



MAP Hospital Workgroup Web Meeting October 31, 2012 11:00am – 1:00pm ET

#### **Participant Instructions:**

Follow the instructions below 15 minutes prior to the scheduled start time.

- 1. Direct your web browser to the following URL: ngf.commpartners.com.
- 2. Under "Enter a meeting," type in the meeting number 464976 and click on "Enter."
- 3. In the "Display Name" field, type in your first and last name and click on "Enter Meeting."
- 4. Dial **1-855-226-0347** and enter passcode **35459053**. Remember to turn off your computer speakers during the presentation. *Note: All task force members have an open line.*

If you need technical assistance, you may press \*0 to alert an operator or send an email to nqf@compartners.com.

#### **Meeting Objectives:**

- Orientation to MAP 2013 pre-rulemaking approach
- Discuss how MAP's first-year work contributes to 2013 pre-rulemaking input
- Review each program likely to be considered by the Hospital Workgroup
- Identify additional information sources to enhance MAP's decision-making

#### 11:00 am Welcome and Review of Meeting Objectives

Frank Opelka, Workgroup Chair

#### 11:05 am MAP Background and Strategy

Tom Valuck, Senior Vice President, Strategic Partnerships, NQF

MAP statutory authority, structure, and Strategic Plan

#### 11:15 am MAP Pre-Rulemaking Approach

#### Lindsay Lang, Senior Program Director, Strategic Partnerships, NQF

- Review four-step pre-rulemaking approach
- Review contribution of MAP's prior work to pre-rulemaking
- Discussion

## **11:45 am Evaluating Program Measure Sets** *NQF Staff*

- Information available to evaluate program measure sets
- Review of anticipated programs

#### PAGE 2

- Uptake of MAP's 2012 recommendations by HHS
- Discussion

**12:30 pm Evaluating Measures Under Consideration** *Allen Leavens, Senior Director, Strategic Partnerships, NQF* 

- Information available to evaluate measures under consideration
- Additional information MAP seeks to enhance the evaluation of measures under consideration
- Discussion

#### 12:50 pm Opportunity for Public Comment

**12:55 pm Next Steps** Frank Opelka, Workgroup Chair

1:00 pm Adjourn

## MAP Hospital Workgroup Web Meeting



NATIONAL QUALITY FORUM

*October 31, 2012* 

## Agenda

- Welcome and Review of Meeting Objectives
- MAP Background and Strategic Plan
- MAP Pre-Rulemaking Approach
- Evaluating Program Measure Sets
- Evaluating Measures Under Consideration
- Opportunity for Public Comment
- Next Steps

## **Meeting Objectives**

- Orientation to MAP 2013 pre-rulemaking approach
- Discuss how MAP's first-year work contributes to 2013 prerulemaking input
- Review each program likely to be considered by the Hospital Workgroup
- Identify additional information sources to enhance MAP's decision-making

## **MAP Pre-Rulemaking Timeline**

- December 1: HHS provides list of measures under consideration to MAP
- December 4: All MAP Web Meeting to preview measures under consideration
- December 10- 18: MAP workgroup meetings to provide input on program measure sets and measures under consideration
- January 8-9: MAP Coordinating Committee Meeting in-person to finalize MAP's recommendations to HHS
- Mid-January: 2-week public comment period for draft Pre-Rulemaking Report
- February 1: Pre-Rulemaking Report due to HHS

# MAP Background and Strategic Plan

# **Measure Applications Partnership**

## **Statutory Authority**

Health reform legislation, the Affordable Care Act (ACA), requires HHS to contract with the consensus-based entity (i.e., NQF) to **"convene multi-stakeholder groups to provide input on the selection of quality measures" for public reporting, payment, and other programs.** 

## **MAP** Purpose

In pursuit of the NQS, MAP informs the selection of performance measures to achieve the goal of <u>improvement</u>, transparency, and value for all.

- MAP Objectives:
  - 1. Improve outcomes in high-leverage areas for patients and their families
  - 2. Align performance measurement across programs and sectors to provide consistent and meaningful information that supports provider/clinician improvement, informs consumer choice, and enables purchasers and payers to buy on value.
  - 3. Coordinate measurement efforts to accelerate improvement, enhance system efficiency, and reduce provider data collection burden.

## **MAP Structure**



## MAP Strategic Plan

## **Strategies**

- Provide input on performance measure sets for numerous accountability applications
- Promote alignment of performance measurement across HHS programs and between public- and private-sector initiatives
- Ensure that recommended performance measures are high-impact, relevant, actionable, and drive toward realization of the NQS
- Recommend removal of measures from federal programs that no longer meet program needs.
- Stimulate gap-filling for high-priority measure gaps and identify solutions to performance measurement implementation barriers.
- Establish feedback loops to
  - Support a data-driven approach to MAP's decision-making and build on other initiatives,
  - Determine whether MAP's recommendations are meeting stakeholder needs and are aligned with their goals, and
  - Ensure that MAP's recommendations are relevant to public and private implementers and that its processes are effective



### **Feedback Loops**

MAP seeks to establish bi-directional communication to stimulate collaboration with stakeholders involved in each of the functions of the Quality Enterprise.

## MAP Strategic Plan

### **Tactics**

- Execute MAP's approach to stakeholder engagement
- Identify families of measures and core measure sets
- Address measure gaps
- Define measure implementation phasing strategies
- Develop analytic support for MAP decision-making
- Refine the MAP Measure Selection Criteria
- Evaluate MAP's processes and impact

# MAP Pre-Rulemaking Approach

## 2012-2013 Goals for Pre-Rulemaking

- Continue to promote alignment across HHS programs and coordination with private sector efforts
- Incorporate measure use and performance information into MAP decision-making
- Provide more granular recommendations
- Potentially expand the number of programs MAP considers

## Pre-Rulemaking Approach

- 1. Build on MAP's prior recommendations
- 2. Evaluate each finalized program measure set using MAP Measure Selection Criteria
- 3. Evaluate measures under consideration for what they would add to the program measure sets
- 4. Identify and prioritize gaps for programs and settings

## 1. Build on MAP's Prior Recommendations

MAP's prior work serves as guidance for pre-rulemaking decisions, however measure selection is not restricted to those measures identified within these efforts.

