

2015 Hospital IPPS Final Rule



Center for Clinical Standards and Quality

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Nancy Sonnenfeld, PhD Validation Lead of HIQR Program, CMS

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Purpose

Provide participants with an overview of the Fiscal Year (FY) 2015 Inpatient Prospective Payment System (IPPS) CMS quality program Final Rule changes for:

- PPS-Exempt Cancer Hospital Quality Reporting (PCH)
- Hospital Inpatient Quality Reporting (IQR) Program
- Alignment of the Hospital IQR Program and Electronic Health Record (EHR) Incentive Program
- Hospital Value-Based Purchasing (VBP)



Objectives

At the conclusion of this presentation, participants will be able to:

- Find the Fiscal Year (FY) 2015 Final Rule text
 - Currently on display at: <u>http://federalregister.gov/a/2014-18545</u>
- Identify changes within the FY 2015 Final Rule





PPS-Exempt Cancer Hospital Quality Reporting Program Policy Updates

Barbara Choo, RN, FNP, PhD Program Lead of PCHQR Center for Clinical Standards and Quality, CMS

PPS-Exempt Cancer Hospital Quality Reporting: Policy Updates

Program requirements:

- Add one measure the External Beam Radiotherapy (EBRT) for Bone Metastases Measure for the fiscal year 2017 and subsequent years,
- EBRT sampling, and
- Public reporting:
 - One cancer-specific treatment (Adjuvant Hormonal Therapy) measure in 2015 and
 - CLABSI and CAUTI no later than 2017.



PPS-Exempt Cancer Hospital Quality Reporting: Policy Updates

	a submission			
Measure Data Submission Mode				
Surgical Care Improvement Project (SCIP)	 Authorized vendor submits an external data file or Leverage current infrastructure via QualityNet 			
Cancer-Specific Treatment	 Authorized vendor submits an external data file or CMS contractor 			
Oncology Care Measures (OCM)	 Authorized vendor submits an external data file or CMS web-based tool 			
External Beam Radiotherapy (EBRT)	 Authorized vendor submits an external data file or CMS web-based tool 			
CLABSI, CAUTI, SSI	1) Authorized vendor submits an external data file			
HCAHPS	1) Authorized vendor submits an external data file			
For additional information, please contact FMQAI	/HSAG Support Contractor: Henrietta Hight at Henrietta.Hight@HCQIS.e			
5/2014	CMS			



Summary: 19 PCHQR Measures & Program Requirements				
SCIP (6)	Oncology Care Measures (5)	Cancer-specific Treatment (3)		
 Surgay Patients who Received Appropriate VTE Prophysicas within 24 Her Pitor to Surgery to 24 He. After Surgery End I arms Unitary Catheter Removed on Post- Operative Day to Post-Operator Day 2 with Day of Surgery Heing Day Zero Prophysica: Autobios Received Waitin 11 Completions: Autobios Received Waitin 12 Completion: Autobios Sciences of Surgical Patiences Sciences for Surgical Patiences Autobios Encourtimed Waitin 24 He. After Surgers Data Time 	Oncology-Radiation Dose Limits to Normal Trauses Oncology: Plan of Care for Pain Oncology: Plan Intensity Quartified Porotate Cancer-Advance for Quartified Promay for High-Rak Patients Promate Cancer-Avoidance of Oversue Messure-Bone Scan for Staging Low- Risk Patients EBRT for Bose Mestatase Pogram requirement: Sampling	Adjuvant Chemothemy is Considered Administered Within 4 Months of Diagnosis to Patients Under the Age of 80 with AUCE III Unymh node positive) Colon Cancer Combination Chemothemys is Considered Administered Within 4 Months of Diagnosis for Wormen Under Patients AUCC Tice or Suggi II or III Hornes AUCC Tice or Suggi II or III Hornes AUCC Tice or Suggi II or III Concer		
 Surgery Patients on Beta Blocker Therapy Prior to Admission who Received a Beta Blocker During the Perioperative Period Program requirement: Sampling 	Patient Engagement / Experience of Care (1) • NHSN Central Line-Associated Bloodstream Infection (CLABSI) Outcome Measure	Patient Engagement / Experience of Care (1) • HCAHPS • Program requirement: Sampling		
	NHSN Catheter-Associated Urinary Tract Infection (CAUTI) Outcome Measure Harmonized Procedure Specific Surgical Site Infection (SSI) Outcome Measure	Clinical Effectiveness Measure (1) External Beam Radiotherapy for Bone Metastases 		
8/25/2014		Program requirement: Sampling		



