4	coiling or clipping might occur.
5	So just curious that this is, you
6	know, hospital arrival would be simpler. It
7	would also capture patients that are transferred
8	in to tertiary centers.
9	MEMBER BULSARA: You know, I totally
10	agree with Steve. I mean, I think that's more
11	reflective of current practice. I think the wait
12	probably should be phrased as soon as the
13	patients get to the emergency room they have a
14	Hunt/Hess score that's documented.
15	MEMBER HUFF: I didn't say that at
16	all, okay. I'm just saying it's interesting how
17	this measure, which will probably be performed by
18	specialists, by neurosurgeons or stroke
19	neurologists, it has an emergency department
20	marker in it.
21	And many of these patients, practice
22	pattern at least in my region is, are transferred

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directly to a Neuro ICU. And so they'll be seen 1 2 at a small regional hospital, maybe even a limited access hospital, and then will go to an 3 4 ICU. 5 MEMBER BULSARA: I stand corrected. Ι disagree with Steve. And the reason I disagree 6 7 is that the best exam that you're going to get on these patients are when they first come to the 8 9 emergency room. 10 I think you need to document that 11 exam, and then I do think it's important to 12 document an exam before the patient is taken for 13 any sort of either interventional or 14 microsurgical procedure, but I don't think that 15 exam is very accurate. 16 MEMBER SCHMIDT: So whenever you have 17 something that needs to be done as soon as 18 possible and where you know that earlier is 19 better, it's often good to design a measure where 20 you choose a threshold where you say about 21 between 40 and 60 percent. 22 The average is going to fall somewhere

between 40 and 60 percent so that we can push 1 2 people into that window. There isn't going to be evidence for that kind of thing because you 3 4 design your measure so that it's optimal for 5 improvement, and then as things improve you can say, well, now we're going to say five hours 6 because we want it to be as soon as possible and 7 we're going to push our threshold up. 8 9 So this is one of the places where 10 measure development and evidence often don't have 11 parallels. 12 DR. SCHWAMM: I just wanted to clarify 13 that according to the Joint Commission direct 14 admissions are also captured in this measure, so 15 it's not just ED based arrivals. 16 MEMBER HUFF: Perhaps that should be 17 amended to reflect that in the measure. 18 MS. KOLBUSZ: It is actually a data 19 element in the algorithm. It's direct admission. 20 After we pilot tested we had set this measure up 21 to kind of mimic the thrombolytic therapy where 22 you came through the ED.

But in the comprehensive stroke 1 2 centers we were losing too many patients to direct admission, so we added the data element 3 direct admission which is reflected in the 4 5 algorithm. CO-CHAIR TIRSCHWELL: 6 Yes. 7 MEMBER BULSARA: Let me just quick put the Hunt test score in perspective. 8 I mean, this 9 is a test that takes less than a minute to do. 10 There's no reason that any patient that presents 11 at the emergency room or that presents in a neuro 12 intensive care unit shouldn't have that done 13 within a very short time of their arrival, and this test takes less than a minute to do. 14 15 CO-CHAIR TIRSCHWELL: I think the hard 16 part may be getting your neurosurgeon to document 17 it in a timely fashion. Light humor. 18 All right, discussion on evidence. 19 Yes, go ahead. Okay. Let's go ahead and vote 20 then. 21 MS. SKIPPER: We are now voting on 22 evidence for Measure Number 2866. Voting is

open. One high, two moderate, three low, four
 insufficient.

3 Results are zero percent high, 17
4 percent moderate, or 17 people voted moderate,
5 four people low, one person insufficient. This
6 measure does pass on evidence.

7 CO-CHAIR TIRSCHWELL: Now we'll have
8 to fix that. It does pass clear majority,
9 greater than 60 percent. Let's talk about gap
10 and opportunities, Jane.

11 MEMBER J. SULLIVAN: So the developer 12 provided some information about performance gap 13 from earlier pilot data which indicated a very 14 large, up to an 80 percent performance gap based 15 on 66 sites and 2,471 cases, as well as data from 16 the first two quarters of 2015 which indicated a 17 smaller but still substantial performance gap. 18 And we were not provided with any data on disparities. 19

20 CO-CHAIR TIRSCHWELL: Discussion 21 related to gap or opportunities for improvement? 22 If no -- yes.

1	MEMBER BULSARA: Just a comment.
2	Usually it's the initial providers that are
3	documenting at least at many institutions that
4	I've been to that are documenting these scores.
5	So I mean, even though the test takes
6	less than a minute to do, it may be a lack of
7	education for the initial staff that's seeing the
8	patients or the neurology team or the
9	neurosurgery team in terms of not documenting
10	them rapidly.
11	CO-CHAIR TIRSCHWELL: Suggesting
12	there's an educational opportunity here as well
13	perhaps.
14	MEMBER BULSARA: Plenty of educational
15	opportunity.
16	CO-CHAIR TIRSCHWELL: Okay. Let's go
17	ahead and vote then on gaps and opportunities for
18	improvement.
19	MS. SKIPPER: We are now voting on gap
20	for Measure 2866. One high, two moderate, three
21	low, four insufficient.
22	CO-CHAIR TIRSCHWELL: Charlotte's not

here right now, so --1 2 MS. SKIPPER: Results are 18 high, 3 moderate, zero low, zero insufficient. 3 This 4 measure does pass on gap. 5 CO-CHAIR TIRSCHWELL: Great. **Reliability?** 6 So reliability 7 MEMBER J. SULLIVAN: testing was done at the data element level. We 8 9 were provided with data about pilot reliability 10 testing at 12 sites done in 2013 with 281 11 records. 12 The percent agreement across the 13 elements for the abstractors ranged from 71 to 99 14 percent and the kappas were in the 90s. So the 15 workgroup committee agreed that the reliability 16 was moderate to high. 17 CO-CHAIR TIRSCHWELL: Comments or 18 discussion about reliability? Let's move to vote 19 on reliability then. 20 MS. SKIPPER: We are now voting on 21 reliability for measure 2866. One high, two moderate, three low, four insufficient. 22

Results are five high, 16 moderate. 1 2 This measure does pass on reliability. CO-CHAIR TIRSCHWELL: Validity? 3 MEMBER J. SULLIVAN: So the developer 4 5 provided information on face validity which was assessed with surveys and focus groups as well as 6 some convergent validity data on other measures 7 within the set for hemorrhagic stroke. 8 9 When Kelly and I talked about this we 10 had some -- and there were some data provided 11 about threats to validity. Some of the comments 12 that were provided about under use and usability 13 during the six-month pilot testing phase, we 14 wondered if they might also be threats to 15 validity in terms of difficulty with abbreviations and alternative terms for the test 16 17 and issues with how to calculate the ICH score. 18 So I guess that's a question is 19 whether those factors impact the validity of the 20 data. 21 MS. KOLBUSZ: Those are findings 22 during the pilot test, so before finalizing the

measure set and ruling it out for implementation 1 2 we did take the feedback from the pilot sites and we did make modifications to the abstraction 3 4 quidelines and put the actual score in the data 5 element definition so people that didn't really fully understand the scoring or how the total 6 7 score of six would be obtained like for ICH, they could see the components and the ratings. 8 9 CO-CHAIR TIRSCHWELL: Any other 10 discussion related to validity? Let's move to 11 vote for validity, please. 12 MS. SKIPPER: We are now voting on 13 validity for measure 2866. One high, two 14 moderate, three low, four insufficient. 15 CO-CHAIR TIRSCHWELL: Charlotte's back 16 so it should be 22. 17 MS. SKIPPER: We're waiting on one 18 Could everyone aim toward me? more. 19 CO-CHAIR TIRSCHWELL: Alright. 20 MS. SKIPPER: Results are 32 percent 21 high, 64 percent moderate, five percent low, zero percent insufficient. The measure does pass on 22

1 validity. 2 CO-CHAIR TIRSCHWELL: And so then 3 feasibility. So the measure's-4 MEMBER J. SULLIVAN: 5 part of this measure set for the comprehensive stroke certification that were implemented in 6 January of 2015. It's in the public domain. 7 The data's captured through the EMR or 8 9 a paper medical record abstraction, and the 10 workgroup felt that the feasibility seemed 11 moderate to high. 12 CO-CHAIR TIRSCHWELL: Discussion on 13 feasibility? Let's move to vote then on 14 feasibility. 15 MS. SKIPPER: We are now voting on 16 feasibility for measure 2866. One high, two 17 moderate, three low, four insufficient. 18 MS. SKIPPER: Results are 41 percent 19 high, 59 percent moderate, zero percent low, zero 20 percent insufficient. The measure does pass on 21 feasibility. 22 CO-CHAIR TIRSCHWELL: Usability and

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use.

2 MEMBER J. SULLIVAN: So the issues 3 that I talked about earlier have been addressed 4 by the developer. The measure is currently in 5 use in an accountability program in the diseasespecific care certification for comprehensive 6 7 stroke centers. 8 And there was no one on our workgroup 9 committee who has experience using the measure, 10 so we wanted to ask if there were people who 11 could comment from that perspective. 12 CO-CHAIR TIRSCHWELL: I have 13 experience using the measures, and as Ketan said 14 the Hunt and Hess Scale is extremely brief. The 15 ICH score's a little bit more complicated because 16 you do have to compute a volume for your 17 intracerebral hemorrhage. 18 The other variables are pretty simple after that. It is a skill to develop, it's not 19 20 that hard, and I think it's feasible. We use it. 21 It's a good learning tool for intracerebral 22 hemorrhage patients.

1	And all the other arguments about
2	communicating severity in a facile fashion like
3	we discussed for the NIH Stroke Scale score, I
4	think also can apply to both the Hunt and Hess
5	and the ICH score.
6	Although Hunt and Hess probably
7	already has similar status amongst neurosurgeons,
8	the ICH score is sort of gaining momentum in
9	those same areas.
10	Michael, do you have a comment? Can
11	we open up Dr. Kaplitt's phone line?
12	MEMBER KAPLITT: Sorry. No, no, it's
13	me. Sorry. I had muted it so you wouldn't
14	whatever, I wouldn't bother you with my coughing.
15	So the I'd be curious on Ketan's
16	opinion on this as well. I agree, the Hunt and
17	Hess is trivial and we all do it. You know,
18	right, if somebody's rushing to the operating
19	room they may not have time to put it in the
20	chart, but everybody does it and they'll document
21	it retrospectively or, you know, retroactively or
22	whatever.

But the ICH score, I agree with 1 2 everything you said, but if the ICH score also applies to patients that has to be done prior to 3 4 going to the OR. 5 So if you have somebody with a clot that's actually going to be removed or someone 6 that's going to get a hemicraniectomy, let's say, 7 because they're young and you can't remove the 8 9 clot but you're doing something for them or 10 whatever, or even if someone's getting a 11 ventriculostomy which is a surgical procedure 12 even though we act as if it's sort of a minor 13 procedure, but it still is, I guess I'm 14 wondering, you know, it's certainly not part of 15 our standard practice --16 CO-CHAIR TIRSCHWELL: Mike, I think 17 you just had a feedback explosion there or 18 something. Are you still there? 19 MEMBER KAPLITT: Yes, I don't know. 20 Yes, something happened, whatever. 21 CO-CHAIR TIRSCHWELL: Okay. 22 Yes, so I was going MEMBER KAPLITT:

to say it's certainly part of our standard 1 2 practice, you know, to do that prior to operating especially when it's an urgent operation. 3 4 It's actually calculated volumes and 5 stuff. I just, I don't know how usable it is, frankly, for a patient who's going for emergency, 6 7 you know, clot evacuation. CO-CHAIR TIRSCHWELL: 8 Yes. 9 DR. SCHWAMM: And the only comment I 10 would make is that the only element of the score 11 that changes is the Glasgow Coma score, right. 12 The score is made up of the Glasgow Coma score, 13 age, this question about whether the volume of 14 blood in the brain is greater than 30 mls, 15 whether there's blood in the ventricular system 16 as well, and whether the bleeding is above or 17 below the tentorium. 18 So everything in there is available to 19 you at any point in time to retroactively 20 calculate the score. The only thing that needs 21 to be calculated on arrival is the Glasgow Coma 22 score, which is routinely calculated in patients

who present with brain hemorrhage and alterations of consciousness.

3 So I think it's a very reasonable 4 point that you would ideally want to make this 5 assessment based on information available to you 6 when the patient arrives, but your point is also 7 well taken.

8 It is not, the ICH score is not what 9 you use to decide whether you clip the aneurysm 10 or whether you go to the operating room. The 11 Hunt and Hess score in some cases if it's very, 12 very high may deter you from going to the 13 operating room, but basically the decision is 14 made on the patient's clinical appearance.

15 These scores are really ways of 16 assessing the severity of the initial injury and 17 are very useful in algorithms that look at the 18 likelihood of survival.

MEMBER KAPLITT: I mean I just worry a
bit about the usability in the population of
patients that are going for clot evacuation. I
mean, you know, Hunt and Hess pretty much

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everybody's doing instinctively on an aneurysm 1 2 patient, you know, as you said, and if it's really bad it does influence what we're doing. 3 4 But measuring clot volume prior to 5 actually going to the OR in somebody who's declining and herniating, if you see that the 6 7 clot is amenable to evacuation and the patient's herniating, I just don't know how easy it's going 8 9 to be to use this to say, wait a minute, you've 10 got to, you know, document that it's more than X, 11 you know, volume. 12 DR. SCHWAMM: But the CT scan is 13 available. You don't have to stop and measure it 14 before you go to the operating room. The data 15 that you need is available to you. 16 So you're really asking the question 17 of when do you construct the score not when do 18 you measure the components that are used in 19 creating the score. 20 MEMBER KAPLITT: Maybe I'm misreading 21 it. It says --CO-CHAIR TIRSCHWELL: So then it would 22

1	be okay in the chart? Would I get a pass if at
2	24 hours I said, you know, based on the initial
3	CT scan, initial Glasgow Coma score, the
4	patient's ICH score at presentation was 3?
5	MS. KOLBUSZ: If in the body of the
6	note you documented that it was at presentation
7	we would give you a pass on it and use the time
8	documented in the note over a stamped time or a
9	file time on the actual written note.
10	If you don't indicate that though in
11	the note, you're going to fail.
12	CO-CHAIR TIRSCHWELL: Mike, does that
13	make sense to you?
14	MEMBER KAPLITT: No. Well, it makes
15	sense to me in terms of what she said. It
16	doesn't make sense to me in terms of what it's
17	doing, you know, but that's fine. You know, I
18	mean this is supposed to be a quality measure.
19	And if the purpose of performing this
20	prior to surgical intervention is to determine
21	whether we're achieving a certain standard of
22	quality, doing it retrospectively I'm just not

sure what that does in terms of quality. 1 Because 2 you've already made your decision based on other -- if you don't actually do the ICH score prior 3 4 to the evacuation then you're doing the 5 evacuation based on other means. And then if you retroactively go back 6 just to satisfy the measure that's fine, but I 7 just then don't understand the purpose. 8 9 Yes, just if I can DR. SCHWAMM: 10 clarify one thing. You're not required to report 11 the number of ccs of hemorrhage on the scan as 12 part of the score. 13 You just have to measure whether it is 14 greater than 30 ccs, which most people who 15 practice in this field can rapidly estimate 16 simply by reviewing the scan which is done by 17 everybody who's going to make a decision about 18 going to the operating room. 19 And so in the super tentorium, above 20 the tentorium in the hemispheres no one ever goes 21 to the operating room for a hemorrhage that's 22 smaller than 30 ccs because it's not enough mass

effect to cause an indication for surgery. 1 In 2 the posterior fossa it definitely can. And so I think, really, what we're 3 talking about is the rare individual where the 4 5 volume of hemorrhage by visual inspection is close to that cut point and would require you to 6 7 estimate, which --8 MEMBER KAPLITT: But again, so does 9 ventriculostomy count as a surgical procedure? 10 So let's say someone has a small bleed --11 DR. SCHWAMM: Yes. 12 MEMBER KAPLITT: -- you know, and they 13 need a ventric -- you have to do this prior to 14 placing the ventriculostomy. 15 DR. SCHWAMM: I think the answer would 16 be yes, because I think ventriculostomy would 17 certainly be coded as a surgical procedure. 18 CO-CHAIR TIRSCHWELL: All right, any 19 other --20 MEMBER KAPLITT: So somebody has a 21 small post fos bleed and you want to put a 22 ventric and in the ER you have to have like

calculated this out? I don't know. 1 I mean, I 2 agree with you that it's not necessarily a hard thing to do when we do it, I just, since we're 3 4 into usability I'm just, there are situations 5 where I think it might be tough. That's all. CO-CHAIR TIRSCHWELL: And I think it's 6 7 pretty clear that you wouldn't delay your procedure to write this down in the chart. 8 That 9 could easily be done later. 10 And in many cases, you know, as we 11 talked about communication amongst providers to 12 optimize patient care and outcomes is again, just 13 like for the other severity scores is relevant 14 here. So let's go ahead and vote on use and 15 usability. 16 MS. SKIPPER: We are now voting on 17 usability and use for Measure 2866. One high, 18 two moderate, three low, four insufficient. 19 Results are five percent high, 86 20 percent moderate, five percent low, five percent 21 insufficient. The measure does pass on usability 22 and use.

1 CO-CHAIR TIRSCHWELL: So let's move 2 then to vote about overall appropriateness for Suitability, excuse me. 3 endorsement. 4 MS. SKIPPER: We are now voting on 5 overall suitability for endorsement for Measure 6 2866. One yes, two no. Results are 95 percent yes, five 7 Measure 2866 has been recommended 8 percent no. 9 for overall suitability for endorsement. 10 CO-CHAIR TIRSCHWELL: Great. So, 11 thanks. I guess I'm wondering do people want to 12 take an early break or do you want to take a 13 delayed break? Why don't we take a ten-minute 14 early break and reconvene at 10:35 promptly. 15 (Whereupon, the above-entitled matter 16 went off the record at 10:24 a.m. and resumed at 17 10:36 a.m.) 18 CO-CHAIR TIRSCHWELL: All right. 19 Well, I'd like to get started again. The next 20 measure that we're reviewing is 2876, which is 21 similar to 2877, which will be next. 22 This first one is hospital 30-day,

1	all-cause, risk-standardized mortality rate
2	following acute ischemic stroke hospitalization,
3	claims-based risk adjustment for severity score
4	from CMS and Yale. Let me ask sorry one
5	(Off microphone comment.)
6	CO-CHAIR TIRSCHWELL: I'm not saying
7	CMS out. Before we start, for the NQF folks,
8	these two measures are totally independent. So
9	regardless of what happens with the first one,
10	we'll be looking at the second one. Okay, good.
11	Thank you for that clarity.
12	Why don't you guys introduce yourself
13	and then introduce your measure?
14	MS. BERNHEIM: Hi, this is Susannah
15	Bernheim. I am the quality measurement program
16	director at Yale CORE, we're the measure
17	developers for this doing this under CMS'
18	stewardship. I think you know my partner-in-
19	crime, who has been sitting on his seat all day.
20	DR. SCHWAMM: And actually for this,
21	I'm also an expert for this measure developer,
22	and I actually was a consultant along with

several other experts on the development of the measure.

MS. BERNHEIM: Okay. So I'm going to try to keep this quite brief. I will orient you to this measure. This is an outcomes measure. It takes ischemic stroke patients and assesses mortality within 30 days.

8 This is a really important measure in 9 that it is a update to a measure that CMS 10 currently uses in their inpatient quality 11 reporting program, that is a claims-based measure 12 of 30-day mortality after ischemic stroke.

13 That measure, when we brought it 14 forward some years ago, the single biggest 15 concern from the committee evaluating at that 16 time was that we did not have a means of 17 evaluating stroke severity when a patient came 18 into the hospital.

So this measure takes an essentially
identical cohort, an outcome definition and a
similar modeling strategy, but we reselected
variables and included the NIH Stroke Scale as a

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risk adjustment variable for the measure. The reason we're able to bring this forward at this point, as you all are probably aware, is there's much more evidence for the use of the NIH Stroke Scale consistently. There's much broader uptake within the -- with the guideline hospitals, it's well over 80 percent at this point.

8 And as of today, you're recommending 9 that it be endorsed as a quality measure, the 10 collection of this, and there's been work to 11 incorporate the NIH Stroke Scale into claims 12 data. So as of October this year, there will be 13 codes that coders can use that identify what the 14 NIH Stroke Scale is.

As Lee spoke to earlier, once that information is in the medical record as a number, it's a pretty straightforward thing for a coder to take that number and translate it to an ICD-10 code. So we're very optimistic about the translation into the codes.

I think the other important thing to
reflect is that the way that we were able to

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develop this measure is that we linked claims 1 2 data to Get With the Guidelines data. So we were able to look at this measure in about 1,500 3 4 hospitals, but they're all Get With The 5 Guidelines hospitals that way we had for each of the patients full Medicare claims data as well as 6 7 an NIH Stroke Scale that came from the registry The registry data in this case was just 8 data. 9 being used as a surrogate for the claims data 10 that we'll have going forward. So that's how we 11 were able to develop the risk model. 12 The only other key point I'll make is 13 that we heard some very early concerns about 14 whether mortality is even an appropriate measure 15 in stroke. So I just want to reiterate the 16 evidence that's out there around mortality being 17 linked to a number of processes of care, 18 prevention of complications, use of stroke 19 centers and stroke units, timeliness of being 20 seen by the right caretakers. We have a number of studies that we 21

can reference, but I think that there's pretty

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1	substantial evidence that high quality care will
2	reduce mortality, and that if you're accounting
3	for stroke severity you can fairly assess
4	relative performance of hospitals. Thank you.
5	CO-CHAIR TIRSCHWELL: Thank you. Did
6	you want to any additional comments?
7	DR. SCHWAMM: Yeah. I just wanted to,
8	for those who aren't familiar with it, first of
9	all I wanted to applaud the Yale group and CMS
10	for taking the feedback from this steering
11	committee several years ago to heart, and really
12	paving the way for doing a validation study,
13	where we partnered registry data with claims
14	data.
15	But also for figuring out a way to
16	actually collect and utilize the NIH Stroke Scale
17	score in all hospitals in the United States, not
18	just those who are participating in a voluntary
19	quality improvement program. So I think it has
20	very broad-reaching implications.
21	In work that we've done in Get With
22	the Guidelines, the NIH Stroke Scale score

contributes over 90 percent of the discriminating 1 2 value in the c statistics for the predictive power of the model. The model has a c statistic 3 4 for about .86, .82 is carried by the NIH Stroke 5 Scale score, two digit score alone. So it's a -- unlike some other 6 7 diseases, it really is one of the most important measures in predicting outcome as relates to 8 9 mortality after ischemic stroke. So I think 10 adding it to this measure makes it a more robust 11 measure. 12 CO-CHAIR TIRSCHWELL: Great. Our 13 reviewers are Jim and Lisa. Who's leading off? 14 MEMBER BURKE: So I'm going to lead 15 off and Lisa's going to jump in. So I guess 16 before -- I think there's probably a quick prior 17 here, which is the bulk of the thing that we 18 spent talking on the workgroup bears -- bodes on 19 the evidence question as well as on the validity 20 question. 21 It was a thing that was alluded to, 22 which is this question of is the mortality the

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right measure sort of philosophically, and this 1 2 sort of bears on both of these. And so sort of what came up on the workgroup call and was talked 3 4 about a lot, and there was -- lots of people said 5 this in sort of various ways, but everyone was getting around the same idea here, was that 6 mortality is not what we measure for stroke 7 trials. 8

9 There's a bunch of reasons for that. 10 A big one is that mortality is not, obviously, 11 the right patient-centered outcome. But we know 12 that in the real world, a lot of patients will 13 have a bad stroke and then die, and that is not 14 necessarily the bad outcome once they've had a 15 bad stroke.

16 If you ask older Americans about their 17 preferences, about surviving with a severe stroke 18 disability or dying, a large proportion of them 19 will tell you they would rather die than live 20 with a severe disability from stroke. The trick 21 here becomes -- that's not true after the fact. 22 Most people who survive after a severe

stroke are happy that they did, but this becomes
 sort of the preference-sensitive question here
 that gets tricky. It's doubly-tricky because
 there's a lot of care factors that can lead to a
 transition between death and survival with severe
 mortality.

So if we take everybody and we put in
PEG tubes or we don't put in PEG tubes, that has
a major influence on mortality, but it may be
highly orthogonal to quality.

11 That sort of broad philosophic 12 perspective, about making sure that patients' 13 preferences are adequately accounted for, was 14 sort of the big thing that sort of fell out in 15 the conversation. It came up sort of time and 16 time again when we talked about it, and it bears 17 on both the evidence question and the validity 18 question.

So in terms of the evidence question,
what the developers cited were several
observational studies that were of reasonable
quality, all of them somewhat limited though,

about whether or not doing something that looks like it's probably good care is associated with mortality.

4 So if you're in the Get With the 5 Guidelines registry, you have slightly lower mortality than if you don't -- not in the 6 7 registry, the idea being that participating in the quality improvement registry might reduce 8 9 mortality. Patients who come in on weekends have 10 slightly lower mortality than patients who come 11 in during weekdays, maybe because of quality of 12 care.

13 There was a complication paper and it 14 was at least one more where there were some 15 process measures correlating with mortality. All 16 of them, you know, require a bit of a leap of 17 faith to assume that quality was the key mediator 18 that led to that.

19 It's not a clearly unreasonable 20 conclusion, but it's also far from a given that 21 that was the key mediator. There's unmeasured, 22 confounding in all of these and a whole lot of

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different factors that any one of these you could pick at and pull it apart.

The other evidence problem is that the evidence provided with this was not necessarily completely systematic. I think that there's other data that suggests that things that should be hospital quality don't necessarily correlate with mortality.

9 The big one here is I think volume 10 outcome relationships. So an ischemic stroke, 11 you know, we in general high volume should mean 12 lots of experience, lots of resources and you're 13 good at it, and there's a modest association 14 there with mortality.

15 The other one that I think is -- and 16 full disclosure, this is work that I participated 17 in -- was that when you look at hospital-level 18 variation in the proportion of people with early 19 DNR orders, which is not easy to interpret but 20 might mean something about patient preferences, 21 that that is very strongly correlated with 22 mortality, and again not necessarily obviously a

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quality factor.

2	When you look at though, the NQF
3	algorithm for this, the evidence bar appears to
4	be really low. So if you look at the algorithm
5	for outcome measures, which is different than the
6	algorithm for everything else, the language seems
7	to suggest that almost anything would get you
8	over the bar.
9	So all you need to do is have an
10	association between some quality factor and an
11	outcome, and I wondered if that was you know,
12	that's how it got put out in the preliminary
13	statement. If that's the case, there's probably
14	nothing to talk about here.
15	It's a totally obvious pass, but that
16	seems like it's a really, really remarkably low
17	bar.
18	MS. JOHNSON: And just to answer your
19	question, we do have a different bar, if you
20	will, for outcome measures and part of that idea
21	is that, you know, outcomes are the ones that are
22	important to patients.

We could discuss whether this one for 1 2 stroke is, but we do have a different bar. We do not require, you know, the studies, the quantity-3 4 quality consistency, that sort of thing that we 5 do require for processed intermediate outcomes. So to answer your question yes, what 6 7 we require is a rationale and that basically supports the relationship between something that 8 9 you can do and that outcome. So that's what we 10 ask for. 11 So it seems like the MEMBER BURKE: 12 question here is I mean, you know, there's 13 clearly an association between something you can 14 do that looks like quality of an outcome. The 15 question is do you have to have some sort of 16 burden of the evidence, because this is the part 17 that seems like it's much trickier, right? 18 Is it a question of are the factors 19 that lead to mortality on the whole quality or on 20 the whole something else seems like it's the open 21 question. I guess that was -- I think if I was 22 going to summarize the workgroup conversation,

that's where the concern was.

2	The concern was that quality might be
3	or is likely one of the factors driving that,
4	but it might not be the predominant one and it
5	might be pretty small, and we don't really know
6	what part of the fraction that is. Is there any
7	guidance on how to judge in that situation?
8	MS. JOHNSON: I don't think we have
9	specific guidance in there, but I think you have
10	to ask as you're thinking about this, is there
11	actually something that providers can do to
12	mediate this outcome, and that's basically the
13	question that we're asking you.
14	CO-CHAIR TIRSCHWELL: Peter.
15	MEMBER SCHMIDT: So my understanding,
16	the reason why there's the lower bar for evidence
17	for an outcome measure is that there is no target
18	for the measure specified in the definition, that
19	we are it is important to measure outcomes,
20	but it is not necessarily by the fact that
21	you're measuring the outcome, it doesn't mean
22	that you're saying that zero is the target for

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death at 30 days. You're just saying that we're 1 2 going to measure what that outcome is. I think you're correct. 3 MS. JOHNSON: 4 I don't -- I wouldn't say that that's why we have 5 a different evidence bar. I think it probably goes back more to QI practices in general, you 6 7 know. If your outcome is not what you would like it to be in your own shop it might be one thing; 8 9 in somebody else's it might be something else. 10 And there may be many things -- there 11 probably are many things that you could do to 12 affect your outcomes, but it would be way too 13 onerous to expect developers to figure out every 14 possible thing and go do lit searches for all of 15 those things. 16 So again, the idea is the QI piece of 17 You are correct that most outcome measures, it. 18 we generally don't expect a zero or 100 percent. 19 MEMBER SCHMIDT: They just fall -- we 20 But if you measure falls in Parkinson's disease. 21 put everyone in a wheelchair, no one would fall. 22 So we do not consider zero falls to be our

target.