| MAP's Prior Efforts                       | Pre-Rulemaking Use   |  |  |  |  |  |  |  |  |
|---|--|--|--|--|--|--|--|--|--|
| 2012 Pre-Rulemaking Decisions             | <ul> <li>Provides historical context and represents a starting place<br/>for pre-rulemaking discussions.</li> <li>Prior MAP decisions will be noted in the individual<br/>measure information.</li> </ul>  |  |  |  |  |  |  |  |  |
| Gaps Identified Across All MAP<br>Efforts | <ul> <li>Provides historical context of MAP gap identification activities.</li> <li>Will serve as a foundation for measure gap prioritization.</li> <li>A universal list of MAP's previously identified gaps will be compiled and provided in background materials.</li> </ul> |  |  |  |  |  |  |  |  |

## 1. Build on MAP's Prior Recommendations

| MAP's Prior Efforts   | Pre-Rulemaking Use   |
|---|--|
| <b>Coordination Strategies</b><br>(i.e., Safety, Clinician, PAC-LTC, Dual<br>Eligible Beneficiaries Cross-Cutting Input)            | <ul> <li>Provide setting-specific considerations that will serve as<br/>background information for MAP's pre-rulemaking<br/>deliberations.</li> <li>Key recommendations from each coordination strategy will<br/>be compiled in background materials.</li> </ul>                             |
| Families of Measures<br>NQS priorities (safety, care<br>coordination)   | <ul> <li>Represents a starting place for identifying the highest-<br/>leverage opportunities for addressing performance gaps<br/>within a particular content area.</li> </ul>  |
| Vulnerable populations (dual<br>eligible beneficiaries, hospice)<br>High-impact conditions<br>(cardiovascular, diabetes,<br>cancer) | <ul> <li>Setting- and level-of-analysis-specific core sets will be compiled, drawing from the families . Core measures will be flagged in the individual measure information.</li> <li>MAP will compare the setting and level-of-analysis cores against the program measure sets.</li> </ul> |

## Duals Eligible Beneficiaries Workgroup Input

- Dual Eligible Beneficiaries Workgroup liaison to the Hospital Workgroup
  - Provide dual eligible beneficiaries perspective throughout MAP's deliberations
- Analysis of where new measures under consideration intersect with areas identified as particularly applicable to the dual eligible population
- Detailed recommendations related to potential measures under consideration for the Hospital Value-Based
   Purchasing program

## Families of Measures and Core Measure Sets

### **Families of Measures**

"Related available measures and measure gaps that span programs, care settings, levels of analysis, and populations for specific topic areas related to the NQS " (e.g., care coordination family of measures, diabetes care family of measures)

#### **Core Measure Sets**

"Available measures and gaps drawn from families of measures that should be applied to specified programs, care settings, levels of analysis, and populations" (e.g., ambulatory clinician measure set, hospital core measure set, dual eligible beneficiaries core measure set)

# Current and Proposed Future Families of Measures

# Patient Safety Care Coordination Cardiovascular Care Diabetes Care

Affordability Population Health

> Patient- and Family-Centered Care

Mental Health

Revisit families as needed Additional highimpact conditions

Other?

## Families of Measures



# Families of Measures Populating Core Sets and Program Sets



## A Patient-Centered Approach to Core Measure Sets



# 2. Evaluate Finalized Program Measure Sets using MAP Measure Selection Criteria

## MAP will identify:

- Gaps—implementation gaps (core measures not in the set) and other gaps (e.g., development, endorsement) along the measure lifecycle
- Potential measures for inclusion (e.g., from core sets, newly NQF-endorsed measures)
- Potential measures for removal
- Additional programmatic considerations (e.g., guidance on implementing MAP recommendations, data collection and transmission, attribution methods)

## 3. Evaluate Measures Under Consideration

#### MAP will indicate a decision and rationale for each measure under consideration:

| MAP Decision Category    | Rationale (Examples)   |  |  |  |  |  |  |
|--------------------------|--|--|--|--|--|--|--|
| Support                  | Addresses a previously identified measure gap  |  |  |  |  |  |  |
|                          | • Core measure not currently included in the program measure set                                     |  |  |  |  |  |  |
|                          | Promotes alignment across programs and settings  |  |  |  |  |  |  |
| Support Direction        | Addresses a gap, but not tested for the setting  |  |  |  |  |  |  |
|                          | <ul> <li>Promotes parsimony, but data sources do not align with<br/>programs data sources</li> </ul> |  |  |  |  |  |  |
| Phased Removal           | • Measure previously finalized in the program, but a better measure is now available                 |  |  |  |  |  |  |
|                          | NQF endorsement removed or retired   |  |  |  |  |  |  |
| Do Not Support           | Overlaps with a previously finalized measure   |  |  |  |  |  |  |
| Insufficient Information | Measure numerator/denominator not provided   |  |  |  |  |  |  |

# 4. Identify and Prioritize Gaps for Programs and Settings

## **MAP's Previously Identified Gaps**

- Compiled from all of MAP's prior reports
- Categorized by NQS priority and high-impact conditions
- Compared with gaps identified in other NQF efforts (e.g., NPP, CDP endorsement reports)

## MAP will:

- Identify priorities for filling gaps across settings and programs
- Present measure ideas to spur development
- Capture barriers to gap filling and potential solutions

# **Evaluating Program Measure Sets**

# MAP Measure Selection Criteria and Information Available

| N  | leasure Selection Criterion   | Inputs Available to MAP  |  |  |  |  |  |  |
|----|---|--|--|--|--|--|--|--|
| 1. | Measures within the program measure<br>set are NQF-endorsed or meet the<br>requirements for expedited review              | NQF endorsement status will be noted for each<br>measure, along with links to additional measure details<br>via NQF's Quality Positioning System (QPS) |  |  |  |  |  |  |
| 2. | Program measure set adequately<br>addresses each of the National Quality<br>Strategy (NQS) priorities                     | Provided for each individual measure<br>MAP discussion will determine adequacy of each<br>program measure set  |  |  |  |  |  |  |
| 3  | Program measure set adequately<br>addresses high-impact conditions<br>relevant to the program's intended<br>population(s) | Provided for each individual measure<br>MAP discussion will determine adequacy of each<br>program measure set  |  |  |  |  |  |  |