Hospital IQR Program Policy Update

Sharon McNeill, RN, MS, CHTS Program Lead of Hospital IQR Center for Clinical Standards and Quality, CMS

Hospital IQR Program New Measures (slide 1 of 2)

FY 2017

- Claims-Based
 - Hospital 30-day, all-cause, unplanned, riskstandardized readmission rate (RSRR) following CABG surgery
 - Hospital 30-day, all-cause, risk-standardized mortality rate (RSMR) following CABG surgery
 - Hospital-level, risk-standardized 30-day episode-ofcare payment measure for pneumonia
 - Hospital-level, risk-standardized 30-day episode-ofcare payment measure for heart failure



Hospital IQR Program New Measures (slide 2 of 2)

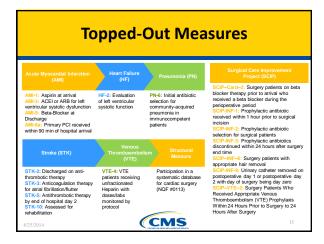
FY 2017

Chart-Abstracted

 Severe sepsis and septic shock: management bundle*

*Note: Communication sent Friday 8/22/14 suspends collection of this data until further notice.







Clarification Regarding Influenza Vaccination for Healthcare Personnel

- CMS received public comments regarding the burden of separately collecting and reporting healthcare personnel influenza immunization statuses for both the inpatient and outpatient settings
- Hospitals will report single HCP influenza count for each healthcare facility enrolled in NHSN by facility Org ID



Change to Claims-based Measures

FY 2017

- Finalized using 3 years of data to calculate current and future condition-specific, claims-based measures:
 - Mortality Measures (AMI, HF, PN, Stroke, COPD)
 - Readmission Measures (AMI, HF, PN, Total Hip/Knee, Stroke, COPD)
 - Hip/Knee Complication Measure





Hospital IQR Program Validation Policy Update

Nancy Sonnenfeld, PhD Validation Lead, Hospital Inpatient Quality Reporting Program Center for Clinical Standards and Quality, CMS

Submission of HAI Measure Data

Clarify data reporting and submission requirements

- Hospitals report patient-level data elements "required" for NHSN
- Required data shared with CMS for Hospital IQR Program and Hospital VBP Program

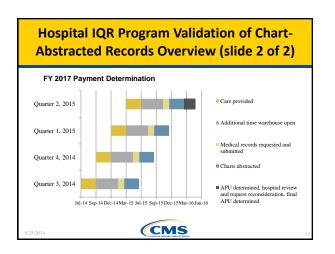
Receive access to voluntarily submitted name and race identifying information

- · Use to match patient charts to NHSN
- Use for Program evaluation

Hospital IQR Program Validation of Chart-Abstracted Records Overview (slide 1 of 2)

- · CMS selects hospitals for validation 400 random
 - Up to 200 targeted
- · CMS selects a subset of patient medical charts to be validated from:
 - Clinical data warehouse for process of care
- Validation templates for healthcare associated infection (HAI) · Clinical data abstraction contractor (CDAC) requests medical
- records in writing Hospitals submit requested medical records within 30 days
- · CDAC conducts validation
- CMS makes APU determination (75% reliability required)





Validation Process: **Validation-Eligible Hospital Definition**

- For FY 2017 payment determination (and future years):
 - Change definition of validation-eligible hospitals
- What this means for hospitals:
 - Hospitals can expect to be notified of selection for random sample 2 - 3 months earlier than in previous year.