2	CO-CHAIR TIRSCHWELL: Yeah, go ahead.
3	MS. BERNHEIM: Just a sort of big
4	picture perspective on this question as an
5	outcomes measure developer, because we think
6	about this all the time, right.
7	So when we start to develop a measure,
8	we ask ourselves two crucial questions. One, do
9	we think the outcome we're assessing has a
10	relationship with quality of care, that higher
11	quality of care is likely to influence this
12	outcome?
13	Two, and I think this gets to your
14	earlier point is can we adequately risk adjust,
15	because the issue is are there too many other
16	things that are clouding the picture for us to
17	sort of tease out the quality? So certainly
18	there are lots of things that affect stroke
19	mortality rates.
20	What we think is that if we do an
21	adequate job of accounting for the severity of
22	the patients who are coming in and their other

risk factors, then as we start to see differences 1 2 across institutions, having done a good job of accounting for differences among their patients, 3 4 what we're seeing is reflecting something about 5 relative quality of those institutions. It's not perfect and this is not the 6 7 perfect outcome for stroke patients. As you all have discussed earlier, the perfect outcome is 8 9 hard to measure. 10 But I think the important question is 11 does this tell us something if we've done 12 adequate risk adjustment about what's happening 13 at these institutions? Do we have evidence that 14 institutions that do a better job at DVT 15 prevention, early intervention, using the 16 appropriate care providers, getting MRIs in a 17 timely fashion, using PPA when it's appropriate, 18 having stroke units, are likely to have lower risk-adjusted mortality rates? 19 20 That's really what we're -- that's 21 really how we think about it, and we think that

the evidence reasonable in that version. It is

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true, there is no gold standard for total 1 2 quality. Process measures are much simpler to handle, because they're sort of yes-no, but the 3 4 outcome measures reflect an enormous range of 5 processes that are going on in a hospital and it's very hard to hold it against a gold 6 7 standard. So the way we tend to think about it 8 9 is, is there reasonable evidence that quality 10 influences this and can we adequately risk-adjust 11 for the other factors? That's what we -- how we 12 think about it when we bring this measure 13 forward. 14 CO-CHAIR TIRSCHWELL: Any other 15 discussion related to evidence? If not, I 16 suggest we vote on evidence. 17 MS. SKIPPER: We are now voting on 18 Evidence on Measure 2876. 1 yes, 2 no if the 19 rationale supports the relationship of the health 20 outcome to at least one health care structure, 21 process, intervention or service. 22 (Voting.)

1	MS. SKIPPER: Results are 100 percent
2	yes.
3	CO-CHAIR TIRSCHWELL: I think it
4	wasn't enough votes.
5	MS. SKIPPER: I thought there were 22.
6	MS. OGUNGBEMI: It did say 22.
7	CO-CHAIR TIRSCHWELL: It did?
8	MS. OGUNGBEMI: Yeah.
9	CO-CHAIR TIRSCHWELL: Okay. I thought
10	it's the bottom left. Is that what you meant?
11	PARTICIPANT: There's separate little
12	bar.
13	CO-CHAIR TIRSCHWELL: Oh okay. Yeah,
14	I can't see that one.
15	MS. SKIPPER: We're going to revote.
16	CO-CHAIR TIRSCHWELL: Okay.
17	MS. SKIPPER: We're now voting on
18	evidence for measure 2876, 1 yes, 2 no.
19	CO-CHAIR TIRSCHWELL: Yeah. I need
20	better glasses. On the bottom left it used to
21	count up as well. I don't know why it's not
22	doing that anymore.

1	(Voting.)
2	MS. SKIPPER: So results are 100
3	percent yes, zero percent no. The measure does
4	pass on evidence.
5	CO-CHAIR TIRSCHWELL: So next we're on
6	to gaps in care or opportunities for improvement.
7	Jim.
8	MEMBER BURKE: So on gaps, we've got
9	data on let me take a quick aside to introduce
10	the data source because we're going to come back
11	to it a couple of times. This is what Susannah
12	alluded to.
13	Basically, what they did was they took
14	Get With the Guidelines hospitals, where you have
15	a voluntary quality improvement registry, where
16	patients where in the most recent years, a
17	large proportion a large majority of the
18	patients have a stroke scale entered.
19	They linked that to Medicare claims
20	and then they created a data set of what they
21	think the world will look like when NIH Stroke
22	Scale is reported via ICD-10 codes. They built

their model on that data set, and what they found was that there is considerable variation in the hospital level 25th -- or the lowest quartile, or it's the 20th percentile at 13 percent mortality, highest at 15-16 percent mortality, and a range of 10.8 to 19 percent mortality, with a median of about 14.5.

So on this measure, there is 8 9 variation. That is also true with CMS' current 10 measure, although one suggesting for NIH Stroke 11 Scale but it looks like the range and 12 interquartile range are substantially reduced 13 compared to what was there previously. So it is 14 clear variation exists. Whether or not one looks 15 at those numbers and sees that as large variation 16 I think is really hard to figure out.

17 They also did present disparities 18 data, looking at three sort of separate 19 subpopulations at the hospital level. The short 20 answer is there's no big differences here, which 21 is to say if anything, mortality looks like it's 22 probably a little bit lower than hospitals that

1	take care of a high proportion of African-
2	Americans. No big difference on socioeconomic
3	status and no big difference on dual eligibles.
4	I think that's the data.
5	CO-CHAIR TIRSCHWELL: So any
6	discussion about gaps in care, disparities,
7	opportunities for improvement?
8	(No response.)
9	CO-CHAIR TIRSCHWELL: Okay. Seeing
10	none, I move to suggest we vote.
11	MS. SKIPPER: We are now voting on gap
12	for measure 2876, 1 high, 2 moderate, 3 low, 4
13	insufficient. Waiting on one more vote.
14	(Voting.)
15	MS. SKIPPER: The results are 32
16	percent high, 55 percent moderate, 14 percent
17	low, 0 percent insufficient. The measure does
18	pass on gap.
19	CO-CHAIR TIRSCHWELL: So then
20	reliability Jim.
21	MEMBER BURKE: So
22	CO-CHAIR TIRSCHWELL: And actually

before you start, Karen, do you make -- mind making the one comment about reliability that we discussed?

4 MS. JOHNSON: Sure. Remember 5 yesterday we talked about does NQF set thresholds for reliability and that sort of thing? 6 The 7 answer was no, we don't set thresholds. What we try to do when we can is provide rules of thumb. 8 9 We have a rule of thumb that we often apply to 10 reliability estimates, that 0.7 and there's some 11 concern and we actually talked to our -- one of 12 our statistical consultants over the weekend 13 about this one.

14 She actually cautioned us for this 15 particular measure to back away a little bit from 16 that rule of thumb for this measure, and part of 17 the reason for that is because reliability 18 actually is contextual. We mentioned this again 19 yesterday. It has to do with variation between, 20 within and sample size, and also to some extent 21 maybe how, you know, the methodology that people 22 There's different methods to look at used.

reliability.

2	So for this particular one, we would
3	like you to consider the other rule of thumb that
4	was mentioned both by the developer as well as in
5	our PAs. There is a classification system for
6	ICCs and for discorrelations specifically. It's
7	the Landis and Koch classification and maybe use
8	that as your rule of thumb when you're thinking
9	about this measure.
10	Probably even more compelling might be
11	some information that Susannah could bring
12	forward. They actually did an additional
13	literature search. I don't think that was in
14	your submission, but they have some other studies
15	where they did something similar and have
16	correlation magnitudes that may help you put what
17	they found into a better context. Any questions?
18	(No response.)
19	CO-CHAIR TIRSCHWELL: Jim.
20	MEMBER BURKE: So the, you know,
21	reliability here there's sort of element
22	reliability and then overall scale reliability.

Element reliability here for most of these are 1 2 really easy, right. So for claims-based measures, reliability's kind of a given so that's 3 not going to be a problem at all. 4 The element where there's a 5 reliability question is NIH Stroke Scale. 6 We 7 know that it's highly reliable when measured in the context of a clinical -- or we should say 8 9 reasonably reliable when measured in the context 10 of a clinical trial, or in a limited context. We 11 don't know nearly as much though about what it 12 looks like in the real world, and the worry here 13 is going to be what is NIH Stroke Scale 14 reliability look like when it goes across all 15 Medicare hospitals? This is I think for right 16 now something we just don't know. 17 Reliability is a question of the 18 context in which it's measured, and we just have 19 never measured it in that context. There's a 20 reference in here that it will get tested and 21 measured at some point in time, some place in the 22 developer's documentation.

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1	I didn't know if we know what the plan
2	is there or how that data was going to be used or
3	modify things. If we find out the reliability
4	looks bad, what do we do?
5	CO-CHAIR TIRSCHWELL: Sure, go ahead.
6	MS. BERNHEIM: Yes. So we noted, we
7	expect in October that there will begin to be
8	collection and that will give us an opportunity
9	and I don't want to speak for CMS, but my
10	expectation is that CMS would wait until we did
11	some additional testing.
12	Again, we'll have the advantage of
13	having Get With The Guidelines data as well, and
14	we can do some comparisons of what we're seeing
15	from the claims data and the registry data to
16	ensure that there's a clean transition to the
17	claims NIH Stroke Scale, but I will say I think
18	it's critical that we test the measure in the
19	final data set that it would be used in before it
20	gets implemented. But sort of harkening to
21	something that Lee said earlier, I think the key
22	is the reliability of the clinician getting the

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information into the chart.

2	I'm not at all concerned that once
3	there's a number and a chart that it will be
4	accurately translated to the claims. Do you want
5	to add anything to that?
6	DR. SCHWAMM: The only additional data
7	I could offer is we did a data validation audit
8	in Get With The Guidelines. It was published in
9	the American Heart Journal back in sorry, 2011
10	and looked, actually had charts sent in and
11	specifically NIH Stroke Scale score accuracy.
12	On reabstraction, it was 93.6 percent
13	accurate. So I think, you know, many fine
14	academic teaching hospitals are Get With The
15	Guidelines hospitals, but there are hundreds and
16	hundreds of smaller community hospitals that are
17	in Get With The Guidelines.
18	So we don't have data on the entirety
19	of Medicare hospitals and you're absolutely
20	right. Seeing the extent to which they can
21	reliably perform an NIH Stroke Scale score is
22	something that will need to be assessed as part

of the implementation of the measure.

2	MEMBER BURKE: So correct me if I'm
3	wrong, but that Get With The Guidelines
4	reference, that's a question of when essentially
5	two different people abstracted the chart, but
6	they fail to pull out the same number. I mean I
7	think the reliability concern here more than
8	the one you alluded to before is going to be
9	who's doing the stroke scale and putting it in
10	the chart.
11	DR. SCHWAMM: Right.
12	(Simultaneous speaking.)
13	MEMBER BURKE: the reliability
14	problem, that's probably where it would I
15	mean, I would agree with you entirely. Once
16	there's a number in the chart, people are going
17	to be able to find it reliably.
18	DR. SCHWAMM: Now there is a VA study
19	that was done many years ago with the National
20	Stroke Project data that I think that Judy
21	Lichtman was involved in, where they looked
22	actually at reabstraction from the source

neurological exam, and showed that actually 1 2 reabstraction rates correlated well with the --3 you know, or retrospective NIH correlated very 4 well with the actually prospectively obtained NIH 5 Stroke Scale score. But there's no data source that I'm 6 7 aware of that we can look to, short of implementing this measure and getting those sites 8 9 to start collecting it to address that question. 10 CO-CHAIR TIRSCHWELL: Is that all you 11 have on reliability? 12 MEMBER BURKE: There's more, but I 13 think Lisa had a question. 14 CO-CHAIR TIRSCHWELL: Oh, okay. Yeah, 15 sorry, go ahead. 16 MEMBER LINES: Well, I'm not sure if 17 you're going to talk about this next and stop me 18 if I'm -- but we're asked to talk about the --19 you know, to talk about the issues or concerns 20 that we have with the specifications, definitions 21 or coding. Other members of the committee know 22 that I have a problem with the NIS because there

is a better instrument out there.

2	I have an issue with hardwiring an
3	outcome measure to a flawed possibly flawed
4	instrument, especially rolling it out across the
5	entire country. So I'm just going to state that
6	again, especially when you're going to be doing
7	multiple imputation of NIS scores for the risk
8	adjustment process. That seems crazy to me.
9	Also, you know, one of the things
10	that's not excluded here is patients with comfort
11	measures only, and almost all of the other
12	measures that we've looked at they're excluding
13	those patients, but not this one.
14	MEMBER BURKE: I think we can probably
15	get to that one on validity. I'm not sure that's
16	quite a reliability thing, but I think that will
17	come back up there. There's a couple of points
18	we need to talk about there.
19	The other big reliability point here
20	is the so does the element reliability, and I
21	think the stroke scale's the conceivable worry
22	there. We don't know what the real world numbers

are going to look like. What they also did was 1 2 they did sort of an overall reliability of the measure itself, and this is what we're getting to 3 4 with the what is the right ICC cutoff point? What they did was they took this big 5 linked sample, they split it in half over three 6 7 years, and they sort of estimated the measure for -- in one half of the sample and estimated the 8 9 measure in one other half of the sample, and they 10 came up with an ICC of .055, which I think means 11 that -- what's that? 12 (Off microphone comment.) 13 MEMBER BURKE: I think it got 14 mistranslated. It was 55 yeah. It got written 15 as 51 a bunch of times, but in their number was 16 55. Actually, one quick point. I couldn't 17 18 tell from your documentation. That was adjusted 19 -- that was sort of Spearman-Brown adjusted to 20 the three years or was that the actual measured 21 one? 22 (Off microphone comment.)

So that was a -- okay. 1 MEMBER BURKE: 2 So the .055 then is to say how much does -- when you come up with these two different numbers, how 3 4 much does hospital -- what proportion of the 5 variance in those numbers does hospital predict? Is that a correct assessment? 6 7 MS. BERNHEIM: So I'm going to check first to see if my statistician is on the call, 8 9 because he will do a better job of answering 10 these questions than me. But I'll do my best if 11 he's not. Jeph, are you on the call? If Jeph Herrin's on the call? 12 13 DR. HERRIN: Yes. I am here. Okay. 14 Oh great, great. MS. BERNHEIM: So 15 I'm going to let you take these questions if it's 16 comfortable from the phone okay. 17 Okay. Yeah, that's fine. DR. HERRIN: 18 So I think that there's -- you know, the ICC is a 19 statistic which can be calculated a number of 20 different ways and it has applied in a lot of 21 different situations. It's very tempting to try 22 and come up with a single very simple

interpretation such as percent variance explained.

Some people have tried to do that. 3 4 Some people have said this actually is the same 5 as a kappa or an alpha -- I'll come back to We think of it as just the, you know, 6 alpha. 7 it's an inter-rater reliability statistic, and we're looking at whether when two people measure 8 9 -- or two measurements are made on the same 10 hospital, if -- not only are those consistent 11 with each other but also if the differences 12 between the hospitals are consistent.

13 So it's a very sort of conservative 14 measure. We're really trying to do more than 15 look at the correlation or just do sort of a one-16 way, you know, traditional ICC is where you just 17 look at the variance between divided by the total 18 variance, and it's not exactly that.

So that's sort of the long answer to
your question. Some people would say that, you
know, would like to interpret it is 55 percent of
the variance is explained by the hospitals, but

I'm not sure that's exactly true.

2 MEMBER BURKE: So let me ask two questions to clarify, because I think it has some 3 relevance -- because I think particularly when it 4 comes to making a judgment about this number, 5 there's a couple of things we need to figure out. 6 7 One is what was the number before it was adjusted? So basically the problem here was 8 9 that when this measure gets implemented in the 10 real world -- we didn't talk about this and we 11 probably should -- it's going to be off of three 12 years of data. And this was a -- in the 13 validation sample or in their validation 14 reliability testing they sort of did three years 15 and then split it in half for the reliability. 16 So it was kind of like one and a half 17 That Spearman-Brown adjustment sort of years. 18 assumes the reliability is the same over that 19 time, isn't that right? 20 DR. HERRIN: Correct. 21 MEMBER BURKE: Okay. So that seems to 22 be saying it's an assumption, and if we just did

1	it over the one and a half years what was it, I
2	mean because it probably went up a lot, right?
3	MS. BERNHEIM: It doesn't go up a lot,
4	but I'm going to look for you right now.
5	MEMBER BURKE: Oh okay, okay.
6	MS. BERNHEIM: I don't have it in
7	front of me, but we've got it in the
8	MEMBER BURKE: Maybe that was the .51.
9	All right. But it doesn't go that much. Then
10	the other question would be the the other
11	questions about this reliability are again what
12	would the score reliability look like in the real
13	world and might it look different here, you know?
14	The element reliability can feed into
15	that. If people in the real world are not
16	measuring those elements well, that's a problem.
17	Two would be whether or not this sample
18	generalizes as well as it could to the real
19	world. So it's 1,500 hospitals as opposed to
20	more than 3,000.
21	So if people who are participating
22	obviously a very, very large sample and it's a

heterogeneous sample, but whether or not it 1 2 represents the rest of the world is not entirely In general, the more heterogeneous sample 3 clear. 4 that you measure across, your reliability is 5 going to fall. So my guess is it would come down somewhat in the real world, but whether or not --6 7 or how much it would come down seems like it's 8 not entirely clear.

9 Then the last question is sort of the 10 value judgment about what ICC's good enough, and 11 this was something where when we talked about this in the workgroup call, people had very 12 13 different perspectives. Some people said 0.55 14 sounds like a pretty good number, and some people 15 said wait, we're only explaining just over half 16 the variance. That sounds terrible.

I don't know if there's -- as we got here, no clear guidance on what's low and what's moderate here in terms of that, and what we really want to know is what would it be when we do it in the real world, which we don't quite know yet?

1	DR. HERRIN: So in terms of
2	generalizing it to a larger scale hospital, I
3	don't think it's it's not clear to me that the
4	ICC would go one way or the other. I think it's
5	mostly affected by the volume of the hospital,
6	and unless we think that the hospitals that are
7	being admitted are much smaller on average than
8	the 1,500 we've measured I wouldn't expect the
9	ICC to go down.
10	But you know, smaller hospitals are
11	less reliably measured because we know less about
12	them. So
13	MEMBER BURKE: I mean I think the
14	problem with the generalizing I obviously
15	don't know what happens. The problem is that
16	you're just going to pick up heterogeneity in
17	hospital type, heterogeneity in practices,
18	heterogeneity in patients. But there's some type
19	of homogeneity that says look, I'm going to
20	participate in Get With The Guidelines.
21	It's an assumption. I don't know that
22	it's true, and I don't know that it's how

important it would be. But if I had to guess, I 1 2 guess this is smaller in the real world. This is just generally when you take a measure at it in a 3 4 couple of people and then you look at it in a lot 5 more people, the reliability usually goes down. CO-CHAIR TIRSCHWELL: And I just have 6 7 a question for the developers. I think on the call, I had suggested this. I don't know whether 8 9 you've had a chance to look at it. But one of 10 the -- you know, the way the current measure is 11 out there in the world, it's you see your 12 numbers, but then you just sort of get a expected 13 -- within the expected range, above the expected 14 range, below the expected range. 15 A really simple question that I have 16 is when you look at the test and this retest for 17 the same hospitals, how many hospitals end up 18 being reclassified into a different territory --19 into a different category? 20 DR. SCHWAMM: By what maneuver, when 21 you're saying --22 CO-CHAIR TIRSCHWELL: By the first

data set -- you know, with the split sample. 1 So 2 you know, you've got two ratings for each hospital. 3 4 DR. SCHWAMM: You're asking what the 5 net reclassification? CO-CHAIR TIRSCHWELL: Which you guys 6 7 did when you put the NIH Stroke Scale score in to justify the fact that you needed it. 8 So I 9 thought that would be an interesting way to 10 assess whether we're worried about this 11 reliability or not. 12 MS. BERNHEIM: So a couple of quick 13 things. I'm trying to look quickly to see if I 14 can get back to the reliability of the current 15 national measure, because that will answer some 16 of your questions about whether this changes a 17 lot when you have a broader sample. 18 So if my team is on the phone, if 19 people could look back in our prior NQF 20 application to help us find that reliability 21 number for the current measure, that would be 22 really helpful. I'm thinking on too many threads
1

at once. No, not at all.

2	So there's a couple of things I think
3	are worth saying. So I want to remind this group
4	that maybe to our own discredit we have taken an
5	extraordinarily conservative approach. We don't
6	want to overplay. So what we do is we pretend
7	that half the patients walked into the hospital
8	and we assess the quality, which is this latent
9	thing that we're trying to assess. We're not,
10	you know, test-retesting whether somebody thought
11	there was heart failure in a patient, right?
12	It's the quality of the hospital, and
13	then we have the other half of the patients walk
14	into the hospital and we assess the quality. So
15	we do not expect extraordinarily high numbers,
16	although I will say when we have large sample
17	sizes, we do get higher numbers. We tend to see
18	this ICC track somewhat with the numbers of
19	patients that come in a hospital.
20	There are a number of other things we
21	do with this measure in use to protect us from
22	misclassifying hospitals. So really small

hospitals are left out during reporting.
 Hospitals with fewer than 25 cases aren't
 reported on at all, and then when hospitals are
 classified, we have a number for them which is
 ICC is looking at but we then create an interval
 estimate.

7 So we have much more confidence in the 8 higher than or lower than number, because we've 9 taken the RSMR, which is the Risk-Standardized 10 Mortality Rate, which is what the ICC is checking 11 -- how reliable that is, and then we've put a 12 confidence interval around it.

13 So we're doing lots of things to 14 ensure that we're not mischaracterizing hospitals 15 that I think help protect against this low 16 reliability rate. I think it's also, you know 17 this is -- by the sources that we use, this is 18 moderate. It's not terrible, it's not terrific. 19 It is comparable to many similar measures and 20 many similar studies.

I'm going to check, if anybody on my
team has a quick number on me for the current

I know I didn't give you much time but 1 measure? 2 -- Karen are you there? I'm here. 3 MS. DORSEY: I'm trying to 4 figure out if I'm looking at the right form, but 5 it looks like we reported .4 for this measure. So this is before we 6 MS. BERNHEIM: 7 used the Spearman-Brown and in a national level? 8 MS. DORSEY: Correct, correct. 9 So a slightly lower MS. BERNHEIM: 10 number for a national sample still meeting the 11 moderate number. Thank you. 12 MS. DORSEY: That's right. 13 CO-CHAIR TIRSCHWELL: Reclassification 14 Any comment on that? thing. 15 So we have not done MS. BERNHEIM: 16 that. We have not classified hospitals based --17 I mean the ICC is getting at the same concept, 18 right? But we have not run hospitals with half 19 their volume and then run them with the other 20 half the volume and seen whether or not they're 21 reclassified. It's just not something we've 22 done.

1 DR. HERRIN: And part of the reason 2 is that we used bootstrapping and it's very time 3 intensive. So you know --CO-CHAIR TIRSCHWELL: We can't hear 4 5 you. 6 DR. HERRIN: I'm sorry. We used 7 bootstrapping to construct confidence intervals. As you may know it takes a very long time to do, 8 9 there is a lot of intensive calculations. So we 10 haven't necessarily done that for the split 11 samples. 12 I wanted to make a couple of other 13 comments too, you know, regarding the .7 cutoff 14 or convention. My understanding is that that's 15 going to be used from a paper of Nunnally and 16 Bernstein, I think. We're talking about inter-17 item reliability for survey instrument like for 18 metric tools. They're talking about if you have 19 a number of items on an instrument and you want 20 to look at -- calculate the alpha. 21 You know, what's the minimum 22 acceptable value, and they proposed .7 and I

1 would tend to concur with them, if I was looking 2 at inter-item reliability on an instrument. I 3 think .7 is pretty minimal, but I think that it's 4 a bit of a -- it's not clear to me and I don't 5 know anyone else who has generally applied that 6 same value to things like inter-rater 7 reliability, kappas or ICCs.

8 We have taken the position, I think, 9 that you know, in addition to looking at other 10 measures, the other way to calibrate what this 11 should be is to look at other contexts where we 12 have a feel for what's going on.

13 So you know, as I think Karen or 14 someone mentioned earlier, we did the literature 15 search and looked for ICCs that were calculated 16 in familiar contexts, contexts like chart 17 abstraction, stroke assessment even. We found a 18 study where someone -- pairs of clinicians assessed patients for stroke and on risk factors 19 20 they found ICCs in the range of like .47 up to 21 .6-something.

22

We find that looking at situations

where we have a feel for what should be 1 2 happening, that we get a better sense of what's a meaningful ICC and it seems like --3 4 MEMBER BURKE: How does this ICC 5 compare to the other CMS mortality measures? How does this compare to MI, pneumonia and heart 6 7 failure? So it's quite similar 8 MS. BERNHEIM: 9 to MI in part because we have similar volumes. 10 Pneumonia has a much larger volume, so we get a 11 much higher ICC, hospital-wide has a higher one 12 and the other ones are sort in the midst. So 13 this is among the lower but it's in the range of 14 the other measures. 15 CO-CHAIR TIRSCHWELL: How high does it 16 get in the higher volume hospitals? 17 MS. BERNHEIM: So hospital-wide, well 18 we do remember we're talking about eight million 19 patients. We get up to .8. Nothing else comes 20 close. I didn't 21 CO-CHAIR TIRSCHWELL: Sorry. 22 understand that answer.

1	MS. BERNHEIM: In the higher volume
2	hospitals I'm sorry. I'm talking about higher
3	volume conditions. I don't think we've looked at
4	this in hospitals.
5	CO-CHAIR TIRSCHWELL: Yeah. I'm
6	talking about higher volume hospitals. You said
7	the ICC sort of
8	MS. BERNHEIM: I meant higher volume
9	conditions. Sorry.
10	MEMBER BURKE: The prevalent
11	conditions.
12	MS. BERNHEIM: Right. The measures
13	for which hospitals tend to have higher volumes
14	overall, we tend to see higher ICCs, which is why
15	the hospital-wide measure, where every hospital
16	has a pretty high volume because we're capturing
17	90 percent of their measured visits.
18	CO-CHAIR TIRSCHWELL: So here, there
19	are stroke hospitals that have higher volumes.
20	Do they if you look at that subset, do they
21	have higher ICCs?
22	MS. BERNHEIM: That's a great

That's not something we've done. 1 question. 2 CO-CHAIR TIRSCHWELL: Okay. MEMBER BURKE: So I think there's one 3 4 more small reliability point, which is by 5 necessity this is Medicare fee-for-service, and we don't know how -- I haven't seen a lot of data 6 7 on how that biases at the hospital level. Which is to say if you have Medicare 8 9 Advantage patients or that happens to be a large 10 proportion of your patient population, and if 11 they have any difference in outcomes at all, then 12 we're going to have conceivable reliability 13 problems there as well. 14 I haven't seen stroke-specific data on 15 differences in mortality in Medicare fee-for-16 service and Medicare Part C. I don't have a 17 strong prior that one would expect, but if it 18 does, that's going to be another reliability 19 problem. 20 MS. BERNHEIM: We have not done this 21 in stroke, but we have looked at this in a couple 22 of different ways. We have one paper out that

just assesses whether or not the amount of 1 2 Medicare Advantage penetration in an area influences how hospitals do on a number of our 3 4 other measures, earlier measures. There doesn't 5 seem to be any relationship. We've done some work looking at 6 7 whether hospitals, when we use an all-payor data set, 18 and older, looks similar as they do if 8 9 we're just looking at the over 65 and again have 10 pretty, pretty good correlations. 11 CO-CHAIR TIRSCHWELL: Okav. Any 12 further discussion on reliability? 13 (No response.) CO-CHAIR TIRSCHWELL: I suggest we 14 15 move to vote on reliability. It's not up on the 16 screen. Okay, thanks. 17 MS. SKIPPER: We are now voting on 18 reliability for measure 2876, 1 high, 2 moderate, 19 3 low, 4 insufficient. 20 CO-CHAIR TIRSCHWELL: 20. Has everybody voted? 21 22 (Voting.)

1	MS. SKIPPER: Results are five percent
2	high, 77 percent moderate, five percent low, 14
3	percent insufficient. The measure passes on
4	reliability.
5	CO-CHAIR TIRSCHWELL: All right then,
6	validity. Jim.
7	MEMBER BURKE: All right. So
8	validity, there's a couple of points of evidence
9	offered, one of which is a face validity argument
10	as well as some expert opinion supporting this
11	concept, and also went through a public comment
12	period, where they've gotten feedback on this.
13	The majority of that feedback was saying NIH
14	Stroke Scale is important and thus including it
15	helps the validity argument considerably.
16	The other piece of data they offer
17	tentatively importance of validity is that these
18	are relative predictive models. They've got c
19	statistics around .08. Then they offer some
20	empiric validity testing, which I think has
21	problems for part of the reason that Dr. Schwamm
22	alluded to earlier.

