# Hospital-Acquired Condition Reduction Program



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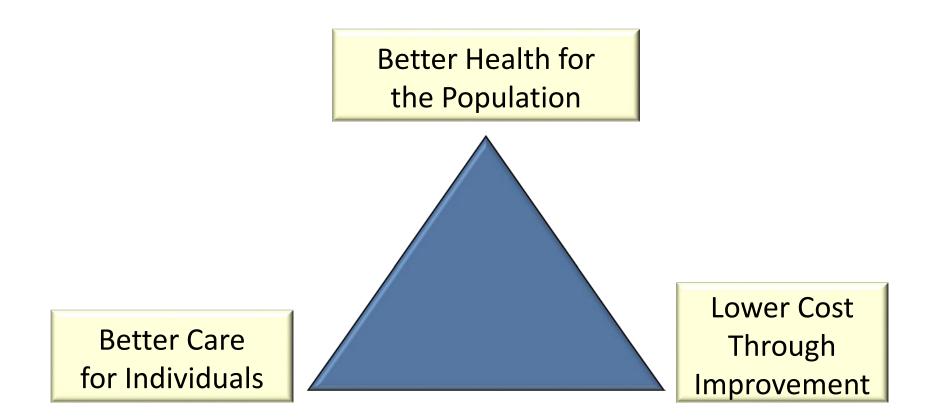
#### Overview

- The Context: CMS' Quality Strategy
- What is the HAC Reduction Program (HACRP)?
- HACRP vs. DRA HAC
- HACRP specifics
  - Measures
  - Domains
  - Scoring Methodology
  - Review and Corrections
  - Public Reporting
- Resources for more information

#### CMS Quality Strategy: Our Vision

#### TO OPTIMIZE HEALTH OUTCOMES BY IMPROVING CLINICAL QUALITY AND TRANSFORMING THE HEALTH SYSTEM.

#### Our Three Aims



# The Six Goals of the National Quality Strategy

1	Make care safer by reducing harm caused in the delivery of care
	<sup>2</sup> Strengthen person and family engagement as partners in their care
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	3 Promote effective communication and coordination of care
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	4 Promote effective prevention and treatment of chronic disease
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	5 Work with communities to promote healthy living
6	Make care affordable

# The Six Priorities Have Become the Goals for the CMS Quality Strategy



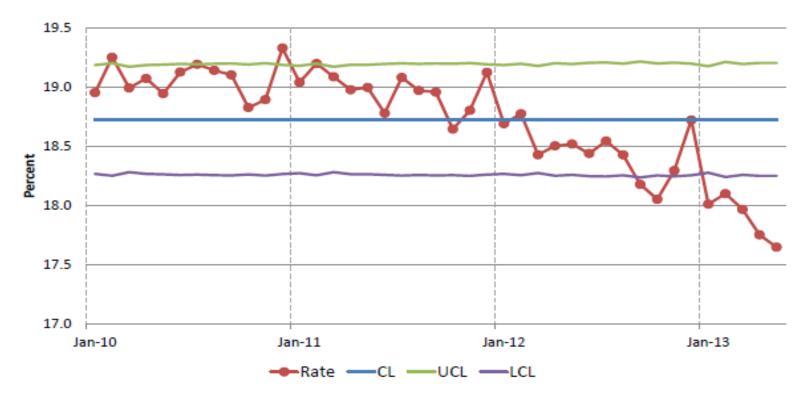
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#### CMS' Quality Reporting and Performance Programs

Hospital Quality	Physician Quality Reporting	PAC and Other Setting Quality Reporting	Payment Model Reporting	"Population" Quality Reporting
<ul> <li>Medicare and Medicaid</li> <li>EHR Incentive Program</li> </ul>	•Medicare and Medicaid EHR Incentive Program	<ul> <li>Inpatient Rehabilitation Facility</li> </ul>	•Medicare Shared Savings Program	•Medicaid Adult Quality Reporting
•PPS-Exempt Cancer Hospitals	•PQRS	• Nursing Home Compare Measures	<ul> <li>Hospital Value-based</li> <li>Purchasing</li> </ul>	•CHIPRA Quality Reporting
Inpatient Psychiatric     Facilities	•eRx quality reporting	•LTCH Quality Reporting •ESRD QIP	<ul> <li>Physician</li> <li>Feedback/Value-based</li> <li>Modifier</li> </ul>	•Health Insurance Exchange Quality Reporting
<ul> <li>Inpatient Quality Reporting</li> </ul>		•Hospice Quality Reporting		•Medicare Part C
•HAC payment reduction program		•Home Health Quality Reporting		•Medicare Part D
<ul> <li>Readmission reduction program</li> </ul>				
•Outpatient Quality Reporting				