Validation Process: Number of Charts to Submit

- FY 2017 Payment Determination (and future years)
- Submit a total of 72 charts (reduced from 96) per year
- 18 charts submitted for validation each quarter:
 - 10 charts for Healthcare Associated Infection (HAI) measures (1 more per quarter)
 - 8 charts for clinical process of care measures (7 fewer per quarter)

CMS

Validation Process: Clinical Process of Care Case Sample

- Fundamental design change: No longer sample separately each quarter for each topic area
- For FY2017 payment determination and future years
 - Immunization (IMM)
 - "All other"

Note: "Other" category includes all topic areas containing required measures aside from those in the Immunization and Perinatal care topic areas.

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Validation Process: Clinical Process of Care Case Sample

- FY2017 payment determination and future years
- 8 total per quarter, 32 per year
 - Quarters 4 and 1: Randomly select 5 cases for Immunization (IMM) and 3 cases from the "other" category
 - Quarters 2 and 3: Randomly select 8 cases from "other" category



		lidation Pro			
U	ting to al calcu	Combine Scor llation	es for Con	fidence	
		Measure Sets	Weight		
	HAI		66.7%		
	IMM		22.2%		
	Other		11.1%		
		Total	100%		
8/25/2014		CMS			

Validation Process: Submitting Medical Records

Expand options for secure transmission of electronic versions of patient medical records. Hospitals may submit records:

- In paper format
- As digital images (PDFs) on portable media such as CD-ROMs, DVDs, and flash drives
- Using a Secure File Transfer Portal on the QualityNet Web site



Validation Process: Plan to Validate eCQM Data

- Three Key threat categories to data accuracy:
 - 1. EHR product design (vendor specifications and hospital customization)
 - 2. Hospital and provider documentation practice
 - 3. EHR and eCQM standards and specifications
- Plans for pilot test of up to 100 volunteer hospitals:
 Must meet EHR Incentive Program Stage 2 criteria
 - Able to produce QRDA-1 Revision 2 extracted data for at least 6 of the 16 measures in STK, VTE, ED, and PC measure sets



Validation Process: Goals of eCQM Validation Pilot

Goals of 100 hospital pilot

- Assess accuracy of eCQM data
- Assess Hospital IQR Program readiness for eCQM reporting
- Identify needs for updates to measure specifications
- Plan future validation requirements



Validation Process: Overview eCQM Validation Pilot (slide 1 of 2)

Highly interactive

- Hospitals will:
- Allow CDAC to view records remotely real-time
 Navigate through the EHR system for selected records
- Hospitals will also:
- Generate patient lists
- Generate QRDA Category 1 files

CDAC will:

- · Abstract data from up to 10 different sources for elements specified in eCQM
- Abstract data following chart-abstracted manual specifications
- Compare abstracted data from 10 different sources with both the chart-abstracted manual process and with QRDA file data
- Assess and refine operational processes

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Validation Process: Overview eCQM Validation ilot (slide 2 of 2)

CMS and its contractors will:

- Determine reliability between extracted and abstracted measures
- Work with measure stewards to refine specifications
- Share conflicting findings with hospitals
- Publicize common patterns of conflicting findings
- Produce statistics to estimate sample size
- Reimburse hospitals for burden



EHR Incentive and Hospital IQR Program Updates

Cindy Tourison, MSHI

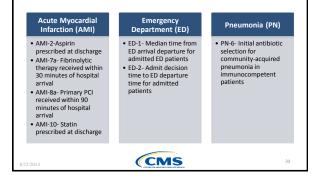
Program Lead, Alignment of Hospital IQR Program & Value-Based Purchasing Program Center for Clinical Standards and Quality, CMS

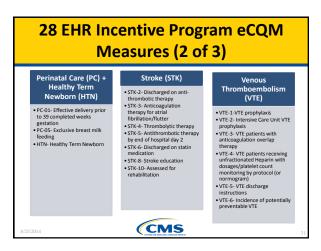
Timelines: EHR Incentive Program and Hospital IQR Program

- Align reporting and submission periods for clinical quality measures
 - Medicare EHR Incentive Program: Fiscal year
 Hospital IQR Program: Calendar year
- Final: Calendar year
- File Submission Deadline: November 30, 2015