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So I have to make sure I fully 1 2 understand what happened here, but what I think they did validity testing-wise is that they sort 3 of looked at two adjusted mortality measures at 4 5 the hospital level. One is the measure we just talked about, which was claims and the stroke 6 7 scale pulled from Get With The Guidelines. The separate measure that they came up with was a 8 9 pure registry-based measure, and this said I took 10 stroke scale and age and blood pressure and where 11 you came from and all the things that get 12 measured in the quality registry, and then 13 separately predicted at the hospital level what 14 mortality was. 15 The trick is is that across those two 16 measures, that was using the exact same stroke

17 scale element, right? So the stroke scale 18 element that was entered in the registry was part 19 of both models, and given that that is the 20 dominant variable in predicting mortality, you 21 know, and then age is the second most important 22 one, and I assume that gets measured very, very

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similarly.

The fact that those two correlate pretty well seems to me like it's not a whole lot of support that would have been overwhelmingly what we guessed. This is not two separate measures. These are overlapping measures that came up with that.

8 MS. BERNHEIM: Right. So we put that 9 in there because there's often historically been 10 concerns about the claims data as a source of 11 risk adjustment variables. So when we've had the 12 opportunity, we do this with all of their 13 measures.

14 If there is a data source where we can 15 compare, where we take the same patients in the 16 same hospitals with the same approach to risk 17 modeling, but we've put forward the measure that 18 has the claims elements in it and then for those 19 same patients, we build a model that has clinical 20 elements that come out of the chart, and it's 21 really validation of whether the claims-based 22 risk adjustment is adequate.

Because we then look at how we profile hospitals and assess whether or not if we had all of the data elements that are in say the registry or a chart-abstracted model, would we learn the same thing about hospitals as we do if we have a purely claims-based measure.

So we followed that in this case. 7 You're absolutely right. There is an inherent 8 9 assumption in everything we're doing that when 10 we're pulling the Get With The Guidelines, NIH 11 Stroke Scale into the claims model, it is 12 mimicking what we will find in claims. We've 13 discussed earlier that that will need to be 14 checked. There wasn't really another way to do 15 this.

We have done something similar with the purely claims-based measure that is available right now in the IQR program without the NIH Stroke Scale, but that's not the measure that we're putting forward. So it offers some reassurance that if we had -- you know, that the other comorbidities in this model are adequately

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capturing the severity of illness and with the
 NIH Stroke Scale now in claims, we don't need to
 wait until we can pull things from clinical
 records.

We can get a good claims-only based model, which is really our goal here. But you're right. There's no way to get around the fact that we only have currently one data source.

9 MEMBER BURKE: I mean one thing we saw 10 a bunch yesterday was it was correlation between 11 process measures getting at this latent construct 12 of quality concept. Something like that seems 13 like it would be external validity support or 14 construct validity support that we don't have 15 here.

I mean so I think this becomes very important, because on the NQF algorithm, if you don't give that a lot of credit, then there's no empiric validity data here. There's an argument for it, but that doesn't seem like it should get much weight, and if that doesn't get much weight that's going to be a problem on the algorithm.

So on the issue of sort 1 MS. BERNHEIM: 2 of trying to line up process measures against outcome measures, as people probably know this 3 4 literature, there are so many things that are 5 different between both the groups that are captured in the process measures and the small 6 7 amount of how much they contribute to the outcomes that we can measure, given the process 8 9 measures we can measure, that it's been very hard 10 to use that model as construct validity in our 11 measures. 12 We've tinkered around with it, but it 13 hasn't been easy. It's a real challenge with 14 these outcome measures, right? I mean if you --15 we often rely on the face validity and the 16 strength of the model. This is a model that 17 performs incredibly well. I think you'll get to 18 that as well. We have a very strong c statistic 19 and good predictive ability. 20 So the combination of the known 21 importance of the NIH Stroke Scale as a risk

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adjuster, the relationship between quality and

outcomes and the strength of this model combined 1 2 is what, you know, sort of gives us the face validity and we do rely on that to some extent. 3 4 MEMBER BURKE: So in terms of the 5 other validity issues then, there are not a lot of exclusions. Exclusions are small in number 6 7 and depending on your perspective, this is good news or bad news. So it's good that they're not 8 9 losing people, but then this gets to the 10 preference concept. 11 Like yesterday we saw on these 12 measures that account for comfort care only, they 13 were losing 10-15 percent of the population for 14 Here, we're not losing these people. that. So 15 this was again the big workgroup conversation on 16 validity, was if we do not have accounting for 17 preferences, are we actually measuring quality? 18 That was probably again the thing that we talked 19 about the most.

The other elements of the model, one is how the risk adjustment algorithm works. We didn't go into that at great detail. It's

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spelled out in extraordinary length and very
 completely in the number of accompanying
 documents and they're following fairly standard
 procedures there. They came up with a high
 predictive model. So I don't know that that's
 necessarily the thing we need to belabor a whole
 lot.

8 The other major threat to validity 9 problem is this missing data problem, which again 10 gets into something that we're kind of making a 11 big guess about, what's going to happen in the 12 real world.

13 So in Get With The Guidelines, you 14 know, where in -- this is in this quality 15 registry where people participate voluntarily. 16 In the most recent years, I think it was 83-ish 17 percent had reported NIH Stroke Scale. So you 18 had relatively small -- missing this huge 19 improvement over time but not 100 percent, and 20 that leaves a question of how do you estimate the 21 model when you have 17 percent of the most 22 important variable missing?

What they did here was that -- and 1 2 what they -- it sounds like would be the intent to do in the real world if there is meaningful 3 4 missingness is to use multiple imputation, to 5 sort of plug in statistically what that variable would look like in the real world and come up 6 7 with credible variance estimates at the hospital level with that. 8

9 The trick to this is several things, 10 one of which is we don't know what missingness is 11 going to look like in the real world, and we kind 12 of get back to this big problem. Not only don't 13 we know how we can't measure NIH Stroke Scale, 14 when we do how often is it going to be missing? 15 Is that going to vary at the hospital level?

The other I think bigger problem is multiple imputations approach it assumes the data is missing at random, and you know, I don't know of any data to support that's the case. But if I had to use my intuition, I would say it's very, very unlikely the data is missing at random. It's going to be mild patients or patients

admitted directly to the hospital or places where 1 2 -- or patients who have early withdrawal, all kinds of over the place is going to be -- missing 3 4 this is very unlikely to be at random, and that 5 to me seems like it's a major assumption here. MEMBER LINES: I also think it sets 6 7 up the measure for gaming. CO-CHAIR TIRSCHWELL: The missingness 8 9 issue and the imputation --10 MEMBER BURKE: The gaming would be 11 never write down. Always leave your zeroes and 12 ones missing, and then get imputed upwards. 13 CO-CHAIR TIRSCHWELL: And yeah, one 14 And I guess I'd also like to hear a second. 15 comment about how you would -- I think you could 16 probably figure out, you guys not me, that if 17 there was an unusually high percentage of comfort 18 measure patients out of hospital, what impact 19 that would have on a hospital's rating. 20 DR. SCHWAMM: I just want to make one comment about -- and I don't know -- I'm not sure 21 22 I know what to do with this information, but

we've looked a lot at this question of trying to adjust for comfort measures only.

And the problem is if you look at 3 4 studies of mortality in the inpatient setting, 5 the number of patients who die despite the team's best efforts to keep them alive is remarkably 6 7 low. Almost everyone who has a stroke and dies in the hospital dies because of a transition in 8 9 life sustaining treatment and preferences. 10 So how do we tell the difference 11 between you come in 40 years old with an NIH of 12 14 in the first hour of your stroke and I don't 13 give you TPA, or I give it very slowly, or I give 14 it badly because your scan says I shouldn't give 15 it and you have a hemorrhage? 16 Now I say I'm so sorry to your wife, 17 you know. This is terrible. He's never going to 18 have a good quality of life. We should 19 transition to CMO. He does and he dies. 20 CO-CHAIR TIRSCHWELL: I quess just 21 like you do with all the other measures for the

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Joint Commission, which is that you only remove

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the people who had early comfort measure removal. 1 2 So obviously a lot of thought went into this, and it's already being included in a 3 4 lot of quality measures. So I mean -- and this 5 potentially might be the most important one of all and we're not including it. 6 7 MEMBER BURKE: And I think the comfort measure only gets at sort of part of the problem, 8 9 Still, it's a much bigger and broader right. 10 problem than that, which is people come to the hospital, they have a serious swallowing deficit. 11 12 They say no, I don't want a PEG tube; I want to 13 go home and try to eat, and then they aspirate 14 and then they die, right? 15 That doesn't seem like it should be on 16 the hospital. I mean it's broadly this 17 accounting for preferences is really important, 18 and I completely agree. It's extraordinarily 19 hard to do. I think you're 100 percent right. 20 Every approach you'd have for it, other than 21 measuring preferences previously in the entire 22 Medicare population, adjusting for that is going

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to have this as a problem.

2	It's just a question of how big of a
3	problem is it, and for me the worry is, and this
4	is the part where I would love to have some sort
5	of empiric data, I mean your last observation
6	your first observation is the one that worries
7	me, which is I can point to and think of very few
8	patients who died, but for this transition.
9	Which makes me think that if indeed
10	there's major variation at the hospital level in
11	terms of how that happens, either because your
12	patients have different preferences, or in the
13	absence of those patient preferences you pick up
14	the facility preferences, that means that that
15	might be how we're measuring here. We might be
16	measuring in aggregate what are patient
17	preferences or, in the absence of that, what are
18	facility preferences more than we're measuring
19	quality. I think that kind of gets to be for me
20	the big rub here.
21	MS. BERNHEIM: So there's a lot in
22	there and I'm going to try to cover it. So this

is really important. It affects a relatively
 small number of patients.

If I could assess the decision to make 3 4 somebody comfort care within the first X number 5 of hours, you guys can fight with me about what number of hours it is and take those patients 6 7 out, we would. We don't have that. So we do everything we can to try to make sure that we're 8 9 not invalidating the measure without that data 10 element.

11 So first, just a reminder that 12 patients who just are enrolled in hospice in the 13 first day are excluded. If they're in hospice 14 leading up to the hospitalization or on the first 15 day of hospitalization, they are excluded from 16 this measure.

17 That's about .08 percent of the 18 patients, and the comfort measure numbers are on 19 the order of three percent. So probably in the 20 guidelines data, right? So the same data source. 21 So we think we're capturing a portion of those 22 patients with our hospice enrollment. Not

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perfect, but an important exclusion.

2 The next question is sort of what's the likelihood that the percentage of patients 3 that this applies to differs across hospitals, 4 5 because if they're in all of the hospitals, then we're still able to assess hospitals equally. 6 It 7 certainly differs, right? I mean there's differences in patient 8 9 mixes, differences in inpatient practices at 10 hospital. So there's no question it differs 11 some, and then the question is how strongly does 12 the looking at the NIH Stroke Scale help us with 13 this issue, right. So although it's not true for 14 every patient and I am not an neurologist, so Lee 15 can back me up. 16 But there's a strong, strong 17 relationship between your NIH Stroke Scale and 18 the likelihood that you're going to end up making 19 -- your NIH Stroke Scale on admission and the 20 likelihood that aside from quality issues that go 21 in the wrong direction, you're going to be making 22 early decisions about end of life care.

So by bringing this NIH Stroke Scale 1 2 in, we think we're handling another piece of It isn't perfect, but I think when you get 3 that. 4 down to the remaining patients, we're not likely 5 to sort of, you know, drastically mischaracterize hospitals. 6 7 The second threat is are we likely to create incentives that people don't like and I 8 9 worry about that. I will just say that we've 10 sort of had a philosophy of sort of we're not 11 going to avoid important quality measures on the 12 concern that, you know, people are really going 13 to do the wrong thing by their patients. 14 I mean it does happen, but in general 15 people are motivated to be doing the right thing 16 by their patients, and we've looked in some of 17 our other mortality measures for evidence that, 18 you know, people are keeping people alive to day 19 31. We don't see, right. We see the -- you 20 know.

21 So are there going to -- is this 22 measure going to really cause people to avoid

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conversations and keep people alive for a couple 1 2 of extra days so they have one fewer mortality? I really hope not, but I don't think it's worth 3 throwing the whole measure out for the concern 4 5 that occasionally people are going to do that. So anyway, it's not perfect, but I 6 7 think that there are enough things within this measure with the NIH Stroke Scale in there that 8 9 it's unlikely that it's going to have huge 10 ramifications for how we compare hospitals. 11 CO-CHAIR TIRSCHWELL: Let me just 12 bring up one other point real quick, and I guess 13 I'm not actually sure. Jim, I'm sure you 14 remember where this was exactly. There was some 15 analysis where being African American was 16 associated with a .62 odds ratio, highly 17 statistically significant of course, of 18 mortality. 19 So if we believe that this measure is 20 in an accurate measure of quality, we would have 21 to then believe that African American patients

are getting substantially higher quality stroke

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1	care than whatever the reference is. Am I
2	misinterpreting that Jim?
3	MEMBER BURKE: I don't think so. Well
4	I mean I think that if you want to make the
5	empiric now we get down to this this is
6	sort of the argument I was sort of prefacing at
7	the beginning, and I'm not sure how to resolve it
8	but it's tricky, right.
9	It says that when you look at
10	mortality, how much of it might be this, how much
11	of it might be preferences and how much of it
12	might be quality? And if we're convinced that
13	it's a lot of quality and a little bit of
14	preferences, then it's easy to go with this.
15	But I think David's point's a good one
16	and I'm worried that's not the case. Because we
17	control most of the mortality happens through
18	our decision-making, there's these empiric
19	slivers of evidence that make me worry that it's
20	a lot more preferences.
21	So the race one is I think one.
22	Again, I don't know what this means, but it's

worrisome that we know that African-Americans 1 2 generally have preferences for more aggressive care, are much less likely to have withdrawal of 3 4 care and generally speaking have more aggressive 5 preferences for life-sustaining treatment. Then we see really a lot lower 6 7 mortality by race, which goes against a lot of priors here if it was about quality. Then two is 8 9 the early DNR thing here, which is the question 10 of how much does this vary at the hospital level? 11 That varies a ton at the hospital level, and it's 12 a question of -- I mean low, the lowest quintile 13 of hospitals in terms of early DNR rates have 14 zero.

15 So nobody's an early DNR, where the 16 highest quintile, it's a third of patients. When 17 you put that in a mortality model, it is -- it's 18 a more important predictor than age. So it's a 19 really, really big predictor of what happens 20 there, and this is the part where I'm 21 uncomfortable with a leap of faith, that it's 22 more about quality than it is about preferences.

1	DR. SCHWAMM: I want to make a
2	comment. I'll let Susannah comment, reply to
3	your last comment. The issue about the
4	relationship between race and in-hospital
5	mortality, we've seen this since the mother
6	analyses, and what we don't have in the registry
7	and it's not in the claims data is stroke
8	subtype.
9	But we do know that African-Americans
10	and Hispanics have a much higher frequency of
11	small vessel occlusion, so lacunar strokes which
12	at the same NIH
13	CO-CHAIR TIRSCHWELL: But you're
14	testing for stroke severity.
15	DR. SCHWAMM: Yeah, but at the same
16	stroke initial stroke severity have substantially
17	lower mortality. So I think the I don't know,
18	because we don't have the data to be able to
19	probe that question. But I do think that part of
20	that, and we've looked at this.
21	You can see a similar paradox in a
22	paper we just published about smoking, where

smokers have lower in-hospital mortality, which
 right, makes no sense.

But it's confounded by age and the 3 fact that smokers tend to have these more minor 4 5 small vessel strokes first, which even when you try to adjust for stroke severity you can't --6 7 you can't quite diminish or eliminate that That was my only comment about that. 8 effect. 9 MS. BERNHEIM: And I'm just -- I am 10 just going to go back to sort of the construction 11 of the models and the incorporation of the stroke 12 severity, right? 13 So these are real concerns, if you 14 didn't have any way of accounting for a hospital 15 that has more such patients. But there's going 16 to be a strong relationship between the severity 17 of the patients that you care for and the 18 likelihood that they're going to make preferences 19 for not going through life-sustaining treatments. 20 So we think that the inclusion of the 21 NIH Stroke Scale in here helps to garner against 22 the concerns you're having.

1 DR. SCHWAMM: Just so we want to make 2 one last comment, which is this measure is an 3 attempt to improve on a measure that is currently in use by CMS. 4 So I would agree, it's not perfect. 5 The question is what do you prefer, because the 6 measure that's currently in use has no adjustment 7 for an NIH Stroke Scale score and we're going to 8 9 have NIH Stroke Scale score available in the 10 claims data set. So that's sort of Issue No. 1. 11 Issue No. 2 I completely agree. 12 Wouldn't it be great to have a functional outcome 13 measure for how patients do after stroke, like 14 the modified Rankin? 15 CO-CHAIR TIRSCHWELL: Not just whether 16 we measure the modified Rankin. So okay, and 17 clearly we're not voting on whether we prefer 18 this to the one that's out there already, just to 19 clarify. That's not what this vote is about. 20 Any other comments on validity? Oh sorry, yes. 21 Charlotte and then Michelle. 22 MEMBER JONES: I just want to make the point that you've raised about hospitals. I've worked in two hospitals, one of which I was told by an ER physician no patient dies in my ER. So I transported the patient to the Neuro ICU to die, and I worked at a hospital where no child does not receive nutrition.

So I think we need to consider our
hospitals and maybe the numbers are tiny, but I
think hospitals are different and it's something
we need to think about.

MS. BERNHEIM: We've previously
discussed the issue of one day versus two days.
So this one day can mean one minute or 23
minutes, 59 seconds, and certainly decisions
might not be made within that period of time.
That may reflect quality and helping people
decide on a different path.

18 CO-CHAIR TIRSCHWELL: Alright, yeah.
 19 Ketan.
 20 MEMBER BULSARA: I mean just along
 21 with what Michelle was saying, I mean as we know

oftentimes these patients are coming with an

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ischemic stroke. They go through this period of
 peak swelling.

They look worse than when they actually come in, and then the decisions regarding hospice and things to that extent are made like almost a week down the road.

7 I think we just have to make sure that 8 there is appropriate risk adjustment and 9 adjudication for these patients, and hospitals 10 aren't being penalized for leading patients down 11 the path of hospice when after peak swelling 12 there's no chance of a reasonable functional 13 outcome.

14 CO-CHAIR TIRSCHWELL: Okay. So that's 15 -- we're starting to circle back on similar 16 issues again and again. So I would say unless 17 there are new substantially different comments, 18 Jim did you want to have the final word? 19 Yeah. I mean I think MEMBER BURKE: 20 that -- I mean I think validity is the problem 21 here, right. So there's the missing data problem 22 and I think that the validity problem here is

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that, you know, when you don't include something in the model, that can mean hey, we get people a little bit off here one way or the other. We misclassified. We called you actually ten point mortality and you should be 10.5.

Those types of imperfections are 6 7 things we can live with. This is place where we might get it backwards, right. I mean so you can 8 9 theorize a hospital that is doing absolutely the 10 right thing, that has a patient population, that 11 just does not opt for aggressive care, and that 12 we're now going to call that a low-performing 13 hospital when they might be delivering optimal 14 preference-sensitive care?

15 The question here becomes I think 16 ultimately one of burden of proof. It's the I 17 don't know that that's not what this measure's 18 going to do in the real world, and that's my big 19 worry about it, is that if the burden of proof is 20 on somebody to show that that's not the case, 21 then I think that it's, you know, we're there. 22 But I think that the burden of proof

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probably has to be on the measure, to make sure 1 2 that it's really measuring quality as opposed to something else, and that's the bar that I just 3 haven't been able to get over. 4 CO-CHAIR TIRSCHWELL: Thank you. 5 Go ahead. 6 7 MS. BERNHEIM: Just briefly, I do want to clarify. CMS has not decided how they would 8 9 address the missing data. They have concerns 10 about imputation and they have other mechanisms 11 that they use in other measures when there's 12 missing data. 13 I think this measure would only be in 14 use if there was a very high -- I think they will 15 work very hard with the societies and others to 16 get to a very high rate of NIH Stroke Scale. Ι 17 would not support its use if we were imputing 18 large numbers. 19 So just to reassure people that, you 20 know again, I can't speak for CMS. But as the 21 measure developer, to the extent that we have 22 influence and understanding of the plan, I don't

think this measure would get used with high rates of imputation of NIH Stroke Scale. I don't think that's consistent with CMS policy. So just to reassure people about that.

5 The second is just the one other point 6 I will make that's relevant to what Lee said 7 earlier, is that although you are not comparing 8 this measure to the measure that's currently in 9 use, we do have a lot of experience with that 10 measure, right.

11 I mean CMS has been reporting on hospitals 30-day mortality using a claims-based 12 13 measure for a couple of years now, and you're not 14 -- you know, I'm sure there are hospitals that 15 quibble with how they're doing. But this general 16 concern that we're going to somehow vastly 17 mischaracterize hospitals --- this measure will be 18 a big improvement to that. But there is 19 experience with a measure that does a less good 20 job of accounting for the likelihood that you're 21 going to have patients that are having more severe strokes and more comfort care. 22

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1 So to the extent that that helps 2 committee members be comfortable that this measure is going to do a reasonable job of 3 characterizing hospitals, I think it's worth 4 5 taking into account. CO-CHAIR TIRSCHWELL: Well what is the 6 7 experience? What has been the outcome? Has quality improved? Have mortality rates gone 8 9 down? What's been the impact of reporting that 10 publicly? 11 So Karen, I should have MS. BERNHEIM: 12 this on my fingertips, but I don't. I think, or 13 maybe even it's our chart book team. I think we 14 are seeing small declines in stroke mortality. 15 Now can I say that this measure has took credit 16 for that as opposed to lots of other things over 17 time among hospitals on the current measure? 18 CO-CHAIR TIRSCHWELL: Okay. Let's go 19 ahead then and vote on validity. 20 MS. SKIPPER: We are now voting on 21 Validity for Measure 2876, 1 high, 2 moderate, 3 22 low, 4 insufficient.

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1 (Voting.) 2 MS. SKIPPER: Voting has closed. Results are 0 percent high, 59 percent moderate, 3 36 percent low, 5 percent insufficient. We have 4 5 reached a gray zone on this measure, on this criteria for this measure. 6 CO-CHAIR TIRSCHWELL: I believe gray 7 8 zone on this one means we proceed through the 9 other parts and then vote overall? Okay. Let's 10 continue along. After Validity is Feasibility. 11 So mercifully it gets MEMBER BURKE: 12 So feasibility is pretty easy. quick now. It's 13 just a question of feasibility of NIH Stroke 14 Scale. You know already -- this measure already 15 exists. It's already rolled out. 16 It's all off of claims, it's all 17 really easy but for one element, and being that 18 we've already endorsed everyone should do that, 19 that doesn't seem like it's much of a marginal 20 ask at this point in time. So Feasibility 21 doesn't seem like it's a big problem. 22 CO-CHAIR TIRSCHWELL: Excellent

1	summary. Let's move to vote on feasibility.
2	MS. SKIPPER: Just a moment. We're
3	now voting on feasibility for Measure 2876, 1
4	high, 2 moderate, 3 low, 4 insufficient.
5	(Voting.)
6	MS. SKIPPER: Results are 36 percent
7	high, 50 percent moderate, 9 percent low, 5
8	percent insufficient. The measure passes on
9	Feasibility.
10	CO-CHAIR TIRSCHWELL: And then finally
11	Use and Usability.
12	MEMBER BURKE: I think this gets at
13	the question that David raised earlier, which is
14	one is what's actually happened with this in the
15	real world to the extent it's been there so far.
16	There's no evidence one way or the other on that.
17	There's concerns about unintended consequences.
18	I don't know that they're going to be the case.
19	You know, I think there's an
20	opportunity for gaming here in the real world
21	with missing data as a possible tool to that and
22	other approaches as well with the coding

differences. Those are all concerns.

2 For me I think the substantive question here is what do you do with this 3 4 information? This is much less obvious to me, 5 So when I've got a hospital that's got a right. performance measure and it says look, I'm not 6 7 giving people DVT prophylaxis, you go why not? You look at those cases and you figure out and 8 9 you get it right. 10 If you turn out to be a hospital that 11 says I have high mortality, and then you look and 12 you say oh, but we're giving everybody aspirin, 13 we're doing DVT prophylaxis and we're doing all 14 of those things, what do you do with that? It 15 seems like much less obvious about how you 16 operationalize that and how you're going to use 17 that to improve quality. 18 I can imagine that it's useful. Ι imagine you might be able to do something with 19 20 it. But it seems much trickier to me than, for 21 example, with a process measure you're going to 22 be able to look at this and go aha, here's the

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1	thing we fix.
2	It's going to be "aha this happened"
3	and maybe it's our patient preferences, maybe
4	it's our doctor's preferences or maybe it
5	actually is a genuine quality problem.
6	CO-CHAIR TIRSCHWELL: Comments from
7	the Committee on that, Use and Usability?
8	Developers?
9	DR. SCHWAMM: The only point I would
10	make, I mean I think it's an interesting
11	conceptual question when you look at your door to
12	treatment time for TPA, and you see oh, I'm not
13	I'm not treating patients as fast as I'd like
14	to.
15	You still have to go back and look at
16	the intermediate process steps that make up that
17	outcome, to figure out am I not scanning quickly
18	enough, am I not recognizing quickly enough?
19	So I would say I got the report back
20	and I had excess mortality, first thing I would
21	do is pull the cases that died, start reviewing
22	the charts, you know, start looking at where are

1 my -- where do I appear to be deviating from best 2 practices. It might be that I look at everything 3 4 and I decide no, I just am taking, you know, 5 maybe my approach to assessing patient preferences different from my peers. But there's 6 7 nothing I see here that I would want to do differently. 8 9 I don't think the outcome measure has 10 to tell you what to do. It just has to tell you 11 what you should be paying attention to. 12 MEMBER BURKE: I mean I don't want to 13 belabor this, but I mean I think this concept of 14 using outcome measure when you already have 15 evidence-based process measures, like what is the 16 marginal value add of that? I could imagine one 17 exists; I just don't know what it is, right. 18 But I think you're right. I would go 19 back and I'd say look, did I fail to do the 20 things that, you know, did I miss TPA cases? 21 Sure, but that should already be getting pulled 22 up in those process measures, right.

Did I have a long time to treatment? 1 2 That should be getting pulled up in those process If it's not, what is the difference 3 measures. here, particularly when I don't know all the 4 5 things that lead to mortality. Well, many of the 6 DR. SCHWAMM: 7 measures that we include in our process measure set for stroke are not about reducing mortality. 8 9 They're actually about improving functional 10 outcome and reducing recurrent stroke, and their 11 time horizons are way beyond 30 days. 12 So I think things that contribute to 13 early mortality are going to be DVT/PE, sepsis, 14 hypotension, you know, things that -- acute MI, 15 things that are under the -- some of which are 16 under the control of the hospital, some of which 17 are based on the patient characteristics. 18 CO-CHAIR TIRSCHWELL: Peter. 19 MEMBER SCHMIDT: So yesterday we 20 talked about a number of measures where we said 21 well, I feel like the time frame is arbitrary. 22 These things should be done as soon as possible.

1	People could pass on within the time frame, but
2	people who do it sooner within the time frame
3	might have better outcomes, and that would be
4	worth identifying.
5	CO-CHAIR TIRSCHWELL: Any other
6	comments, discussion?
7	(No response.)
8	CO-CHAIR TIRSCHWELL: I say we move to
9	vote on Use and Usability.
10	MS. OGUNGBEMI: Voting is now open for
11	Usability and Use on Measure 2876. The options
12	are high, moderate, low and insufficient. Voting
13	is open.
14	(Voting.)
15	MS. OGUNGBEMI: Voting is closed. The
16	results are zero percent high, 82 percent
17	moderate, 14 percent low and 5 percent
18	insufficient. Usability and Use passes for
19	Measure 2876.
20	CO-CHAIR TIRSCHWELL: So now we'll
21	move to vote on overall suitability for
22	endorsement and just to recall, all of the

categories passed. Validity was a gray vote with 1 2 just less than 60 percent moderate or high. 3 MS. OGUNGBEMI: We are now voting on 4 the overall suitability for endorsement on 5 Measure 2876. The options are yes and no. Voting is open. 6 7 CO-CHAIR TIRSCHWELL: Rogue voter. 8 (Voting.) 9 MS. OGUNGBEMI: We're going to revote. 10 CO-CHAIR TIRSCHWELL: Did you guys get 11 some clickers or --12 PARTICIPANT: There's an app on my 13 phone. 14 PARTICIPANT: I almost endorsed that. 15 (Laughter.) 16 (Voting.) 17 MS. OGUNGBEMI: Okay. This is revote 18 for the overall suitability for endorsement on 19 Measure 2876. Options are yes and no. Voting is 20 open. 21 (Voting.) 22 MS. OGUNGBEMI: Voting is closed. The

1	results are 77 percent yes, 23 percent no.
2	Measure 2876 is suitable for endorsement.
3	CO-CHAIR TIRSCHWELL: Okay, great.
4	Thank you all for that important conversation and
5	discussion. So now we're going to move on to the
6	next measure. You all have to stop me when it's
7	like time to pick up our lunch and come
8	immediately back to the table to continue
9	working.
10	Similar and I'm hoping that because
11	the issues are somewhat redundant, that we won't
12	have to talk about all of them in quite as great
13	length again, 2877 and we invite the developers
14	to introduce the measure.
15	MS. BERNHEIM: So this measure is
16	extremely similar to the prior measure. It is
17	the same cohort of patients. It's the same
18	outcome. It's the same basic approach to risk
19	adjustment.
20	What we've done in this case is that
21	we are interested in the move towards the use of
22	electronic health records to support quality

measurement, especially as there's been interest
 in the use of clinical data elements that can be
 pulled from the record.

