

**Hospital Quality Star Ratings on *Hospital Compare***  
**Public Comment Report #2:**  
**Methodology of Overall Hospital Quality Star Ratings**

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**June 2015**

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## Section 1: Introduction

The Centers for Medicare & Medicaid Services (CMS) is presenting and seeking comment on methodology under development for an overall hospital star rating. The goal of the Overall Hospital Quality Star Ratings project is to improve the usability, accessibility, and interpretability of CMS's hospital quality website, *Hospital Compare*, for patients and consumers. Exploration of the Star Ratings methodology is also a result of the requirement to summarize data on performance measures that was mandated in Sec. 399JJ of the Patient Protection and Affordable Care Act. This public comment period is the second public comment in a series of efforts to engage stakeholders and promote transparency in developing this methodology. Concurrent with this public comment period, CMS will hold a national dry run to provide hospitals with their results, based on the methods described in this report. CMS seeks public input on the methodology under development for the overall star ratings.

### Goal of Project

Under contract with CMS, the Yale New Haven Health Services Corporation – Center for Outcomes Research & Evaluation (CORE), in collaboration with the Lantana Consulting Group, is developing the Overall Hospital Quality Star Ratings methodology. The star ratings would provide an overall quality rating for each hospital that currently has a sufficient amount of reported hospital quality information available on *Hospital Compare*. The *Hospital Compare* website would continue to provide the results of individual quality measures to inform consumers about the quality of care for particular conditions, procedures, and aspects of care such as patient experience.

The development team aimed to develop an approach that provides patients and consumers with scientifically valid information to inform them about multiple dimensions of quality in a single measure. The star ratings on *Hospital Compare* would use a five-star rating system for consistency and alignment with existing CMS star ratings efforts for other providers.

The star ratings summarize hospital quality based on existing measures, which capture some, though not all, aspects of quality through 75 measures across 7 distinct quality dimensions. As CMS develops more measures, the methodology for the star ratings would be able to reflect hospital quality more comprehensively.

### Background

The development team strove to engage stakeholders early on in the development of the methodology for the star ratings. The development team convened a 15-member technical expert panel (TEP) of patient advocates, hospitals representatives, purchasers, and experts on other star ratings projects. Following the first TEP meeting, CMS held a public comment period. The second and third TEP meetings covered the methodology decisions detailed in this report. A summary of

the discussion from the three TEP meetings can be found at:

<http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/MMS/CallforPublicComment.html>.

The first public comment period was dedicated to soliciting input regarding the project objectives and the criteria to select measures for inclusion in the Overall Hospital Quality Star Ratings. The results of this public comment are available on the CMS Call for Public Comment webpage (<http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/MMS/CallforPublicComment.html>).

[Figure 5](#) summarizes the stakeholder engagement activities to date as well as describes the development team's current and future efforts.

### **Purpose of Public Comment Period**

This second public comment period seeks input from a wide variety of stakeholders regarding several key decisions made during the development of the methodology including the analytic approach for summarizing individual measures, the use of weights to combine several aspects of quality into a single measure, and the approach to categorizing hospitals into star categories.

This public comment period aims to highlight important technical and policy considerations for the public. This document presents the methodology that will be used during the June 2015 Hospital Dry Run. Specifically, the document:

1. Describes the process for providing feedback during the public comment ([Section 2](#))
2. Reviews the phases of Star Ratings development ([Section 3](#))
3. Lists the measure exclusion criteria ([Section 4](#))
4. Presents the approach for calculating hospital summary scores ([Section 5](#))
5. Presents the approach for translating summary scores to star ratings ([Section 6](#))
6. Discusses threshold for star ratings calculations ([Section 7](#))
7. Details the proposed next steps for the project ([Section 8](#))

In the appendix sections, we provide a glossary of technical terms used throughout this report ([Appendix A](#)); the list of measures that would be included in the star ratings as of April 2015 ([Appendix B](#)); technical details on the two-stage approach ([Appendix C](#)); and the loading for each measure used in the statistical model ([Appendix D](#)).

**We invite the public to comment on the Overall Hospital Quality Star Ratings methodology. Feedback provided by stakeholders will inform both the dry run methodology as well as any potential future Star Ratings work by CMS.**

## Section 2: Providing Feedback

CMS requests that interested parties submit comments on the methodology under development for the Overall Hospital Quality Star Ratings. CMS asks that stakeholders provide comments regarding the approaches to calculating hospital summary scores and translating summary scores to star ratings. The public may also offer general suggestions regarding the Overall Hospital Quality Star Ratings project.

### Instructions for Providing Comments:

- If you are providing comments on behalf of an organization, include the organization's name and contact information.
- If you are commenting as an individual, submit identifying or contact information.
- Comments are due by close of business July 6, 2015.
- Please do not include personal health information in your comments.
- Send your comments to [cmsstarratings@lantanagroup.com](mailto:cmsstarratings@lantanagroup.com).

## Section 3: Phases of Star Ratings Development

In this section, we describe the key steps we took to establish the methodology for calculating an overall star rating.

