Welcome!

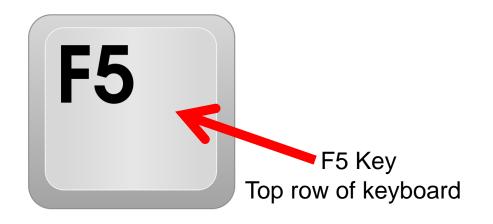
ReadyTalk

- Presentation slides can be downloaded from <u>www.qualityreportingcenter.com</u> under Upcoming Events on the right-hand side of the page.
- Audio for this event is available via ReadyTalk[®] Internet streaming. No telephone line is required.
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Troubleshooting Audio

Audio from computer speakers breaking up? Audio suddenly stops?

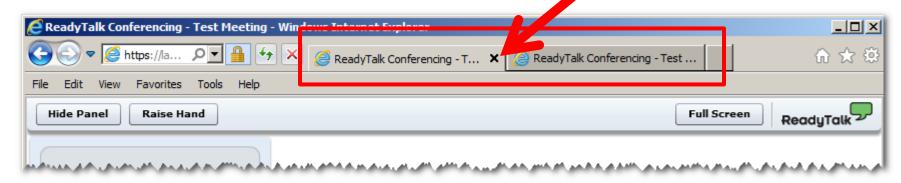
- Click Refresh icon or
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Troubleshooting Echo

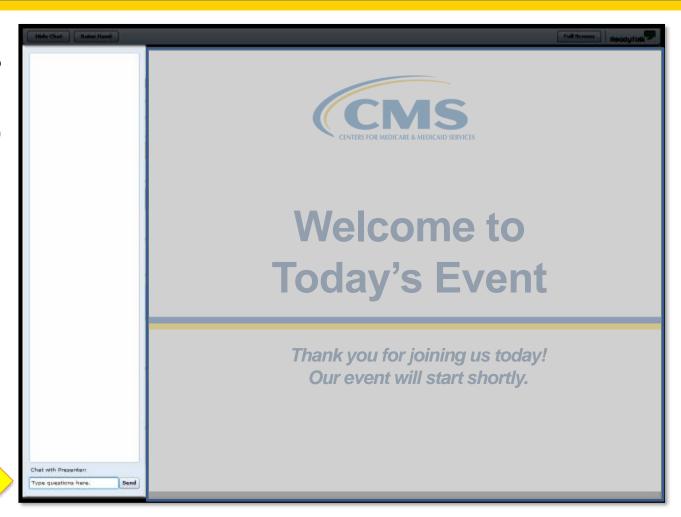
- Hear a bad echo on the call?
- Echo is caused by multiple browsers/tabs open to a single event (multiple audio feeds).
- Close all but one browser/tab, and the echo will clear up.



Example of two browsers/tabs open in same event

Submitting Questions

Type questions in the "Chat with Presenter" section located on the bottom-left corner of your screen.





CY 2018 OPPS/ASC Proposed Rule: Ambulatory Surgical Center Quality Reporting (ASCQR) Program

Anita Bhatia, PhD, MPH

Program Lead, ASCQR Program

Centers for Medicare & Medicaid Services (CMS)

August 3, 2017

Learning Objectives

At the conclusion of the program, attendees will be able to:

- ✓ Locate the Calendar Year (CY) 2018 OPPS/ASC Proposed Rule in the Federal Register
- ✓ Identify the changes to the ASCQR Program in the CY 2018 OPPS/ASC Proposed Rule
- ✓ Submit comments to CMS regarding the CY 2018 OPPS/ASC Proposed Rule

Question and Answer Limitations

- During the course of this webinar, CMS:
 - Can only address procedural questions and comment submissions.
 - Cannot address ANY rule-related questions.
- Your understanding of these constraints is appreciated.
- CMS looks forward to your formal comments on the Proposed Rule.