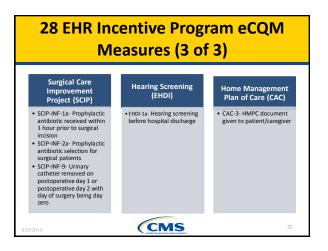


28 EHR Incentive Program eCQM Measures (1 of 3)











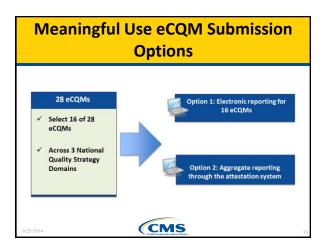
Hospital IQR and Voluntary eCQM Data Submission Alignment

FY 2017 Payment Determination:

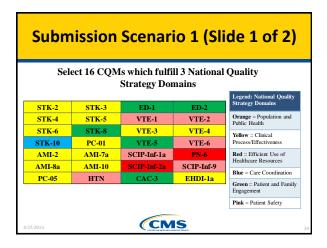
- Electronically report any 16 of the 28 Hospital IQR eCQMs that align with the Medicare EHR incentive program and span 3 different National Quality Strategy (NQS) domains
- There are 12 measures which are required under IQR that are available as chartabstracted or eCQMs.

AMI –7a VTE -3 STK-4 VTE-5 STK-6 VTE-6 STK-8 ED-1 VTE-1 ED-2 VTE-2 PC-01	12 Required IQR Measures (electronic submission or chart-abstraction)						
STK-6 VTE-6 STK-8 ED-1 VTE-1 ED-2		AMI –7a	VTE -3				
STK-8 ED-1 VTE-1 ED-2		STK-4	VTE-5				
VTE-1 ED-2		STK-6	VTE-6				
		STK-8	ED-1				
VTE-2 PC-01		VTE-1	ED-2				
		VTE-2	PC-01				

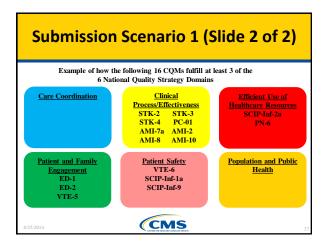














Voluntary eCQM Data Submission Requirements

FY 2017 Payment Determination:

- Report names of hospitals who successfully submit Q1, Q2, or Q3 electronic data
 - November 30, 2015
 - Symbol on Hospital Compare
 - Not publicly reporting actual data at this time;
 - Not include a preview period; and
 - Not provide hospitals an option to suppress their participation



EH	EHR Incentive and Hospital IQR Program Alignment Reporting Timeline					
		7 Electronic Clinical Q riods and Finalized Sul	uality Measures Data Reporting omission Deadlines			
	CY 2015 Quarter	Reporting Period (2015)	Finalized Submission Deadlines			
	1	January 1 - March 31	November 30, 2015			
	2	April 1 - June 30	November 30, 2015			
	3	July 1 - September 30	November 30, 2015			
8/25/2014		CM	S	39		





- Finalized: Two options to submit CQMs for the EHR Incentive Program Stage 2
 - Option 1: QRDA-I:
 - · Electronically submit patient-level data using QRDA-1 reporting
 - CY Q1, CY Q2, or CY Q3 - Option 2: Aggregate:

 - Report aggregate CQM results through the CMS Registration and Attestation System
 - Submit one full year (not quarter) CQM data (October 1, 2014 September 30, 2015)
 - · Medicare EHR Incentive Program only

Please Note: QRDA-III, not feasible to collect in 2015 for eligible hospitals and CAHs under the Medicare EHR Program



Electronically Specified Clinical Quality Measures (CQMs) Reporting for 2015

- Eligible hospitals and CAHs that seek to report CQMs electronically under the Medicare EHR Incentive Program must use the April 2014 version of the electronic specifications for the CQMs
- **CEHRT that is tested and certified to the most recent version of the electronic specifications for the CQMs
- April 2014 Version of annual update



EHR Incentive and Hospital IQR Program: Zero Denominator Declaration Clarification

- Zero denominator can be used when:
 - The hospital's EHR is certified for an eCQM; and
 - The hospital does not have patients that meet the denominator criteria of that CQM.
- · Submitting a zero denominator
 - Counts as a successful submission for that eCQM for both EHR Incentive Program and Hospital IQR Program