So we had done some prior work to establish a set of about 21 or 22 variables that can be feasibly pulled from electronic health records under any system, and there's lots of detail if you want it about sort of how we established that these were feasibly pulled.

But essentially they're mostly labs and vitals within the first two hours for the vitals and 24 hours for the labs. I probably have those numbers wrong.

14 So we -- for this risk model, we used 15 as candidate risk adjustment variables a set of 16 clinical variables that were feasible to pull, 17 part of our what we call core clinical data 18 elements as well as the claims-based, and then we 19 used a modeling strategy that was sort of 20 repeated step-wise to decide which of those 21 variables came into the model.

22

So the difference in this model and

the one you just heard about is that in addition 1 2 to the NIH Stroke Scale, we have three clinical variables, blood glucose, a blood pressure 3 4 measure -- I should have these right in front of 5 me and of course I don't. Here, I'm going to tell you the actual 6 7 Heart rate, diastolic blood pressure and ones. glucose, and the NIH Stroke Scale and a slightly 8 9 smaller number of claims-based risk factors as 10 well. 11 So the way that this would get 12 implemented is that CMS would get the EHR data 13 elements submitted from hospitals, link it with the claims and so it would be a combination of 14 15 claims and EHR data elements. 16 I will just mention as an aside we 17 have a similar measure for AMI mortality that is 18 NQF-endorsed. CMS has not yet proposed its use 19 but has signaled future intention to move towards 20 these measures. So this would be partnered and 21 there's a strategy underway for collecting these 22 data elements that CMS is signaling in their

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rulemaking process.

2 Otherwise, the measure is the same. It has a slightly higher C statistic, this 3 4 approach than the other one, but it's hard to 5 argue that it's meaningful. It's really just part of a progression towards the use of EHR data 6 7 elements in outcomes measures. There's a modification of this measure 8 9 also in the application that gets rid of the 10 claims element. That's sort of the next version 11 that they could use, where you -- once you can 12 get all of the information from the EHRs or if 13 you have a health system or a state that's really 14 advanced and wanted to use it, there's a sort of 15 a modification of the measure that's all EHR-16 based. 17 But the measure that's really in front 18 of you is one that's what we call a hybrid 19 Somebody has a question. measure. 20 DR. SCHWAMM: And the only other thing 21 I would -- you might wonder well why did you add 22 like blood pressure and heart rate and things

like that? The feedback to NQF -- from NQF to CMS at the last review where the prior measures were discussed was to incorporate measures of clinical severity.

So one of the available data sets for 5 CMS was some of this EHR data, and the question 6 7 was asked and actually tested, what if we just use those and don't get into the quagmire of 8 9 trying to make a new code for NIH and collect 10 It just -- it adds, you know, like a little NIH? 11 tiny piece of gravy on the top of the NIH Stroke 12 Scale score.

So again, if it's available and there's no cost to collecting it, why not put it in the model? But again, that's why those other elements ended up in this model in the first place. But the addition of the NIH Stroke Scale score is such a powerful addition to the model that that's really still the dominate model.

20 So the differences between this and 21 the previous one are really more one of source 22 rather than scope.

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1 CO-CHAIR TIRSCHWELL: Okay. So our 2 discussants are Ketan and Charlotte. Charlotte, 3 are you going to start or --4 MEMBER JONES: No. Before we start I 5 have a methodologic question. We have just accepted the measure without these three 6 additional criteria. So when we're voting, 7 previously we said they're already doing this, 8 9 but it's not before you so we're not really 10 comparing them. 11 Now it really is a comparison between 12 this measure and the one we just voted on. 13 CO-CHAIR TIRSCHWELL: No. I don't --14 I think they're independent. We should think of 15 it as this is the only one that we're reviewing 16 right now. 17 MEMBER JONES: But the logic of if we 18 voted this one down, it would only be because of 19 those three elements. 20 CO-CHAIR TIRSCHWELL: I'm sorry, which 21 three elements are you referring to? 22 MS. BERNHEIM: The additional three

clinical risk factors that are in here. 1 The 2 claims measure, the claims-based risk adjusters are slightly different for this measure, again 3 4 because we used a process to select measures. 5 But the main difference is that there are some clinical data elements included. 6 7 CO-CHAIR TIRSCHWELL: Yeah. I quess if you think those are enough to fail this one, 8 9 then yes, you should fail it. But --10 MEMBER JONES: So NQF, we could end up 11 having both of these measures on our portfolio, 12 we would be a responsible for? 13 (Off microphone comment.) 14 CO-CHAIR TIRSCHWELL: I think 15 eventually the likelihood is that in the future, 16 we would -- we'd be migrating to these measures 17 that come out of the electronic health care 18 records, as there's, you know, little or no 19 burden hopefully in the future to collect them 20 because they're part of your standard processes 21 of care. So yes, we could have both of them. 22 Okay. Yeah, go ahead. MEMBER JONES:

1 MEMBER BULSARA: So as was pointed out 2 earlier, I mean this measure is almost identical to the previous one, and Jim did a fantastic job 3 in terms of the discussion. So I think this will 4 5 probably move a little bit faster, because we've already discussed sort of the salient points in 6 7 the previous one. So we'll go straight to evidence, and 8 9 I mean there is evidence in the sense that, as 10 was pointed out earlier, CMS is already using a 11 version to sort of risk adjudicate. 12 There's a lot of data that says that 13 we can improve things such as communication 14 between providers, prevention of and response to 15 complications, etcetera. So I think there's a 16 lot of evidence that we do need to -- we do need 17 to risk adjust. 18 CO-CHAIR TIRSCHWELL: So let's qo 19 ahead and vote on Evidence. 20 MS. OGUNGBEMI: We are now voting for Evidence for Measure 2877. The options are yes 21 22 or no. Voting is open.

1	CO-CHAIR TIRSCHWELL: Thank you. I
2	like the stopwatch at the bottom. I can read it
3	now. I don't know why it's not working.
4	(Voting.)
5	MS. OGUNGBEMI: Voting is closed. The
6	results are 95 percent yes, 5 percent no.
7	Evidence passes for Measure 2877.
8	CO-CHAIR TIRSCHWELL: Gap in
9	care/opportunity for improvement.
10	MEMBER BULSARA: You know, the
11	discussion for that is identical to the previous
12	one. So I think we shed no new data.
13	CO-CHAIR TIRSCHWELL: Let's move to
14	then vote on gap in care and opportunity for
15	improvement.
16	MS. OGUNGBEMI: We are now voting on
17	performance gap for Measure 2877. The options
18	are high, moderate, low and insufficient. Voting
19	is open.
20	(Voting.)
21	MS. OGUNGBEMI: Voting is closed. The
22	results are 36 percent high, 64 percent moderate,

0 percent low and 0 percent insufficient.
Measure 2877 passes on performance gap.
CO-CHAIR TIRSCHWELL: So then
Reliability.
MEMBER BULSARA: The only, and I don't
think this should deter it from necessarily
moving forward, but the only issue I come up with
for reliability, something that was brought up
yesterday, is that we don't have one standardized
electronic health care record across the country.
So just I guess we need to assess for some way as
to whether they'll be consistency across the
measures.
The other, the other issue that came
up that Karen addressed was, you know, we the
ICC reliability was like .7, which is the minimal
acceptable reliability value. But we're told
that we should go with the Landis-Koch
classification, where that will be a 56
percent is moderate agreement.
So again, I don't fully understand the
statistical reasons behind that, but if we're

accepting the Landis-Koch classification, then 1 2 this passes on reliability. CO-CHAIR TIRSCHWELL: Any other --3 4 yes, Charlotte. Go ahead. 5 And again, people have MEMBER JONES: the option of considering in their voting that we 6 7 are again using the Get With the Guidelines data that we -- for the national population. So you 8 9 have the same however you voted before, but 10 that's a reliability issue. 11 CO-CHAIR TIRSCHWELL: So that they 12 might not be representative? Is that what you're 13 saying? 14 They might not be MEMBER JONES: 15 representative. 16 CO-CHAIR TIRSCHWELL: Okay, thanks. 17 Any other comments from the Committee on 18 reliability? 19 I would point the DR. SCHWAMM: 20 Committee members to a paper published by Reeves 21 and our colleagues, demonstrating that the 22 population of patients in the fee for service

Medicare population compared to the Get With the 1 2 Guidelines population, that they were quite similar and felt to be representative. 3 4 CO-CHAIR TIRSCHWELL: If there are no 5 more -- maybe there's one comment. Just to clarify. 6 MEMBER BAUTISTA: So 7 did they actually test within different electronic medical records? 8 9 Not that I gathered, no. DR. SCHWAMM: 10 CO-CHAIR TIRSCHWELL: Yeah, okay. Can 11 you clarify Susannah? 12 MS. BERNHEIM: Yes. So this is the 13 art of developing measures when you don't have a 14 perfect data source, so it's a little bit 15 But I want to make sure that the complicated. 16 Committee understands. So to build the model, we 17 were using data elements from the registry as 18 surrogates for the EHR data. 19 However, those data elements are part 20 of our broader work to develop a core, set of 21 core clinical data elements, and those core 22 clinical data elements we have done a lot of

feasibility and reliability, validity testing. 1 2 We've done a couple of things where we've surveyed hospitals about whether they can 3 adequately pull an initial -- remember, this is 4 5 initial vital signs and lab values. They're sort of the easiest things to 6 7 get out of EHRs, and then we've done in a couple of hospital health systems what is considered 8 9 data element validity for EHR data elements, 10 where you use our electronic specifications for 11 pulling them out, and then you have a nurse 12 abstracter also pull the same data elements and 13 you check to see if they're the same. 14 Extremely high at one hospital, one 15 health system. Not quite done adequately at the 16 other, but once we figured out where the problem 17 was with the abstraction, pulling the wrong 18 numbers, also good match. I mean so we've shown 19 successfully in a number of different EHRs that 20 you can pull these out and get accurate values. 21 CO-CHAIR TIRSCHWELL: Great, thanks. 22 Jim.

MEMBER BURKE: Do we have those data? 1 2 Are those data here? We have anything on the element reliability. 3 4 MS. BERNHEIM: So I think that they 5 were attached as a separate report with our --CO-CHAIR TIRSCHWELL: In the technical 6 7 report? 8 MS. BERNHEIM: Karen Dorsey, are you 9 still on the line, because you know exactly where 10 to find all of our hybrid data testing. 11 In our initial MS. DORSEY: Yes. 12 report, we included the validity, the data 13 element validity testing, but we didn't include 14 the reliability testing for the second site. You 15 know, you're technically right. Because we did 16 validity testing twice, we sort of left it out of 17 the first submission. 18 But we later spoke with NQF and 19 provided them the reliability as a separate 20 submission prior to this meeting, prior to the 21 working group meeting. 22 MS. BERNHEIM: And is it in this

1 measure worksheet Karen? I'm seeing on -- go 2 ahead.

MS. DORSEY: I didn't see it in that
measure worksheet, so I don't know how it might
have gotten in front of a Committee.

So I have a table in 6 MS. BERNHEIM: 7 the measure worksheet that I'm looking at on page 68. I don't know if everybody has the same thing 8 9 that I have, that is about data element validity 10 and it shows the two sites and it shows the 11 percent agreement between the data set where the 12 records matched.

In the first site, it's 94 to 96
percent. In the second site, you'll see two of
the data elements were lower, and again Karen
does a better job than I do of explaining. I
think that had to do with which one they pulled,
right?

MS. DORSEY: Right. Yeah, they had
made a slight error in the execution of the
query. So it was a little bit lower in the
second site, and then we do have data on two

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health systems looking just at the rate of 1 2 capture. So just discussing the feasibility of the data elements. 3 4 MS. BERNHEIM: And the rate of capture 5 was what? MS. DORSEY: Over 90 percent for all 6 the elements, both sites. 7 8 CO-CHAIR TIRSCHWELL: Okay. Any other 9 10 MS. DORSEY: Sorry, one caveat. It 11 was over 70 percent for the raw value because it included the full scope of patients, not just 12 13 patients admitted for medical conditions. So it 14 was also surgical patients. 15 CO-CHAIR TIRSCHWELL: Any other 16 comments? Jim, yeah sure. 17 MEMBER BURKE: I guess so there's a 18 question were those using different EMRs, and 19 then for NQF, would this -- we had the concept 20 yesterday for the eMeasure or validity and 21 reliability testing that we had to see this for 22 multiple EMRs, and that had algorithmic

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consequences. So for a hybrid measure, how do
 those consequences work out?

MS. BERNHEIM: Just to clarify, these are two separate or three. Go ahead Karen.

5 MS. DORSEY: Sorry. I was going to 6 say yes we tested. The testing was done in -- on 7 Epic system, and the feasibility testing was one 8 in Epic and certain validity testing was done in 9 the Kiefer system. So we've done multiple 10 systems.

In terms of merging the data, that happens after the hospital submits the data. So that's not anything that adds burdens to the hospital or is involved at the hospital level. They just report the data elements and then they are linked.

17 CO-CHAIR TIRSCHWELL: Karen, did you 18 want to comment on the criteria thing? 19 MS. JOHNSON: Well I think -- yeah. Ι 20 think Karen did say that some of the work was 21 done in at least two systems. So you've got 22 I think the other thing to think about and that.

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the way that I think about it is they're pulling 1 2 data from the registry and the data from the registry comes from a lot more EHRs I'm assuming 3 4 than just a couple, right, a couple of sites? 5 CO-CHAIR TIRSCHWELL: But it's handabstracted mostly so --6 MS. JOHNSON: Okay, okay. So that's 7 8 the piece that I wasn't sure about. But I think 9 there's those two. 10 CO-CHAIR TIRSCHWELL: Okay. Any other 11 comments before we vote on reliability? Let's go 12 ahead and vote then. 13 MS. OGUNGBEMI: We are now voting on 14 Reliability for Measure 2877. The options are 15 high, moderate, low and insufficient. Voting is 16 open. 17 (Voting.) 18 MS. OGUNGBEMI: Voting is closed. The 19 results are 9 percent high, 82 percent moderate, 20 5 percent low and 5 percent insufficient. 21 Measure 2877 passes on Reliability. 22 CO-CHAIR TIRSCHWELL: Feasibility.

1 PARTICIPANT: Validity. 2 CO-CHAIR TIRSCHWELL: Oh, I'm sorry. 3 Yes please. 4 MEMBER BULSARA: So for the same 5 reasons that Jim pointed out in the previous discussion, I think this measure continues to 6 7 have validity issues, and I mean I do think that hospitals, I mean the patients that go into 8 9 hospice may adversely affect the perceived 10 quality of a given hospital. I think the way the measures or like 11 12 the risk factors are sort of adjudicated, there's 13 a correlation coefficient that's assigned to each that's used in the overall calculation. 14 15 So I think that's sort of a 16 preference-based coefficient and I think it could 17 vary depending on one's socioeconomic backgrounds 18 and things to that extent. So same validity 19 issues that Jim had mentioned earlier. 20 CO-CHAIR TIRSCHWELL: Okay. Anybody -21 - no further discussion on validity? 22 (No response.)

1 CO-CHAIR TIRSCHWELL: Move to vote on 2 validity then. 3 MS. OGUNGBEMI: We're now voting on 4 Validity for Measure 2877. The options are high, 5 moderate, low and insufficient. Voting is open. (Voting.) 6 7 MS. OGUNGBEMI: Voting is closed. The results are 0 percent high, 73 percent moderate, 8 9 27 percent low and 0 percent insufficient. 10 Measure 2877 passes on validity. 11 CO-CHAIR TIRSCHWELL: Now Feasibility. 12 MEMBER BULSARA: So the measure is a 13 It relies on the NIH Stroke core and hybrid. 14 electronic record and ICD-10 coding. I think, 15 you know, I'm not sure how much -- I think we're 16 just going to have to see how accurate or 17 reliable the data's going to be sort of long-term 18 in terms of acquisition. I don't know if 19 Charlotte has anything else to add to that. 20 MEMBER JONES: I think again we're 21 left with looking at data that we don't have, and 22 then they looked at the SES factors and decided

that they didn't add additional value, so did 1 2 not include it in their final measures. CO-CHAIR TIRSCHWELL: Yeah. 3 That was, 4 I think, more of a validity issue. Any other 5 comments on Feasibility? Let's go ahead and vote on Feasibility then. 6 7 MS. OGUNGBEMI: We're now voting on Feasibility for Measure 2877. The options are 8 9 high, moderate, low and insufficient. Voting is 10 open. 11 (Voting.) 12 MS. OGUNGBEMI: Voting is closed. The 13 results are 14 percent high, 73 percent moderate, 9 percent low and 5 percent insufficient. 14 15 Measure 2877 passes on Feasibility. 16 CO-CHAIR TIRSCHWELL: Usability and 17 Use. 18 MEMBER BULSARA: Usability, the only 19 issues with electronic, sort of the variations in 20 terms of electronic health care systems that are 21 out there, and which I pointed out earlier in the 22 sense that we'll have this data. We'll risk

adjudicate. I mean what do we really do with it 1 2 after that. CO-CHAIR TIRSCHWELL: Any further 3 comments or discussion? 4 5 (No response.) CO-CHAIR TIRSCHWELL: Let's go ahead 6 and vote then on Usability and Use. 7 MS. OGUNGBEMI: We are now voting on 8 9 Usability and Use for Measure 2877. The options 10 are high, moderate, low and insufficient. Voting 11 is open. 12 (Voting.) 13 MS. OGUNGBEMI: Voting is closed. The 14 results are 9 percent high, 73 percent moderate, 15 14 percent low and 5 percent insufficient. 16 Measure 2877 passes on Usability and Use. 17 CO-CHAIR TIRSCHWELL: And then I think 18 we'll move directly to vote on overall 19 suitability. 20 MS. OGUNGBEMI: We are now voting for 21 Measure 2877's overall suitability for 22 endorsement. Options are yes or no. Voting is

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open.

MS. OGUNGBEMI: Voting is closed.
Results are 90 percent yes, 10 percent no.
Measure 2877 passes on its suitability for
endorsement.

(Voting.)

7 CO-CHAIR TIRSCHWELL: Great. Thank 8 you everybody for moving through that one, and I 9 just want to make one comment and this is me the 10 neurologist taking care of sick patients, not as 11 the chair. Susannah, you said that if I could 12 identify the patients that had comfort measures 13 on the first day, I would take them out.

Well, in the hybrid measure, it seems
like there's a real possibility for that.
Fantastic. That's what I was hoping you would
say. Thank you.

18 (Off microphone comments.) 19 CO-CHAIR TIRSCHWELL: Well then I 20 don't know what the right answer is, because I 21 can imagine a very imperfect world where there's 22 a perverse incentive then to make people comfort

care if they're sick, because they're going to 1 2 have a bad outcome and then they get excluded from your measure and not counted against you. 3 4 So I think we need to research it at 5 the very least and see what different things to -- thank you very much. All right. 6 Are we 7 moving straight in? Are we breaking for lunch? 8 No lunch. You're going to have to earn your 9 lunch. 10 All right. We're going straight to 11 the one that -- and David's going to be --12 David's going to be in charge now right, 1952. 13 CO-CHAIR KNOWLTON: Okay. I didn't 14 realize that. Okay. We're going to 1952. Time 15 to Intravenous Thrombolytic Therapy, Heart 16 Association, Stroke Association. Ron and Alex 17 are the discussants. You folks are representing 18 the developer. 19 CO-CHAIR TIRSCHWELL: And I am -- just 20 to note, I am, because I'm on the Committee, I'm 21 recusing myself. I'm not participating in this 22 one.

1	MS. TIERNEY: Yes hi. I'm Sam
2	Tierney, and I'm with the PCPI Foundation, and
3	we're supporting the American Heart Association
4	in their submission of this measure. We're going
5	to let Dr. Schwamm actually introduce the measure
6	to you all.
7	MS. GRAY: Hi. I'm Diedra Gray, also
8	with the PCPI Foundation.
9	DR. SCHWAMM: So now I'm speaking on
10	behalf of the American Heart Association. So
11	this measure is Time to Intravenous Thrombolytic
12	Therapy. The measure was submitted for
13	endorsement maintenance, which was because it was
14	originally endorsed in 2012.
15	It's used in it's already in use in
16	a variety of AHA/ASA programs, including most
17	prominently the Get With the Guidelines stroke
18	registry, the recognition program of the registry
19	and the target stroke quality improvement
20	initiative, which is based on trying to shorten
21	time to treatment among those patients in whom
22	treatment has the decision has been made to

treat.

2 So this is not a measure that is 3 trying to increase the total number of eligible 4 patients being treated, but rather focusing on 5 rapid treatment among those in whom treatment is 6 indicated.

The intent of the measure is to 7 increase the proportion of patients who receive 8 9 treatment within 60 minutes of hospital arrival. 10 I will point out parenthetically that the 11 European registry equivalent of Get With the 12 Guidelines called the SITS registry, which is a 13 mandatory registry for all patients treated on 14 label with thrombolysis in Europe.

15 It has now moved to a 45 minute target 16 for their equivalent, 40 minute target, excuse 17 me, for their equivalent of this initiative. So 18 despite some concerns that were voiced initially 19 at this hearing and in other quarters, that this 20 measure would promote an inappropriate rush to 21 treatment and treatment of inappropriate 22 patients, in fact there has been no increased

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risk and harm.

2	In a paper that was published in 2014,
3	Drs. Fonarow, Mozaffarian and colleagues,
4	including myself in JAMA demonstrated that with
5	the increased rate of treatment, there was not
6	only lower rates of symptomatic intra-cranial
7	hemorrhage but more patients discharged home and
8	actually a reduction in overall mortality.
9	So it's the first study to demonstrate
10	a reduction in mortality associated with TPA use.
11	I'm not going to belabor the evidence. Let me
12	shift to the actual measure inclusion statement.
13	So the numerator includes all patients age 18 and
14	older receiving intravenous TPA during the
15	hospital stay, and receiving it at that hospital,
16	by the way, not another hospital in transit, and
17	having a time from hospital arrival to initiation
18	of thrombolytic therapy of 60 minutes or less in
19	the denominator.
20	Included are all ischemic stroke
21	patients who received thrombolytic therapy during

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their hospital stay and exclusions are age less
than 18, a stroke that occurred while in hospital, patients received in transfer, patients that received TPA greater than 4.5 hours after they were last known well, so outside of the on label indication, and patients enrolled in an experimental clinical trial as an alternative to thrombolytic therapy.

Patients with a documented eligibility 8 9 or medical reason for a delay in treatment are 10 also exceptions from the denominator when 11 documented explicitly by a provider as the reason 12 for delay, and those include social, religious, 13 initial refusal, hypertension that required 14 aggressive control with intravenous medication 15 and therefore still permitted treatment but 16 delayed treatment beyond 60 minutes, inability to 17 confirm patient eligibility.

So lack of an appropriate witness to provide medical history and time of onset of patients who are aphasic, or further diagnostic evaluation that needs to confirm stroke for patients which hypoglycemia, which is a blood

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glucose less than 50, seizures or other major metabolic disorders.

This gets to the point that Dr. Huff 3 made earlier about making sure that stroke mimics 4 5 are not being treated with this measure. It incorporates the ability to exclude patients in 6 7 whom further rapid diagnostic testing is indicated, or the management of emergent acute 8 9 conditions such as cardiopulmonary and 10 respiratory failure requiring intubation, or 11 again as we said before, an investigational or 12 experimental protocol. So I'll stop there. 13 CO-CHAIR KNOWLTON: And our 14 discussants are Charlotte and Jocelyn. Who's --15 oh, I'm sorry. I'm on the wrong one. Ron and 16 Alex. 17 MEMBER RAE-GRANT: Yeah Ron has ceded 18 -- Ron ceded to me, but I'm sure he'll jump in if I'm wallowing badly. So under Evidence, there's 19 20 evidence prior to the 2012 review and then 21 subsequent evidence. 22 A number of guidelines that require

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this measure, and then basically data from multiple patients, multiple studies showing earlier time to treatment with TPA improves outcome. The newer data updates are the AHA/ASA 2013 guideline which includes this measure, doorto-needle time within 60 minutes from hospital arrival, and then two additional studies. There's one that's an observational study looking at time to needle and showing better outcomes and shorter time-to-needle, and then a large meta-

analysis showing again improvements in outcomethe shorter the time is to the needle.

14So the points about time-based were15made. This was a decision to use 60 minutes but16maybe it will change at some point to meet the17European criteria. So that's the new data and18that does rate as high evidence. That's all I'm19saying on Evidence.

20 CO-CHAIR KNOWLTON: Questions,
 21 comments. Valerie.
 22 MEMBER COTTER: Can I just ask a point

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of clarification in the exclusion criteria? 1 It's 2 unclear to me why patient stroke occurred while in hospital is an exclusion. Isn't that why the 3 4 patient is in the hospital, because they're 5 having stroke? CO-CHAIR KNOWLTON: 6 Go ahead. 7 DR. SCHWAMM: Excellent point. The patients are always treated in the emergency 8 9 department when they present with symptoms of 10 This is to exclude patients who are in stroke. 11 the hospital for cardiac surgery and have a 12 stroke while they're in the hospital. 13 And so in those patients, there is no defined arrival time that would make sense to 14 15 apply to this measure. About ten percent of 16 strokes occur in hospital, and there are separate 17 quality improvement initiatives going on to try 18 to improve the timeliness of care for those 19 patients. 20 But many of those patients are

20 But many of those patients are 21 disqualified on medical reasons, because they 22 have just had a procedure that puts them at

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increased risk of bleeding. 1 2 CO-CHAIR KNOWLTON: Thank you. Other 3 questions? Yeah, Jim. 4 MEMBER BURKE: So we get dinged on one 5 of these like every month or two, where somebody comes in and they came in and then normalized and 6 7 were not treated and then they get worse again. I mean if it's door-to-treatment 8 9 criteria then that's something you're going to 10 Is that right? Is there an exclusion lose on. 11 for that or is there -- can you reset the clock 12 if somebody gets back to normal? It doesn't look 13 like it on this. 14 It's a very complicated DR. SCHWAMM: 15 clinical issue, and people -- experts will 16 disagree as to whether or not you should reset 17 the clock. I think if patients get completely 18 back to normal, have another scan that 19 demonstrates no evidence of infarction and then 20 worsen again, many would reset that clock and 21 then would say that actually that was an in-22 hospital stroke.

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1	So if you come in with stroke symptoms
2	but fully resolved in the emergency department,
3	you haven't had a stroke. You had a TIA. You
4	are at that point in the hospital, and then if
5	you subsequently have another event, even if it's
6	in the next 15, 20 minutes or hour, you could be
7	considered then to have an in-hospital stroke.
8	This is actually how Get With the
9	Guidelines deals with this issue of patients who
10	completely return to normal and then recur while
11	in the emergency department. I think it's an
12	artifact of measurement, because again the point
13	here is to really look at processes of care, and
14	I would say that the experience you're
15	describing, we can all think of a few cases.
16	But they're in general the exception
17	rather than the rule. So I would say that in
18	those patients, those patients will at times fall
19	into this measure and remain in the denominator,
20	which is why 100 percent is, you know, is not the
21	goal.
22	CO-CHAIR KNOWLTON: Other comments,

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questions on Evidence? 1 2 (No response.) 3 CO-CHAIR KNOWLTON: Okay. Let's go to 4 vote. 5 MS. OGUNGBEMI: We are now voting on Evidence for Measure 1952. The options are high, 6 7 moderate, low and insufficient. Voting is open. CO-CHAIR KNOWLTON: You'll be down 8 9 David's not voting. one. 10 (Voting.) 11 MS. OGUNGBEMI: Voting is closed. The 12 results are 86 percent high, 14 percent moderate, 13 0 percent low and 0 percent insufficient. 14 Measure 1952 passes on Evidence. 15 CO-CHAIR KNOWLTON: Alex, gap. 16 MEMBER RAE-GRANT: So under gaps, a 17 recent study from Fonarow and another study, 18 Mozaffarian, indicating 30 percent of patients 19 receiving TPA within the guideline recommended 60 20 minutes toward a needle time, indicating a 21 substantial gap. 22 There was also Get With the Guidelines

registry data and some improvement, but still 70 1 2 percent of -- only 70 percent meeting this 3 criteria as of 2015. 4 There was some disparities data 5 showing that certain populations, older patients, black patients, those with less severe stroke or 6 arriving in off hours, those patients were less 7 likely to receive timely care. So this did 8 9 indicate a high gap in care. 10 CO-CHAIR KNOWLTON: Ouestions or 11 comments? Let's go to a vote. 12 MS. OGUNGBEMI: We are now voting on 13 Options are performance gap for Measure 1952. 14 high, moderate, low and insufficient. Voting is 15 open. 16 (Off microphone comments.) 17 MS. OGUNGBEMI: We know who's voting. 18 We just need the vote to come in. 19 (Voting.) 20 MS. OGUNGBEMI: Okay, voting is 21 closed. Results are 71 percent high, 29 percent 22 moderate, 0 percent low and 0 percent

1 insufficient. Measure 1952 passes on performance 2 gap. 3 CO-CHAIR KNOWLTON: Okay. Ron, 4 Reliability then. 5 Alright. MEMBER RAE-GRANT: So Reliability, specifications from a clinical 6 7 registry, Get With the Guidelines at the hospital facility level, and I'm not going to go through 8 9 the numerator/denominator again. We've gone 10 through that. 11 Reliability testing, there was empiric 12 validity testing using a signal noise analysis, 13 and this was used in Get With the Guidelines 14 stroke registry data from 800 some-odd hospitals, 15 and that had an inter-rater reliability of .72, 16 which was -- indicated substantial agreement. 17 Updated results were done and 18 reliability seemed to be higher if all hospitals 19 had a higher reporting event rate of 23.9 versus 20 10, and 20 percent of the hospitals in the 21 registry had fewer than ten reporting events that 22 were not included. So that would be a

preliminary rating of moderate for Reliability.
 CO-CHAIR KNOWLTON: Questions and
 comments? Charlotte.