 Ambulatory Surgical Centers Encouraging Results: Hospital Readmissions

#### Medicare All Cause, 30 Day Hospital Readmission Rate



Source: Office of Information Products and Data Analytics, CMS

#### Encouraging Results: CLABSIs\*



#### Quarters of participation by hospital cohorts, 2009–2012

\* Central line-associated bloodstream infections

#### Affordable Care Act (ACA) Section 3008

- Establishes the Hospital-Acquired Condition Reduction Program (HACRP)
- Begins fiscal year 2015 (October 1, 2014)
- Purpose: provide an incentive for hospitals to reduce HACs
- Method: Adjust payments to hospitals that rank in the lowest performing quartile with respect to HACs
  - Medicare reimbursement is reduced to 99 percent of what would otherwise have been paid
  - Apply an appropriate risk adjustment methodology

#### HACRP vs. DRA HACs

#### HACRP

- Section 3008 of the ACA
- Pay for performance quality program for hospital inpatients
  - Subsection (d) hospitals
  - Comprises risk adjusted quality measures
  - Scoring methodology
  - Public reporting of performance
- Payment reduction for hospitals in the lowest performing quartile
  - Affects all Medicare discharges during that fiscal year

#### **DRA HACs**

- Section 5001 of the DRA of 2005
- Conditions among hospital inpatients that are
  - High volume and/or high cost
  - Not present on admission
  - Result in a higher DRG
  - Preventable through evidence based guidelines
  - Identified based on coding
  - 11 categories for FY 2015
- Hospitals are paid as if this condition was not present
  - Affects the specific discharge that had the HAC

#### HACRP Measures: Overview

 Measures through FY 2017 were finalized in the FY2014 IPPS/LTCH PPS rule

Measure	FY 2015	FY 2016	FY 2017
Patient Safety Indicator 90	Х	Х	Х
Central line-associated bloodstream infection	Х	Х	Х
Catheter associated urinary tract infection	Х	Х	Х
Surgical site infection		Х	Х
MRSA bacteremia			Х
C. difficile			X <sub>12</sub>

#### HACRP Measures: PSI 90

#### • Composite of 8 distinct measures

 Pressure ulcer (PSI 3); latrogenic Pneumothorax (PSI 6); Central venous catheter-related blood stream infection (PSI 7); Postoperative hip fracture (PSI 8); Postoperative pulmonary embolism (PE) or deep vein thrombosis(DVT) (PSI 12); Postoperative sepsis (PSI 13); Wound dehiscence (PSI 14); Accidental puncture and laceration (PSI 15)

Characteristic	PSI 90 Specifics
Measure Steward	AHRQ
Implementation Start Date	FY 2015
Data Source	Administrative Claims
Applicable Period for FY15	July 1, 2011 – June 20, 2013
Measure Result	weighted average of the observed to expected ratios for each component

#### HACRP Measures: CLABSI and CAUTI

• BSI or UTI in patient having a central line or urinary catheter for >48 hours

Characteristic	CLABSI/CAUTI Specifics
Measure Steward	CDC
Implementation Start Date	FY 2015
Applicable Period for FY15	January 1, 2012 – December 31, 2013
Data Source	Chart abstracted; reported via NHSN
Measure Result	Standardized infection ratio (SIR) SIR = Reported infections/Predicted infections Predicted infections = device days x national infection rate

#### HACRP Measures: SSI

 Infections following abdominal hysterectomy or colon procedures

Characteristic	CLABSI/CAUTI Specifics
Measure Steward	CDC
Implementation Start Date	FY 2016
Applicable Period for FY16	January 1, 2013 – December 31, 2014
Data Source	Chart abstracted; reported via NHSN
Measure Result	Pooled Standardized infection ratio (SIR) (Colon infections + hysterectomy infections) (Predicted colon infections + predicted hysterectomy infections)

#### HACRP Measures: MRSA and C. difficile

• MRSA bacteremia or *C. difficile* infection

Characteristic	CLABSI/CAUTI Specifics
Measure Steward	CDC
Implementation Start Date	FY 2017
Applicable Period for FY17	January 1, 2014 – December 31, 2015
Data Source	Laboratory identification; reported via NHSN
Measure Result	Standardized infection ratio (SIR) SIR = Reported infections/Predicted infections