# MAP Measure Selection Criteria and Information Available

| Measure Selection Criterion  | Inputs Available to MAP  |  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|--|--|
| <ol> <li>Program measure set promotes<br/>alignment with specific program<br/><u>attributes</u> as well as alignment<br/><u>across programs</u></li> </ol> | <ul> <li>For each program, NQF staff will compile 1-page program information sheets that provide:</li> <li>Statutory requirements</li> <li>Program goals provided by CMS</li> <li>Additional information provided in federal rules</li> <li>MAP's prior key recommendations regarding the program</li> </ul> For individual measures, NQF staff will identify: <ul> <li>MAP decision history (e.g., supported/not supported, included in a family of measures)</li> <li>Measure use in private sector initiatives (where available)</li> <li>Measure use in public programs (where available)</li> </ul> |  |  |  |  |  |  |  |

# MAP Measure Selection Criteria and Information Available

| M  | easure Selection Criterion  | Inputs Available to MAP   |
|----|---|---|
| 5. | Program measure set includes an appropriate mix of measure types                          | Type provided for each individual measure<br>MAP discussion will determine if the mix of measure<br>types is appropriate for each program   |
| 6. | Program measure set enables<br>measurement across the person-<br>centered episode of care | Provided for each individual measure, based upon the<br>principles in the NQF-endorsed Patient-focused<br>Episode of Care model<br>MAP discussion will inform if the program measure set<br>spans the episode of care |
| 7. | Program measure set includes<br>considerations for healthcare disparities                 | Provided for each individual measure, based upon<br>NQF's Disparities Consensus Development Project<br>MAP discussion will determine adequacy for each<br>program   |
| 8. | Program measure set promotes<br>parsimony   | Parsimony will be evaluated through MAP discussion for each program   |

## Sample Program Information Sheet

#### Nursing Home Compare

Program Type: Pay for Reporting – Information is gathered through annual inspection surveys and complaint investigations findings, the CMS Online Survey and Certification Reporting (OSCAR) system, and Minimum Data Set (MDS) quality measures and reported on the Nursing Home Compare website. The Nursing Home Compare includes the Five-Star Quality Rating System, which assigns each nursing home a rating of 1 to 5 stars, with 5 representing highest standard of quality, and 1 representing the lowest.<sup>1</sup>

Incentive Structure: Skilled nursing facilities (SNFs) and nursing facilities (NFs) are required to be in compliance with the requirements in 42 CFR Part 483, Subpart B, to receive payment under the Medicare or Medicaid programs. States certify SNF/NF and ensure compliance through surveys, subject to CMS approval. Nursing homes are required to complete the MDS as part of the federally mandated clinical assessment of all residents in Medicare or Medicaid certified nursing facilities.

Care Settings Included: Medicare and Medicaid certified nursing facilities

Statutory Mandate: The 1987 Omnibus Budget Reconciliation Act mandated the development of a nursing home resident assessment instrument.

Statutory Requirements for Measures: OBRA mandated the inclusion of domains of resident health and quality of life in the resident assessment instrument.

#### **Program Analysis**

MAP 2012 Pre-Rulemaking Program-Specific Input (optional):

- There were no measures under consideration for 2012 pre-rulemaking
- Incorporate additional measures for short-stay residents
- Align short-stay measures with IRF measures
- Include NHCAHPS in the program set

#### Program Measure Set Evaluation Using MAP Measure Selection Criteria:

| M/ | AP Measure Selection Criteria  | Evaluation |
|----|--|------------|
| 1. | Measures within the program measure set are<br>NQF-endorsed or meet the requirements for<br>expedited review           |            |
| 2. | Program measure set adequately addresses<br>each of the National Quality Strategy (NQS)<br>priorities                  |            |
| 3. | Program measure set adequately addresses<br>high-impact conditions relevant to the<br>program's intended population(s) |            |

## Sample Measure Table

| Row # | PQRS | Measure Name/<br>Title                                  | NQF# | NQS Priority   |                                      |                        |                        | Measure<br>Type       |                 | HIC     |                       |     |                                    | Staff Comments<br>(e.g. staff proposed |  |  |
|-------|------|---|------|----------------|--------------------------------------|------------------------|------------------------|-----------------------|-----------------|---------|-----------------------|-----|------------------------------------|--|--|--|
|       |      |   |      | Patient Safety | Effective Comm./Care<br>Coordination | Prevention & Treatment | Person/Family Centered | Health and Well Being | Affordable Care |         | Addresses Disparities |     | Public Alignment                   | Private Alignment                      | MAP Prior Decisions                        | rationale)                                   |
|       | Fin  | Asthma<br>Assessment                                    | 0001 |                | x                                    |                        |                        | х                     |                 | Process | No                    | Yes | PQRS: Fin,<br>MU: Fin,<br>VBM: Fin | eValu8                                 | Previously<br>Supported                    | Topped out                                   |
|       | Fin  | Appropriate Testing<br>for Children with<br>Pharyngitis | 0002 |                |                                      |                        |                        |                       | х               | Process | No                    | No  | PQRS: Fin,<br>MU: Fin,<br>VBM: Fin | eValu8,<br>IHA P4P                     | Previously<br>Supported                    | Addresses known<br>gap area                  |
|       | Fin  | Prenatal Care: Anti-D<br>Immune Globulin                | 0012 |                |                                      |                        |                        |                       | х               | Process | No                    | No  | PQRS: Fin,<br>MU: Fin              | IHA P4P                                | Previously<br>Supported                    | Addresses known<br>gap area                  |
|       | Fin  | Hypertension (HTN):<br>Plan of Care                     | 0017 |                | x                                    |                        |                        |                       |                 | Process | No                    | Yes | PQRS: Fin,<br>VBM: Fin             | eValu8                                 | Previously<br>Supported                    | Known Data<br>collection burden              |
|       | Fin  | Controlling High Blood<br>Pressure                      | 0018 |                | x                                    |                        |                        |                       |                 | Outcome | No                    | Yes | PQRS: Fin,<br>MU: Fin,<br>VBM: Fin | eValu8,<br>IHA P4P                     | Previously<br>Supported,<br>Cardio. Family | Frequently selected<br>measure by clinicians |