EHR Incentive Program Requirement Updates: Changes for 2014 and 2015

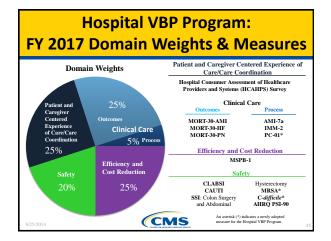
- 1. Case Threshold Exemption can be used when (EHR Incentive Program):
 - The hospital's EHR system is certified to report data
 - Five or fewer discharges during the relevant EHR reporting period (if attesting to a 90-day EHR reporting period), or
 - Twenty or fewer discharges during the year (if attesting to a full year EHR reporting period) as defined by the CQM's denominator population



EHR Incentive Program Requirement Updates: Changes for 2014 and 2015 (Cont.)

- 2. Beginning in 2014 (interim final rule):
 - Eligible hospitals/CAHs would need to qualify for more than 13 CQMs to report fewer than 16 required
 - If the eligible hospital/CAH does not meet criteria:
 Would be able to report at least 16 CQMs
 - Must choose another CQM to submit data or continue to invoke exemption until it exceeds 13 cases
 - · Reporting fewer than 16 CQMs
- 3. Beginning in 2015: threshold exception policy changes:
 - If eligible hospital or CAH qualifies for exemption for CQM
 - Count toward the 16 required CQMs







Hospital VBP Program: Added and Removed Measures

- Measures Added for FY 2017
 - MRSA Bacteremia (Safety Domain)
 - C. difficile infection (Safety Domain)
 - PC-01: Elective Delivery Prior to 39 Completed Weeks Gestation (Clinical Care/Process Domain)

Measures Removed in FY 2017

- PN-6 (Clinical Process of Care)
- SCIP-CARD-2 (Clinical Process of Care)
- SCIP-Inf-2 (Clinical Process of Care)
- SCIP-Inf-3 (Clinical Process of Care)
- SCIP-Inf-9 (Clinical Process of Care)
- SCIP-VTE-2 (Clinical Process of Care)



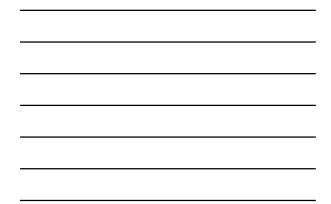
Hospital VBP Program: FY 2017 Reporting Periods

Domain	Baseline Period	Performance Period
Safety Healthcare Associated Infections AHRQ PSI-90 	1/1/2013 – 12/31/2013 10/1/2010 – 6/30/2012	1/1/2015 - 12/31/2015 10/1/2013 - 6/30/2015
Clinical Care Process Outcomes 	1/1/2013 – 12/31/2013 10/1/2010 – 6/30/2012	1/1/2015 - 12/31/2015 10/1/2013 - 6/30/2015
Efficiency and Cost Reduction	1/1/2013 - 12/31/2013	1/1/2015 - 12/31/2015
Patient and Caregiver-Centered Experience of Care/Care Coordination (HCAHPS)	1/1/2013 - 12/31/2013	1/1/2015 - 12/31/2015

Hospital VBP Program: FY 2017 Performance Standards (1 of 2)					
Domain	Measure	Achievement Threshold	Benchmark	Floor	
	CAUTI	0.845	0.000	N/A	
	CLABSI	0.457	0.000	N/A	
Safety	C. difficile	0.750	0.000	N/A	
	MRSA Bacteremia	0.799	0.000	N/A	
	PSI-90	0.577321	0.397051	N/A	
	MORT-30-AMI	0.851458	0.871669	N/A	
Clinical Care Outcomes	MORT-30-HF	0.881794	0.903985	N/A	
	MORT-30-PN	0.882986	0.908124	N/A	
	AMI-7a	0.954545	1.000000	N/A	
Clinical Care Process	IMM-2	0.951607	0.997739	N/A	
Process	PC-01	0.031250	0.000000	N/A	
8/25/2014	PC-01	0.031250	0.000000	N/A 48	