### Literature Review and Environment Scan

The development team began constructing the methodology for Overall Hospital Quality Star Ratings by both reviewing previous star ratings development experiences and conducting a comprehensive literature search on methodologies, best practices, and consumer preferences. The literature review and environmental scan supported the concept of bringing a wide variety of measures together into a single overall star rating for consumers. In addition, this work pointed to the need for extensive engagement and education of stakeholders to ensure that the methodology will facilitate stakeholder's understanding of the star ratings.

### Phase 1: Measure Selection

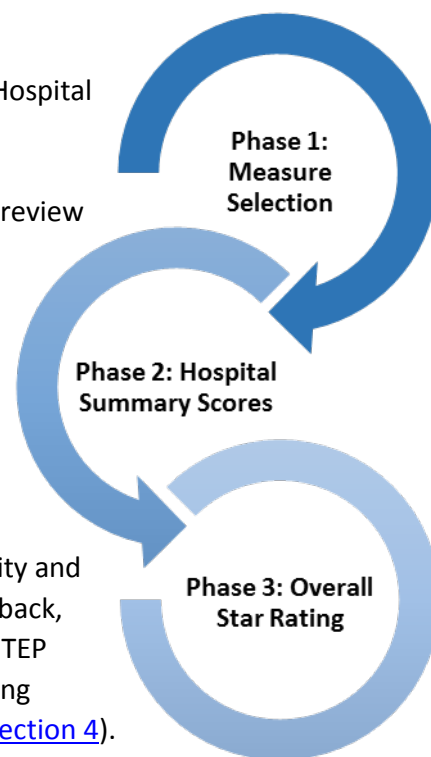
To determine the appropriate set of measures for inclusion in the star ratings, the development team adhered to five guiding principles: simplicity and accessibility, inclusivity, scientific rigor, incorporation of stakeholder feedback, and consistency across CMS programs. After receiving feedback from the TEP and the first public comment period, CMS finalized the criteria for excluding measures from the Overall Hospital Quality Star Ratings for the dry run ([Section 4](#)).

### Phase 2: Calculation of Hospital Summary Scores

During our second and third TEP meetings we evaluated the options for summarizing the measure information available for each hospital into a single summary score. The methodology under development utilizes a two-stage approach ([Section 5](#)). First, measures are grouped by type (e.g., mortality, process, etc.), and a statistical model is applied to each group to generate a measure group score. Hospital quality is reflected by many dimensions, represented by the measure groups. The star ratings seek to combine these groups into a single measure of quality. In the second stage, the group scores are combined as a weighted average to produce the hospital summary score.

### Phase 3: Translation of Summary Scores to Star Ratings

During the third TEP meeting, the development team also evaluated options for translating hospital summary scores into one of five star categories ([Section 6](#)). CMS continues to seek stakeholder input and feedback on the approach considered for categorizing hospital summary scores into one of five star ratings.



## Section 4: Measure Exclusion Criteria

This section describes the criteria to determine which measures from *Hospital Compare* are included in the calculation of the Overall Hospital Quality Star Ratings. These criteria were vetted through the TEP and first public comment period and are being used for the dry run.

The Overall Hospital Quality Star Ratings project strives to be as inclusive as possible of existing hospital quality measures in order to fully represent the information available to consumers on *Hospital Compare* in a star rating. However, some measures that are currently included on *Hospital Compare* would be excluded from the calculation of the Overall Hospital Quality Star Ratings. Certain measures would be excluded in order to generate a star rating based on measures that are actively collected and reported, widely available, suitable for combination, and interpretable by patients and consumers.

As of April 2015, there are 106 hospital quality measures potentially available for public reporting on *Hospital Compare*. These measures represent a variety of measure types and cover a broad set of clinical conditions and care processes. In order to understand the variety of the quality measures currently on *Hospital Compare*, the development team abstracted important measure details and guidance from FY 2015 rulemaking and sub-regulatory reports, Measure Applications Partnership Reports, the *Hospital Compare* website, 2014 Inpatient Quality Reporting (IQR) Measure Comparison Table, and other publicly published resources.<sup>1-10</sup> We used this information to exclude measures according to the final exclusion criteria determined by CMS following the first TEP meeting and public comment period.

Seventy-five ([Table B.1](#)) of the 106 potentially reportable measures on *Hospital Compare* as of April 2015 are recommended for inclusion. A flowchart that diagrams the measure selection process is included in Figure 1.