Proposed Rule CY 2018

Locating the Rule

Federal Register Link

- https://www.gpo.gov/fdsys/pkg/FR-2017-07-20/pdf/2017-14883.pdf
- The ASCQR Program section begins on p. 33685 of the Federal Register

Accessing the Federal Register

www.federalregister.gov 82FR33685 Sections Browse Search Reader Aids My FR FEDERAL REGISTER The Daily Journal of the United States Government Thursday, July 20th 95 documents from 36 agencies (335 Pages) Current Issue 79 Notices 2 Presidential Documents 6 Proposed Rules 8 Rules 3 Significant Documents Special Filing Regular Filing **Public Inspection** updated on 08:45 AM, on Thursday, July 20, 2017 updated on 11:15 AM, on Tuesday, July 18, 2017 2 documents from 2 agencies 113 documents from 43 agencies 1 Proposed Rule 1 Rule 81 Notices 11 Proposed Rules 21 Rules Search All Federal Register Documents Since 1994 Find 755.251 documents Search term or citation

Finding the Right Page



Finding the Right Section





Accounting for Social Risk Factors

Social Risk Factors

CMS review of information:

- Considerations for strategies to account for social risk factors
- NQF to undertake a two-year trial period to assess whether risk adjustment for social factors is appropriate

What Do You Think?

Seeking public comment on:

- Whether CMS should account for social risk factors in the ASCQR Program
 - If so, what methods would be most appropriate?
- Which social risk factors might be most appropriate for reporting stratified measure scores and/or potential risk adjustment

Measures to Be Removed

Removing Measures

Two statistical criteria for determining when a measure is "topped out":

- 1) When there is statistically indistinguishable performance at the 75th and 90th percentiles of national performance
- 2) When the measures' truncated coefficient of variation is less than or equal to 0.10

Measures Proposed for Removal

Three measures for the **CY 2019** Payment Determination:

- ASC-5: Prophylactic Intravenous (IV)
 Antibiotic Timing
- ASC-6: Safe Surgery Checklist Use
- ASC-7: ASC Facility Volume Data on Selected Procedures

ASC-5

This measure assesses whether intravenous antibiotics given for prevention of surgical site infection were administered on time.

- Based on measure data for CY 2014 through 2016 encounters, ASC performance is unvarying, and further improvement cannot be made.
- National Quality Forum (NQF) endorsement was removed because this measure was topped out.

ASC-5: Data

Encounters	Number of ASCs	75th Percentile	90th Percentile	Truncated COV
CY 2014	2,206	100.000	100.000	0.02633
CY 2015	2,196	100.000	100.000	0.03289
CY 2016	2,158	100.000	100.000	0.02619

ASC-6

This measure of facility process assesses whether an ASC employed a safe surgery checklist.

- Based on analysis of measure data for CY 2014 through 2016 encounters, the measure meets the criterion for removal due to high and unvarying performance.
 - Traditional criteria for topped out measures are not applicable due to the "Yes" or "No" answer to the question.

ASC-6: Data

Encounters	Number of ASCs	Rate	75th Percentile	90th Percentile	Truncated COV
CY 2012	4,356	0.989	100.000	100.000	0.106
CY 2013	*	*	*	*	*
CY 2014	4,328	0.997	100.000	100.000	0.050
CY 2015	4,305	0.998	100.000	100.000	0.043

^{*}No data were collected for CY 2013.

ASC-5 and **ASC-6**: Reasons

Reasons for removal:

- Measure performance is high and unvarying
- Meaningful distinctions and improvements in performance can no longer be made
- Reduces administrative burden of retaining the measures.

ASC-7

This measure collects surgical procedure volume data on six categories of procedures frequently performed in the ASC setting.

 CMS has adopted, and intends to continue to adopt, more measures assessing ASCs' performance on specific procedure types.

ASC-7: Reasons

Reasons for removal:

- Other measures are more strongly associated with patient outcomes.
- Removal of this measure will alleviate maintenance costs and administrative burden.

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Measure Removal

Benefits to removing these measures:

- Little room for improvement
- Would alleviate maintenance costs and administrative burden of retaining measures
- Burdens outweigh benefits of keeping measures in the program

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Proposal to Delay

Changes to Existing Measures

Survey Measures

Outpatient and Ambulatory Surgery Consumer Assessment of Healthcare Providers and Systems (OAS CAHPS) survey-based measures

- Propose to delay OAS CAHPS survey measures
 - Implementation date will be determined in future rulemaking.