#### HACRP Scoring Methodology (FY2015)

- Statute requires payment adjustment for hospitals that rank in the lowest performing quartile of subsection (d) hospitals with respect to HACs.
- Lowest performing quartile is determined based on the Total HAC Score
- Multiple steps to determine the Total HAC score
  - Measure results Measure scores
  - Measure scores
     Domain scores
  - − Domain scores → Total HAC score



#### FY15 Scoring Methodology: Measure Scores

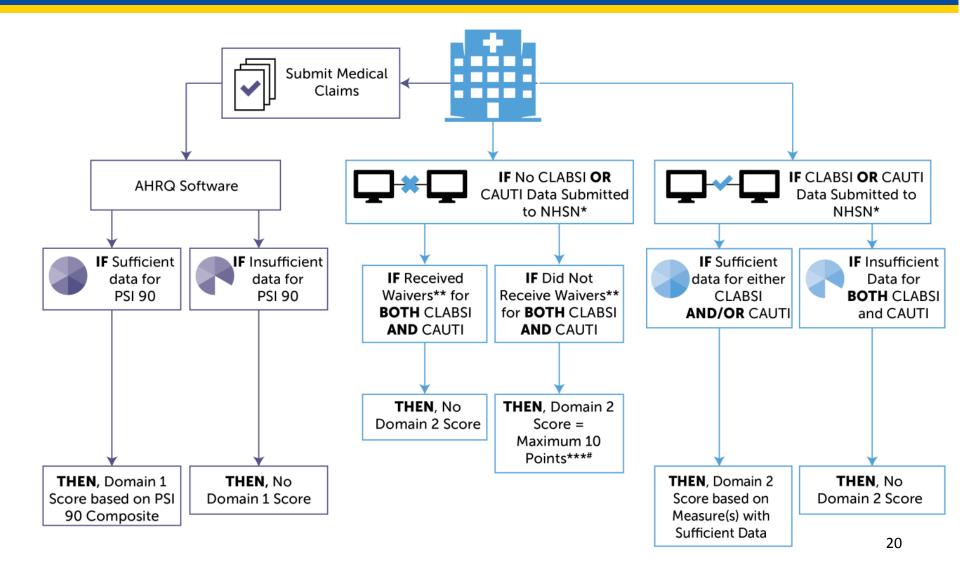
- Measure results transformed into measure scores
  - Measure results for all hospitals are listed from lowest to highest and divided into deciles
  - Points are assigned to each measure result based on the decile
    - Lowest decile = 1 point
    - Highest decile = 10 points
  - If there are ties such that hospitals with the same measure result span multiple deciles, all hospitals with that result will be given the score of the lower decile

#### FY15 Scoring Methodology: Domain Scores

- Measure scores transformed into domain scores
- Domain 1 patient safety; PSI 90 measure
- Domain 2 hospital-acquired infections; CLABSI and CAUTI measures

Measure Score	Domain Score
PSI 90 measure score	Domain 1 score IS the PSI 90 measure score.
CLABSI measure score	CLARSI score + CAUTI score /2
CAUTI measure score	CLABSI score + CAUTI score/2

#### FY15 Scoring Methodology: Handling Missing Data



#### FY15 Scoring Methodology: Total HAC Score

- If both domains have a score
   Total HAC score = (D1 x 35%) + (D2 x 65%)
- If only 1 domain has a score

– Total HAC score = score of the domain with data

• If neither domain has a score

Total HAC score is not calculated

#### Payment Adjustment

- Affects hospitals with a Total HAC Score in the lowest performing quartile
- Payment adjustment is 99% of what would otherwise have been paid for a Medicare discharge

### Public Reporting

- HAC Reduction Program data will be publicly reported
  - Measure scores
  - Domain scores
  - Total HAC score
- Anticipated posting: Hospital Compare in mid-December 2014

#### **Review and Correction**

- Statutory provision
- Purpose
  - Allow hospitals to review their data and ensure information for payment determination and public reporting is accurate
- Process Overview
  - Hospital accesses Quality Net Secure Portal
  - View/Download/Review Hospital Specific Report
  - Contact CMS to request a review and correction if they believe there is an error in the score calculations

### Review and Correction (cont.)

- Hospital Specific Reports: Excel workbook
  - Table 1: Hospital's Domain Scores
  - Table 2: Hospital's AHRQ PSI 90 subcomponent measure results and related data.
  - Table 3: Hospital's Discharge-Level Information for the AHRQ PSI Measures for the FY 2015 HAC Reduction Program.
  - Table 4: Hospital's Performance on CDC CAUTI and CLABSI Measures