Hospital VBP Program: FY 2017 Performance Standards (2 of 2)					
Domain	Measure	Achievement Threshold	Benchmark	Floor	
Efficiency and Cost Reduction	MSPB-1	Median Medicare Spending per Beneficiary ratio across all hospitals during the performance period	Mean of the lowest decile Medicare Spending per Beneficiary ratios across all hospitals during the performance period	N/A	
	Communication with Nurses	78.19	86.61	58.14	
	Communication with Doctors	80.51	88.80	63.58	
D.4 - 10 - 1	Responsiveness of Hospital Staff	65.05	80.01	37.29	
Patient and Caregiver- Centered Experience of	Pain Management	70.28	78.33	49.53	
Care/Care Coordination Domain	Communication about Medicines	62.88	73.36	41.42	
	Hospital Cleanliness & Quietness	65.30	79.39	44.32	
	Discharge Information	85.91	91.23	64.09	
	Overall Rating of Hospital	70.02	84.60	35.99	
8/25/2014		(CMS		49	



Hospital VBP Program: FY 2017 Minimum Requirements (1 of 2)

Domain	Domain Minimum	Measure	Measure Minimum
		CAUTI	1.000 Predicted Infections
		CLABSI	1.000 Predicted Infections
		C. difficile	1.000 Predicted Infections
Safety	3 of 6 Measures	MRSA Bacteremia	1.000 Predicted Infections
		SSI	1.000 Predicted Infections on either Abdominal Hysterectomy or Colon
		PSI-90	3 Cases in Any One Underlying Indicator
		MORT-30-AMI	25 Cases
Clinical Care Outcome	2 of 3 Measures	MORT-30-HF	25 Cases
Outcome		MORT-30-PN	25 Cases
		AMI-7a	10 Cases
Clinical Care Process	1 of 3 Measures	IMM-2	10 Cases
		PC-01	10 Cases



Hospital VBP Program: FY 2017 Minimum Requirements (2 of 2)

Domain Minimum	Measure	Measure Minimum	
1 of 1 Measure	MSPB-1	25 Episodes of Care	
	Communication with Nurses		
	Communication with Doctors		
	Responsiveness of Hospital Staff		
100 Completed Surveys	Pain Management	100 Completed Surveys	
	Communication about Medicines		
	Hospital Cleanliness & Quietness		
	Discharge Information		
	Overall Rating of Hospital		
		100 Completed Surveys Communication with Nurses Communication with Doctors Responsiveness of Hospital Staff Pain Management Communication about Medicines Hospital Cleantiness & Quietness Discharge Information	



Hospital VBP Program: Domain Reweighting Changes

- Hospitals must receive domain scores on at least 3 of the 4 quality domains to receive a Total Performance Score (TPS)
- Clinical Care domain Process or Outcome subdomains considered as one domain
- Only reweight a hospital's TPS once:
 If a hospital does not have sufficient data for 1 of the 2 Clinical Care subdomains
 - Will not reallocate weighting of the 2 clinical subdomains within the Clinical Care domain
 - The weighting of the subdomain without sufficient data will be proportionately reallocated across all domains
 - will be proportionately reallocated across all domains





2015 Final Rule

Details regarding various quality reporting programs begin on the Final Rule pages noted:

- Hospital Value-Based Purchasing (VBP) Program p. 822
- Hospital Inpatient Quality Reporting (IQR) Program p. 1443
- Electronic Health Records (EHRs) p. 1908
- PPS-Exempt Cancer Hospital Quality Reporting (PCHQR) Program – p.1745

CE Credit Process

- Compete the WebEx survey that will automatically pop up at the end of our presentation
- At the end of the survey, click **Done**, and then click **New User** or **Existing User** to access the Learning Management Center for your CE Certificate
 - A one time registration is required
 - The facility must allow automatic emails. If not, please contact your IT department to open the following domain: <u>lmc@hsag.com</u>



Continuing Education Approval

- This program has been approved for 1.0 continuing education (CE) credit given by CE Provider #50-747 for the following professions:
 - Florida Board of Nursing
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 - Family Therapy and Mental Health Counseling
 - Florida Board of Nursing Home Administrators
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- Professionals licensed in other states will receive a Certificate of Completion to submit to their licensing Boards.