## Potential Programs to Be Considered

- Hospital Inpatient Quality Reporting
- Hospital Value-Based Purchasing
- Hospital Readmission Reduction Program
- Hospital Outpatient Quality Reporting
- Ambulatory Surgical Center Quality Reporting
- Inpatient Psychiatric Facility Quality Reporting
- Prospective Payment System (PPS) Exempt Cancer Hospital Quality Reporting
- Hospital Acquired Condition Payment Reduction (ACA 3008)
- Medicare and Medicaid EHR Incentive Program for Hospitals and CAHs
- Medicare Shared Savings Program

## Hospital Inpatient Quality Reporting Program

- Program Type: Pay for Reporting Information available on Hospital Compare
- Incentive Structure: 2.0 percentage points reduction in annual IPPS payment update for non-participation
- Statutory Requirements for Measures:
  - Began with baseline set of performance measures included in the November 2005 IOM report
  - Program should include process, structure, outcome, patients' perspectives on care, efficiency, and costs of care measures
  - The Secretary can add or replace measures in appropriate cases

## Hospital Inpatient Quality Reporting Program

### **HHS Uptake of 2012 Recommendations**

- MAP provided input on 33 measures for the Hospital IQR program
  - Of these measures, 23 received either a "Support" or "Do Not Support" recommendation from MAP
    - » Of the 11 measures supported, 6 were finalized (55% concordance)
    - » Of the 12 measures not supported, 1 was finalized (92% concordance)
    - » Overall concordance was 74% (17/23)
  - MAP had a "Support Direction" recommendation for the remaining 10 measures, 1 of which was finalized
# **Hospital Value-Based Purchasing**

- **Program Type**: Pay for Performance Program began FY 2013
- Incentive Structure:
  - 1% of regular reimbursements (increasing to 2% over time) are withheld from reimbursements to fund incentive payments.
  - Hospitals are scored on their performance relative to other hospitals and how their performance improves over time - the higher of these scores is used to determine incentive payments
- Statutory Requirements for Measures:
  - Measures must be included in IQR and reported on Hospital Compare for at least 1 year prior to use in VBP
  - Required in initial set: AMI, Heart Failure, Pneumonia, Surgeries (as measured by SCIP), Healthcare-associated infections (as noted in HHS Action Plan to Prevent Healthcare-Associated Infections), HCAHPS
  - FY 2014 set should include "Medicare Spending Per Beneficiary"
  - The Secretary can replace measures in appropriate cases
  - Readmissions measures cannot be included

# **Hospital Value-Based Purchasing**

### HHS Uptake of 2012 Recommendations

- MAP provided input on 13 measures for the Hospital VBP program
  - Of these measures, 12 received either a "Support" or "Do Not Support" recommendation from MAP
    - » Of the 3 measures supported, 0 were finalized (0% concordance)
    - » Of the 9 measures not supported, 8 were finalized for removal and 1 was finalized (89% concordance)
    - » Overall concordance was 67% (8/12)
  - MAP had a "Support Direction" recommendation for the remaining 1 measure, which was finalized

# **Hospital Readmission Reduction Program**

- **Program Type**: Pay for Performance Program began FY 2013
- Incentive Structure: Hospitals determined to have excess readmissions will receive a reduction in DRG payment rates. The maximum payment reduction is 1% in FY 2013, 2% in FY 2014, and capped at 3% for FY 2015 and beyond.

## Statutory Requirements for Measures:

- Measures should be NQF-endorsed
- Readmissions unrelated to prior discharge should be excluded from the measures
- Begin with measures for acute myocardial infarction (#0505), heart failure(#0330), and pneumonia (#0506)
- In FY 2015, the Secretary can expand the program to include other applicable conditions

# Hospital Outpatient Quality Reporting

- Program Type: Pay for Reporting Information available on Hospital Compare
- Incentive Structure: 2.0 percentage points reduction in annual OPPS payment update for non-participation
- Statutory Requirements for Measures:
  - Program should include process, structure, outcome, patients' perspectives on care, efficiency, and costs of care measures
  - The Secretary can add or replace any measures in appropriate cases

# Ambulatory Surgical Center (ASC) Quality Reporting

- **Program Type:** Pay for Reporting Program takes effect CY 2014
- Incentive Structure: 2.0 percentage points reduction in annual ASC payment system update for non-participation
- Statutory Requirements for Measures:
  - Measures may be similar or the same as those reported in IQR or OQR
  - Program should include process, structure, outcome, patients' perspectives on care, efficiency, and costs of care measures
  - To extent feasible, outcome and patient experience measures should be risk-adjusted
  - The Secretary can add or replace any measures in appropriate cases

# Inpatient Psychiatric Facility (IPF) Quality Reporting

- Program Type: Pay for Reporting Program begins FY 2014
- Incentive Structure: 2.0 percentage points reduction in annual IPPS payment update for non-participation
- Statutory Requirements for Measures:
  - CMS was required to establish initial list of performance measures by October 1, 2012
  - Program should include process, structure, outcome, patients' perspectives on care, efficiency, and costs of care measures
  - The Secretary can add or replace any measures in appropriate cases

# Inpatient Psychiatric Facility Quality Reporting

## HHS Uptake of 2012 Recommendations

- MAP provided input on 6 measures for the IPFQR program
  - Of these measures, 6 received a "Support" recommendation from MAP
    - » Of the 6 measures supported, 6 were finalized (100% concordance)
    - » Overall concordance was 100% (6/6)

# Prospective Payment System (PPS) Exempt Cancer Hospital (PCH) Quality Reporting

- Program Type: Required Reporting Program begins FY 2014
- Incentive Structure: Program does not currently include incentive/penalty for failing to report. CMS plans to address incentives in future rulemaking.
- Statutory Requirements for Measures:
  - Program should include process, structure, outcome, patients' perspectives on care, efficiency, and costs of care measures
  - Measures should reflect the level and most important aspects of care furnished by PCHs as well as gaps in quality of cancer care
  - The Secretary can add or replace any measures in appropriate cases