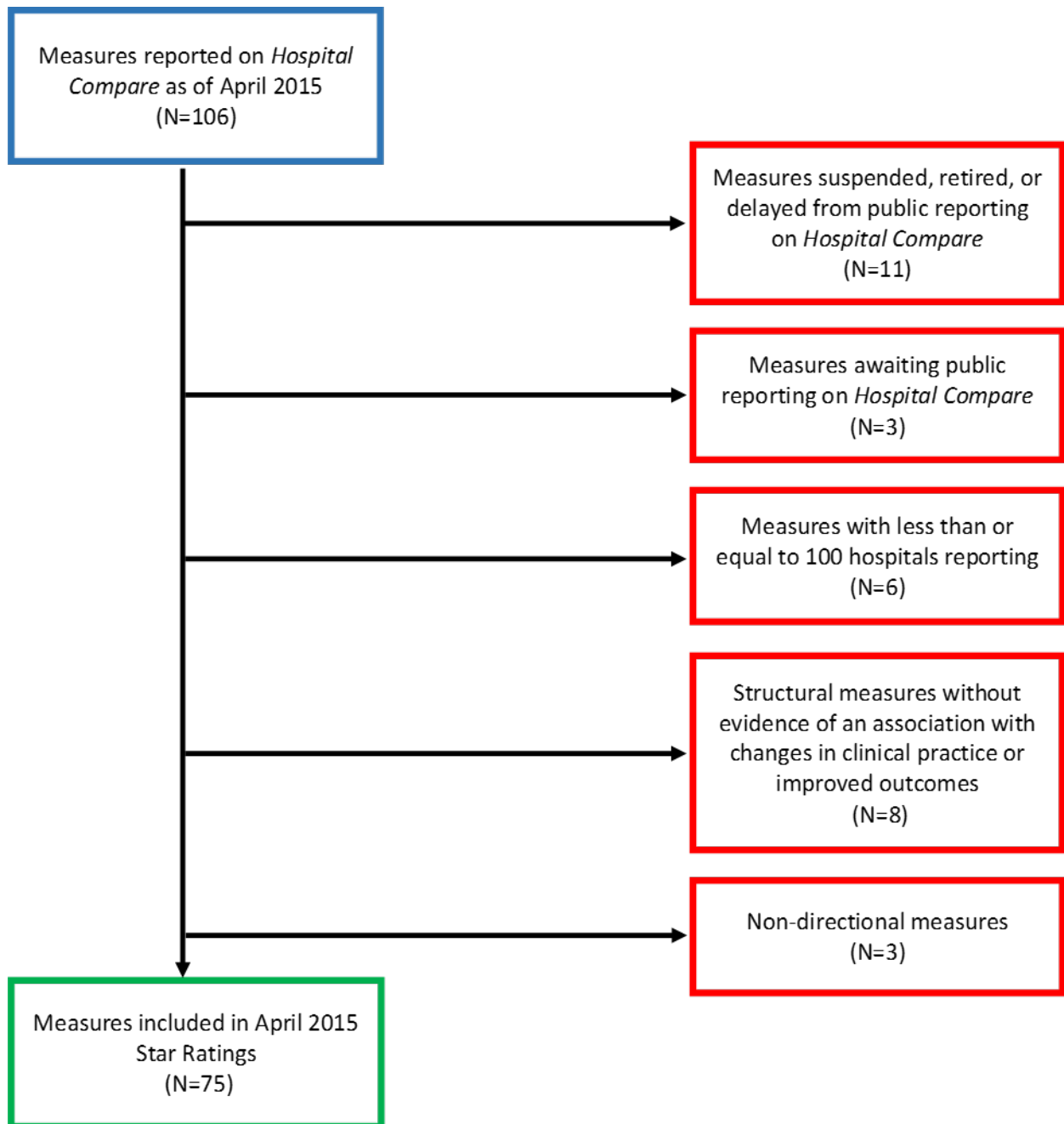
### Criteria for Measure Exclusion

The following criteria will be used for the hospital dry run to exclude measures for star ratings:

1. Measures suspended, retired, or delayed from public reporting on *Hospital Compare*;
2. Measures awaiting public reporting on *Hospital Compare*;
3. Measures with less than or equal to 100 hospitals reporting performance publicly
4. Structural measures without evidence of an association with changes in clinical practice or improved outcomes (e.g., volume and registry participation); and
5. Measures for which it is not clear whether a higher or lower scores is better (i.e., non-directional measures).



Figure 1. Measure Selection Flowchart (April 2015 data)



## Section 5: Approach under Development for Calculating Hospital Summary Scores

**The methodology under development for Overall Hospital Quality Star Ratings uses a two-stage approach to calculating hospital summary scores. We are seeking public comment on this approach in general and with respect to several key elements.**

The development team considered various approaches, including simple or weighted averages of all the measures and more complex statistical approaches utilizing factor analysis and latent variable models. The development team evaluated each approach in the context of the project goals and timeline.

The development team sought to identify an approach that would:

- 1) Generate a single, aggregate measure of available hospital quality information;
- 2) Account for the heterogeneity of measures available (process, outcome, etc.);
- 3) Account for the fact that different hospitals are reporting different numbers of measures and different types of measures;
- 4) Accommodate changes in the included measures (for example, retirement of measures or addition of new measures); and
- 5) Utilize an evidence-based approach reflecting both modern statistical methods and expert insights that previously have been applied to health care.