MEMBER JONES: Previously the Joint 4 5 Commission had excluded hospitals from these measures who had ten or fewer events, and in a 6 7 previous discussion they had specifically mentioned that children's hospitals were 8 9 excluded, that potentially could be seeing 10 patients between 18 and 21. Is this -- can the 11 developers address this?

12 DR. SCHWAMM: So the measure, as with 13 all the measure sets, is for adults aged 18 and 14 older. I think the answer is yes, some children 15 -- well, children's hospitals don't -- I guess I 16 don't know the answer. That's a good question. 17 I think the answer is if they failed to treat 18 more than ten subjects a year, they would not 19 have their data reported in this measure.

They could still participate in the registry and collect this data and analyze their performance, but when the number of treated

patients is so low, you know, complying, meeting 1 2 a rate of 60 percent, of 50 percent of patients is hard to interpret. 3 4 MS. TIERNEY: Yeah. I was just going 5 to add that the sample is based on those hospitals participating in Get With the 6 7 Guidelines. So it doesn't necessarily exclude 8 9 children's hospitals, if they're hospitals that 10 participate in the program. But it does have that ten event minimum, so that may impact that, 11 12 as Dr. Schwamm said. 13 CO-CHAIR KNOWLTON: Anybody else? 14 (No response.) 15 CO-CHAIR KNOWLTON: Okay. Let's go to 16 the vote. 17 MS. OGUNGBEMI: We are now voting on 18 Reliability for Measure 1952. Options are high, moderate, low and insufficient. Voting is open. 19 20 (Voting.) 21 MS. OGUNGBEMI: Voting is closed. The 22 results are 5 percent high, 95 percent moderate,

1	0 percent low and 0 percent insufficient.
2	Measure 1952 passes on Reliability.
3	CO-CHAIR KNOWLTON: Validity?
4	MEMBER RAE-GRANT: So under Validity,
5	it's primarily older work that was done. Data
6	element testing show agreement using kappa
7	statistics and Get With the Guideline stroke
8	program data. The newer data is from 20 experts
9	from the AHA Council on Stroke 2015-2016
10	Leadership Committee looking at face validity of
11	the measure, and that indicated good validity.
12	Let's go to the next page. 85 percent
13	of respondents agreed or strongly agreed the
14	measure could actually distinguish good and poor
15	quality. So that would probably indicate
16	moderate validity.
17	Threats to validity. I think we
18	primarily reviewed these exception issues and
19	overall, the numbers that were given for 672
20	hospitals with minimum ten reporting events.
21	There was a 10.8 percent overall
22	exclusion rate on one measure and then on another

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measure 18.2 percent. I don't know if people 1 2 want to comment on the threats to validity. Ι don't think we thought there was a major issue, 3 4 Ron. 5 CO-CHAIR KNOWLTON: Comments or questions on validity? Charlotte. 6 I'm confused. 7 MEMBER JONES: So Get With the Guidelines excluded patients with less 8 9 than ten patients, but the measure before us does 10 not exclude hospitals with fewer than ten events 11 or does it? 12 MS. TIERNEY: The sample used for 13 testing the measure's reliability excluded 14 hospitals that had less than ten events. The 15 measure in and of itself technically does not do 16 that. 17 MEMBER JONES: So I address this in 18 Usability? Dave? 19 MEMBER RAE-GRANT: So do you want to 20 come back to this in Usability? 21 MEMBER JONES: Yeah. 22 MEMBER RAE-GRANT: Okay.

1	MEMBER JONES: I'm just trying to
2	figure out where we discussed it.
3	CO-CHAIR KNOWLTON: Yeah. Why don't
4	you bring it up in Usability if that's all right.
5	MEMBER JONES: Okay, thank you.
6	CO-CHAIR KNOWLTON: Other comments on
7	Validity?
8	(No response.)
9	CO-CHAIR KNOWLTON: Okay. Let's go to
10	a vote on it.
11	MS. OGUNGBEMI: We are now voting on
12	Validity for Measure 1952. Options are high,
13	moderate, low and insufficient. Voting is open.
14	(Voting.)
15	MS. OGUNGBEMI: Voting is closed. The
16	results are 5 percent high, 90 percent moderate,
17	5 percent low and 0 percent insufficient.
18	Measure 1952 passes on Validity.
19	CO-CHAIR KNOWLTON: Feasibility.
20	MEMBER RAE-GRANT: Under Feasibility,
21	again the data is collected through the Get With
22	the Guidelines registry. The developer states

there was no issue with data collection and 1 2 relatively standard data elements, and it's extracted from the record by someone other than 3 4 the person obtaining original information. So 5 this was preliminarily rated for Feasibility as moderate. 6 CO-CHAIR KNOWLTON: Okay. Charlotte, 7 did you want to comment here? 8 No. Oh, on 9 Usability. Okay. Further comments or questions 10 on usability? 11 PARTICIPANT: Feasibility. 12 CO-CHAIR KNOWLTON: Feasibility. I'm 13 going to get this right, trust me. 14 (No response.) 15 CO-CHAIR KNOWLTON: Okav. 16 Feasibility. We're ready to vote. 17 MS. OGUNGBEMI: We are now voting on 18 Feasibility for Measure 1952. Options are high, moderate, low and insufficient. Voting is open. 19 20 (Voting.) 21 MS. OGUNGBEMI: Voting is closed. The 22 results are 10 percent high, 90 percent moderate,

1	0 percent low and 0 percent insufficient.
2	Measure 1952 passes on Feasibility.
3	CO-CHAIR KNOWLTON: Usability.
4	MEMBER RAE-GRANT: So in the
5	Usability, this is currently used as an
6	accountability program. There are a number of
7	benchmarking and achievement award measures which
8	relate to this, and recognition of professional
9	certification and stroke hospital recognition
10	programs. And again, the developer presented
11	data demonstrating a mean performance improvement
12	from 2012 of 53 percent to 2015, 70 percent.
13	So again, this would be rated
14	preliminarily as high Usability end use.
15	CO-CHAIR KNOWLTON: Charlotte.
16	MEMBER JONES: So the Get With the
17	Guidelines program was used to develop the
18	measure. They excluded hospitals that had less
19	than ten. But we're going to put this out as a
20	measure that hospitals that include children's
21	hospitals and limited access and other programs
22	that may have less than ten are going to get

dinged if they don't. 1 2 Can I clarify? DR. SCHWAMM: 3 CO-CHAIR KNOWLTON: Lee qo ahead. DR. SCHWAMM: So for the data provided 4 5 for demonstrating reliability and preparing the measure specifications and the measure supporting 6 7 materials, we did not include hospitals treating less than ten patients in the analysis. 8 The 9 measure does not exclude hospitals that put in 10 less than ten patients. 11 Recognize that the reliability of 12 those estimates of percentages will be lower in 13 hospitals that include fewer than ten patients. 14 But it doesn't prevent those hospitals from 15 running that measure and hospitals currently run 16 that measure, even if they are small hospitals 17 and see fewer than ten patients. 18 So it doesn't prevent the hospitals 19 from participating, but in terms of presenting 20 you with data around the reliability and 21 validity, that cutoff was chosen.

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MEMBER JONES: Okay. So then we are

going to be putting forth a measure endorsed by NQF, and we are going to say hospitals that we 3 don't have reliability and validity should be -should be held accountable for this measure, when 4 we don't have data to say it's reliable and valid. 6

I would say it is going to create a 7 significant burden on those hospitals if this 8 9 measure is accepted as it currently is, that any 10 hospital who sees a patient over 18 needs to get 11 them TPA within 60 minutes.

12 CO-CHAIR KNOWLTON: Dr. Schwamm, if 13 you want to comment.

14 MS. GRAY: Yeah hi. So just to 15 clarify. As Dr. Schwamm said, the measure 16 doesn't exclude the hospitals that see fewer than 17 ten patients. The minimum of ten observations is 18 applied to the reliability testing as a 19 statistical kind of a rule in signal to noise 20 ratio analysis.

21 So the minimum of ten is really set 22 there to minimize bias amongst the hospitals

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included in the sample that we're going to analyze. That doesn't speak to any exclusion for the measure.

4 DR. SCHWAMM: So I quess in response 5 to your question about the responsibility of hospitals that receive patients in the first few 6 hours after the sudden onset of neurological 7 symptoms that could be consistent with stroke, I 8 9 think the answer is in many jurisdictions, those 10 patients are not necessarily taken by ambulance 11 to a primarily children's hospital.

12 It does happen, but many of those 13 patients are taken to an adult general hospital. 14 But if you are a children's hospital and you 15 receive a patient in that time period, I think 16 the same standards should apply, which is that 17 patients who have evidence of an acute ischemic 18 stroke need to have a rapid evaluation and 19 treatment as quickly as possible.

It may be that in this population it's
very difficult to determine age of patient
eligibility. It may be that the perception is

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that stroke is not leading the diagnosis. 1 It 2 doesn't mean that those patients shouldn't be rapidly and carefully evaluated just as they 3 should be everywhere else. 4 5 So children's hospitals are not unfamiliar with ischemic stroke. 6 It's actually 7 fairly common in neonates and young children. So it's not like it's -- as I'm sure you know, it's 8 not like it's an unheard-of event. 9 10 So this is a challenge that I think is unique to children's hospital, but is an 11 12 important one, which is that they not assume that 13 young adults in the 18 to 21 year-old range who 14 present with symptoms, not to dismiss stroke as a 15 possibility. 16 So I think the risk here of harm and 17 the burden is remarkably low when you think about 18 the benefit to the population of patients who are 19 arriving with true ischemic stroke. So I quess 20 I'm -- this is not -- this measure is not -- I 21 don't think that creates an undue burden. 22 So I am going to MEMBER JONES:

disagree as the pediatric neurologist on this committee. The likelihood of -- we have in our jurisdiction we are going to get four acute ischemic events a year, based on our case load and based on the fact that we are a stroke center.

That's not necessarily in the 18 to 21 7 year-olds. The burden of creating a stroke 8 9 service, the burden of having the people to 10 respond to get TPA in an hour, that's a 11 significant burden for a very rare event. Ι 12 think saying that a children's hospital that does 13 not decide to invest in that, you're right. For 14 that patient who has had a stroke that may be.

But in a world of limited resources, and we all live in that world, trying for the one in 10,000 I think is the numbers that our stroke people quote, is not a good use of resources. You probably have the Get With the data -- the Get With the Guidelines data would tell you how many 18 to 21 year-olds you have.

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I have real problems about you did

your reliability and validity testing excluding 1 2 hospitals with less than ten, and now you're saying hospitals that get less than ten are going 3 to be held to the same standard when we don't 4 5 have reliability and validity testing. CO-CHAIR KNOWLTON: 6 Ron. 7 MEMBER KOENIG: Charlotte, would you then say that we shouldn't be doing this at all 8 9 in the adult population? I mean I'm sort of --10 So I don't think that's MEMBER JONES: 11 fair, but I would say this measure in front of 12 us, the way the developers chose to write it and 13 not exclude -- they could have easily said 14 patients under the age of 21, recognizing that 15 the majority of children's hospitals try not to 16 17 And yes, if a patient comes in and we 18 quickly recognize that 22 year-old or that 40 19 year-old or I have a stroke in the hospital, my 20 children's hospital is going to do everything 21 within their power to get me out of there and to 22 get me to the local adult hospital where I will

get TPA, which is what I want them to do. 1 2 But when the 18-1/2 year-old with a long history of migraines, who has been treated 3 4 at my hospital for years and years shows up, 5 there's probably going to be a delay that I think in terms of resource utilization is perfect and 6 appropriate based on needs. 7 I get that you all want to pass this, 8 9 because for the general group it is good. But if 10 we are voting on this measure as it was put forth 11 by these developers, I have a problem with 12 patients -- that they chose to include patients 13 down to the age of 18. 14 CO-CHAIR KNOWLTON: Valerie. 15 MEMBER COTTER: I'd just like to make 16 a point as a clinician and as a parent. Are we 17 putting the, you know, that parents should know 18 where to take their child if they think their 19 child is having a stroke? I mean from the 20 consumer point of view, as a parent point of 21 view, it's not up to us to decide what hospital 22 is best to take my kid that's having a stroke.

It's up to the hospital. The burden 1 2 should be on the hospital to make that diagnosis and move forward with care and treatment. 3 4 CO-CHAIR KNOWLTON: Peter. 5 MEMBER SCHMIDT: So many of these comments could have been applied to many previous 6 7 measures, and you know, would apply equally to many prior measures and were not. There's no 8 9 exclusion for less than ten in the head CT 10 measure, for example. So and then the next 11 question that comes up to me is what outcome 12 would you want out of this should there be some 13 14 Because if you're not at a good place 15 to get stroke care, is it bad for us to identify 16 that you're not a good place to get stroke care? 17 CO-CHAIR KNOWLTON: Alex, did you have 18 your card up? 19 The only point I was DR. SCHWAMM: 20 going to make is I mean you're pointing out an 21 incredibly important systems issue in care. In 22 Canada, what they've developed is a stroke

network, so that there's a centralized group of
 sick kids in Toronto.

3	So they get calls all the time about
4	strokes in smaller centers and help them work
5	their way through, and they have the coordinated
6	care and registry. So perhaps something like
7	this would push more of a coordinated approach to
8	pediatric stroke, including the 18 to 21 year-old
9	range. But I'm not sure that's within the
10	purview of what we're doing, and again I think we
11	should
12	You made the point. I think it's on
13	record and unless there's other changes to the
14	discussion, we maybe should move on.
15	CO-CHAIR KNOWLTON: Anything further
16	on this?
17	(No response.)
18	CO-CHAIR KNOWLTON: Ron and Charlotte
19	and Peter, put your cards down if you don't want
20	me to call them. Okay. Let's vote on this
21	Usability and Use.
22	MS. OGUNGBEMI: We are now voting on

1	Usability and Use for Measure 1952. Options are
2	high, moderate, low and insufficient. Voting is
3	open.
4	(Voting.)
5	MS. OGUNGBEMI: Voting is closed. The
6	results are 19 percent high, 71 percent moderate,
7	10 percent low and 0 percent insufficient.
8	Measure 1952 passes on Usability and Use.
9	CO-CHAIR KNOWLTON: So now on overall
10	then?
11	MS. OGUNGBEMI: We are now voting on
12	the overall suitability for endorsement of
13	Measure 1952. Your options are yes and no.
14	Voting is open.
15	(Voting.)
16	MS. OGUNGBEMI: Voting is closed. A
17	unanimous 100 percent for yes, the Measure 1952
18	is suitable for endorsement.
19	PARTICIPANT: I know you'll continue
20	without me, but I am leaving.
21	CO-CHAIR TIRSCHWELL: Thanks. So we
22	are going to have a working lunch today. We're

going to take ten minutes to move efficiently 1 2 through the lunch line. Bring your food back to the table, and we'll dig right in. Oh, sorry. 3 4 While you're doing that, we're going 5 to open the phones up for public comment. Is that okay? So can the operator open the phones 6 7 for public comment please? At this time, if you 8 OPERATOR: Yes. 9 want to make a comment, please press star then 10 the number one. 11 CO-CHAIR TIRSCHWELL: Turn the volume 12 Is that possible? up. 13 (No response.) 14 OPERATOR: There are no public 15 comments at this time. 16 CO-CHAIR TIRSCHWELL: Thank you. Any 17 comments from the audience in the back? Sorry, 18 we did not mean to ignore you guys. 19 (No response.) 20 CO-CHAIR TIRSCHWELL: Alright, thank 21 you. 22 (Whereupon, the above-entitled matter

went off the record at 12:51 p.m. and resumed at 1:03 p.m.)

CO-CHAIR KNOWLTON: Okay let's get 3 4 Just so we're clear, we've got a little qoing. 5 bit of a quorum challenge if we lose more people, so we're really trying to be respectful of 6 people's need to get to transportation and get 7 through as many of these as we can. So this is--8 9 we're starting consideration of Measure 1814, the 10 counseling of women of childbearing potential 11 with epilepsy. I was told we were doing this 12 one. 13 PARTICIPANT: We skipped 1814. 14 CO-CHAIR KNOWLTON: We skipped 1814. 15 PARTICIPANT: Correct. 16 CO-CHAIR KNOWLTON: Okay. Do we have 17 a developer here on this issue? 18 PARTICIPANT: Is the American Academy 19 of Neurology here to introduce -- yes. Sorry. 20 CO-CHAIR KNOWLTON: Sorry to be 21 misleading here. Would you like to introduce 22 yourselves and your measure?

Hello, I'm Amy Bennett, 1 MS. BENNETT: 2 Manager of Quality Improvement for the American Academy of Neurology. On behalf of the American 3 Academy of Neurology, thank you in advance or 4 5 considering our measure. We --CO-CHAIR KNOWLTON: Pull your mic a 6 little bit closer. They've got to pick you up. 7 MS. BENNETT: We affectionately know 8 9 this measure as the Women with Epilepsy measure, 10 This is a process measure addressing the so. 11 percentage of all female patients age 12 to 14 of 12 child-bearing potential, diagnosed with epilepsy. 13 Would it be possible to display the measure 14 specifications of this measure at this time? 15 Sorry, with epilepsy who are counseled at least 16 once a year about how epilepsy and its treatment 17 may affect contraception or pregnancy. This 18 measure is intended to help women with epilepsy 19 understand pregnancy risks and mitigate these 20 risk factors, which may in turn prevent unplanned 21 pregnancies, fetal malformations and improve 22 patients' quality of life.

The measure has been implemented in 1 2 the CMS PQRS program, and is being implemented in the AAN's Axon Registry. The Axon Registry is 3 currently in a pilot phase, so data is 4 5 unavailable at this time on performance. The Women with Epilepsy measure was initially 6 7 endorsed as a time-limited endorsement, and then during the 2014 annual review, testing data was 8 9 provided. During that review, the group granted 10 full endorsement, but recommended exception 11 concerns noted during the testing be addressed. 12 So later in 2014, the AAN seated a workgroup and 13 updated the measure and further clarified 14 exceptions to the measure in response to the 15 testing data. So that is my brief introduction 16 to the measure. 17 CO-CHAIR KNOWLTON: Has this been 18 fully endorsed by NQF? 19 MS. BENNETT: Yes. 20 MS. JOHNSON: That particular measure 21 was what we called at the time, time limited, and 22 it had special circumstances underneath it, and

what happened is with time limited measures --1 2 which we don't do any more, by the way--the developer brings that to our CSAC group, and the 3 4 CSAC looks at the testing data and makes the 5 decision. CO-CHAIR KNOWLTON: 6 Jocelyn and 7 Charlotte, are you presenting? MEMBER BAUTISTA: Uh huh. 8 9 CO-CHAIR KNOWLTON: This is Jocelyn and 10 Charlotte. Go ahead. 11 MEMBER BAUTISTA: Okay, so we'll go 12 directly into the evidence. The developer did 13 provide updated evidence for this measure. So 14 when it was initially approved for time limited 15 use, we invoked the exception to the evidence. 16 There was insufficient evidence--the group 17 thought at the time--there was insufficient 18 evidence, but felt it was an important enough 19 measure to proceed. So the updated evidence is 20 basically clinical guidelines published in 2014 that rated level 3 evidence for the importance of 21 22 counseling on contraception, et cetera. So I

think we're still left with the issue that 1 2 there's no direct evidence that counseling on these issues leads to improved outcomes in women 3 4 with epilepsy, but I don't think there ever will 5 I don't think there ever will be a be. randomized, controlled trial; I mean I could be 6 wrong, but I don't envision that there ever will 7 be randomized, controlled trials that look at 8 9 counseling versus no counseling on these issues. 10 So I think we're in this issue. 11 Charlotte, what CO-CHAIR KNOWLTON: 12 did you want to add? 13 MEMBER JONES: I agree that there will 14 never be a trial looking at whether counseling or 15 no counseling is beneficial, but I do think there 16 could certainly be trials looking at what forms 17 of counseling are appropriate; there could be 18 trials looking at who provides counseling, and 19 there could also be trials looking at are some --20 are there times in people's lives when they are 21 more willing to be counseled and more likely to 22 take counseling to heart. So I think saying

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nobody's ever going to stop counseling women,
 therefore we should use the evidence exception is
 inappropriate.

CO-CHAIR KNOWLTON: Valerie.

5 MEMBER COTTER: Can we make the point is the only outcome about, you know, having a 6 7 healthy baby or is the outcome also about making informed decision and choice about moving forward 8 9 and having a pregnancy? I mean, I think it's 10 really important that women are fully informed to 11 participate in that decision about whether they 12 want to get pregnant or not.

MEMBER BAUTISTA: I do think that's important, but the outcomes that the developer put forward, I don't believe that was one of their outcomes.

17MEMBER COTTER: Unplanned pregnancy is18listed as a potential outcome, and that--

19 CO-CHAIR KNOWLTON: Better to speak
20 close to your mics. People are eating, and it's
21 hard to hear, so speak close to your mics, so
22 everybody can hear. And we're taping this too,

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so that's important.

2 MR. PATEL: So counseling then, unwanted pregnancies is definitely part of this 3 4 measure and it was listed in there, and the data 5 used to justify it was also part of the measure. So it's very important, and we consider it to be 6 crucially part of the measure. And you know, 7 that does address perhaps there could be some 8 9 ways that you could counsel, like Dr. Jones has 10 recommended or certain aspects of it, but one 11 thing I would point out is, you know, this 12 measure isn't specifically about those things, 13 it's just the overall goal is to provide that 14 counseling, and that's the first step, and what 15 hopes to be better outcomes develop because of 16 the counseling that's provided. 17 CO-CHAIR KNOWLTON: Other comments or 18 questions or thoughts? David? 19 MEMBER ANDREWS: Maybe I'm revealing 20 my ignorance, but why is this a different issue 21 for women with epilepsy than women in general? 22 MR. PATEL: A lot of the anti-

1 epileptics that we use to treat women can have 2 effects on their contraceptive choices, effects to the child, the unborn child, as far as neural 3 4 tube defects, so that's a big issue there. Data 5 has shown that women with epilepsy have a harder time achieving fertility and other outcomes that 6 way, and so therefore, it tends to be more--a 7 little bit bigger of an issue as it relates to 8 9 women who have epilepsy. 10 How big a little bit? MEMBER ANDREWS: 11 Sir? MR. PATEL: 12 MEMBER ANDREWS: How big a little bit? 13 You said there's a little--sorry. 14 So approximately 90 MS. BENNETT: 15 percent of women who have pregnancies with 16 epilepsy do not have complications, but for 10 17 percent, there is potential complications with 18 their pregnancy, which could potentially be 19 seizure dis-control or birth defects. And then 20 there's also the concern about unplanned 21 pregnancy, the fact that the impact of the antiseizure medication reduces the efficacy of the 22

birth control, so it leads to unplanned 1 2 pregnancies. CO-CHAIR KNOWLTON: Anybody else? 3 4 Lisa. 5 MEMBER LINES: So that's interesting, but do we have comparable data in terms of rate 6 7 of unplanned pregnancies in women without epilepsy versus women with; do they have rates of 8 9 complications for women with epilepsy versus 10 women without? I'm not hearing that. 11 CO-CHAIR TIRSCHWELL: So I'll just say 12 from a clinical perspective the risk of a 13 complication of pregnancy in women who have 14 epilepsy who are taking anti-epileptics and sort 15 of are cognizant of what's going on, that they're 16 pregnant early is substantially higher. So 17 there's a huge potential impact here; there's no 18 arguing that. I guess the argument is whether 19 this measure is going to impact that, but it 20 seems like last time we were so compelled by the 21 fact that at the very least, we should try to 22 tell these women about this potentially huge

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That carried the day, carried them 1 health issue. 2 over the finish line without any evidence. CO-CHAIR KNOWLTON: 3 Peter. MEMBER SCHMIDT: I just think that 4 5 there might be a technical error in the preliminary rating because my understanding is 6 7 that low would mean that there is a discrepancy, or that the evidence is conflicting about whether 8 9 or not we should do this. My sense is that there 10 is high face validity to this measure. We've had 11 agreement that you--that it would be unethical to 12 test this in a randomized way. So the issue is, 13 is it insufficient, or do we think that the issue in front of us has evidence for it? 14 15 CO-CHAIR KNOWLTON: Jocelyn. 16 MEMBER BAUTISTA: I think the rating 17 of low, the preliminary rating for low on the 18 evidence is the fact that there is evidence that 19 certain anti-epileptic medications have effects 20 on--you know, it's all of the related evidence 21 that there are important issues that need to be 22 discussed about women's epilepsy, but there's no

direct evidence that the counseling will impact 1 the ultimate outcomes. I think that's why it got 2 the low rating. 3 4 MEMBER SCHMIDT: But not counseling 5 would certainly--not counseling would clearly be Face validity but not counseling means 6 worse. 7 that that information is not conveyed. 8 MEMBER BAUTISTA: We argued the 9 original time it was presented. 10 CO-CHAIR KNOWLTON: Steve? 11 This would seem to be a MEMBER HUFF: 12 mom and apple pie thing. I mean, at face value, 13 how could this be a bad thing? 14 PARTICIPANT: Do you want to quantify 15 that? Just kidding. 16 MEMBER HUFF: Yes, I mean the only 17 good question is, is what would you do with this 18 measure and how would you use this to--how would 19 this be used to alter providers' behaviors? 20 CO-CHAIR KNOWLTON: I think I'm 21 wondering whether -- I'm trying to channel you 22 here, Peter--if we're going for the exception to

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the evidence rule again, it would probably have to go to insufficient, not to low. Low will fail; insufficient means that we can go to the exception again. I don't know. Yes. I learned that yesterday.

And just a little bit of 6 MS. JOHNSON: NQF trivia, the last time around we didn't have 7 8 the algorithms. So you guys, we still had an 9 exception back then, but our algorithms are new since the last time. How we landed on low really 10 11 had to do with the nice guidelines being graded 12 and graded with a level C. So, and that's why we 13 landed on low rather than insufficient.

CO-CHAIR KNOWLTON: David.

15 I'm just unclear on MEMBER HACKNEY: 16 what kind of evidence we would say we would want 17 if we were to come up with insufficient. You 18 know, if we had evidence that said this 50 19 percent of women got counseled, this 50 percent 20 didn't, these people had less unintended 21 pregnancies and less birth defects, then we would 22 have good evidence that counseling -- so that would

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be the gold standard. We could it--it would be
 less gold if it was observational data, which
 seems feasible, but that--

I think that's the 4 MEMBER DICKERSON: 5 evidence that we're looking for that we don't That raises the question of why, if we're 6 have. 7 here again addressing this question, why hasn't the measure been used or why haven't 8 9 encouragements been made or incentives been made 10 to use the measure to collect this kind of data? 11 So the measure has been MS. BENNETT: 12 utilized in the CMS PQRS Program, but the 13 performance rates under that have not been 14 released by CMS. And additionally, the AAN is in 15 the process of developing a performance 16 improvement registry, but that hasn't been 17 launched at this date. So it has been released 18 and studied in practice, and we know that there 19 is a gap in care based on published data, but we 20 haven't had a tracking system for the data yet. 21 CO-CHAIR KNOWLTON: Peter. 22 I would like that there MR. PATEL:

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are case reports on other data that have since 1 2 come out since the original measure was proposed and endorsed by NQF on that continued gap. 3 You 4 know, we still are seeing greater than 50 percent 5 of women not getting this counseling and therefore, we have not seen the rates decrease in 6 7 what we would hope to see. Now as further implementation occurs, and it gets improved and 8 9 hopefully continued endorsement occurs from this 10 group that will lead to that, then we're 11 hopefully going to be tracking those outcomes and 12 then be able to present that as well. 13 CO-CHAIR KNOWLTON: Peter. 14 MEMBER SCHMIDT: So I just want to say 15 that to the point of does counseling affect 16 pregnancy rates, I think we've seen a natural 17 experiment going on across schools since 18 curriculums are adapted that it does in fact 19 affect pregnancy rates. 20 CO-CHAIR KNOWLTON: Anything further 21 on evidence? 22 I think I just have to MEMBER JONES:

put in counseling has a minimal impact on 1 2 pregnancy rate. What really impacts pregnancy rate is access to contraception on demand. 3 That 4 is what really makes the difference. CO-CHAIR KNOWLTON: 5 So we--are we ready to vote on evidence? Are people 6 comfortable with what we--7 CO-CHAIR TIRSCHWELL: Can we clarify 8 9 when we put it up that if you think it should 10 fail on evidence, you can vote low; if you think 11 it should pass, it's high or moderate; if you 12 think we should invoke the exception again, then 13 you probably need to be in the insufficient 14 category. Did I do all that right? 15 CO-CHAIR KNOWLTON: Okay, ready to 16 vote? Let's go. 17 MS. OGUNGBEMI: We are now voting for 18 Measure 1814 on evidence; the options are high, 19 moderate, low and insufficient. Voting is open. 20 Voting is closed. Results are zero percent high, 21 10 percent moderate, 15 percent low and 75 22 percent insufficient. Measure 1814 does not pass 1

on evidence.

