The New Mandatory Quality Measures: Is Your Organization Ready?

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Today We Will Talk about ...

- Background of regulatory requirements for quality measurement in hospice
- Current requirements – Final Rule
- What is on the horizon in hospice quality measurement
- Preparation for hospice quality reporting

Stakeholders

Regulators  Payers

Providers  Patients & Families

Performance measurement varies depending on ...

- What is being measured
- Who is the end-user of the information
- What the measure is designed to reflect

Performance Measures

Characteristics of good performance measures:

- Accurately and reliably measures concepts (validity and reliability)
- Based on a conceptual framework
- Measure performance that is directly attributable

Endorsement of Measures

National Quality Forum Criteria

- Importance
- Scientific Acceptability
- Usability
- Feasibility
Regulations for Quality Measurement

Chronology of Hospice Quality Measurement

1. QAPI
2. PEACE
3. AIM
4. PPACA

QAPI

- Quality
- Assessment and
- Performance
- Improvement
- § 418.58

CMS and Quality

- Quality health care for Medicare beneficiaries is a high priority for the President, the Department of Health and Human Services (HHS), and the Centers for Medicare & Medicaid Services (CMS)

- HHS and CMS began launching Quality Initiatives in 2001 for Medicare provider types (nursing homes, home health, hospitals etc.) to assure quality health care for all Americans through accountability and public disclosure.

§ 418.58 Quality assessment and performance improvement (QAPI)

The hospice must develop, implement and maintain an effective, ongoing, hospice-wide, data-driven quality assessment process improvement program.

Medicare Hospice Conditions of Participation §418.56 (a) QAPI
§ 418.58 Quality assessment and performance improvement (QAPI)

The hospice must ensure that the program:
- Reflects the complexity of its organization and services
- Involves all hospice services (including those services furnished under contract or arrangement)
- Focuses on indicators related to palliative outcomes
- Takes actions to demonstrate improvement in hospice performance

§ 418.58 Quality assessment and performance improvement (QAPI)

The hospice must maintain documentary evidence of its QAPI program and be able to demonstrate its operation to CMS

§ 418.58 Quality assessment and performance improvement (QAPI)

Standard: Program Scope
Show measurable improvement in indicators for which there is evidence that improvement in those indicators will improve palliative outcomes and end of life support services

Standard: Program Data
Must utilize quality indicator data, including patient care, and other relevant data, in the design of its program

§ 418.58 Quality assessment and performance improvement (QAPI)

Standard: Program Activities
The hospice’s performance improvement activities must:
- Focus on high risk, high volume, problem prone areas
- Consider evidence, prevalence, and severity of problems in those areas

Standard: Program Activities (continued)
The hospice’s performance improvement activities must:
- Affect palliative outcomes, patient safety and quality of care
- Performance activities must track adverse patient events, analyze their causes and implement preventive actions and mechanisms that include feedback and learning throughout the hospice
§ 418.58  Quality assessment and performance improvement (QAPI)

Standard: Performance Improvement Projects
- The number and scope of projects conducted annually must reflect the scope, complexity and past performance of the hospice’s services and operations
- Document what quality improvement projects are being conducted, reasons for conducting the projects and measurable progress achieved on these projects

The QAPI Process

QAPI Activities Summary
- Identify what activities and operations need to be improved in your organization
- Take action aimed at performance improvement
- Measure success of action
- Track performance of action to ensure that improvements are sustained

PEACE Project

PEACE
- Prepare
- Embrace
- Attend
- Communicate
- Empower

PEACE Project
- Completed in February 2008
- Listed 34 suggested measures along with data definitions and a tool for data collection
- Completed by the Carolinas Center for Medical Excellence (the North Carolina QIO)
- Available at www.qualitynet.org

AIM Project

AIM
- Assessment
- Intervention
- Measurement

AIM Project
- August 2009 – November 2010
- Conducted by IPRO, the New York State QIO
- Implemented in 7 hospices and 1 palliative care site within the state of New York that volunteered to participate in the project.
- Available at http://www.ipro.org/index/hospice-aim
PPACA Section 3004 requires the Secretary to implement quality reporting measures for long-term care hospitals, inpatient rehabilitation facilities and hospice programs.

• The quality measures were to be published by October 1, 2012.
• Requires hospices to submit data on selected quality measures to receive annual payment update for fiscal year 2014 and subsequent fiscal years.
• Beginning in FY 2014, hospices that do not submit required quality measure data will have their market basket rate reduced by 2% for that FY.

CMS must take steps to make hospice quality measure data available to the public (no timeline given).
• The published quality measures must receive endorsement from a consensus body (e.g. NQF), with exceptions.

CMS has a contract with RTI International to develop the hospice quality reporting program.
• Contract also focuses on the other providers that are affected by section 3004 (i.e., long-term care hospitals and rehabilitation hospitals).
• RTI has convened technical expert panels for each affected provider type. These panels will help guide the process and outcomes.