New Measures

ASC-16

Measure Entered into a CMS Web-Based Tool

ASC-16

ASC-16: Toxic Anterior Segment Syndrome (TASS):

- Complication of anterior segment eye surgery developing within 24 hours after surgery
- Assesses the number of patients diagnosed with TASS within two days

Why TASS?

- Measurement and public reporting have the potential to drive preventative efforts.
- This surgery is commonly performed at ASCs.
- Reporting would promote improvement over time.
- The measure would address the Measure Applications Partnership (MAP)-identified priority measure area of procedure complications.

ASC-16: Calculation

- The number of ophthalmic anterior segment surgery patients diagnosed with TASS within two days of surgery
 - Includes all patients, regardless of age, undergoing anterior segment surgery at an ASC
- Numerator: All anterior segment surgery patients diagnosed with TASS within two days of surgery
- Denominator: All anterior segment surgery patients

ASC-16: Submission

- Proposed for the CY 2021 Payment
 Determination and subsequent years
- Data will be submitted via a CMS online data submission tool.
- Submission of these data to CMS would be January 1 to May 15 in the year prior to the affected payment determination year

ASC-17 and ASC-18

Claims-Based Measures

ASC-17

ASC-17: Hospital Visits after Orthopedic Ambulatory Surgical Center Procedures

- Proposed for the CY 2022 Payment Determination and subsequent years.
- The measure outcome is all-cause, unplanned hospital visits within seven days of an orthopedic procedure performed at an ASC.
- Hospital visits include ED visits, observation stays, and unplanned inpatient admissions.

Why ASC-17?

- The number of orthopedic procedures has increased.
- Reporting will incentivize ASCs to improve care.
- Complications are preventable such as: infection, post-operative bleeding, urinary retention, nausea and vomiting, and pain.
- Tracking and reporting events would facilitate efforts to lower adverse events.

ASC-17: Inclusions

- Claims-based using Part A and Part B Medicare administrative claims and Medicare enrollment data
- Includes all Medicare beneficiaries ages 65 and older undergoing outpatient orthopedic surgery at an ASC who have 12 prior months of Fee-for-Service (FFS) Parts A and B Medicare enrollment

ASC-17: Exclusions

 Excludes patients who survived at least seven days following orthopedic surgery at an ASC but not continuously enrolled in Medicare FFS Parts A and B in the seven days after surgery

ASC-18

ASC-18: Hospital Visits after Urology Ambulatory Surgical Center Procedures

- Proposed for the CY 2022 Payment Determination and subsequent years.
- The measure outcome is all-cause, unplanned hospital visits occurring within seven days of a urology procedure performed at an ASC.

Why ASC-18?

- The number of urology procedures in ASCs is increasing.
- Many reasons for hospital visits are preventable. Some complications are urinary tract infection, calculus of the ureter, urinary retention, hematuria, and septicemia.
- Tracking and reporting events incentivizes improvement of care.
- The measure addresses the CMS National Quality Strategy of making care safer.

ASC-18: Inclusions

- Includes all Medicare beneficiaries ages 65 and older undergoing outpatient urology procedures at an ASC who have 12 prior months of FFS Parts A and B Medicare enrollment
- Target procedures are routinely performed, involve increased risk, and are performed by urologists

ASC-18: Exclusions

 Excludes patients who survived at least seven days following a urology procedure at an ASC, but were not continuously enrolled in Medicare FFS Parts A and B in the seven days after surgery

Public Reporting

Prior to public reporting of data for ASC-17 and ASC-18:

- There will be a dry run which will utilize the most current two-year set of complete claims available.
- The dry run will generate confidential reports for ASCs.

Proposed Rule CY 2018

Measures and Topics for Future Consideration

Breast SSI

Ambulatory Breast Procedure Surgical Site Infection (SSI) Outcome Measure

- Represent a substantial proportion of SSIs in the inpatient setting
- Have one of the highest infection risks in the outpatient setting
- Trend in surgery to outpatient and the ASC setting

Why SSI?