2 CO-CHAIR KNOWLTON: Okay, so we move on to whether we wish to make an exception here; 3 4 we do that by a vote. Any comment on it before 5 we move to a vote? CO-CHAIR TIRSCHWELL: There's no gray 6 zone here, right? 60 or bust. 7 Greater than 60. 8 PARTICIPANT: 9 CO-CHAIR TIRSCHWELL: Greater than 60. 10 CO-CHAIR KNOWLTON: Greater than 60. 11 All right, let's go. 12 MS. OGUNGBEMI: We are now voting on 13 evidence and the potential exception to empirical 14 evidence for measure 1818. Your options are 15 insufficient evidence with exception or no 16 exception. Voting is open. Voting is closed. 17 Okay then we will re-vote. 18 PARTICIPANT: We've got to start the 19 two days over again. 20 MS. OGUNGBEMI: We are now re-voting 21 on the evidence, potential exception to empirical 22 evidence for Measure 1814. Your options are

insufficient evidence with exception and no exception. Voting is open. Voting is closed. The results are 90 percent insufficient evidence with exception and 10 percent no exception. Measure 1814 passes on its insufficient evidence with exception.

CO-CHAIR KNOWLTON: A gap? Jocelyn. 7 MEMBER BAUTISTA: 8 So in the 9 performance data submitted by the developer, 10 there is a clear gap in care. Less than 40 11 percent of women receive counseling about 12 epilepsy and its treatment. So I don't think--13 and that's supported by the literature. I don't 14 think there's any question that there's a gap. 15 CO-CHAIR KNOWLTON: Comments or 16 questions now, then let's move to vote. 17 MS. OGUNGBEMI: We are now voting on 18 performance gap for Measure 1814. The options are 19 high, moderate, low and insufficient. Voting is 20 Can everyone try to vote, please? Voting open. 21 is closed; results are 85 percent high, 10 percent 22 moderate, five percent low, and zero percent

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insufficient. Measure 1814 passes on performance gap.

3 CO-CHAIR KNOWLTON: Reliability. MEMBER BAUTISTA: So reliability 4 5 testing consisted of data element validity testing, which does satisfy NQF requirements. 6 So 7 the way they did this, they recruited 3 neurology practices in Minnesota and asked them to submit 8 9 their data, retrospective data, and they had sort 10 of a chart review to evaluate the validity of the 11 data elements. Two of the three practices did 12 well; one of practices had to resubmit data, which 13 I think raises some questions. So the preliminary 14 rating for reliability was low. 15 MS. BENNETT: So in follow up, the 16 practice was asked to submit additional records, 17 and the concern was that the cognitive impairment 18 exception had been invoked, and then there was a 19 failure to document mild mental retardation in the 20 chart, which led to the request for additional 21 data. 22 MEMBER BAUTISTA: So there are number

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of exceptions to this measure, and I think that's where the validity may become an issue. So they have exclusions for patients with intellectual disability, and physicians interpret that term in different ways, and they document it in different ways, and I think that speaks to the problem of extracting that particular data element.

8 MS. BENNETT: So in response to this 9 data testing, we further refined exceptions so 10 that it is very clear which developmental 11 disabilities and neurological disorders, 12 neurodevelopmental disorders meet the exception 13 criteria. In the original version of this 14 measure, it had just stated severe developmental 15 disability, so it wasn't clear what met that 16 exclusion. So we hope that by further refining 17 exclusions, it is now clear which patients would 18 meet the exclusion criteria.

19 PARTICIPANT: So what does it say?
20 MS. BENNETT: It now states what is
21 listed on--sorry--on 699, it states the
22 exclusions; the exception for neurodevelopmental

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disorder, encephalopathy, hydrocephalus, brain 1 2 injury, cerebral palsy, or a diagnosis of severe cognitive impairment or severe intellectual 3 disability, whereas before it had just stated 4 5 severe medical reason for severe disability. 6 CO-CHAIR KNOWLTON: Charlotte. 7 MEMBER JONES: Question for the developers. What was the definition of counseling 8 9 that was used in the chart review? When I went 10 through the literature, I didn't--because you have 11 a number of things you wants patients counseled 12 You want them counseled on breast-feeding, on. 13 you want them counseled on contraception, you want 14 them counseled on birth defects, you want them 15 counseled on folic acid. So when you are 16 identifying that counseling has occurred, it seems to me that there are at least four or five 17 18 different factors that constitute counseling. How 19 are you distinguishing those?

20 MS. BENNETT: We've defined counseling 21 to include--counseling should include a discussion 22 about folic acid supplementation, contraception,

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potential anti-seizure medication effects on 1 2 pregnancy, safe pregnancies and breast-feeding. So you are asking them 3 MEMBER JONES: 4 to counsel on all five of these things to --5 MS. BENNETT: Once a year, yes. 6 MEMBER JONES: --to--once a year? 7 MS. BENNETT: Yes. On all five of these 8 MEMBER JONES: 9 things? 10 MS. BENNETT: Yes. 11 MEMBER JONES: Okay. 12 MEMBER DICKERSON: So they couldn't 13 claim that they did it without doing all five? I think that if there was 14 MS. BENNETT: 15 documentation that they didn't counsel on one 16 particular aspect of the--it wouldn't meet the 17 measure criteria. But we have developed an e-18 measure, the ability to pull this data through our 19 registry without additional burden on doing a 20 So we have the data elements to chart review. 21 find to pull from EHR. 22 MEMBER JONES: How are you pulling that 1

from the EHR?

2 MS. BENNETT: An elaborate data dictionary so that each individual component, 3 there are a multitude of words that we've worked 4 5 through with our registry committee members to identify all the different variations of words 6 7 that could be used rather than breast-feeding or other items. So each one of these has an 8 9 elaborate data dictionary that's included with it. 10 Yes, you can extract it from a medical record 11 without doing a chart review. 12 CO-CHAIR KNOWLTON: This is an 13 electronic measure, let's--this is interesting, 14 but it's off of the point of what we're proving 15 here. Yes, it does, and that's a valid concern 16 and you can raise it Charlotte, but whether 17 there's a data dictionary and we're using it in 18 the EHR at some point is not before us at the 19 moment. Jim? 20 MEMBER BURKE: So are three practices 21 enough to tell us anything about reliability? 22 CO-CHAIR KNOWLTON: On the mic, please.

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1	MEMBER BURKE: Are three practices
2	enough to tell us anything about reliability? I
3	mean, we had a gripe earlier today about whether
4	or not 1,500 hospitals is enough to tell us about
5	3,000. Three seems awfully thin for reliability.
6	CO-CHAIR KNOWLTON: Other comments,
7	questions?
8	MEMBER KAPLITT: Yes, this is Mike
9	Kaplitt, I had put my electronic hand thing up,
10	but I guess nobody saw it. I just have aon the
11	same point, whether three is enough or not, on its
12	face the developer said that they changed theI
13	guess it was the exclusion criteria or the data
14	elements or something, based on the fact that they
15	learned from that one out of three practices that
16	had problems, they learned that they needed to
17	improve it. So I'm wondering why has this come
18	forward now, rather than retesting this with,
19	let's say, even if three is sufficient, why wasn't
20	it retested in three new practices to make sure
21	that that solved the problem? Because using your
22	own words, you said you hoped that this will solve

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the problem, but we have no data to say that it did. So whether it's enough or not, you felt that there was enough of an issue to change this, and now we have no new data to say that it solved the problem.

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So during the update 6 MS. BENNETT: 7 process, we had an extensive discussion with the workgroup about should there be exclusions at all. 8 9 There was a lot of argument that there shouldn't 10 be any exclusions, that even those with severe 11 developmental disabilities are at risk for abuse 12 and violence that could result in an unplanned 13 pregnancy through rape. But there was a workgroup 14 consensus that these are the exceptions to be 15 utilized, so a committee of 30--25 individuals 16 agreed that these are appropriate exclusions for 17 the measure. Testing a measure takes 18 approximately 18 months; we released this measurement set in 2015; this project was 19 20 announced and we haven't had enough time to 21 conduct additional validity testing through the 22 use and the registry, but that is our intent that

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there will be ongoing assessment of the measure
 through data gathered from our registry.

And I'd like to clarify 3 MR. PATEL: that the definitions of exclusions were not based 4 5 on the feedback we got from the practice; it was on workgroup consensus. And again, like Amy had 6 said, we spent a lot of time to make sure we had 7 the proper definitions and they were more tightly 8 9 aligned so it would be easier to capture in 10 measures.

11 MEMBER KAPLITT: Okay, because my 12 recollection of the discussion, and I assume we 13 have transcripts, is that when the reliability was 14 presented, it was presented as that one of the 15 three groups had an issue, and then they were 16 asked to resubmit data, and then whoever responded from the developer said that, you know, as a 17 18 result of that, you guys made your changes. Now I'm sure it was the workgroup that made the 19 20 change, but either the three groups provided 21 useful data or they didn't, right? I mean, if you 22 didn't do anything based on it, then what's the

relevance of those three groups? There just seems 1 2 to be--there seems to be an issue with both the logic of how this process is done, and the timing. 3 4 Is there some time pressure that forced this to be 5 done now rather than 18 months from now, when you had more--I mean I don't know why it would take 18 6 months to get data from three practices, but even 7 if that were true, is there some time pressure 8 9 that we have to do this now? 10 MS. BENNETT: It's up for maintenance 11 review now. 12 MEMBER KAPLITT: Okay. 13 So I feel like there MEMBER SCHMIDT: 14 should be more data available because it's up for 15 maintenance review. It's been used and it had a 16 provisional endorsement; isn't there data from the 17 prior period where--that could inform our decision 18 on this? 19 The AAN did not generate MS. BENNETT: 20 data; we didn't have a source for gathering data 21 in the interim, so any data that has been used in 22 practice has been private data. So we're reliant

upon what's been published as well as the fact 1 2 that CMS hasn't released the performance rates So the AAN doesn't have access to 3 under PORS. 4 other people's information on use of the 5 performance in practice. MR. PATEL: That will be corrected with 6 7 the registry, but again, the registry is just getting started. 8 9 CO-CHAIR KNOWLTON: Anything further on 10 this? I hear that people have concerns, but 11 anything new? Any additional issues? Okay, we 12 are voting on reliability. 13 MS. OGUNGBEMI: We are now voting on 14 reliability for Measure 1814. Options are high, 15 moderate, low, and insufficient. Voting is open. 16 Voting is closed. Results are zero percent high, 17 40 percent moderate, 30 percent low, and 30 18 percent insufficient. We are in a gray zone. 19 MS. JOHNSON: We're between 40 and 60 20 inclusive if you add high and moderate. So if 21 that 40 had been 39, it would have failed. You're 22 in a gray zone.

1 CO-CHAIR KNOWLTON: Correct. We proceed 2 then? Yes. 3 MS. JOHNSON: 4 CO-CHAIR KNOWLTON: Okay. And Jocelyn 5 had the lead, so Charlotte, it's on you. Microphone, please. 6 7 MEMBER JONES: So in terms of validity, the group used an 8/30 process where they reviewed 8 9 eight charts to determine if the records were 10 compliant. If eight were greater than 90 percent 11 I believe, they then stopped assuming that all 12 charts were compliant. If not, they went to 30, 13 and that was where they found that they needed to address the issue of date of birth because they 14 15 were missing a year's worth of patients, and then 16 they also had a group that -- where the patients who 17 were surgically sterile or intellectual 18 disability, they resubmitted that data with 19 corrections. So the validation process identified 20 errors, they went back and improved on that, they 21 had problems with the intellectual disability, 22 which was modified as previously discussed. They

had statistics for the rate of contraceptive 1 2 counseling and the rate of contraceptive and pregnancy counseling; I don't know where breast-3 4 feeding fell in to that, so I'm wondering if they 5 have additional data on that, but that was not provided to us, and they certainly showed--and 6 7 this was one of their ways for gaps. So the validity in terms of was the information in the 8 9 chart retrievable seemed moderate to low; based on 10 the analysis, one is left with the question, as 11 one often is left with chart reviews, is what is 12 checked or entered the correct information, but 13 that's the reality that we have to deal with. So 14 when it comes to validity testing, I believe based 15 on the algorithm, and I don't have -- we have the 16 problem of the small number of clinics, and the 17 generalized ability for the validity. And I 18 apologize, Jocelyn and I had discussed how we were 19 going to do this, but she had to leave because of 20 time constraints.

21 MS. BENNETT: They contracted with 22 Minnesota Community Measurement, who utilized a

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process developed by the NCQA, and ultimately 1 2 their finding was there was no significant flaws or errors with the data. Minnesota Community 3 Measurement was confident that the rate 4 5 calculation and any additional data analysis can be completed using validated and reliable data. 6 7 So that's what the AAN was informed based on our contracted assessment of this reliability. 8 9 CO-CHAIR KNOWLTON: Comments or 10 questions? Okay, we're voting on validity. 11 MS. OGUNGBEMI: We are now voting on validity for Measure 1814. Options are high, 12 13 moderate, low and insufficient. Voting is open. 14 Voting is closed. Results are zero percent high, 15 68 percent moderate, 11 percent low and 21 percent 16 insufficient. Measure 1814 passes on validity. 17 CO-CHAIR KNOWLTON: Okay, feasibility. 18 MEMBER JONES: Feasibility, the 19 information is generated and used by health care 20 personnel during the provision of care. We have 21 heard that it is possible to--all date elements 22 are in defined fields and a combination of

electronic sources, and there was information that 1 2 one of the clinics reported difficulty in doing the work. We also have the feasibility that these 3 4 were three groups that volunteered to participate, 5 which will not necessarily be true if this is a endorsed measure, but the same thing is true as we 6 7 certainly used the Get With the Guidelines programs, and those are also volunteer. So I 8 9 don't know that that in and of itself is a threat 10 to feasibility. We haven't raised it with the 11 stroke data. Usability--12 CO-CHAIR KNOWLTON: Don't go into 13 usability yet. Stay on feasibility. 14 Stay on feasibility. MEMBER JONES: 15 CO-CHAIR KNOWLTON: Because we have to 16 vote on it. Any comments on feasibility? Okay, 17 let's vote on feasibility. 18 MS. OGUNGBEMI: We are now voting on 19 feasibility for Measure 1814. The options are 20 high, moderate, low and insufficient. Voting is open. Voting is closed. Results are zero percent 21 22 high, 89 percent moderate, five percent low and

five percent insufficient. Measure 1814 passes on 1 2 feasibility. 3 CO-CHAIR KNOWLTON: Feasibility and use? Charlotte. 4 So the American Academy 5 MEMBER JONES: of Neurology makes a significant -- and this is 6 7 where I am a member of the American Academy of Neurology AXON registries. I am an advisor to the 8 9 group, and I'm honestly feeling a bit of a 10 conflict of interest here because it was not my 11 understanding that all of these measures were 12 definitely to be incorporated. I am hearing from 13 the AAN that it is going to be incorporated, so I 14 feel--and I feel really bad because this was a 15 measure I was assigned to. I almost feel like I 16 have to recuse myself because I was unaware that 17 it had been accepted into the AXON registry. Ι 18 wasn't part of the development of it. But the 19 AXON registry is a registry that is a voluntary 20 registry that is at this point, not used for bench 21 marking, and --22 Charlotte, if you CO-CHAIR KNOWLTON:

have a conflict, then you should stop discussing 1 2 and you should not vote. MS. BENNETT: Dr. Patel is here to 3 4 provide expertise on his use of the measure in the field, if you would like to hear his--5 CO-CHAIR KNOWLTON: 6 He can speak as to 7 development, but to that point and then we'll move back to our committee. Go ahead. 8 9 Yes, so at our institution MR. PATEL: 10 we actually have created though our EHR guick 11 buttons that take less than 30 seconds to complete, that you're compliant with the different 12 13 components of this measure. It was very easy to 14 implement, and it's being rolled out. We also 15 created other best practice alerts which would 16 be--would flag you if you had a patient that would 17 meet criteria for this measure, and again you 18 would then follow the prompts and be able to 19 collect that data. They're discrete elements, so 20 they're easy to collect, and we're going to be now 21 reporting on that and looking at those outcomes 22 that we talked about earlier. So from a usability

standpoint, it can easily be placed into anyone's EHR. And again with the AXON registry, we're going to have those data dictionary elements, they're going to be able to be pulled out, which means that the individual user of--that's going to do this measure will not have additional work or any obstructions to that.

8 CO-CHAIR KNOWLTON: Okay, thank you 9 Doctor. Are there other thoughts from the 10 committee? Okay, well let's move forward on a 11 vote here.

MS. OGUNGBEMI: We are now voting on usability and use for Measure 1814. Options are high, moderate, low and insufficient. Voting is open. Results are 11 percent high, 89 percent moderate, zero percent low and zero percent insufficient. Measure 1814 passes on usability and use.

19 CO-CHAIR KNOWLTON: We're going to have
20 to return and re-vote on the other issues, because
21 Charlotte recused herself. So we've got to go
22 back to evidence. I don't know if we need to

discuss it, but we --1 2 CO-CHAIR TIRSCHWELL: So it doesn't matter which one we take out, it won't change the 3 4 results. 5 CO-CHAIR KNOWLTON: Right. CO-CHAIR TIRSCHWELL: 6 I would propose 7 that we don't -- for evidence, and then the next one on the exception as well, same thing, and then 8 9 the next one was--I think it's just gap, no issue 10 there, vast majority. This one is the one that we 11 probably have to re-vote on. 12 CO-CHAIR KNOWLTON: Okay so the issue 13 then is reliability. Any comments? Are we 14 logistically settled on what we're doing? Yes? 15 CO-CHAIR TIRSCHWELL: So we're just re-16 voting on--17 CO-CHAIR KNOWLTON: We're just re-18 voting on reliability. 19 CO-CHAIR TIRSCHWELL: Well, and then 20 we'll see what the other results are. 21 CO-CHAIR KNOWLTON: Yes, that's right. 22 MS. OGUNGBEMI: We are now re-voting on

reliability for Measure 1814. Options are high, 1 2 moderate, low and insufficient. Voting is open. For reliability, the results are zero percent 3 4 high, 56 percent moderate, 17 percent low and 28 5 percent insufficient, so we are still in a gray 6 zone. 7 CO-CHAIR KNOWLTON: That's okay. 8 MS. OGUNGBEMI: We are not voting on 9 the overall suitability for endorsement of Measure 10 1814. Options are yes or no. Voting is open. 11 Voting is closed. Results are 67 percent yes, 33 12 percent no. Measure 1814 is suitable for 13 endorsement. 14 Thank you everybody. MR. PATEL: 15 CO-CHAIR KNOWLTON: Okay. Moving on, 16 0507, Diagnostic Imagining Stenosis Measurement 17 and Carotid Imaging Reports. Hello. You want to 18 introduce yourself and your measure? Turn your 19 microphone on, please. 20 MS. BURLESON: Hi, I'm Judy Burleson 21 with the American College of Radiology, and I 22 believe we have Dr. David Seidenwurm on the phone

if we can open that up to him as well. I'll 1 2 introduce the measure, 0507, Stenosis Measurement in Carotid Imaging Reports. This measure was 3 originally endorsed in 2008 and was reviewed again 4 5 and maintained for endorsement in 2013. It has been in the PQS program since 2007 and is 6 7 currently contained in the ACRS Clinical Quality data registry for PQS reporting purposes. 8 Is Dr. 9 Seidenwurm on the phone? 10 DR. SEIDENWURM: Yes. 11 MS. BURLESON: Hi. 12 DR. SEIDENWURM: Hello. Hi. 13 MS. BURLESON: Hi. The measure 14 denominator is final imaging reports for carotid 15 imaging studies to include neck MRA, CTA and neck 16 duplex ultrasound and carotid angiogram. The 17 numerator is of those reports, those that have 18 documented the method used for stenosis calculation in a way that includes direct or 19 20 indirect reference to measurements of distal 21 internal carotid diameter as the denominator for stenosis measurement. And this would include a 22

direct angiographic stenosis calculation based on the distal lumen as the denominator for stenosis measurement, or an equivalent validated method referenced to that type of calculation. So for duplex ultrasound studies, velocity parameters that correlate with the anatomic measurements that use a distal internal carotid lumen as the denominator.

9 Where the improvement focus is for this 10 measure is on the wide variation and the 11 classification, documentation and reporting of 12 methods for stenosis calculation, which may also 13 lead to variation in the appropriateness of carotid intervention. Different methods of 14 15 stenosis calculation yield different results, so 16 the degree of stenosis is an important element of 17 the decision for carotid intervention and thus the 18 characterization of the degree of stenosis needs 19 to be standardized in order to provide reliable 20 info for treatment decisions. As described in the 21 denominator, the measure is applicable to CTNMR 22 imaging techniques and geography as well as duplex

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1	ultrasound, and reference standards for these
2	techniques allow interpretation that coordinate
3	with methods such as the NASCET methodology. Dr.
4	Seidenwurm, do you have any comments?
5	DR. SEIDENWURM: No, I think you did a
6	very good job summarizing. Thank you.
7	CO-CHAIR KNOWLTON: Our discussants
8	are, let me see, Brad and David.
9	MEMBER HACKNEY: I'm going to start
10	Brad and I discussing.
11	CO-CHAIR KNOWLTON: Okay.
12	MEMBER HACKNEY: So this is a measure
13	that has been previously approved; it'sthere's
14	one issue about it that I'm going to raise once,
15	but it comes up in a lot of the evaluations, and
16	that is the denominator. The value of this is
17	that there's excellent evidence that in
18	symptomatic adults, in adults with brain ischemic
19	symptoms ipsilateral to a carotid stenosis, that
20	the severity of that stenosis helps predict
21	whether they would benefit from mechanical
22	intervention, surgery or carotid stenting. And so

if the group were confined to that, the evidence 1 2 would be great, and a lot of the other issues would be great. The problem is because the 3 4 denominator includes everybody who gets vascular 5 imaging of the neck, it includes a large number of people, maybe the vast majority for whom there is 6 7 no data that it matters at all what the diameter of the carotid is or how you measure it. 8

9 So for the people for whom it matters, 10 the good thing about the NASCET measure is that it 11 has been empirically proven to be a good predictor 12 of response to surgery versus medical management, 13 and nobody does this anymore but there have been 14 studies in the past that demonstrated that some of 15 the alternate measures--methods of calculating the 16 stenosis severity were not as reproducible as the 17 NASCET measure. So as applied to the target 18 population, it's great; as applied to everyone, 19 that people who don't have atherosclerotic 20 disease, for example, the people who don't have 21 symptoms, children who might have symptoms but 22 don't have symptoms because of atherosclerotic

disease, and even if they did, there are no data 1 2 on what you do with that number in a child. Now you have a measure in which potentially the 3 4 majority of the instances, this number doesn't 5 mean anything. And so as I said, this will come up repeatedly through the evaluation, but that's 6 the basic concern that I have, and it's really the 7 only concern that I have. 8

9 So should we start with--I think I 10 addressed evidence. There is good evidence that 11 it matters in some people, and no evidence that it 12 matters in others. They also--there's an issue 13 about how the measure is constructed, and I just 14 want clarity on. It is in some people not 15 possible to actually do the measurement, 16 particularly when the stenosis is tight for 17 technical reasons or the way the UGIB works. In 18 the evidence document, they mention that in that 19 case, you do a qualitative estimate rather than a 20 quantitative measurement, and that's what 21 everybody does who uses this. The only thing I'm 22 concerned about is it doesn't actually say that in

the measure, it just says it in the evidence, so 1 2 is that included by reference or is it considered okay officially by the measure to do that, and I 3 4 don't know if the developer has an answer or David 5 has an answer for that. 6 DR. SEIDENWURM: Are you asking the 7 question now, David? 8 MEMBER HACKNEY: Yes, I'm asking that 9 question just --10 DR. SEIDENWURM: Sure. The way we've 11 interpreted that aspect of things is that there 12 are published crosswalks between all of the 13 different modalities and angiographic data, which 14 were the original basis for the methodology. So 15 for example, the velocities and velocity ratios, 16 speckle patterns and so forth in duplex 17 ultrasound, the patterns of signal dropout with 18 different MRA techniques and then direct 19 measurement methodologies for CTA. So I think 20 that with direct or indirect reference to 21 measurements, and I think is how we've kind of 22 elided that point.

Okay, I was asking a 1 MEMBER HACKNEY: 2 fairly narrow question that may not be that important. That is, is it okay--the evidence 3 document says you can use a qualitative estimate 4 5 when you can't do a measurement, so and I guess that's the question is, is that statement in the 6 7 evidence document, therefore part of the definition in the measure, and it's fine to use 8 9 that, or does the measure say you have to measure, 10 although the evidence document says qualitative is 11 okay? Do you understand my question? 12 DR. SEIDENWURM: Well, maybe. Ι 13 thought I did before, but I think now I think I 14 understand it differently. I think what you're 15 getting at is the fact that the interpretation of 16 some these studies leads to some gray zones. For 17 example, the near total occlusion pattern in 18 angiography, which is the gold standard for this. 19 The signal drop out spectral patterns, so some of 20 those are necessarily somewhat qualitative, and I 21 think that's why we were allowing that. One 22 always has to make a judgment with respect to

measurements and cross-sectional imaging with 1 2 partial volume phenomena and pixel sizes and so So I think we were just allowing for 3 forth. 4 professional judgment at the gray zones. 5 Okay, so if people can MEMBER HACKNEY: use qualitative when they can't measure, then 6 that's not a problem. So the evidence as I would 7 8 say, we've got two answers. For the narrow group 9 that I mentioned, the evidence is great; for the 10 So I don't know broad group, there's no evidence. 11 what to--how to resolve that in terms of a one 12 score for evidence. 13 CO-CHAIR KNOWLTON: David. 14 CO-CHAIR TIRSCHWELL: So I have two 15 comments or questions, and one may be easy. 16 Ultrasound is generally not reported with a 17 specific stenosis measurement, it's more often a 18 Is that still okay with this? range. 19 If that question is DR. SEIDENWURM: 20 asked of the developer, yes it is, as long as the 21 ranges are validated against the reference 22 measured.

CO-CHAIR TIRSCHWELL: So the individual 1 2 hospital has to do their own correlation at one point? 3 4 MEMBER HACKNEY: There are published 5 criteria. CO-CHAIR TIRSCHWELL: So as long as 6 7 they're using published criteria to estimate the range of stenosis, then they're good? 8 9 MEMBER HACKNEY: Right, because you 10 can't do this measure directly with ultrasound in 11 any case, but there are published criteria, and 12 the measure--13 CO-CHAIR TIRSCHWELL: So they're not 14 really using the NASCET method in the carotid 15 ultrasound? 16 MEMBER HACKNEY: Well, they're saying 17 use a method that has been validated against 18 NASCET measurements. 19 CO-CHAIR TIRSCHWELL: Okay, fine. So 20 that was the easy one. The second one is, is that 21 it's not entirely true that there's no evidence 22 for intervention in asymptomatic patients; in
fact, if you look at the most recent guidelines, 1 2 I agree, I'm not sure I believe them anymore, but as it stands right now, guidelines for carotid 3 4 interventions include the possibility, especially 5 in older adults with atherosclerosis, that asymptomatic patients with greater than 60 percent 6 stenosis are potentially candidates for an 7 appropriate intervention, and in fact, 75 percent 8 9 of carotid interventions in this country are done 10 in asymptomatic patients. So I don't think you 11 can really go with the if they're asymptomatic 12 it's never appropriate to have the stenosis 13 measurement. 14 MEMBER DICKERSON: I think the concern

MEMBER DICKERSON: I think the concern was more that for MRA in particular, there's often a low prior probability of carotid concerns, and it's just the catch all in many emergency room evaluations, and so do we want to force the poor radiologist to have to quantify every one of those.

21 MEMBER HACKNEY: Actually, my concern 22 isn't so much the force to quantify, because

coming up with a number isn't that hard. But what I'm worried about is precisely that issue that David raised, that the vast majority of carotid interventions are done in asymptomatic patients, but they shouldn't be. And so I'm afraid that this is encouraging--

7 CO-CHAIR TIRSCHWELL: I mean, that's not true though. There's a randomized trial going 8 9 on now, because there's clinical equipoise about 10 whether they should or should not be done, and the 11 guidelines as they stand still endorse 12 intervention for asymptomatic patients, although 13 a lot of clinical practice has moved away from 14 that.

MEMBER DICKERSON: And in this case, it
would provide some data from a broader catchment
to address that potentially.

CO-CHAIR KNOWLTON: Peter.

MEMBER SCHMIDT: I'm just going to point out that we just voted as insufficient a recommendation based on clinical practice guidelines and gave it the exception with the

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counseling measure.