Ultimately, the development team consulted the TEP and expert stakeholders within CMS to arrive at a two-stage approach which employs latent variable modeling (LVM) and weighted averaging to meet these principles. Within this section we describe each of the specific steps following measure selection necessary to establish a hospital's star rating:

- a. Standardization of measure scores into a common format
- b. Potential measure groups to summarize aspects of quality
- c. Two-stage approach to calculating hospital summary score

### Standardization

Before combining measures into a score, each measure is first converted into a common scale of measurement. Hospital quality measure results include many different types of scoring information, ranging from time (e.g., median time in minutes from ED Arrival to ED Departure for Admitted ED Patients) to percentages (e.g., percentage of patients given antibiotics prior to surgery); quality measures also have two directions, with either "lower is better" (readmissions, mortality) or "higher is better" (use of aspirin for AMI). Therefore, to enable the combination of information, we used standardization to ensure all measure scores were in a common scale and in a common direction. This does not change the measure information – just the scale for scoring in order to make it

possible to bring them together in the hospital star rating calculation. Specifically, we standardized a hospital's score on each measure by calculating "Z" scores for each measure, reversing if necessary so that larger values were always 'better'; the measure "Z" score is the difference between an individual hospital's score and the overall mean score for hospitals divided by the standard deviation across hospitals.

For example, OP-21 (Median Time to Pain Management for Fractures) has national average performance of 55.6 minutes with a standard deviation of 17.75 minutes. In contrast, VTE-6 (Incidence of Potentially Preventable Blood Clots) has a national average of 7.23% with standard deviation of 9.10%. After standardization and redirection, both measures have a mean score of 0 and standard deviation of 1; a higher standardized score indicated better quality. For an individual hospital with an OP-21 score of 65 minutes, the standardized score would be -0.53, while the standardized score for a hospital with a score of 45 minutes would be 0.602. Henceforth in this report, measure score refers to the standardized measure score or "Z" score.

We further winsorize the standardized measure score at the 0.125<sup>th</sup> percentile ( $Z=-3$ ) and the 99.875 percentile ( $Z=3$ ) of the a Standard Normal distribution to avoid extreme outlier performance for which it is unclear if the reported measure score represents extreme performance or potentially inaccurate reporting. All standardized scores above 3 are set to be 3 and all standardized scores below -3 are set to be -3.

## Proposed Measure Groups

Hospital quality is represented by several dimensions, ranging from clinical care processes to readmission reduction initiatives focused on care transitions to patients' experiences. The development team evaluated several options for organizing quality measures into mutually exclusive conceptual groups. Each group contains measures that represent similar dimensions of quality. For the two-stage approach, the development team, with the input of the TEP, has grouped measures into seven groups based on the type of measure: Outcomes – Mortality, Outcomes – Safety, Outcomes – Readmissions, Patient Experience, Process – Effectiveness, Process – Timeliness, and Efficiency – Imaging ([Appendix B](#)). The rationale for these seven measure groups is as follows:

- The seven measure groups are aligned with the CMS Hospital Value-Based Purchasing (HVPB) program, the current categories on the *Hospital Compare* website, and other national quality initiatives.
- Measure groups are clinically reasonable in that they capture common components of quality for which hospital quality is likely linked across measures. For example, the degree to which hospitals effectively manage care transitions or safely discharge patients is likely to be reflected in all readmission measures.

The proposed measure groups will allow for future measures to be added and removed from the star ratings. This option permits the mutually exclusive assignment of measures to each group,

whereas alternative approaches may be more subjective and require substantial deliberation and compromise to ensure consistency.

**Figure 2. Proposed Measure Groups**



## Overview of Two-Stage Approach

The two-stage approach with measure groups calculates group scores for each hospital based on their standardized measure scores and then combines the seven group scores into one single overall hospital summary score (Figure 3). In stage one, seven separate statistical models are generated for each measure group to calculate a group-specific latent summary score (group score). The statistical model used is LVM, which produces a hospital-specific group score that reflects the information about each aspect of quality that is conveyed by the available measures within a group. In step two, a policy-based weighting scheme is applied to the group scores in order to generate the hospital summary score.