- Assesses outcome of all SSIs following breast procedures conducted at an ASC among adult patients
- Compares the reported number of SSIs observed with a predicted value based on nationally aggregated data

Numerator and Denominator

- Numerator: All SSIs during the 30-day and 90-day postoperative periods following breast procedures in ASCs
- Denominator: All adult patients (defined as patients ages 18 to 108 years) undergoing breast procedures, as specified by the operative codes that comprise the breast procedure category of the National Healthcare Safety Network (NHSN) Patient Safety Component Protocol at an ASC

Requirements for Data Submission

Data Submission

CMS is proposing to allow ASCs an alternate method of submission.

- Expand the CMS online tool to allow for batch submission of measure data.
 - Data would be submitted electronically for ASC agents via assigned QualityNet accounts.

Extraordinary Circumstances Extensions Or Exemptions (ECEs)

Areas of Variance

Five areas of variance In ECEs among CMS programs:

- Allowing the facilities to submit a form signed by CEO versus CEO or designee
- Requiring the form to be submitted at varying days following the event
- Inconsistency in timelines to provide a formal response
- Variances in CMS authority to grant ECEs due to CMS system issues

Inconsistencies in verbiage

ECE Change

- Change in terminology from "Extraordinary Circumstances Extensions or Exemptions" to "Extraordinary Circumstances Exceptions"
 - CMS will strive to complete the review of each request within 90 days of receipt.

Proposed Rule CY 2018

Measures Moving Forward

ASCQR Measure Set as Proposed

Measure	CY 2022 and Subsequent Payment Determinations
ASC-1: Patient Burn	Yes
ASC-2: Patient Fall	Yes
ASC-3: Wrong Site, Wrong Side, Wrong Patient, Wrong Procedure, Wrong Implant	Yes
ASC-4: All-Cause Hospital Transfer/Admission	Yes
ASC-5: Prophylactic Intravenous Antibiotic Timing	Proposed Removal CY 2019
ASC-6: Safe Surgery Checklist Use	Proposed Removal CY 2019
ASC-7: ASC Facility Volume Data on Selected ASC Surgical Procedures	Proposed Removal CY 2019
ASC-8: Influenza Vaccination Coverage among Healthcare Personnel	Yes

ASCQR Measure Set as Proposed (cont.)

Measure	CY 2022 and Subsequent Payment Determinations
ASC-9: Appropriate Follow-Up Interval for Normal Colonoscopy in Average Risk Patients	Yes
ASC-10: Colonoscopy Interval for Patients with a History of Adenomatous Polyps – Avoidance of Inappropriate Use	Yes
ASC-11: Cataracts: Improvement in Patient's Visual Function within 90 Days Following Cataract Surgery	Yes
ASC-12: Facility 7-Day Risk-Standardized Hospital Visit Rate after Outpatient Colonoscopy	Yes
ASC-13: Normothermia Outcome	Yes
ASC-14: Unplanned Anterior Vitrectomy	Yes

ASCQR Measure Set as Proposed (cont.)

Measure	CY 2022 and Subsequent Payment Determinations
ASC-15a: OAS CAHPS – About Facilities and Staff	Proposed Delay CY 2020
ASC-15b: OAS CAHPS – Communication About Procedure	Proposed Delay CY 2020
ASC-15c: OAS CAHPS – Preparation for Discharge and Recovery	Proposed Delay CY 2020
ASC-15d: OAS CAHPS – Overall Rating of Facility	Proposed Delay CY 2020
ASC-15e: OAS CAHPS – Recommendation of Facility	Proposed Delay CY 2020
ASC-16: Toxic Anterior Segment Syndrome	Proposed Beginning CY 2021
ASC-17: Hospital Visits After Orthopedic Ambulatory Surgery Center Procedures	Proposed Beginning CY 2022
ASC-18: Hospital Visits After Urology Ambulatory Surgery Center Procedures	Proposed Beginning CY 2022

Proposed Rule CY 2018

Commenting

Submitting Comments

- Comments must be received no later than 5 p.m. ET on September 11, 2017, if delivered by regular mail, express or overnight mail, or by hand or courier.
- Comments submitted electronically will be accepted until 11:59 p.m. ET.
- CMS encourages submission of electronic comments to <u>www.regulations.gov</u>.
- Responses to comments will be in the Final Rule, to be issued November 2017.