Measures for the first year of quality reporting
1. NQF #0209:
   Comfortable Dying = Percentage of patients who were uncomfortable because of pain on admission to hospice whose pain was brought to a comfortable level within 48 hours
Hospice Wage Index for Fiscal Year 2012 (CMS Final Rule)

Comfortable Dying (NHPCO)

- Data collection timeframe: October 1, 2012 – December 31, 2012
- Data submission due: April 1, 2013

2. Structural Measure:
Participation in a QAPI program that includes at least 3 quality indicators related to patient care

Hospice Wage Index for Fiscal Year 2012 (CMS Final Rule)

QAPI Structural Measure
Submission =
- Indication if hospice has a QAPI program that includes at least three indicators related to patient care; and
- Description of all quality indicators related to patient care.
No results are submitted -- only the patient care measure descriptions

Hospice Wage Index for Fiscal Year 2012 (CMS Final Rule)

QAPI Structural Measure
Focus (domains) of patient care measures:
- Provision of care in accordance with documented patient and family goals
- Effective and timely symptom management
- Care coordination
- Patient safety
Hospice Wage Index for Fiscal Year 2012 (CMS Final Rule)

**QAPI Structural Measure**
- Voluntary Submission
  - Data submitted January 31, 2012
  - Data collection October 1, 2011 – December 31, 2011
  - Data collection form (web-based):

What We Know
- Two measures (QAPI structural and NQF 0209 Comfortable Dying)
- Data collection dates (4th quarter 2012)
- Submission dates
  - QAPI Structural: January 31, 2012
  - Comfortable Dying: April 1, 2013 deadline
- Penalty for non-compliance (2% reduction in market basket update)

What We Don’t Know
- Comfortable Dying measure -
  - Details of data submission process
  - Data submission form
  - Data elements to be submitted

Current Proposals
- Quality measure reporting cycles will be based on calendar year after the initial reporting period (e.g., 1/1/2013 – 12/31/13 for FY 2015 market basket increase)
- FY 2013, FY 2014, FY 2015 – iterative implementation of expanded measure set
- Value based purchasing – pilot testing
  - Utilize already implemented measures
  - Implement by January 1, 2016

Additional Measures
**National Quality Forum (NQF)**
- Call for Palliative/End-of-Life measures April 18, 2011
- CMS has no influence over which measures will be endorsed
- 14 measures currently moving through NQF process
- [http://www.qualityforum.org/Topics/Palliative_and_End-of-Life_Care.aspx](http://www.qualityforum.org/Topics/Palliative_and_End-of-Life_Care.aspx)
**Additional Measures**

Family Evaluation of Hospice Care (FEHC) survey

- Composite score and Overall rating (G1) moving through NQF process
- CMS considering inclusion - possibly in 2012 Rule

**Data Collection**

CMS considering standardized data collection vehicle -
- Similar to OASIS and MDS
- Modified version of CARE (Continuity Assessment Record and Evaluation) tool
- Pilot test Spring 2012

**Check Often**


**Preparation for Quality Reporting**

**Quality Measure Implementation**

- Select measures
- Know your measures
- Design systems and processes
- Staff responsibilities
- Monitor results

**Selecting Measures to Report**

- QAPI Plan
- Scan PEACE, AIM, FEHC, FEBS,...
- Factors to consider
Know Your Measures

- Standardization
- Understanding the components
- Estimating volume of data

Design System & Process

- Documentation
- Medical record
- Working with vendors
- Adding to workflow
- Reporting

Staff Responsibilities

- Introduction to staff
- Staff assignments
- Staff training
- Adding to workload?

Monitor Results

- Compliance audits
- Aggregating results
- Reporting actionable data
- Continuous improvement

Strategic Plan for Compliance

- Vision for success
- Preparing for 2013
- Preparing for Value Based Purchasing

Vision for Success

- Preparing for a marathon
- Start today
- Walk, jog, run, marathon
Prepare for 2013

- Quality Partners Self Assessment
- Staff buy in
- QAPI Program

Prepare for Value Based Purchasing

- Innovation
- Making an impact
- Strategic partners
- Quality success equals financial success

Resources

CMS

User Guide for Hospice Quality Reporting Data Entry Site (PDF) Guidelines for online data entry and submission for voluntary reporting of the structural measure (Participation in a QAPI Program that Includes at Least Three Quality Indicators Related to Patient Care)

CMS Hospice Quality Reporting web page. Currently features information on voluntary reporting of the structural measure along with the link for the quality reporting data entry site.

NHPCO Performance Measures

Basic Information and Materials
- www.nhpco.org/outcomemeasures
- www.nhpco.org/qualityreporting

Questions
- quality@nhpco.org
- research@nhpco.org

Questions?