**Figure 3. Process for Calculating the Overall Hospital Quality Star Ratings**

**Step 1: Select Measures**

Apply measure selection criteria each quarter

**Step 2: Group Measures**

Similar to HVBP and existing *Hospital Compare* display

**Step 3: Calculate Group Score**

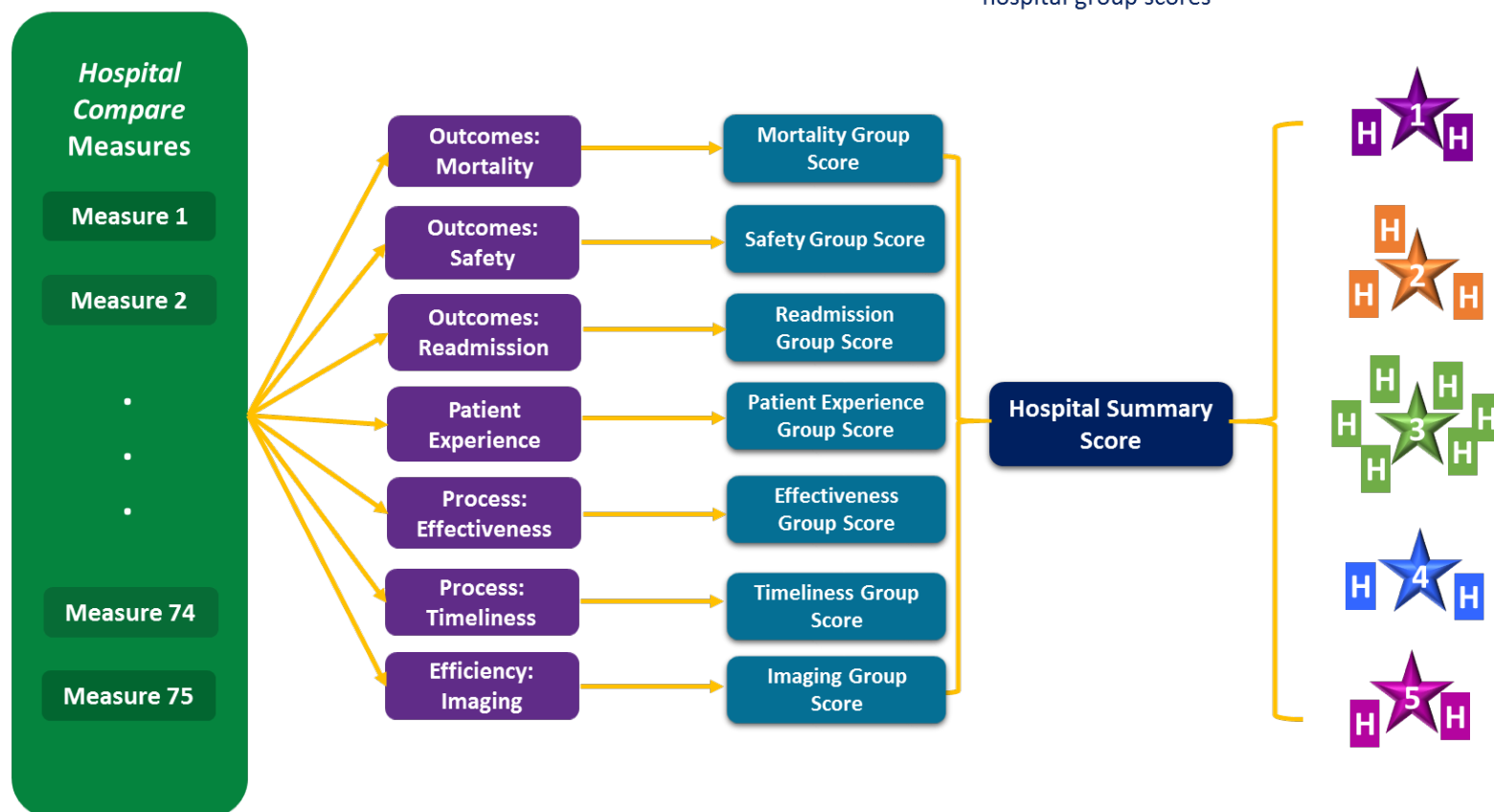
Use 7 latent variable models

**Step 4: Generate Summary Score**

Policy-based weighted average of available hospital group scores

**Step 5: Assign Star Ratings**

Categorize hospitals using k-means Cluster Analysis



Additional technical details regarding the two-stage approach are presented in [Appendix C](#).

### ***Stage 1: Group-Specific Latent Variable Modeling (LVM)***

The first stage of the two-stage approach utilizes LVM to calculate a group score for each of a hospital's measure groups. No single measure exists to reflect an entire aspect of hospital quality; however, through a group score, LVM combines the individual measures within a group to reflect the aspect of quality represented by those measures. The LVM approach confers several advantages making it well-suited for the star ratings.

#### **Advantages of LVM to Calculate Group Scores**

- Method is used for composite measures in healthcare quality literature.<sup>11</sup>
- The LVM accounts for consistency of performance by giving more importance to measures that are correlated within a group.
- LVM accounts for missing measures by using only available information to generate a group score so that hospitals with limited information will not be calculated to have extreme group scores.
- The model can account for sampling variance, or reflect the differences in precisions for each hospital's individual measure score as a result of different hospital volumes counted for each measure.

#### **Challenges of LVM to Calculate Group Scores**

- The modeling technique may be challenging for patients and consumers to understand.
- Each LVM assumes that each group reflects a distinct aspect of quality. Each measure contributes to one group score even if it may potentially reflect more than one aspect of quality.
- Each included measure is a valid indicator of quality.