# Prospective Payment System (PPS) Exempt Cancer Hospital (PCH) Quality Reporting

## HHS Uptake of 2012 Recommendations

- MAP provided input on 5 measures for the PCHQR program
  - Of these measures, 5 received a "Support" recommendation from MAP
    - » Of the 5 measures supported, 5 were finalized (100% concordance)
    - » Overall concordance was 100% (5/5)

# Hospital Acquired Condition (HAC) Payment Reduction Program

- **Program Type:** Pay for Performance Program begins FY 2015
- Incentive Structure: Hospitals scoring in the top quartile for rates of HACs based on the national average will have their Medicare payments reduced by 1% for all DRGs.
- Statutory Requirements for Measures:
  - Conditions included should be the same as those already selected for the current HAC payment policy
  - Other conditions acquired during the hospital stay deemed appropriate by the Secretary may added

Medicare and Medicaid EHR Incentive Program for Hospitals and Critical Access Hospitals (CAHs)

- Program Type: Pay for Reporting Stage 1 began in 2011
- Incentive Structure:
  - Incentive payments provided to eligible hospitals and CAHs as they adopt, implement, upgrade or demonstrate meaningful use of certified EHR technology.

## Statutory Requirements for Measures:

- Measures of processes, experience and/or outcomes of patient care, observations or treatment that relate to one or more quality aims for health care such as effective, safe, efficient, patient-centered, equitable and timely care should be included.
- Measures must be reported for all patients, not just Medicare and Medicaid beneficiaries.
- Preference should be given to quality measures endorsed by NQF.

# Medicare and Medicaid EHR Incentive Program for Hospitals and Critical Access Hospitals (CAHs)

### **HHS Uptake of 2012 Recommendations**

- MAP provided input on 36 measures for the Hospital and CAH Meaningful Use program
  - Of these measures, all received either a "Support" or "Do Not Support" recommendation from MAP
    - » Of the 27 measures supported, 13 were finalized (48% concordance)
    - » Of the 9 measures not supported, 1 was finalized (89% concordance)
    - » Overall concordance was 58% (21/36)

# Medicare Shared Savings Program

- Program Type: Pay for Reporting and Pay for Performance
- Incentive Structure Options:
  - One-sided risk model (sharing of savings only for the first two years and sharing of savings and losses in the third year)
  - Two-sided risk model (sharing of savings and losses for all three years)
- Statutory Requirements for Measures:
  - Appropriate clinical processes and outcomes measures
  - Patient, and, wherever practicable, caregiver experience of care measures
  - Utilization measures (such as rates of hospital admission for ambulatory-sensitive conditions)

# **Evaluating Measures Under Consideration**

# Sample Discussion Guide

### Pre-Rulemaking Discussion Guide

| Time   | Issue/Question Considerations  |
|--------|--|
| 9:00am | Pre-Rulemaking Input on Value-Based Payment Modifier Program Measures  |
| 9:00   | <ul> <li>Review program summary and previously finalized measures, additional input on the measure set.</li> <li>The workgroup previously evaluated the proposed Value-Modifier programeasure set. Few changes were made to the finalized measure set.</li> <li>The vast majority of the finalized measures are NQF-endorsed. Hat the measures under consideration are endorsed.</li> <li>All NQS priorities are addressed by finalized measures. Measures under consideration address safer care, effective care coordination and making care more affordable.</li> <li>Parsimony is partially addressed as the majority of the finalized measures that should not be considered to a potential core set; removing some measures that should not be considered core.</li> </ul> |
| 9:30   | 2. One measures under consideration is endorsed and utilized in other programs       NQF #0036 Use of Appropriate Medications for Asthma         • Promotes alignment across programs—finalized for PQRS and Meaningfu         • This measure was previously proposed for the value-modifier set and was finalized.  |
| 9:35   | 3. One measure under       NQF #0097 Post-discharge Medication Reconciliation         consideration is endorsed and       • Addresses a high-leverage opportunity identified by the Duals Workgroup         proposed for use in another       • Potentially promotes alignment across programs- proposed for use in         program.       Meaningful Use  |
| 9:40   | 4. Three measures under       NQF #0279 Ambulatory Sensitive Conditions Admissions: Bacterial pneumonia         consideration are endorsed and       NQF #0280 Ambulatory Sensitive Conditions Admissions: Dehydration         are not utilized in other       NQF #0281 Ambulatory Sensitive Conditions Admissions: Urinary Infections         programs       NQF #0281 Ambulatory Sensitive Conditions Admissions: Urinary Infections  |

| Information                  | Use for   | Primary Sources                     | Information Available   |
|------------------------------|---|-------------------------------------|---|
| Туре                         | pre-rulemaking  |                                     |   |
| Measurement<br>Opportunities | Identify high-<br>leverage                                | National Quality<br>Strategy/NPP    | 2012 National Quality Strategy and NPP reports provide consensus priorities   |
|                              | opportunities (per<br>impact,                             | HHS websites                        | AHRQ, CDC, CMS, Partnership for Patients, and other sites provide stats<br>and research findings  |
|                              | improvability, and inclusiveness)                         | NQF partnerships                    | Multiple NQF-convened groups identified/prioritized measurement<br>gaps; a new report on gaps is expected in<br>Dec 2012  |
| Measure use                  | Determine which public and private                        | HHS rules                           | Proposed and Final rules list measures in programs, dates of implementation, and rationale for selection  |
|                              | programs use<br>measures, including<br>dates of use where | NQF reports/tools                   | NQF reports describe recommendations and actual use in multiple<br>settings; Alignment Tool describes community use; NQF measure<br>database contains developer info on use |
|                              | available   | HHS measure<br>inventory            | Tracks measures in HHS programs   |
|                              |   | Private<br>organization<br>websites | Multiple private program sites list measures in use (e.g. Alternative Quality Contract, eValue8, Joint Commission, Leapfrog, etc)   |
|                              |   | AHIP Survey                         | Identifies measures used by a majority of health plans  |