#### Mock HSR

https://www.qualitynet.org/dcs/ContentServer?c=Page&pagename=QnetPublic%2FPage%2 FQnetTier3&cid=1228774298662 25

#### Review and Correction (cont.)

#### HSRs are posted to Quality Net Secure Portal

- Must have an account
- FY 2015: Available between 23 July 21 August 2014.
- Supporting documents also available
- Have 30 days to submit a request for review and correction
  - All requests must be submitted to the *QualityNet* helpdesk at <a href="mailto:qnetsupport@hcqis.org">qnetsupport@hcqis.org</a>
  - Deadline is 11:59 PM PDT on August 21, 2014
  - Can request review/correction for measure scores, domain scores or Total HAC score 26

## Additional Resources (1)

- HAC Reduction Program
  - https://www.qualitynet.org/dcs/ContentServer?c=Page&pagename= QnetPublic%2FPage%2FQnetTier2&cid=1228774189166
  - gnetsupport@hcqis.org
  - IPPS/LTCH PPS Rules
    - http://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/AcuteInpatientPPS/FY-2014-IPPS-Proposed-Rule-Home-Page.html
    - http://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/AcuteInpatientPPS/FY2014-IPPS-Final-Rule-Home-Page.html
    - http://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/AcuteInpatientPPS/FY2015-IPPS-Proposed-Rule-Home-Page.html 27

# Additional Resources (2)

- PSI 90
  - <u>https://www.qualitynet.org/dcs/ContentServer?c=Page&pagename</u>
     <u>=QnetPublic%2FPage%2FQnetTier3&cid=1228695321101</u>
  - <u>http://www.qualityindicators.ahrq.gov/</u>
  - <u>Qlsupport@ahrq.hhs.gov</u>

- CLABSI, CAUTI, SSI, MRSA and C. difficile
  - <u>https://www.qualitynet.org/dcs/ContentServer?c=Page&pagename</u>
     <u>=QnetPublic%2FPage%2FQnetTier2&cid=1228760487021</u>
  - <u>http://www.cdc.gov/nhsn/</u>
  - <u>nhsn@cdc.gov</u>

#### Thank-you!





**Any Questions?** 

#### Back-up slides

### Scoring Methodology (cont.)

Item to calculate	Rules	Corresponding Sections in Prior rules
Measure Results	Minimum # of cases HAIs: expected cases ≥ 1. PSI 90: ≥ 3 eligible discharges	<ol> <li>CDC HAIs: FY 2014IPPS/LTCH proposed rule (vol. 78; 27628).</li> <li>AHRQ PSI 90: FY 2014 IPPS/LTCH proposed rule (vol. 78; 27628).</li> </ol>
Measure Score	ICU waiver IQR exception: SSI	Criteria for Applicable Hospitals and Performance Scoring: FY IPPS/LTCH 2014 final rule (vol. 78 50722-50723).
Domain 1 & 2 score	Domain 2 criterion	Criteria for Applicable Hospitals and Performance Scoring: FY IPPS/LTCH 2014 final rule (vol. 78 50722-50723).
Total HAC Score	AHRQ Criterion	Criteria for Applicable Hospitals and Performance Scoring: FY IPPS/LTCH 2014 final rule (vol. 78 50722-50723).

### Scoring Methodology (cont.)

Item	Description	Impact
Data source	Hospital IQR program for Domain 2 CDC HAIs	Measures look at ICU HAIs. IQR has a waiver for: -hospitals without ICUs -hospitals with fewer than 10 SSIs
ICU waiver	Hospitals submit waiver quarterly indicating lack of ICU.	Domain 2 score takes into account presence of ICU waiver for each measure. Rules described FY IPPS/LTCH 2014 final rule (vol. 78 50723).
IQR exception: SSI	Hospitals submit waiver indicating if during the prior year they had < 10 SSIs.	Domain 2 score takes into account presence of SSI waiver. Not specifically described in FY IPPS/LTCH 2014 final rule (vol. 78 50723).
Domain 2 criterion	Domain 2 score will be based on "complete" data submitted for at least one HAI.	Encourages hospitals to report via CDC NHSN. See FY IPPS/LTCH 2014 final rule (78 50723). Not clearly stated as the "Domain 2 criterion".
AHRQ Criterion	If a hospital lacks complete data to calculate a PSI 90 measure and domain score OR any HAI measure, no Total HAC score will be assigned.	If no Total HAC score assigned no payment adjustment occurs (see FY IPPS/LTCH 2014 final rule, vol. 78 50725.