#### **Measure Loadings**

A "loading" is estimated for each measure in a group using LVM ([Appendix D](#)). The loading is the degree of the measure's relationship to the group score (latent aspect of quality) relative to the other measures included in the group. To be clear, the loadings are not weights applied to the measures to calculate a group score. Key considerations for measure loadings include:

- A measure's loading is the same across hospitals. Although loadings are different by measure, we assume they are the same across hospitals.
- Measures with higher loadings are more strongly associated with the group score. These more "consistent" measures, in terms of hospital performance, give us more signal or information about a hospital's quality profile than measures with "random" performance. Loadings are estimated using maximum likelihood.
- Large measure loadings do not directly imply that only a few measures "matter" towards the group score. However, measures with higher loadings do have a greater association (or

‘impact’) on the group score than measures with much lower loadings. There could be multiple measures with large loadings in one measure group. Measures which are reported by more hospitals with consistent performance will tend to have higher loadings, as they reflect a stronger “signal” of hospital quality.

### Accounting for Measure Sampling Variation

As part of the statistical model to obtain groups scores, the development team also accounts for the sampling variation of each measure for each hospital. The development team uses the hospital’s measure denominator as an approximation of the sampling variation. A weighted likelihood is used to ensure that a hospital with a larger denominator, or a more precise measure score, would be weighted more in the LVM. Technical details on the approach for accounting for measure sampling variation are presented in [Appendix C](#).

### Stage 2: Weighted Average of Group-Specific Scores

The second stage of the two-stage approach applies weights to each of the seven group-specific scores to generate an overall summary score for each hospital. We aimed to determine weights for each group that represent the preferences of stakeholders, particularly patients and consumers.

CORE presented two potential weighting options to the TEP and CMS, equal weighting and weighting modified from the FY 2017 HVBP program. To obtain feedback on the TEP’s preferences for weighting, the development team administered an online survey asking the TEP to rank the following measure groups: Outcomes – Mortality, Outcomes – Safety, Outcomes – Readmission, Patient Experience, Process, and Efficiency. The results of this survey are summarized in Table 1. The TEP ranked the groups on a scale of 0-10 with higher numbers indicating higher importance. Please note, the development team separated the Process group into Process – Effectiveness and Process – Timeliness following the final TEP meeting to better account for the heterogeneity of the process measures included in the Overall Hospital Quality Star Ratings.

**Table 1. TEP Survey Results Ranking Measure Groups (N=13 TEP Members)**

Measure Group	Mean Ranking by TEP
Outcomes – Mortality	7
Outcomes – Safety	8
Outcomes – Readmission	7
Patient Experience	6
Process	4
Efficiency – Imaging	5

We applied the following criteria in our approach to determining an appropriate weighting scheme:

- Measure importance
  - The weight of outcome measure groups should be greater than that of process measure groups.
  - The weight of the Efficiency – Imaging measure group should take into account the limited population captured by these measures.
- Consistency
  - The weights should align with the existing weighting schemes of other CMS programs to ensure consistent incentives.
- Policy priorities
  - The weights should reflect CMS’s priorities as reflected in the CMS Quality Strategy.<sup>12</sup>
- Stakeholder input
  - The proposed weights should reflect the prioritization of measure groups by the TEP as well as future feedback via public comment periods, the hospital dry run, and additional sources of patient and consumer feedback.

Given the TEP’s feedback and these criteria, CMS is considering using a policy-based weighting scheme modified from HVBP. We propose two options (Table 2) in alignment with HVBP and national quality initiatives for public comment.

**Table 2. Proposed Policy-based Weighting Scheme Modified from FY 2017 HVBP**

Measure Group	FY17 HVBP Weight	Dry Run Proposed Weight	Alternative Proposed Weight
Outcomes – Mortality (N=6)	25%	22%	20%
Outcomes – Safety (N=8)	20%	22%	20%
Outcomes – Readmission (N=7)	---	22%	20%
Patient Experience (N=11)	25%	22%	25%
Process – Effectiveness (N=30)	5%	4%	5%
Process – Timeliness (N=8)	---	4%	5%
Efficiency – Imaging (N=5)	---	4%	5%
Efficiency – Cost	25%	---	---

Note: The FY 2017 HVBP program is set to include 22 measures and assigned a 25% weight to Medicare Spending per Beneficiary measure, which is not included in Star Ratings.

**We are seeking public comment on the proposed policy-based weighting schemes and any other alternative methods for weighting.**