| Information Type | Use for<br>pre-rulemaking                     | Primary Sources                              | Information Available  |
|------------------|---|--|--|
| Performance      | Examine recent results                        | CMS Impact Assessment                        | CMS measure trends over 2+ years   |
| results          | and trends to gauge<br>potential future value | HHS Compare sites                            | National, state, and local results for select measures in various programs   |
|                  |   | AHRQ NHQRDRnet                               | National and state results for select measures, with demographic stratification  |
|                  |   | Private organization websites<br>and reports | Some private organizations provide limited<br>performance data (e.g. ASC Quality<br>Collaboration, Joint Commission Annual<br>Report, NCQA 2011 State of Health Care<br>Quality Report, etc) |

| Information Type             | Use for<br>pre-rulemaking             | Primary Sources                               | Information Available   |
|------------------------------|---------------------------------------|---|---|
| Implementation<br>experience | Assess practical<br>issues of measure | CMS 2010 Reporting<br>Experience (PQRS & eRx) | Describes participation rates, including measures reported by the largest # of EPs in PQRS                                    |
|                              | implementation in programs, such as   | Alignment Tool<br>measurement stories         | Provides details on measure use experiences of three AF4Q communities   |
|                              | adoption rates and unintended         | Pubmed  | Limited research has been done on impact of measures used in the field  |
|                              | consequences                          | NQF feedback loops                            | Comments submitted through QPS; CDP implementation feedback and developer responses; Future sources of implementation info    |
| Measure impact               | Establish the effectiveness of using  | 2015 CMS Impact<br>Assessment                 | In planning stages; MAP will focus on aligning with RE-<br>AIM framework  |
|                              | measures in specific<br>applications  | Various from above                            | Many of the other sources for measure use,<br>performance, and implementation experience info can<br>inform impact assessment |
|                              |                                       | NQF feedback loops<br>QASC survey             | Future source of impact info<br>Future source of impact info  |

- Information Limitations
  - Varying type and availability of performance data
  - Minimal implementation experience
- Inputs noted earlier related to the MAP Measure Selection Criteria will also be provided
- Use with MAP decision making
  - To the extent possible, information will be provided in the discussion guide
  - Additional information will be shared throughout MAP's deliberations, as available

# **Public Comment**

# **Next Steps**

# Workgroup Assignments

### Assignments distributed late November prior to December meeting

- Each Workgroup member will be assigned a program
  - Review finalized program measure set and evaluate using the MAP Measure Selection Criteria
  - Identify gaps, measures for addition or removal, additional programmatic considerations
  - Consider if new measures under consideration contribute to the finalized program measure set
- To support this activity, staff will provide:
  - Program summary sheet including an initial evaluation of the program measure set against the MAP Measure Selection Criteria
  - Setting-specific core measures and list of measure gaps
  - Current program measure set and list of measures under consideration

## Next Steps

- Late November: pre-meeting assignments distributed
- December 4: All MAP Web Meeting
- December 12-13: Hospital Workgroup Meeting in-person
- January 8-9: Coordinating Committee Meeting in-person
- Mid-January: 2-week public comment period for draft Pre-Rulemaking Report
- **February 1**: Pre-Rulemaking Report due to HHS

### **MAP Approach to Pre-Rulemaking**

MAP has enhanced its approach to pre-rulemaking, based on its first year experience providing pre-rulemaking input to HHS. This approach includes two critical components: 1) building on MAP's prior recommendations and 2) using MAP's Measure Selection Criteria and additional information on the use and performance of individual measures to evaluate program measure sets. See Table 4 for a list of programs MAP will likely be asked to review during its 2013 pre-rulemaking activities.

### **Building on MAP's Prior Recommendations**

MAP's prior strategic input and pre-rulemaking decisions are important to MAP's ongoing deliberations. Each of MAP's prior inputs and how they will contribute to pre-rulemaking decisions are described below.

**Coordination Strategies** elucidated opportunities for public and private stakeholders to accelerate improvement and synchronize measurement initiatives. Each coordination strategy addresses available measures, gaps, and measurement issues; data sources and health information technology implications; alignment opportunities across settings and across public- and private-sector programs; special considerations for dual-eligible beneficiaries; and approaches for improving measure application. The recommendations provide setting-specific considerations that will serve as background information to MAP's pre-rulemaking deliberations.

**2012 Pre-Rulemaking Report** provided program-specific input that included recommendations about measures previously finalized for the programs and about measures on the list of measures under consideration for implementation by HHS. The high-level recommendations in this report serve as useful background while measure-specific recommendations will be incorporated into the measure-by-measure deliberations.

**Families of Measures** facilitate coordination of measurement efforts. These measure sets are composed of related available measures and measure gaps that span programs, care settings, levels of analysis, and populations for specific topic areas related to the NQS priorities (i.e., safety, care coordination families of measures), vulnerable populations (i.e., dual eligible beneficiaries, hospice families) and high-impact conditions (i.e., cardiovascular, diabetes, and cancer families). Setting- and level-of analysis-specific core sets are drawn from the families. These core measure sets serve as an initial starting place for evaluation of program measure sets, identifying measures that should be added to the program measure set or measures that should replace previously finalized measures in the program measure set.

Figure 1 illustrates how core measure sets and program measure sets are populated from the families of measures. The boxes represent individual performance measures. In this example, the orange boxes represent measures that are specified for individual clinician or group practice levels of analysis. The dark orange boxes in the clinician program measure sets (i.e., PQRS, Value Based Payment Modifier, Meaningful Use) represent measures recommended for those programs from the clinician core measure set while the light orange boxes represent measures recommended for those programs that are not included in the clinician core measure set, but fit the specific purpose of the program.



### Figure 1. Families of Measures Populating a Core Measure Set and Program Measure Sets

**Measure gaps** have been identified across all MAP reports. When reviewing program measure sets, MAP will re-evaluate the previously identified gaps, noting where gaps persist.