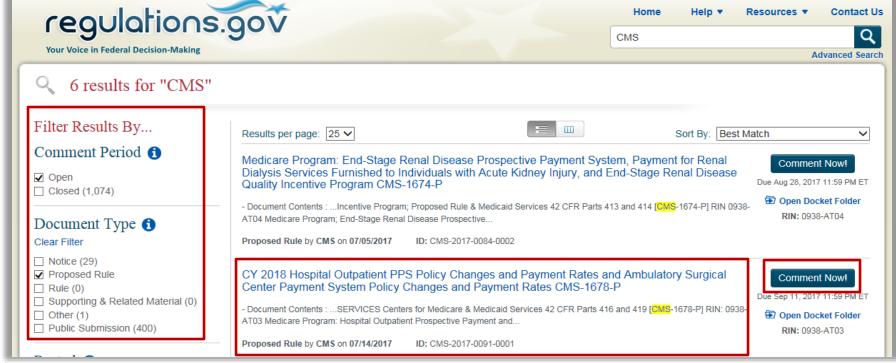
Submitting Comments



- 1. Enter *CMS* in the [Search for] box.
- 2. Select the [Search] button.

Submitting Comments (cont.)

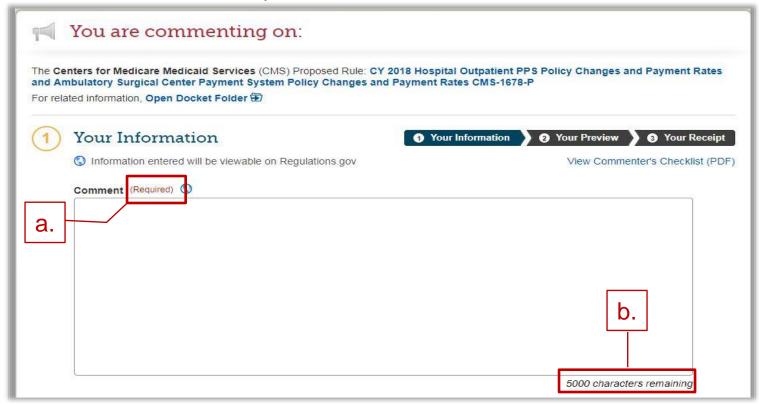
- 3. Filter: Comment Period = Open; Document Type = Proposed Rule
- Scroll: Medicare Program: Hospital Outpatient Prospective Payment and Ambulatory Surgical Center Payment Systems and Quality Reporting Programs; etc.
- 5. Select: [Comment Now] button



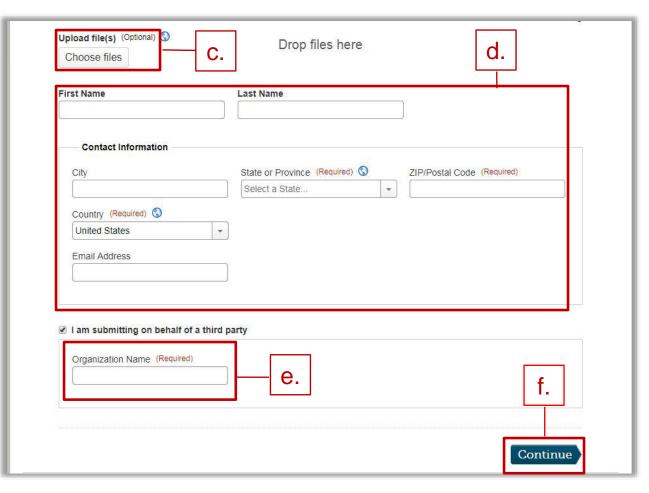
Comment on Proposed Rule: Step 1

The system will guide you through a three-step comment process.

- **Step 1.** Enter your comment and contact information.
 - a. Required fields have (Required) next to the field name.
 - b. Comments can be up to 5,000 characters.



Comment on Proposed Rule: Step 1 (cont.)

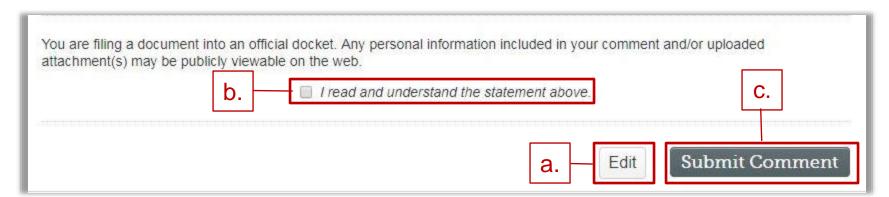


- c. You can upload a file if you wish.
- d. Enter your contact information.
- e. If submitting a comment on behalf of a third party, enter the organization's name.
- f. When finished entering your comment and contact information, select the [Continue] button.