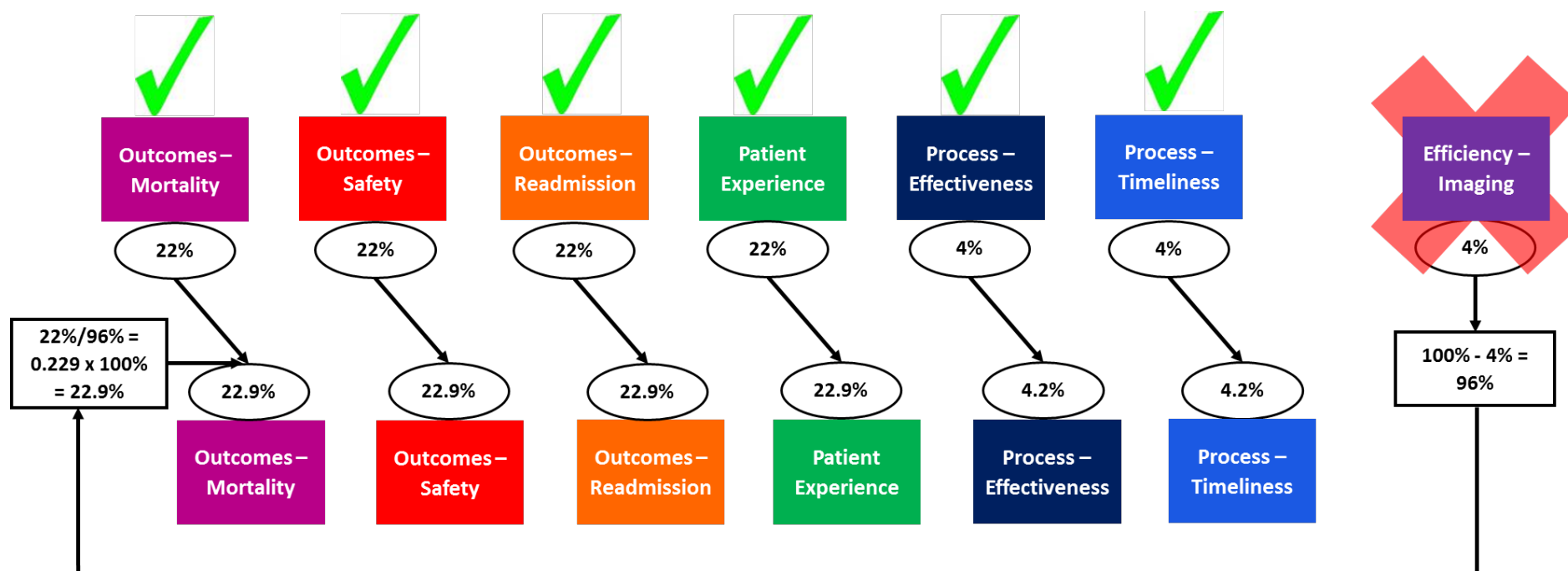
### ***Proposed Method for Weighting When Missing Group(s)***

In some cases, a hospital may not have measures reported for every measure group. The development team has recommended following the approach taken by the HVBP program in which weights of missing groups are re-proportioned across the groups that a hospital reports. If a hospital reports zero measures in a group, the group is considered missing. An example adjusted weighting scheme accounting for missing groups is shown in Table 3 and Figure 4.

**Table 3. Example of Re-weighting Scheme when Missing Outcomes – Safety Measures**

Measure Group	Dry Run Proposed Weight	Re proportioned Weight
Outcomes – Mortality (N=6)	22%	22.9%
Outcomes – Safety (N=8)	22%	22.9%
Outcomes – Readmissions (N=7)	22%	22.9%
Patient Experience (N=11)	22%	22.9%
Process – Effectiveness (N=30)	4%	4.2%
Process – Timeliness (N=8)	4%	4.2%
Efficiency – Imaging ( <b>Missing; N=0</b> )	4%	---

Figure 4. Example of Re-weighting Scheme when Missing Efficiency – Imaging Measures



We are seeking public comment on the method for proportionally redistributing the weight of a measure group when a hospital has no measures available for that group.

## Section 6: Options for Translating Summary Scores to Stars

This section describes the methodology for translating summary scores into star ratings once hospital summary scores are generated.

### Assumptions:

There are several important assumptions to consider prior to determining the approach for translating hospital summary scores into one of five star categories:

- Hospitals will always have summary scores at the margin of a star category (in other words, some hospitals will border a higher/lower star category).
- Similar to other CMS Star Ratings efforts, a three-star rating will be considered “average.”
- The objective of this project is to develop whole-star ratings (not half-stars).
- Star ratings do not reflect an “apples to apples” comparison between hospitals (in other words, just because two hospitals may have the same star rating does not mean they have identical hospital quality). Rather, the star ratings reflect the weighted average of the summarized, group-level quality information available for a given hospital.
  - For example, there are many ways a hospital can be three stars. One hospital may do exceedingly well on the Process and Efficiency groups but perform poorly on Patient Experience. Another hospital with the same rating may do average across all available measure groups.
  - Because each hospital may have a different set of measures contributing to its star rating, patients and consumers should evaluate individual measure scores in addition to the overall star rating.
- Star ratings are not intended to guide specific hospital quality improvement efforts, but rather to make summary information available to the public.

CORE considered several options with the TEP for translating summary scores to stars. For the methodology under development, we present the use of k-means clustering to assign hospital star ratings.

### **k-Means Clustering**

*k*-Means Clustering is the suggested method for translating hospital summary scores to star ratings. This is a method for creating groups (or clusters) of hospitals so that scores in each cluster are closer to their group mean than to any other group mean. In the case of a summary score, *k*-means cluster analysis with  $k=5$  can be used to categorize hospitals into a star rating category such that hospitals in each star category have a summary score that is ‘more like’ the other hospitals in that star category than it is like hospitals in different categories.