Table 1 below illustrates how MAP's prior work will serve as an input to MAP's pre-rulemaking deliberations.

| MAP's Prior Efforts   | Pre-Rulemaking Use   |    |  |
|---|--|----|--|
| Coordination Strategies (i.e., Safety, Clinician,<br>PAC-LTC, Dual Eligible Beneficiaries Cross-Cutting<br>Input) | <ul> <li>Provide setting-specific considerations that will serve as backgrou information for MAP's pre-rulemaking deliberations.</li> <li>Key recommendations from each coordination strategy will be compiled in background materials.</li> </ul> | nd |  |
| Families of Measures<br>NQS priorities (safety, care coordination)<br>Vulnerable populations (dual eligible       | <ul> <li>Represents a starting place for identifying the highest-leverage<br/>opportunities for addressing performance gaps within a particular<br/>content area.</li> </ul>   | r  |  |

Table 1. Using MAP's Prior Work in Pre-Rulemaking

| beneficiaries, hospice)<br>High-impact conditions (cardiovascular,<br>diabetes, cancer) | <ul> <li>Setting- and level-of-analysis-specific core sets will be compiled,<br/>drawing from the families and population cores. Core measures will be<br/>flagged in the individual measure information.</li> <li>MAP will compare the setting and level-of-analysis cores against the<br/>program measure sets.</li> </ul> |
|---|--|
| 2012 Pre-Rulemaking Decisions   | <ul> <li>Provides historical context and represents a starting place for pre-<br/>rulemaking discussions.</li> <li>Prior MAP decisions will be noted in the individual measure<br/>information.</li> </ul>   |
| Gaps Identified Across All MAP Efforts  | <ul> <li>Provides historical context of MAP gap identification activities.</li> <li>Will serve as a foundation for measure gap prioritization.</li> <li>A universal list of MAP's previously identified gaps will be compiled and provided in background materials.</li> </ul>   |

### Using MAP Measure Selection Criteria and Additional Information to Evaluate Program Measure Sets

The Measure Selection Criteria (MSC) are intended to facilitate structured discussion and decision-making processes. In the second year of pre-rulemaking input, MAP aims to use the MSC in a more purposeful way. Table 2 below identifies inputs available to MAP to evaluate program measure sets against the MSC.

| Measure Selection Criterion |  | Inputs Available to MAP  |  |
|-----------------------------|--|--|--|
| 1.                          | Measures within the program measure set are<br>NQF-endorsed or meet the requirements for<br>expedited review                     | NQF endorsement status will be noted for each measure,<br>along with links to additional measure details via NQF's<br>Quality Positioning System (QPS)   |  |
| 2.                          | Program measure set adequately addresses<br>each of the National Quality Strategy (NQS)<br>priorities                            | Provided for each individual measure<br>MAP discussion will determine adequacy of each program<br>measure set  |  |
| 3.                          | Program measure set adequately addresses<br>high-impact conditions relevant to the<br>program's intended population(s)           | Provided for each individual measure<br>MAP discussion will determine adequacy of each program<br>measure set  |  |
| 4.                          | Program measure set promotes alignment<br>with specific program <u>attributes</u> as well as<br>alignment <u>across programs</u> | <ul> <li>For each program, NQF staff will compile 1-page program<br/>information sheets that provide:</li> <li>Statutory requirements</li> <li>Program goals provided by CMS</li> <li>Additional information provided in federal rules</li> <li>MAP's prior key recommendations regarding the program</li> <li>For individual measures, NQF staff will identify:</li> <li>MAP decision history (e.g., supported/not supported, included in<br/>a family of measures)</li> <li>Measure use in private sector initiatives (where available)</li> <li>Measure use in public programs (where available)</li> </ul> |  |
| 5.                          | Program measure set includes an appropriate mix of measure types   | Type provided for each individual measure<br>MAP discussion will determine if the mix of measure types is<br>appropriate for each program  |  |

Table 2. Information Available to Evaluate Programs Against the MAP Measure Selection Criteria.

| 6. | Program measure set enables measurement across the person-centered episode of care | Provided for each individual measure, based upon the principles in the NQF-endorsed Patient-focused Episode of Care model |
|----|--|---|
|    |  | MAP discussion will inform if the program measure set spans the episode of care   |
| 7. | Program measure set includes considerations  | Provided for each individual measure, based upon NQF's  |
|    | for healthcare disparities   | Disparities Consensus Development Project   |
|    |  |   |
|    |  | MAP discussion will determine adequacy for each program   |
| 8. | Program measure set promotes parsimony   | Parsimony will be evaluated through MAP discussion for each   |
|    |  | program   |

#### **Evaluation of Program Measure Sets**

Using the available inputs, MAP will evaluate each finalized program measure set against the MAP Measure Selection Criteria to identify:

- Gaps—implementation gaps (core measures not in the set) and other gaps (e.g., development, endorsement) along the measure lifecycle
- Potential measures for inclusion (e.g., from core sets, newly endorsed measures)
- Potential measures for removal
- Additional programmatic considerations (e.g., guidance on implementing MAP recommendations, data collection and transmission, attribution methods)

Note: NQF staff will produce preliminary program measure set evaluations for consideration by MAP.

#### **Evaluating Measures Under Consideration**

The evaluation of each finalized program measure set serves as a starting point for reviewing the measures under consideration. Next, MAP will determine whether the measures under consideration will enhance the program measure sets. For each measure under consideration, MAP will indicate a decision and rationale as well as note any additional comments or considerations. Table 3 below indicates MAP's decision categories and potential rationale.

| MAP Decision Category | Rationale (Examples)   |
|-----------------------|--|
| Support               | <ul> <li>Addresses a previously identified measure gap</li> <li>Core measure not currently included in the program measure set</li> <li>Promotes alignment across programs and settings</li> </ul> |
| Support Direction     | <ul> <li>Addresses a gap, but not tested for the setting</li> <li>Promotes parsimony, but data sources do not align with programs data sources</li> </ul>  |
| Phased Removal        | <ul> <li>Measure previously finalized in the program, but a better measure is now available</li> <li>NQF endorsement removed or retired</li> </ul>   |

#### Table 3. MAP Decision Categories and Rationale Examples

| Do Not Support           | Overlaps with a previously finalized measure |
|--------------------------|--|
| Insufficient Information | Measure numerator/denominator not provided   |

To accomplish this review of measures, NQF staff will identify information for each measure under consideration. The information noted in Table 2 will assist MAP in determining whether the measure under consideration contributes to the finalized program measure set. Additionally, MAP will utilize additional information—such as measure performance results, unintended consequences, impact, and implementation experiences—when accessible. NQF Staff will attempt to identify as much information as possible.