Comment on Proposed Rule: Step 2

Step 2. Your Preview: Shows how your comment* and information** will appear on *regulations.gov*.

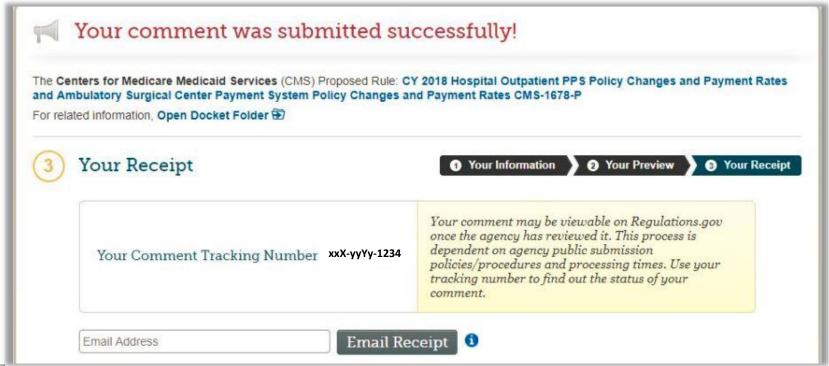
- *Your Comment, files you uploaded, Country, and State or Province *will appear* on Regulations.gov.
- **Your Name, ZIP/Postal Code, and Organization Name *will not appear* on Regulations.gov.
- a. Select the [Edit] button to edit your comment and contact information.
- b. When finished previewing, check the box to acknowledge that you have read and understand the provisions of commenting.
- c. If all information is correct, select the [Submit Comment] button.



Comment on Proposed Rule: Step 3

Step 3. Your Receipt:

Your comment is assigned a tracking number. Take a screenshot of this page or save your tracking number. You can use your tracking number to learn the status of your comment.



References

Proposed Rule:

https://www.gpo.gov/fdsys/pkg/FR-2017-07-20/pdf/2017-14883.pdf

Comment Site:

https://www.regulations.gov/comment?D=CMS-2017-0091-0001

Questions



Continuing Education Approval

This program has been approved for 1.0 continuing education (CE) unit for the following professional boards:

- Florida Board of Clinical Social Work, Marriage and Family Therapy and Mental Health Counseling
- Florida Board of Nursing Home Administrators
- Florida Council of Dietetics
- Florida Board of Pharmacy
- Board of Registered Nursing (Provider #16578)
 - It is your responsibility to submit this form to your accrediting body for credit.

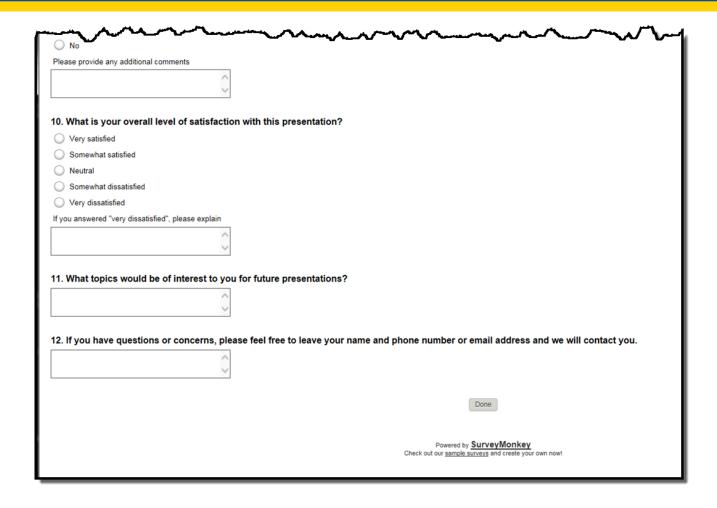
CE Credit Process

- Complete the ReadyTalk® survey that will pop up after the webinar, or wait for the survey that will be sent to all registrants within the next 48 hours.
- After completion of the survey, click "Done" at the bottom of the screen.
- Another page will open that asks you to register in HSAG's Learning Management Center.
 - This is separate from registering for the webinar. If you have not registered at the Learning Management Center, you will **not** receive your certificate.
 - Please use your personal email so you can receive your certificate.
 - Healthcare facilities have firewalls that block our certificates.