2 CO-CHAIR TIRSCHWELL: Those clinical practice guidelines are based on randomized 3 4 trials. 5 CO-CHAIR KNOWLTON: Are there comments on this evidence for this measure? Are we ready 6 7 to vote on it? Okay 8 MS. OGUNGBEMI: We are now voting on 9 evidence for Measure 0507; the options are high, 10 moderate, low and insufficient. Voting is open. 11 MEMBER HACKNEY: I'll just mention, 12 which I didn't--neglected to do, the preliminary 13 rating was moderate. 14 MS. OGUNGBEMI: Voting is closed. 15 Results are five percent high, 84 percent 16 moderate, five percent low and five percent 17 insufficient. Measure 0507 passes on evidence. 18 CO-CHAIR KNOWLTON: Gap? 19 MEMBER HACKNEY: So there is excellent 20 demonstration of a gap that has changed 21 dramatically in the last few years, but there's 22 still a substantial share of studies that are not

1 reported this way. So I think there's good, high 2 evidence of a gap. CO-CHAIR KNOWLTON: Questions or 3 comments on gap? Let's vote on it. 4 5 MS. OGUNGBEMI: We are now voting on performance gap for Measure 0507. 6 Options are 7 high, moderate, low and insufficient. Voting is open. Voting is closed. Results are 47 percent 8 9 high and 53 percent moderate, zero percent low, 10 zero percent insufficient. Measure 0507 passes on

11 performance gap.

12 CO-CHAIR KNOWLTON: Reliability? 13 MEMBER HACKNEY: There is--the evidence document includes excellent evidence of 14 15 reliability. They did a calculation that got 16 about .86 for reliability, and it's well 17 documented. It's very straightforward and 18 reliable to tell whether somebody has complied 19 with this. 20 CO-CHAIR KNOWLTON: Any questions or

21 comments? Let's vote.

MS. OGUNGBEMI: We are now voting on

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reliability for Measure 0507. Options are high, 1 2 moderate, low and insufficient. Voting is open. We're just missing one single vote. 3 Oh, got it. 4 Voting is closed. Results are 79 percent high, 21 5 percent moderate, zero percent low and zero percent insufficient. 6 Measure 0507 passes on 7 reliability.

CO-CHAIR KNOWLTON: Validity? 8 9 MEMBER HACKNEY: This was reviewed by 10 an expert panel, and then a second expert panel 11 did another review in February 2015. So there was 12 an initial expert panel review as it was being 13 developed, then one after it was in existence, and 14 then another one in February 2015, and all of them 15 agreed that this passes face validity and fairly 16 strongly endorsed the validity of the measure. So 17 I'd say aye.

18 CO-CHAIR KNOWLTON: Questions or19 comments? Let's vote on validity.

20 MS. OGUNGBEMI: We are now voting on 21 validity for Measure 0507. Options are high, 22 moderate, low and insufficient. Voting is open.

1 Voting is closed. Results are 58 percent high, 42 2 percent moderate, zero percent low and zero percent insufficient. Measure 0507 passes on 3 4 validity. 5 CO-CHAIR KNOWLTON: Feasibility? MEMBER HACKNEY: Feasibility is high. 6 7 This is already in use, it is widely used, it uses only information that's already routinely 8 9 generated for clinical care, and the data elements 10 are in the fields in electronic sources. So high 11 feasibility. 12 CO-CHAIR KNOWLTON: Questions or 13 comments? Let's vote on the feasibility. 14 MS. OGUNGBEMI: We are now voting on 15 feasibility for Measure 0507. Options are high, 16 moderate, low and insufficient. Voting is open. 17 Voting is closed. Results are 95 percent high, 18 five percent moderate, zero percent low, and zero 19 percent insufficient. Measure 0507 passes on 20 feasibility. CO-CHAIR KNOWLTON: Usability and use. 21 22 MEMBER HACKNEY: This is widely used.

It's used by CMS in their PQRS, it's used by the 1 2 American College of Radiology in their clinical data registry. It's not being publicly reported 3 4 now, but there is an anticipation from the 5 developer that it will be, so it's entirely Unintended consequences, I discussed my 6 usable. concern about that, but otherwise I'd say that 7 it's very usable, and I'd give it a high. 8 9 CO-CHAIR KNOWLTON: Ouestions or 10 comments? Okay, let's vote on usability and use. 11 MS. OGUNGBEMI: We are now voting on 12 usability and use for Measure 0507. Options are 13 high, moderate, low and insufficient. Voting is 14 Voting is closed. Results are 79 percent open. 15 high, 29 percent moderate, zero percent low and 16 zero percent insufficient. Measure 0507 passes on usability and use. 17 18 CO-CHAIR KNOWLTON: So look at the 19 overall suitability for endorsement. 20 MS. OGUNGBEMI: We are now voting on 21 the overall suitability for endorsement for 22 Measure 0507. Options are yes or no. Voting is

1	open. Voting is closed. The overall suitability
2	for endorsement result is 100 percent yes, zero
3	percent no. Measure 0507 passes on its
4	suitability for endorsement.
5	MS. TIERNEY: So
6	DR. SEIDENWURM: Thank you.
7	CO-CHAIR TIRSCHWELL: Thank you. You
8	win. It's a good day for you.
9	CO-CHAIR KNOWLTON: Okay, we're moving
10	on. Since we've already had our lunch, we're
11	moving on to 2111. So we're going out of order,
12	so we're doing 2872 and then 2870? Okay, we're
13	starting with 2872, Dementia and Cognitive
14	Assessment, Physician Consortium for Performance
15	Improvement. Is there a developer here?
16	CO-CHAIR TIRSCHWELL: We have currently
17	just 17 members now? Are we at the quorum number?
18	PARTICIPANT: Yes, we do. We still
19	have a quorum.
20	CO-CHAIR TIRSCHWELL: We're at 17, so
21	does anybody else have to leave very soon?
22	Dorothy, when do you need to leave? Okay, and

1 your measure is --2 (Off microphone comments.) CO-CHAIR KNOWLTON: 3 Okay. 4 MS. TIERNEY: So should we just take up 5 the 2872? 6 CO-CHAIR KNOWLTON: We are proceeding with 2872. 7 Okay, so we have a 8 MS. TIERNEY: 9 clinical expert on the phone, Dr. Soo Borson, who 10 is going to present the measure for us. Dr. 11 Borson, are you on the line, or can you make sure 12 she has an open line? 13 OPERATOR: Her line is open. 14 Thank you. Dr. Borson? MS. TIERNEY: 15 DR. BORSON: Yes, can you hear me? 16 MS. TIERNEY: Yes, we can. 17 DR. BORSON: Okay, great. Good 18 afternoon everybody. Yes, this is annual 19 measurement of cognition in people with a 20 diagnosis of dementia. Why this matters is as follows: the measure is intended to encourage 21 22 initial and ongoing assessment of cognition in

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patients who are diagnosed with dementia. 1 It 2 qualifies as a patient engagement measure, which is a recognized national priority. The measure 3 4 requires annual assessment regardless of care 5 setting, and applies to all care settings. Repeat cognitive assessment at its heart is a core 6 7 element of dementia staging; cognitive function itself is most tightly linked, beyond functional 8 9 status and other measures, to a patient's ability 10 to make medical decisions and to participate in 11 their own care planning. Repeat measurement of cognition can help identify otherwise silent 12 13 causes of reversible excess decline, for example, medications and certain medical conditions that 14 15 are otherwise not easy to detect.

Cognitive decline is also associated with important patient care factors and outcomes, including the following: impaired ability to understand and manage one's own personal health condition, greater risk for elder self-neglect, higher levels of every day disability and functional impairment, need for greater care giver

involvement in managing every day affairs and 1 2 health care, need for medical decisional proxy, higher risk of medical and surgical complications 3 4 of dementia, earlier institutionalization and 5 timely initiation of comfort care near the end of It's important to note that this measure 6 life. 7 applies to patients with any type of dementia, regardless of ideologic subtype. Subtype is not 8 9 a basis for criticism of this measure. This 10 measure follows a similar construction to many in 11 which membership in a broad diagnostic category determines patients' eligibility. 12

The measure is intended to be flexible. 13 14 It's left to the physician's discretion as to 15 which tool or technique is to be used to measure 16 cognitive impairment, provided the approach uses 17 an objective measure. A physician should use the 18 tool or technique that is most useful based on the 19 patient's needs. The measure also applies to 20 multiple care settings from ambulatory care in the 21 office or urgent care settings, inpatient medical, 22 surgical, behavioral health and psychiatric

facilities, skilled nursing facilities, 1 2 occupational therapy services, domiciliary rest home and custodial care services. 3 Just as a reminder, NQF had previously 4 5 convened a committee to look at gaps in Alzheimer's and dementia care, and they did 6 7 identify cognitive assessments as a gap area. Somewhere between 40 and 50 percent of individuals 8 9 with diagnosed dementia have an annual cognitive 10 assessment, and some would say that's probably 11 even a higher percentage than is generally true. 12 There are medical exceptions that can be valid, 13 and there may be a few patient exceptions --14 CO-CHAIR TIRSCHWELL: Sue, I'm going to 15 interrupt you. This is David Tirschwell, I'm co-16 chairing this committee. We really just needed a 17 one-minute overview; we're going to go through all 18 the criteria, so you're not obligated to do that. 19 DR. BORSON: Okay, that's fine. 20 CO-CHAIR TIRSCHWELL: Thank you. 21 DR. BORSON: So--well thank you. 22 CO-CHAIR TIRSCHWELL: And Karen, this

1 is a measure that's up for trial use, is that 2 right?

That is correct. 3 MS. JOHNSON: CO-CHAIR TIRSCHWELL: Can you give us 4 5 the 10-second cliff notes on how that changes our evaluation process? 6 7 MS. JOHNSON: I can. It'll shorten it I think. It is a trial use measure, so you'll be 8 9 considering evidence, you'll be considering gap, 10 you will not be considering much in the way of

11 scientific acceptability, except whether or not it conforms to the evidence. So that's what you need 12 13 to look at. So there's not testing for these data 14 for this measure, and that's fine. And then 15 you'll talk about feasibility and usability and 16 use. The difference is in the scientific 17 acceptability reliability validity stuff.

18 CO-CHAIR TIRSCHWELL: Great. Thank
19 you. And David Andrews and Jane Sullivan are our
20 discussants.

21 MEMBER ANDREWS: Just to be clear at 22 the outset, in your proposal this says it's

reviewed every 12 months. That really means 1 2 repeated, is that correct? 3 MS. JOHNSON: Yes, it does. MEMBER ANDREWS: Okay. As you've 4 5 heard, this is up for trial approval, so the developers have presented several studies that 6 7 indicate that cognitive decline contributes to poor self-care, which can lead to inappropriate, 8 9 undesirable medical outcomes. So in that sense, 10 the evidence that this is something worth 11 assessing is fairly clear, but in my mind as the 12 consumer side of this world is a concern is that, 13 okay, we assess it, does anybody do anything with 14 that assessment? Does it actually contribute to 15 making decisions about educating the patient 16 further, moving them to more residential care, or 17 whatever. That's not really our concern now, but 18 I think it is an issue that needs to be addressed 19 actually with a lot of measures, not just this 20 So I think that's sufficient for now. one. 21 CO-CHAIR TIRSCHWELL: Any other 22 comments or discussion from the committee on

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evidence? Valerie, go ahead.

2 MEMBER COTTER: I'm just going to make the point that I'm all in favor of this, but we 3 already have this in place with annual Medicare 4 5 wellness visits, and clinicians should be assessing cognitive function in any new members to 6 7 Medicare, and then on an annual basis. I think the reason it's not being implemented across the 8 9 country is because it doesn't specify a measure to 10 evaluate the cognitive function, so you just ask 11 a patient how's your memory and thinking, and if 12 a patient says yes, you can just drop it. In some 13 ways, I wish this measure had dictated what that 14 measure might be or give a subset of measures that 15 might be possible for a clinician to use. It 16 might be even more helpful than the Medicare 17 wellness visit.

18 MEMBER ANDREWS: Just to be clear, in 19 some of the evidence they present, it suggests 20 that the real issue is executive function and not 21 memory function that contributes to these problems 22 over time. You have a number of tests that are

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identified, which gets to the next reliability 1 2 section, some of which have both memory and executive items within the tests. So whether over 3 4 time as your trialing this, you discover that some 5 of these are more effective than others in identifying the needs -- is an important issue to 6 7 keep in mind going forward. CO-CHAIR TIRSCHWELL: 8 Brad. 9 MEMBER DICKERSON: I was a little 10 confused when I was first reading this, too, and 11 what I think I understand is that this is really 12 meant for patients with diagnosed dementia so that 13 you can stage their illness and help educate them 14 and their families along the way, not for 15 screening for cognitive impairment as the annual 16 wellness visit generally intends to try to 17 implement. So whether primary care physicians are 18 doing this in their annual wellness visit for 19 their patients with dementia, I don't know, but I 20 think there's been tremendous tension around 21 trying to prescribe a particular instrument, and 22 I think we should avoid doing that, but I think we

should mandate that people don't just get put into 1 2 a facility or get diagnosed as having dementia and no one re-address where they are in the process. 3 CO-CHAIR TIRSCHWELL: Dorothy. 4 Well the problem is I 5 MEMBER EDWARDS: absolutely agree with you, but these measures 6 won't stage dementia. These are not any of the 7 dementia staging tools like the CDR or any of the 8 9 other tools used to stage dementia, and so this is 10 just a repeat of basically the screening measures. 11 Not that I don't think that that would be better 12 than nothing, but that's not--these aren't staging 13 tools.

14 I completely agree MEMBER DICKERSON: 15 with you, and that was another thing I wanted to 16 bring up at some point, and I guess the time is 17 right now. So you know, when a person can no 18 longer perform the mini mental or you know, even 19 the severe impairment battery, that's when you 20 really need more effort to try to stage their 21 progression, and I think these are clinician-based 22 judgments that various tools that you mentioned

and others are helpful for, and I think the 1 2 emphasis on cognitive test performance is really, you know, only part of the story, and obviously 3 4 that's part of the story at the mild to moderate 5 stages, but once you get into the moderate to severe stages, you can't rely on cognitive tests 6 7 So I was a little concerned that that any more. would make it difficult to stage the stages of 8 9 dementia where you really need to be doing this 10 kind of care planning.

11 CO-CHAIR TIRSCHWELL: So I think as 12 we'll see, if there's still gap with this measure, 13 then there's likely to be even more gap with any 14 of those more perhaps comprehensive evaluations, 15 so in some ways I'm seeing that as a vote for. 16 Any other comments on evidence before we vote? 17 Let's go ahead and vote on evidence.

MS. OGUNGBEMI: We are now voting on
evidence for Measure 2872. The options are high,
moderate, low and insufficient. Voting is open.
CO-CHAIR TIRSCHWELL: Is our goal 18?
Push that button one more time. Push it really

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5

hard.

MS. OGUNGBEMI: Results are 33 percent 3 high, 61 percent moderate, zero percent low and 4 six percent insufficient. Measure 2872 passes on evidence.

CO-CHAIR TIRSCHWELL: 6 Yes, Lisa? 7 MEMBER LINES: Don't the guidelines say that we can't rate it as high if a QQC is not 8 9 presented, and there is no QQC on this one? 10 CO-CHAIR TIRSCHWELL: So they say that 11 there was a QQC, and I haven't read it close 12 enough to argue with it, but in reality, those 13 algorithms are strong guidance, but we end up, I 14 think, being able to vote as we see fit. No 15 problem. So next, gap and opportunities for 16 improvement.

17 MEMBER ANDREWS: Okay, in terms of gap, 18 they identify that in 2015, there was a 19 performance rate of 63.93, which suggests a fairly 20 strong gap in performance here. So I think 21 there's no question about what this is, something 22 that has a performance gap that's appropriate.

1	CO-CHAIR TIRSCHWELL: Was there
2	anything about disparities?
3	MEMBER ANDREWS: Oh, the disparities,
4	this is more or less the same thing we've heard
5	with lots of other things. There undoubtedly are
6	disparities people talk about, but they're not
7	identified here, which is again one of the things
8	that I think as this gets used in its trial would
9	be very appropriate for data collection.
10	CO-CHAIR TIRSCHWELL: Great. Any
11	discussion? Dorothy.
12	MEMBER EDWARDS: They're very, very
13	documented, there's a rich literature on the
14	disparities in diagnosis and actually treatment of
15	dementia in communities of color and other
16	medically underserved groups. They're just not
17	cited in this application.
18	MEMBER ANDREWS: Right, and the issue
19	of whether there are disparities in the
20	assessment, I'm not sure if they're data, I don't
21	know the data that well.
22	MEMBER EDWARDS: Yes, there are.

Substantial.

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2	CO-CHAIR TIRSCHWELL: Great, any other
3	discussion? If not, we'll move to voting on
4	performance gap and opportunities for improvement.
5	MS. OGUNGBEMI: We are now voting on
6	performance gap for Measure 2872. The options are
7	high, moderate, low and insufficient. Voting is
8	open.
9	CO-CHAIR TIRSCHWELL: Everybody's
10	voted? All right, there we go.
11	MS. OGUNGBEMI: Voting is closed.
12	Results are 78 percent high, 22 percent moderate,
13	zero percent low and zero percent insufficient.
14	Measure 2872 passes on performance gap.
15	CO-CHAIR TIRSCHWELL: So do we talk
16	about reliability but then not vote on it? Karen?
17	MS. JOHNSON: I'm sorry?
18	CO-CHAIR TIRSCHWELL: Do we talk about
19	reliability but then not vote on it, or
20	MS. JOHNSON: You talk about
21	reliability only in how it the specs go with
22	the evidence, so basically that's the only thing

you have to make sure of, is that the specs --1 2 CO-CHAIR TIRSCHWELL: I mean, do we Do we take a different vote? 3 vote? 4 MS. JOHNSON: Yes, you do take a vote. 5 You take a vote. So it's a -- yes, on reliability. 6 7 CO-CHAIR TIRSCHWELL: We just vote whether it goes with the specs? 8 9 MS. JOHNSON: Yes, and there should be 10 a special slide for trial use, scientific 11 acceptability. If you look at that, there should 12 be an extra slide. 13 CO-CHAIR TIRSCHWELL: So David, can you 14 tell us about reliability as relates to the 15 evidence? 16 MEMBER ANDREWS: Yes, I misunderstood 17 because I didn't think we did vote on this, but be 18 that as it may, I accept your authority. In this 19 case then, with reliability and validity, they did 20 a Bonnie test, and I think I almost understand 21 what Bonnie tests are and how they work now. 22 Almost. And the evidence from the Bonnie tests

were very positive that these were both going to 1 2 be reliable and valid measures. 3 CO-CHAIR TIRSCHWELL: Jane, and then Dorothy. 4 MEMBER J. SULLIVAN: 5 I have a question, because as I'm looking on the measure worksheet, 6 7 it says "reliability for this measure will not be considered; the committee will not be asked to 8 9 vote on reliability." 10 MS. JOHNSON: My mistake; we should be 11 voting on scientific acceptability, and what 12 you're asked to vote on is do the specifications, 13 are they consistent with the evidence. So that 14 was my mistake for saying you should vote on 15 reliability for -- this is a trial use measure, so 16 even though they did do Bonnie testing, you'll 17 look at that to think about how the feasibility 18 basically is what you'll look at there. They're 19 not putting this forward as being a tested 20 measure. CO-CHAIR TIRSCHWELL: So we're going to 21 22 pass through reliability after that great summary,

David, and -- sorry? Well, but you just said the 1 2 scientific acceptability that we have to comment on is whether the specifications are in line with 3 4 the evidence, and that's under validity, so that's 5 all I meant by that. So you can give a yes/no 6 answer to that. 7 MEMBER ANDREWS: Yes. 8 CO-CHAIR TIRSCHWELL: Okay. Let's 9 Yes, go ahead Jane. vote. 10 MEMBER J. SULLIVAN: So I have a 11 question just about the language in -- maybe it's 12 semantics, but the way that this is written, it 13 says that the numerator statement is patients for 14 whom an assessment of cognition is performed and 15 the results reviewed. Are those two separate 16 things? 17 CO-CHAIR TIRSCHWELL: Where are you 18 exactly? 19 MEMBER J. SULLIVAN: Now I'm on the 20 numerator statement. Well that's -- I don't --21 but do you have to have documentation of it being 22 done, and that somebody reviewed -- it just is

weird that it's written that way to me. 1 2 PARTICIPANT: So thanks for that The assessment needs to be performed; 3 question. the intent is that the physician also reviews the 4 5 results as they see the patient and treat the patient. But at the end of the day when we're 6 7 figuring out what actually needs the measure to count, we're looking at whether or not it was 8 9 performed, especially given that this is an e-10 measure. 11 CO-CHAIR TIRSCHWELL: Thank you. So e-12 measure approval for trial use, measure 13 specifications, specifications consistent with 14 evidence, must pass. 15 MS. OGUNGBEMI: We are now voting on 16 the e-measures approval for trial use. The 17 options are high, moderate, low and insufficient. 18 Voting is open. 19 CO-CHAIR TIRSCHWELL: Whoa, that can't 20 be right. 20 votes? Somebody left. Move that 21 blue sticker away from you. Thank you. It should 22 be like 17 or something or other, right? We're

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down to--

2	MS. OGUNGBEMI: So we are going to re-
3	vote on Measure 2872, the e-measure approval for
4	trial use. The options are high, moderate, low an
5	insufficient. Voting is open. Voting is closed.
6	Results are 35 percent high, 65 percent moderate,
7	zero percent low and zero percent insufficient.
8	The e-measure approval for trial use for Measure
9	2872 passes.
10	CO-CHAIR TIRSCHWELL: So now we move on
11	to feasibility, David.
12	MEMBER ANDREWS: So the feasibility was
13	tested with two entities, one electronic health
14	record vendor and also a national network of 30
15	post-acute care facilities, and the reports from
16	both of those activities were that this was highly
17	feasible. The data are entered and readily
18	available.
19	CO-CHAIR TIRSCHWELL: So any
20	discussion? If not, move tooh Valerie, go
21	ahead.
22	MEMBER COTTER: Just brief, but if it

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was tested in long term care and subacute care,
 will it be as feasible in acute care environments
 and in primary care practices?

4 MS. GRAY: So I can speak to that. 5 The assumption is yes, and that's because the two EHR vendors that were included in the feasibility 6 7 assessment both allow for their products to be implemented in ambulatory care settings, so urgent 8 9 care, physician offices, even independent living, 10 things like that, and they both have cloud-based 11 platforms that will allow for data sharing and 12 things like that. So the same data that can be 13 captured by the post-acute care network will be 14 able to be captured in ambulatory care settings. 15 CO-CHAIR TIRSCHWELL: Anything else on 16 feasibility? If not, let's vote.

MS. OGUNGBEMI: We are now voting on the feasibility of Measure 2872. Options are high, moderate, low and insufficient. Voting is open. Voting is closed. Results are 47 percent high, 47 percent moderate, six percent low and zero percent insufficient. Measure 2872 passes on

feasibility. 1 2 CO-CHAIR TIRSCHWELL: Usability and 3 use. 4 MEMBER ANDREWS: This is currently in 5 accountability programs, it's in PQRS and also meaningful use two, so it would be regarded as 6 very usable as rated by the algorithm as moderate. 7 I'd lean toward a little higher than that. 8 9 CO-CHAIR TIRSCHWELL: Any discussion? 10 If not, let's proceed to vote on use and 11 usability. 12 MS. OGUNGBEMI: We are now voting on 13 usability and use for Measure 2872. The options 14 are high, moderate, low and insufficient. Voting 15 is open. Voting is closed. Results are 59 16 percent high, 41 percent moderate, zero percent 17 low and zero percent insufficient. Measure 2872 18 passes on usability and use. 19 CO-CHAIR TIRSCHWELL: And so is that 20 it? Are we done, because we don't do overall 21 suitability because it's trial use? Okay. Please 22 give her a microphone.

1 DR. TERRY: I just want everybody to 2 know that at this point in time, we hope to have one more--we have two more measures to go. 3 We 4 hope to get to one, but we may not be able to 5 based on timing and a quorum. So at this point, we're planning to move to 2111, and so we'll have 6 7 to evaluate that as we're going along, whether we 8 can get to both measures at this point. There's 9 a question. 10 CO-CHAIR TIRSCHWELL: Sounds great. So 11 let's go to 2111, are you guys PQA? 12 MS. TIERNEY: No, it's not us, but I 13 just have a quick process question. I do--we have 14 had other measures approved for trial use, and 15 they usually do take an overall vote for approval 16 for trial use. That was the vote, the vote on 17 usability? I don't believe so. 18 CO-CHAIR TIRSCHWELL: That was the 19 scientific acceptability that --20 MS. TIERNEY: Yes, I don't want to 21 delay getting on to the next measure, but I just 22 think that that has been part of the process.

CO-CHAIR TIRSCHWELL: Sounds like we
 are supposed to do it. So--

MS. OGUNGBEMI: So really quickly, 3 4 we're just going to do an overall vote just for 5 process, for approval for trial use. We are now voting on Measure 2872's overall suitability for 6 7 the e-measure approval for trial use. Voting is 8 open. Options are yes or no. Results are 9 The voting is closed, it's 100 percent unanimous. 10 yes, zero percent no. The e-measure is suitable 11 for trial use.

12 CO-CHAIR TIRSCHWELL: Okay great. So 13 now we're going to change to Measure 2111, Anti-14 Psychotic Use in Persons with Dementia, the 15 developer PQA please introduce yourself and then 16 briefly introduce your measure.

DR. EISENBERG: Thank you. I'm Woody Eisenberg with PQA, and I'm joined today by my colleague, Julie Kuhle. We're also joined by another colleague by phone, Kristen Butterfield, who would love to be here, but she's sharing the worst case of laryngitis in the world with her

2 response to your questions as needed. But let me just check-- Kristen are you on the line? 3 4 MS. BUTTERFIELD: Yes, I'm here Woody. 5 Thank you. Thank you. 6 DR. EISENBERG: Okay. So we're here to re-endorse a measure initially 7 endorsed in 2012, and by way of introduction, 8 9 there are serious safety concerns related to the 10 use of anti-psychotic medications in the elderly 11 patients with dementia, including cardiovascular complications and death. 12 This measure includes 13 that particular very vulnerable population and 14 also includes consequences of high resource use, 15 as well as poor quality of care. This measure is 16 specified for patients 65 years or older, it 17 identifies the population of patients with 18 dementia who are at high risk of these adverse 19 events from anti-psychotic medications and 20 importantly, who do not have a documented 21 diagnosis for which an anti-psychotic agent is 22 clearly indicated.

children, and I've advised her to only croak in

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Now there are some exclusions, and the 1 2 exclusions to the measure are the same three diagnoses that are currently being used in a 3 nursing home compare measure for which the benefit 4 5 of anti-psychotic medications apparently outweighs the potential risk. These three exclusions are 6 7 schizophrenia, Tourette's, and Huntington's. But in developing the measure, our clinicians also 8 9 thought that bipolar disease should be a fourth 10 diagnosis to exclude from the measure. So the 11 measure identifies the proportion of patients at 12 high risk of anti-psychotic associated adverse 13 events in patients who do not have a diagnosis 14 code to indicate that an anti-psychotic would be 15 beneficial.

And while there can be appropriate use of anti-psychotic drugs in persons with dementia, when they're a threat to others or to themselves, this should be consistent across plans, and this is a measure that's intended to be used at the plan level. It is not for individual providers. We are not expecting zero to be the goal of this

There will be certain members included. 1 measure. 2 It's a population-based measure to assess utilization across Medicare plans, it is specified 3 for the data that are available at the plan level, 4 5 and that is medical claims and diagnoses and drug The measure uses diagnostic codes or 6 claims data. medication codes to identify patients with 7 dementia because dementia is under reported. 8 9 Currently, this measure is being used by CMS Part 10 D for quality improvement purposes this year, 11 2016, for the first time, sending patient safety 12 reports to health plans, and they plan to start 13 using this 2016 data for display measures for the 14 Part D plan starting in 2018. So this is our 15 first use of this measure.

We've done some testing, pilot testing by two large Medicare advantage plans using 2011 data showed room for improvement in performance. Data across the two plans found a rate of 13.7 to 15.9 percent of patients--okay, okay. Then let me just add that reliability testing was performed because that's something that was requested during

the phone conference, and the testing was carried 1 2 out across 720 CMS Part D contracts, including over 35 million beneficiaries, and the contract 3 4 reliability mean score was 0.76 and the median 5 0.87, which are acceptable for reliability. I just have to make one 6 DR. TERRY: 7 more statement. I just want to actually thank all of the developers who have traveled here today to 8 9 be with us and to present their information, and 10 I wanted to say that we are aware that we will 11 probably have to move a measure at this point. 12 We'll have to see how it goes. We'll see how it 13 goes, but move a measure to a call, which we will 14 set up as soon as we can. So I just wanted to 15 thank everybody, and we wanted all the developers 16 to actually have an opportunity to at least 17 discuss one measure here that they could. So 18 thank you. 19 CO-CHAIR TIRSCHWELL: So are we 20 continuing? Okay, sorry. So Valerie, Dorothy, 21 Kelly, start with evidence. 22 MEMBER COTTER: Okay, so we'll start

The only thing that we could find 1 with evidence. 2 in the literature that's been updated that was not submitted is that the American Geriatric Society 3 has updated their BEERS criteria list of 4 5 potentially inappropriate drug use for older adults, and that was just published in 2015, with 6 7 similar strong recommendations against antipsychotic drug use. Other than that, we were not 8 9 able to find any additional evidence. I think 10 this will come up further in the discussion, but 11 in our workgroup, one of the major issues for us 12 was the denominator in that it included not just 13 patients with a diagnosis of dementia, but it 14 could be a patient that did not have a diagnosis 15 of dementia but was prescribed two or more 16 prescription drugs, you know, the cholinesterase 17 inhibitors and the NMDA antagonist drug. And in 18 our mind, that is a big issue in this guideline. 19 I think we all recognize that dementia is not well 20 diagnosed as we would like it to be, but it seems 21 like we should be able to manage without that 22 proxy for a diagnosis, in this case to be able to

demonstrate anti-psychotic drug use in dementia
 patients.