To systematically review the measures under consideration, NQF staff will prepare a discussion guide. The discussion guide will facilitate MAP's response to the following questions regarding measures under consideration:

- Is there sufficient information to make a decision?
- Does the measure contribute to the program set (e.g., addresses a gap, addresses an aspect of the MSC)?
- Is the measure ready for implementation in a program (e.g., tested for that setting, data sources align with the program's structure)?

The discussion guide will facilitate MAP revisiting the previously finalized measures to determine if any measures should be removed from the program. The discussion guide will also include previously identified gaps to help MAP determine which gaps persist and whether there are any new gaps.

### **Determine Gap-Filling Priorities**

MAP will continue to identify gaps within each program, providing measure ideas to spur development. MAP will also consider the gaps across settings, prioritizing by importance and feasibility of addressing the gap. For the high priority areas across settings, MAP will highlight barriers to gap-filling and suggest potential solutions to those barriers.

| Program   | Workgroup to Rev       |
|---|------------------------|
| Table 4. Programs That MAP Will Likely Be Asked to Review for | r Pre-Rulemaking Input |

| Program  | Workgroup to Review |
|--|---------------------|
| Ambulatory Surgical Center Quality Reporting                           | Hospital            |
| End Stage Renal Disease Quality Improvement Program                    | PAC/LTC             |
| Home Health Quality Reporting  | PAC/LTC             |
| Hospice Quality Reporting  | PAC/LTC             |
| Hospital-Acquired Condition Payment Reduction (ACA 3008)               | Hospital            |
| Hospital Inpatient Quality Reporting                                   | Hospital            |
| Hospital Outpatient Quality Reporting                                  | Hospital            |
| Hospital Readmission Reduction Program                                 | Hospital            |
| Hospital Value-Based Purchasing  | Hospital            |
| Inpatient Psychiatric Facility Quality Reporting                       | Hospital            |
| Inpatient Rehabilitation Facility Quality Reporting                    | PAC/LTC             |
| Long-Term Care Hospital Quality Reporting                              | PAC/LTC             |
| Medicare and Medicaid EHR Incentive Program for Eligible Professionals | Clinician           |
| Medicare and Medicaid EHR Incentive Program for Hospitals and CAHs     | Hospital            |
| Medicare Physician Quality Reporting System (PQRS)                     | Clinician           |
| Medicare Shared Savings Program  | Clinician, Hospital |
| Physician Compare  | Clinician           |
| Prospective Payment System (PPS) Exempt Cancer Hospital Quality        | Hospital            |
| Reporting  |                     |
| CMS Nursing Home Quality Initiative and Nursing Home Compare           | PAC/LTC             |
| Measures   |                     |
| Physician Feedback/Value-Based Modifier Program                        | Clinician           |

### MAP Approach to Pre-Rulemaking: Information Sources

| Information Type          | Use for Pre-Rulemaking  | Primary Sources                              | Information Available   |
|---------------------------|---|--|---|
| Measurement<br>priorities | Identify high-leverage<br>opportunities (per impact,<br>improvability, and<br>inclusiveness)              | National Quality Strategy/NPP                | 2012 National Quality Strategy and NPP reports provide consensus priorities   |
|                           |   | HHS websites                                 | AHRQ, CDC, CMS, Partnership for Patients, and other sites provide stats and research findings   |
|                           |   | NQF partnerships                             | Multiple NQF-convened groups identified/prioritized<br>measurement gaps; a new report on gaps is expected in Dec<br>2012  |
| Measure use               | Determine which public and<br>private programs use<br>measures, including dates of<br>use where available | HHS rules                                    | Proposed and Final rules list measures in programs, dates of implementation, and rationale for selection  |
|                           |   | NQF reports/tools                            | NQF reports describe recommendations and actual use in<br>multiple settings; Alignment Tool describes community use;<br>NQF measure database contains developer info on use               |
|                           |   | HHS measure inventory                        | Tracks measures in HHS programs   |
|                           |   | Private organization websites                | Multiple private program sites list measures in use (e.g.<br>Alternative Quality Contract, eValue8, Joint Commission,<br>Leapfrog, etc)   |
|                           |   | AHIP Survey                                  | Identifies measures used by a majority of health plans  |
| Performance<br>results    | Examine recent results and<br>trends to gauge potential<br>future value                                   | CMS Impact Assessment                        | CMS measure trends over 2+ years  |
|                           |   | HHS Compare sites                            | National, state, and local results for select measures in various programs  |
|                           |   | AHRQ NHQRDRnet                               | National and state results for select measures, with demographic stratification   |
|                           |   | Private organization websites<br>and reports | Some private organizations provide limited performance<br>data (e.g. ASC Quality Collaboration, Joint Commission<br>Annual Report, NCQA 2011 State of Health Care Quality<br>Report, etc) |

| Information Type             | Use for Pre-Rulemaking  | Primary Sources                                 | Information Available   |
|------------------------------|---|---|---|
| Implementation<br>experience | Assess practical issues of<br>measure implementation in<br>programs, such as adoption<br>rates and unintended<br>consequences | CMS 2010 Reporting<br>Experience (PQRS and eRx) | Describes participation rates, including measures reported<br>by the largest # of EPs in PQRS                                 |
|                              |   | Alignment Tool measurement stories              | Provides details on measure use experiences of three AF4Q communities   |
|                              |   | Pubmed  | Limited research has been done on impact of measures used in the field  |
|                              |   | NQF feedback loops                              | Comments submitted through QPS; CDP implementation feedback and developer responses; Future sources of implementation info    |
| Measure impact               | Establish the effectiveness of<br>using measures in specific<br>applications  | 2015 CMS Impact Assessment                      | In planning stages; MAP will focus on aligning with RE-AIM framework  |
|                              |   | Various from above                              | Many of the other sources for measure use, performance,<br>and implementation experience info can inform impact<br>assessment |
|                              |   | NQF feedback loops                              | Future source of impact info  |
|                              |   | QASC survey                                     | Future source of impact info  |

### MAP Approach to Pre-Rulemaking: Information Sources

MAP Approach to Pre-Rulemaking: Information Sources