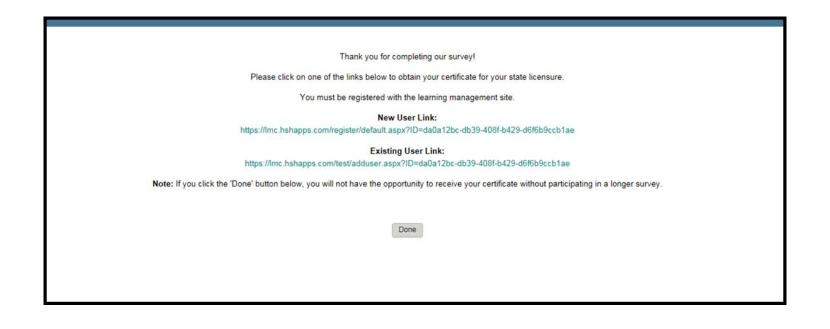
CE Certificate Problems?

- If you do not immediately receive a response to the email you used to register in the Learning Management Center, a firewall is blocking the survey link.
- Please go back to the New User link and register your personal email account.
- If you continue to have problems, please contact Deb Price at dprice@hsag.com.

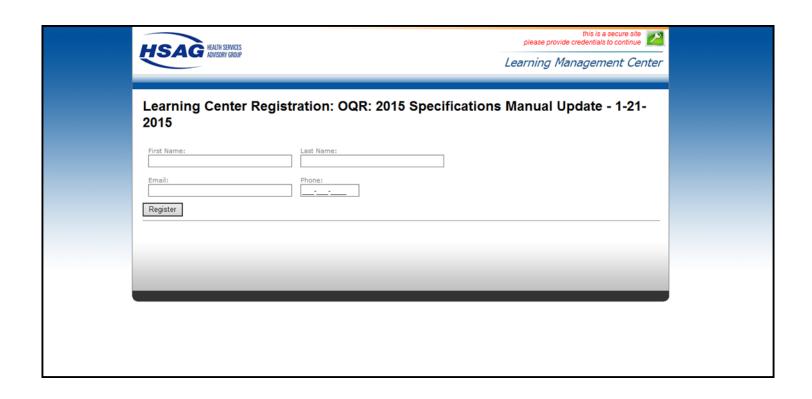
CE Credit Process: Survey



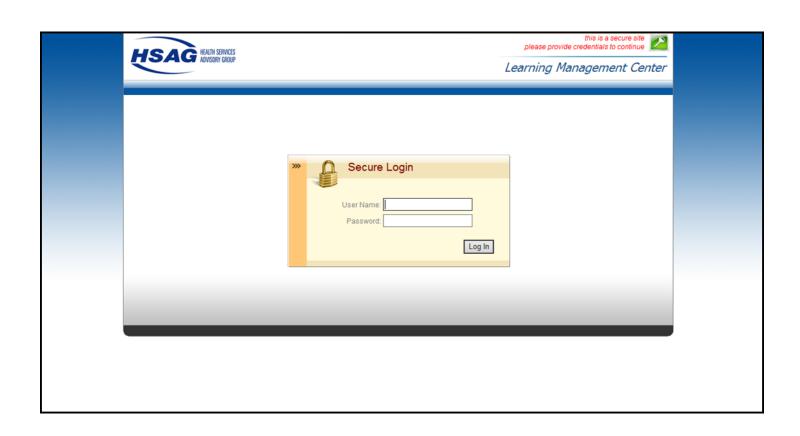
CE Credit Process



CE Credit Process: New User



CE Credit Process: Existing User



Thank You for Participating!

Please contact the Support Contractor if you have any questions:

 Submit questions online through the QualityNet Question & Answer Tool at <u>www.qualitynet.org</u>

Or

 Call the Support Contractor at 866.800.8756.