3 CO-CHAIR TIRSCHWELL: Any further comments from the committee? Peter. 4 So a week ago, there 5 MEMBER SCHMIDT: is an FDA hearing, and I was here in the city at 6 that meeting for Pimavanserin, a anti-psychotic 7 drug that was being approved for psychosis in 8 9 Parkinson's patients. So there's been a body of 10 literature about that drug that has been released, 11 it was reviewed at the FDA hearing, and I will be 12 presenting in June in Berlin research on the 13 impact of quality of life for patients with 14 psychosis who go untreated with Parkinson's 15 So in 2013 when we first discussed this, disease. 16 John Duda and I both brought up Parkinson's 17 disease; we were comfortable because there was no 18 FDA indication for Parkinson's disease on an anti-19 psychotic; that situation has now changed. There 20 is--the FDA has not yet accepted the 21 recommendations of the panel, but it was voted 22 that this drug, that Pimavanserin should be
approved with an indication for Parkinson's 1 2 disease psychosis. I'm not sure how we can leave off Parkinson's psychosis from this. 3 CO-CHAIR TIRSCHWELL: Well then they 4 5 would also have to have a diagnosis of dementia, which is not all Parkinson's disease patients 6 7 either, right? Well the patients in 8 MEMBER SCHMIDT: 9 the study all had at least MCI. It's a psychosis 10 requiring treatment with an anti-psychotic. It's 11 typically in more advanced Parkinson's patients. 12 MEMBER COTTER: And I'll just bring up 13 I think that is another issue here around what is 14 the diagnosis in that we're seeing more and more 15 patients with cognitive impairment or more 16 specifically, mild cognitive impairment that is 17 not dementia, being prescribed especially the 18 cholinesterase inhibitors, maybe not the NMDA 19 antagonists, but the cholinesterase inhibitors. 20 CO-CHAIR TIRSCHWELL: And so are you--21 is the use of anti-psychotics more appropriate in 22 those patients or equally as inappropriate?

MEMBER COTTER: I don't know if that's 1 2 the right question here. I think the question is should all those patients be included in the 3 4 denominator? And I think --CO-CHAIR TIRSCHWELL: I quess that was 5 my worry about including them depends on whether 6 7 you think it's equally inappropriate or it's not as inappropriate. 8 9 MEMBER COTTER: Well I don't think 10 that's the issue here because an anti-psychotic could be prescribed for a patient with cognitive 11 12 impairment that also has depression, psychotic 13 depression, and that's inappropriate treatment. 14 Our point is that it seems like it's sort of a 15 basket in all--you know, like dementia and 16 cognitive impairment, mild cognitive impairment, 17 Parkinson's disease, lots of diagnoses that -- some 18 diagnoses that may not be dementia at all that 19 could be included here. 20 MEMBER SCHMIDT: So I just want to add 21 to my comment that there are quite a few 22 Parkinson's patients who are prescribed

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contraindicated anti-psychotics when really they
 are incorrectly medicated. So there's a balance
 between help and harm.

CO-CHAIR TIRSCHWELL: Melody, and then Dorothy.

MEMBER EDWARDS: So dementia is a 6 7 generic term, not a specific diagnosis. It's a generic term for cognitive impairment. 8 I think 9 this is the challenge of this particular measure, 10 is that the black box warning is there for a 11 reason, and it's very, very important to monitor 12 the off label use, particularly the inappropriate 13 use, but getting to the denominator to figure out 14 the reliability of the measure or the validity of 15 the measure is a real challenge because we know 16 that the best attempts to create a composite 17 measure, either the ICD-9 or ICD-10 code, or the 18 prescription data actually confounded. They're 19 confounded by people with mild cognitive 20 impairment, they're confounded by individuals who 21 actually are never diagnosed and never medicated 22 with either of those drugs who are very, very

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demented who are actually at greater risk for the use of the--particularly the atypical antipsychotics. So the issue of diagnostic precision is really, really important for this measure. And I'm unfortunately going to have to go, but I want to thank you for letting me say that.

7 MEMBER RYAN: So I'm not sure just because someone has Parkinson's and dementia there 8 9 should be an exclusion for that person. I'm not 10 understanding that logic, because the original 11 studies were that the FDA looked at this for the 12 black box warning included all the people with 13 dementia regardless of extra diagnoses or not --14 they were in clinical trials.

15 CO-CHAIR TIRSCHWELL: Yes, I guess 16 there's only this one medication with the 17 evidence, and maybe the black box is going to look 18 different. I don't really know. It seems like 19 they'll have to deal with that. Yes Brad, go 20 ahead.

21 MEMBER DICKERSON: But I mean if a 22 person had Parkinson's and dementia diagnoses,

they wouldn't be excluded, would they? It's just 1 2 that if they only have a diagnosis of Parkinson's with psychosis, they wouldn't be included, right? 3 MEMBER RYAN: Right. 4 MEMBER DICKERSON: Yes, so if they have 5 6 Parkinson's with dementia, we're going to capture 7 that. I'm just--I think Peter 8 MEMBER RYAN: 9 was advocating for just Parkinson's as an 10 exclusion criteria. 11 MEMBER DICKINSON: As an inclusion, 12 You wanted them to be included? right? 13 MEMBER SCHMIDT: The question is should 14 they be in the same group with Huntington's. So 15 if you look at the ends, there probably are as 16 many people with Parkinson's and psychosis as 17 there are with Huntington's. 18 MEMBER DICKERSON: But I mean that does 19 get back to the question that Dorothy was trying 20 to ask, which is why would the developers want to 21 make this or criteria with cholinesterase 22 inhibitors? I mean I think maybe patients don't

have dementia in their diagnosis, and you were 1 2 hoping to capture more of them, but cholinesterase inhibitors are being used in traumatic brain 3 4 injury, multiple sclerosis, a variety of 5 conditions besides just mild cognitive impairment, and so I agree with Dorothy's point that that's 6 really going to pollute your ability to monitor 7 their efficacy and adverse events in the dementia 8 9 population.

10 MS. KUHLE: A couple of things. As 11 evidence changes, we have a systematic process 12 that we look every year at our measures to see 13 what is out there, what changes as far as 14 medications, evidence, et cetera. So we would 15 look at this new medication once it's FDA approved 16 and there's some information there. To the idea 17 of including medications, and remember this is 18 non-approved use, and medications are used as 19 diagnostic markers often. In this case, all four 20 medications are only FDA approved for dementia 21 related to Alzheimer's. We know that there is 22 some off-label use. Remember, this measure is

only 65 years old and older. We did do a study 1 2 after the last committee meeting to look at traumatic brain injury, and I think it was less 3 4 than one percent that actually had that diagnosis, 5 and some of those also had dementia. So it is complicated. It's a 6 7 population-based measure. And I'm going to just reiterate it's not perfect, and we don't intend 8 9 the numerator to be zero. We don't want this 10 There will be some use of measure to be zero. 11 anti-psychotics that's appropriate, similar to 12 other measures. 13 CO-CHAIR TIRSCHWELL: I've got a 14 question, then Valerie we'll go to you. I mean if 15 it's at a population level and you're looking for 16 plans that are outliers, I guess if you're pulling 17 in the right additional people into the 18 denominator, it seems like it would still be the 19 same plans that are the outliers, whereas if 20 you're pulling--and so you're not actually getting 21 any more information, and if you're pulling in the 22 wrong people into the denominator, you may start

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actually mis-classifying plans. So I'm not--I mean I get that you're trying to increase your sensitivity, but I think there's no gain, I can't figure out how there's any gain in actual information, and I think there's a real chance for sort of misclassification.

7 DR. EISENBERG: Well, we didn't want to develop a measure that would further discourage 8 9 clinicians from using diagnoses of dementia. If 10 we are measuring only--if we have a measure that's including only those patients with the diagnosis 11 12 of dementia from our testing, we're probably going 13 to catch about 50 percent of the people that we 14 will catch if we use the drugs as well, and we 15 were concerned that leaving out the drugs would 16 really miss a lot and perhaps discourage further 17 diagnoses.

18 CO-CHAIR TIRSCHWELL: Because you think 19 there would then be a perverse incentive not to 20 diagnose this, because then we won't be looking at 21 what they're doing--

DR EISENBERG: Yes.

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1 CO-CHAIR TIRSCHWELL: -- over there. Is 2 there any evidence for that actually occurring? DR. EISENBERG: Well, we know right now 3 that there is tremendous under reporting of 4 5 dementia, so that's the only evidence. MEMBER COTTER: It doesn't make sense 6 to me though. As a provider, why wouldn't you 7 make the diagnosis? I mean, you're not trying to 8 9 hide it from the patient or from the family. Ι 10 mean, they ask you why you're prescribing this 11 medication; they want to know what the purpose of 12 the medication is, so--and I just wanted to make 13 another point that it's my understanding that the 14 cholinesterase inhibitors are not only FDA 15 approved for AD, but also for vascular dementia, 16 so it's broader than just Alzheimer's disease. 17 DR. EISENBERG: Yes, the measure 18 doesn't specify Alzheimer's disease. It's for 19 dementia, and to my knowledge, the studies that 20 show increased morbidity and mortality also didn't 21 specify Alzheimer's disease, it was dementia. 22 MEMBER COTTER: But when I look at the

list of all the diagnoses that potentially could 1 2 be included, the inclusive--the list, it's not just dementia. It's a long list of dementia 3 4 otherwise specified, Alzheimer's disease, vascular 5 dementia. It's a long list of the diagnoses that could be included. 6 CO-CHAIR TIRSCHWELL: Any other comments? Dorothy 7 was commenting from -- after her exit I guess. 8 9 All right, so I feel like we ventured a little bit 10 off of the evidence, although if we thought the 11 evidence wasn't applicable because the denominator 12 issue was a relevant conversation, but we do need 13 to vote on the evidence issue first. 14 MEMBER COTTER: Can I just make a point 15 on -- the evidence that I think we're voting on is 16 none of these patients should -- or most should 17 not be prescribed anti-psychotic drug use, but the 18 evidence I don't think that is being demonstrated 19 is how under reported dementia is. 20 CO-CHAIR TIRSCHWELL: Okay. 21 MEMBER DICKERSON: Yes, I guess can we 22 just clarify exactly what we are voting on,

because you know I think there is perfect -- as you guys said, there is appropriate use of antipsychotic medications, and there is efficacy data for them even though -- in dementia, even though there's adverse event data as well. So you know, I think we should be very clear about what we're really voting on here.

CO-CHAIR TIRSCHWELL: I think what 8 9 we're voting on in its simplest terms, and I think 10 we'll come back to the specifications later in the 11 validity issue, but this vote is I think more 12 about whether we think there's good evidence that 13 measuring at the plan level overuse of anti-14 psychotics might help promote interventions that 15 can lead to improved quality of care. That's how 16 I see it.

Do you guys -- okay with that, or you want to -- that's bad, that means I'm starting to talk like NQF or something. I've lost my English. You know, that there's evidence I think that measuring this could be part of a quality improvement process based on the potential for

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overuse.

2	(Off microphone comment.)
3	CO-CHAIR TIRSCHWELL: Yes. Sure. I'm
4	going to read a comment briefly by Dr. Ferziger.
5	In addition to schizophrenia and
6	Tourette's as mentioned, APs, anti-psychotics have
7	indications for depression, bipolar,
8	schizoaffective and autism behavior. They should
9	all be considered for exclusions to the measure.
10	It's concerning to me the measure developer was
11	not aware or did not cite diagnoses for which some
12	anti-psychotics have FDA indications, including I
13	guess Parkinson's disease as well. This is more
14	complex issue than may be apparent. Of course.
15	MS. KUHLE: So as was stated, there is
16	a measure that's being used in Nursing Home
17	Quality Compare, looking at anti-psychotic use,
18	and they only exclude three diagnoses:
19	schizophrenia, Huntington's and Tourette's.
20	And we were trying to be as compatible
21	with that measure as possible, although we did
22	the workgroup of experts did think that bipolar

1 was also important. So we strayed from the 2 Nursing Home Compare measure by adding bipolar, we did consider these other diagnoses. We know that 3 4 anti-psychotics can be used for them, it's the 5 risk benefit of -- and alternatives, you know, similar to other medications. 6 CO-CHAIR TIRSCHWELL: Right, and as you 7 said, the goal isn't zero, it's just to identify 8 9 outliers on the high end where you might be able 10 to make an intervention and improve quality of 11 So any -- Valerie, do you want to make care. 12 another comment? Okay, well then put your card 13 down. 14 All right, let's vote on the evidence. 15 MS. OGUNGBEMI: We are now voting on 16 evidence for measure 2111; the options are high, 17 moderate, low and insufficient. Voting is open. 18 (Voting.) MS. OGUNGBEMI: Voting is closed. 19 20 Results are 31 percent high, 63 percent moderate, 21 six percent low and zero percent insufficient. 22 Measure 2111 passes on evidence.

1 CO-CHAIR TIRSCHWELL: So let's move on 2 to gap. MEMBER COTTER: Using the CMS Part D 3 contract data, the developer submitted that the 4 5 performance gap was 12.8 percent, with a range of 6 7.7 to 10 percent -- or to 19.4 percent. Sorry. So there is a wide gap, a wide performance gap 7 here that I think is significant. 8 9 They also submitted some disparities 10 data. Let's see, again, those residents residing 11 in a nursing home facility and showed that those 12 who resided there longer than 100 days had a mean 13 rate of 10.8 percent -- I'm sorry, the nursing 14 home had a rate of 23.9 percent. So the 15 preliminary rating is for moderate, opportunity 16 for improvement. 17 CO-CHAIR TIRSCHWELL: Any discussion 18 from the group? Further comments from the 19 developer? Let's go ahead then and vote on 20 importance -- excuse me -- performance gap. 21 MS. OGUNGBEMI: We are now voting on 22 performance gap for measure 2111; the options are

high, moderate, low and insufficient. Voting is 1 2 open. 3 (Voting.) 4 MS. OGUNGBEMI: Voting is closed. 5 Results are 13 percent high, 88 percent moderate, zero percent low and zero percent insufficient. 6 7 Measure 2111 passes on performance gap. CO-CHAIR TIRSCHWELL: Let's move on to 8 9 reliability. 10 MEMBER COTTER: The developer submitted 11 updated testing, again from CMS Part D contract 12 data, and the testing was done at the measure 13 score level. I think you actually presented that 14 at your beginning of the presentation, wasn't it? 15 So I don't know that we need to hear that again, 16 or that I need to present it again. 17 CO-CHAIR TIRSCHWELL: Maybe just recap 18 it real quick. 19 MEMBER COTTER: So I think what's been 20 presented is that the updated reliability data is 21 sufficient. It was originally preliminarily rated 22 as insufficient, but we would say it is sufficient

probably at the moderate level. 1 2 CO-CHAIR TIRSCHWELL: Okay. Anybody have any questions or comments about that? Seeing 3 4 none, we'll proceed to voting. 5 MS. OGUNGBEMI: We are now voting on reliability for measure 2111; options are high, 6 7 moderate, low or insufficient. Voting is open. 8 (Voting.) 9 MS. OGUNGBEMI: Voting is closed. 10 Results are zero percent high, 100 percent 11 moderate, zero percent low and zero percent 12 insufficient. Measure 2111 passes on reliability. 13 CO-CHAIR TIRSCHWELL: Validity. 14 MEMBER COTTER: So the developer 15 presented on face validity that was reviewed by an 16 expert panel, and it was a vote of 67 percent in 17 favor of the endorsement. So it looks like all we 18 have is the face validity I believe. 19 I think the threats to validity in this 20 particular measure are not insignificant, and I 21 think we discussed those at the beginning. In 22 such a large, broad denominator that you're going

to be capturing some patients that do not have dementia and are prescribed these cholinesterase inhibitors and NMDA antagonists and an antipsychotic, and I think that is a significant validity threat. Now the preliminary rating for validity is moderate.

7 CO-CHAIR TIRSCHWELL: Does anybody have 8 any comments? So the whole discussion about the 9 denominator I think is what is a little bit more 10 about what we're voting for than it was earlier in 11 the evidence. Jim, go ahead.

12 MEMBER BURKE: I think this is kind of 13 like the hospital care compare question from 14 earlier is ultimately, do we know how these data 15 are going to be reported? Because I think a lot 16 of these distinctions about who should exactly be 17 in the denominator are worrisome if it's called 18 we're going to make subtle distinctions and report lots of difference as opposed to culling out 19 20 outliers that are two standard deviations above 21 the mean. Do we know once these data exist, how 22 they're going to be used?

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1	MS. KUHLE: I can respond to that.
2	We've had discussions with CMS, they are reporting
3	it to plans in their patient safety reports for
4	quality improvement only. So you know, I think
5	when we develop measures, our members go right to
6	this measure is going to be used in the star
7	rating program, and there is no indication.
8	In fact, there's indication from CMS
9	that they will not ever move this to a
10	performance-based measure for payment. Rather, it
11	is quality improvement, it is virtually patient
12	safety and quality improvement for the plans to
13	react to.
14	CO-CHAIR TIRSCHWELL: Thank you. Any
15	other comments or questions before we vote on
16	validity? Seeing none, I say we vote.
17	MS. OGUNGBEMI: We are now voting on
18	validity for measure 2111; options are high,
19	moderate, low and insufficient. Voting is open.
20	(Voting.)
21	MS. OGUNGBEMI: Voting is closed.
22	Results are zero percent high, 81 percent

1	moderate, 19 percent low and zero percent
2	insufficient. Measure 2111 passes on validity.
3	CO-CHAIR TIRSCHWELL: All right then,
4	feasibility.
5	MEMBER COTTER: This seems to have high
6	feasibility, it's the data is easily collected
7	in the electronic claims. So we didn't have an
8	issue about the feasibility, and the preliminary
9	rating is high.
10	CO-CHAIR TIRSCHWELL: Any discussion?
11	If not, let's move to vote.
12	MS. OGUNGBEMI: We are now voting on
13	the feasibility of measure 2111; options are high,
14	moderate, low and insufficient. Voting is open.
15	(Voting.)
16	MS. OGUNGBEMI: Voting is closed.
17	Results are 69 percent high, 31 percent moderate,
18	zero percent low and zero percent insufficient.
19	Measure 2111 passes on feasibility.
20	CO-CHAIR TIRSCHWELL: Usability and
21	use.
22	MEMBER COTTER: So at this point, it's

1	not publicly reported or in any accountability
2	program. As was said, there's planned use.
3	I guess there's one question here about
4	if current programs are not adopting the measure
5	since its initial endorsement, and there's no data
6	to demonstrate improvement, why isn't it being
7	used? I mean that is it a usability issue why
8	programs are not adopting the measure?
9	MS. KUHLE: Sure. So, good question.
10	This measure is really suited to CMS Part D, I
11	mean that's basically where it was developed for.
12	We also developed an MDS measure that's very
13	similar, and there was a lot of interest by
14	Nursing Home Compare.
15	So they did some testing with RTI, they
16	were very interested in the measure. Part D was
17	waiting for Nursing Home Compare, the nursing home
18	side of CMS to decide whether they were going to
19	use that measure; that one wasn't endorsed. This
20	is all to say that there was just a gap; one part
21	was waiting for the other hand of CMS to decide
22	what to do with the measure. The Nursing Home

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Compare measure didn't go forward, so CMS decided 1 2 really in 2015 to start using this. They haven't noticed -- they have to give notice to plans, so 3 4 there's a time lag even once they decide to use a 5 measure before it actually is used. 6 MEMBER COTTER: Thank you. 7 MS. KUHLE: Sure. MEMBER SCHMIDT: So I just want to 8 9 bring up again under the category of unintended 10 consequences that we are on the edge of approving 11 a measure that would recommend against on-label 12 use of medication, which seems like a conflict 13 that I wouldn't want to be involved in. 14 CO-CHAIR TIRSCHWELL: And by that, you 15 mean in the -- some of the potential better 16 denominator exclusions groups, if we were to add 17 some more exclusions, they might get roped in and 18 so there's some appropriate use might get bungled 19 in with some of these numbers? 20 MEMBER SCHMIDT: Well, it sounds like 21 Michael also has some items that could be included 22 in this, too. It would be interesting to review

the label for anti-psychotic medications and make 1 2 sure that we are addressing on label use of medications so that we don't adopt a measure where 3 4 if I have a choice between using chemical 5 restraints on a difficult patient and treating troublesome hallucinations in another, that given 6 7 that choice, that I'm not biased -- you know, I don't make my choice based on what is more 8 9 convenient for the center, but what is on-label 10 use and what has evidence. 11 CO-CHAIR TIRSCHWELL: Yes, do you want 12 to respond? 13 MS. KUHLE: I will respond to that. Ι 14 think this is one of the reasons that CMS only 15 wants to use it for quality improvement. We don't 16 -- so there are some unintended consequences even 17 with the high-risk medications in the elderly, and 18 CMS has now taken that from a star rating 19 performance measure where there's a big push by 20 plans to decrease that rate, and have moved it now 21 just to a display measure -- just to a displayed 22 measure where they're just reporting it. And I

think part of that is this notion that not to move
 towards zero -- too close to zero. Maybe that
 addresses your point.

DR. EISENBERG: And again as was raised earlier, all of our measures are reviewed every year by our measure update panel, and new indications or perhaps existing indications that were not -- did not receive adequate attention can be addressed.

10 CO-CHAIR TIRSCHWELL: Great. Melody? 11 MEMBER RYAN: So the way I understand that the new likely candidate that would be 12 13 approved is it would be for psychosis only related 14 to Parkinson's. So these patients wouldn't 15 necessarily be demented, right? I mean, we don't 16 have any reason to think that you know, that 17 treating with this drug in dementia is necessarily 18 appropriate? 19 MEMBER SCHMIDT: So the psych -- about 20 a third of patients with Parkinson's disease will

develop psychosis during the course of their
disease; it works out to maybe 300,000 people.

Psychosis that is -- that occurs early in the 1 2 disease is typically due to incorrect medication; psychosis that occurs late in the disease is 3 4 commonly comorbid with dementia and requires 5 treatment with an anti-psychotic. So again, I would say 6 MEMBER RYAN: 7 that the dementia studies didn't exclude Parkinson's patients in the anti-psychotic use for 8 9 the agents we have now. I don't know that we can 10 say for an agent we don't have now yet that we can 11 base our conversation on it. 12 CO-CHAIR TIRSCHWELL: And I just heard 13 the developer say that they are committed to being 14 nimble and responding to changes in the market, 15 so. 16 MEMBER SCHMIDT: But the evidence is 17 there, I mean this is not -- quetiapine, Clozaril 18 have all been tested and there is evidence for Clozaril ambiguous with clozapine, quetiapine for 19 20 -- in Parkinson's disease, but this is not 21 something without evidence. 22 MEMBER JONES: So there's lots of data

going in, this is a population I would say the
 number of patients who are over 65 whose
 Tourette's is being treated with anti-psychotics
 is probably minuscule. Somebody raised autism,
 although the autism population is large, in the
 over 65, they are tiny.

7 So if you're going to re-evaluate this on a regular basis, some of these populations can 8 9 go in and out. Right now, I think you've got a 10 lot of the major populations that you need and in 11 large enough numbers, a lot of these smaller 12 groups that we're talking about -- perhaps not the 13 Parkinson's population, but a lot of these other 14 ones are going to be a wash.

15 CO-CHAIR TIRSCHWELL: I'm going to --16 is David going to be back? Okay, well I'm just 17 hearing the same arguments going around, and more 18 and more people are getting ready to leave, so I'm 19 going to suggest, unless somebody has a different 20 comment, that we go ahead and vote on usability 21 and use.

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MS. OGUNGBEMI: We are voting on

usability and use for measure 2111; options are 1 2 high, moderate, low and insufficient. Voting is 3 open. 4 (Voting.) 5 MS. OGUNGBEMI: Voting is closed. Results are 19 percent high, 75 percent moderate, 6 7 six percent low and zero percent insufficient. CO-CHAIR TIRSCHWELL: And then one 8 9 final vote --10 MS. OGUNGBEMI: Usability and use passes for measure 2111, and now we are going to 11 12 vote on the suitability for endorsement for 13 measure 2111. Voting is open. 14 CO-CHAIR TIRSCHWELL: Thank you. 15 (Voting.) 16 MS. OGUNGBEMI: Voting is closed. We 17 have a unanimous 100 percent overall suitability 18 for endorsement for measure 2111. Thank you. 19 CO-CHAIR TIRSCHWELL: Thank you very 20 Thank you, and I apologize Woody for much. 21 cutting you off at the beginning. We might not 22 have made it.

1 Yes, we're going to open the 2 microphone. Operator, if you could open the mic for public comment. 3 4 OPERATOR: And at this time, if you 5 would like to make a public comment, please press star, then the number one on your telephone 6 7 keypad. 8 (Pause.) 9 OPERATOR: And we have no public 10 comments at this time. 11 CO-CHAIR TIRSCHWELL: Anybody else? 12 Any comments back there? Okay, thank you. **All** 13 right, now we only have about an hour more of 14 agenda items. Do -- I don't know, Christy, do you 15 want to take us through the next steps? 16 MS. SKIPPER: Yes, so first of all, 17 thank you all for hanging in there with us as we 18 sort of pressed up to the hour, but just a couple 19 of next steps for activities on this project. 20 So we will be having a post-meeting 21 call on April 22 from 1:00 to 3:00 p.m. Eastern 22 Time, where we will need to have a vote for the

measure that we did not get to today. And then between now and the end of the month, our team will be working to draft a report documenting the proceedings of this meeting, and then it will be posted for a month beginning on May 6 for public and NQF member comment.

7 On June 23, I will have a standing committee call to review and respond to comments 8 9 that were made based on the report of this 10 meeting, and then we'll incorporate your comments 11 and then also draft another report for NQF member 12 vote on July 6, and they'll have from July 6 to 13 July 20. And then recommendations will go to CSAC 14 for review and approval on August 9, and then to 15 the Board September 15 for endorsement.

And then appeals will open April 19th -- or I'm sorry, August 19 and run for a month through September 19. And just -- and then also we will need to -- for those of you that are here, we need to assign term limits as standing committee members, so we'll quickly have everyone draw a number from our magic bowl down here and

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whatever number you pull will be your term 1 2 assignment. And then also you may elect yourself to 3 4 one other term following this term, and that term 5 is three years. And if there is a problem with any term number that you pull, just please let us 6 7 know. And then we'll have you announce your number out loud for the group so that we can 8 9 record what your term is. 10 PARTICIPANT: Can you explain that 11 second statement? 12 MS. SKIPPER: So ---13 PARTICIPANT: I understand the number 14 15 Peter Schmidt, two. MEMBER SCHMIDT: 16 MS. SKIPPER: Was that it? Did that 17 answer your question? So you may elect yourself 18 or nominate yourself to serve another term 19 following this term that you will be randomly 20 choosing today. 21 (Off microphone comment.) 22 DR. TERRY: I just wanted to thank

everybody, in particular our co-chairs, for really 1 2 a wonderful meeting, and thank you everybody and thank you for hanging in there. 3 It's really been 4 very good. So thank you. MS. SKIPPER: Yes, for those of you on 5 the phone, we will have NQF draw a number on your 6 behalf. So to Kelly and Michael, we will be 7 pulling for you. 8 9 MEMBER COTTER: Valerie Cotter, number 10 two. 11 MEMBER ANDREWS: David Andrews, three. 12 Steve Huff, two, subject MEMBER HUFF: 13 to the American College of Emergency Physicians. MEMBER JONES: 14 Charlotte Jones, three. 15 MEMBER BURKE: Jim Burke, two. 16 MEMBER JONES: Because it's going to 17 take me three years to learn how to use the mic. 18 MEMBER LINES: Lisa Lines, three. 19 MEMBER RYAN: Melody Ryan, two. 20 CO-CHAIR KNOWLTON: Dave Knowlton, 21 three. 22 MS. SKIPPER: Jocelyn Bautista, two.

Michelle Camicia, three. Dorothy Edwards, two. 1 2 Reuven Ferziger, three. David Hackney, two. 3 Michael Kaplitt, three. Ronald Koenig, two. Alex 4 Rae-Grant, three. Jane Sullivan, two. Kelly Sullivan, two. 5 And --MS. ISIJOLA: Well thank you again, 6 We appreciate your hard work and 7 everyone. flexibility with keeping with us until after 8 9 three. We have a ton of next steps, and we'll 10 definitely send out details of that. 11 A lot of the information today will be 12 compiled in a report for public commenting, and 13 many of the discussion that we have had and the 14 gray zone will be discussed during that public 15 commenting post-call. So please look out for 16 emails and have a safe travel back home. 17 (Whereupon, the above-entitled matter 18 was concluded at 3:24 p.m.) 19 20 21 22

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This is to certify that the foregoing transcript

In the matter of: Neurology Standing Committee

Before: NQF

Date: 04-05-16

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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