This approach, utilized for the dry run, is based solely on hospitals' summary scores. Table 4 presents the frequency of star ratings using *k*-means clustering.

### ***Description of Categories using Clustering***

- ★★★★★ Cluster of hospitals with highest summary scores determined by the sum of the square of distance between hospital's summary scores and the cluster mean
- ★★★★ Cluster of hospitals with higher than average summary scores determined by the sum of the square of distance between hospital's summary scores and the cluster mean
- ★★★ Cluster of hospitals with average summary scores determined by the sum of the square of distance between hospital's summary scores and the cluster mean
- ★★ Cluster of hospitals with below average summary scores determined by the sum of the square of distance between hospital's summary scores and the cluster mean
- ★ Cluster of hospitals with lowest summary scores determined by the sum of the square of distance between hospital's summary scores and the cluster mean

### **Advantages of *k*-Means Clustering Approach**

- *k*-means optimally designated five "means" for five star categories within the distribution of hospital summary scores. This minimizes the within-cluster and maximizes the between-cluster differences in summary scores.
- Hospitals in a cluster will have similar summary scores.
- Individual measure performance does not appear to be assessed "twice" as in the overall and measure-specific threshold approach.
- In comparison to alternative approaches, the *k*-means clustering approach produced a slightly broader distribution of star ratings.
- An analysis conducted for validation broadly demonstrates statistically different group scores between each star rating category in many groups supporting the ability of this approach to distinguish hospital performance across these five clusters.

### **Challenges of *k*-Means Clustering Approach**

- The majority of hospitals will fall into the three-star cluster.
- The complexity of approach may be difficult for patients and consumers to understand.
- The approach is "tournament-based" in comparison to an "achievement-based" approach. In other words, the approach calculates a hospital's star rating relative to other hospitals based on the distribution of hospital summary scores. An alternative approach or "achievement-based" approach would utilize an absolute threshold for each star category

(for example, a hospital with high performance in six out of the seven groups would be a five-star hospital).

**Table 4. Frequency of Star Ratings Using k-Means Clustering (April 2015 data)**

Rating	Frequency (Number of Hospitals)	Minimum Summary Score in Cluster	Maximum Summary Score in Cluster
1 Star	5	-2.40	-1.58
2 Star	544	-1.53	-0.43
3 Star	2615	-0.43	0.38
4 Star	528	0.38	1.31
5 Star	17	1.37	2.21

Note: The total number of hospitals in the *Hospital Compare* dataset as of April 2015 is 4,746 hospitals. Results shown are for all hospitals meeting the criteria discussed in [Section 7](#) (N=3,709).

## Measure Threshold Approach

As an alternative to the k-means clustering option, we also considered setting a threshold for a hospital's performance on both their hospital summary score and individual measure performance, which is similar to proposed approaches employed by other CMS efforts. This approach is based on categorizing each star rating depending on the statistical difference in summary scores and a threshold for individual measure performance.

In this approach, the threshold for individual measure performance can be set based on face validity and policy objectives. Table 5 presents the frequency of star ratings using statistical significance.

## Description of Categories using Overall and Measure-Specific Threshold

- ★★★★★ Hospital's summary score is significantly better than the national average and more than half of the individual measures are better than the national average
- ★★★★ Hospital's summary score is significantly better than the national average and less than half of the individual measures are better than the national average
- ★★★ Hospital's summary score is not significantly different from the national average or no other criteria is met
- ★★ Hospital's summary score is significantly less than the national average and less than half of the individual measures are worse than the national average
- ★ Hospital's summary score is significantly less than the national average and more than half of the individual measures are worse than the national average

### Advantages of Overall and Measure-Specific Threshold Approach

- Some star categories reflect statistical differences in the summary score.
- Hospitals with few measures must perform well on the same percentage of total measures reported as hospitals with many measures.

### Limitations of Overall and Measure-Specific Threshold Approach

- Frequency of hospitals in each star category will likely be unequal, and the majority of hospitals will fall into the three-star category.
- Setting an individual measure threshold (e.g., better than average on “half” of the individual measures) is arbitrary and may generate less stable results as measure score availability changes over time.

**Table 5. Frequency of Star Ratings Using Statistical Significance Rating (April 2015 data)**

Rating	Frequency (Number of Hospitals)	Minimum Summary Score in Cluster	Maximum Summary Score in Cluster
1 Star	97	-2.40	-0.87
2 Star	20	-1.53	-0.87
3 Star	3534	-1.26	1.26
4 Star	1	1.00	1.00
5 Star	57	0.87	2.21

Note: The total number of hospitals in the *Hospital Compare* dataset as of April 2015 is 4,746 hospitals. Results shown are for all hospitals meeting the criteria discussed in [Section 7](#) (N=3,709).

**We are seeking comments on both potential approaches as well as any alternative approach for translating summary scores into star ratings.**

## Section 7: Thresholds for Receiving a Star Rating during Dry Run

A few hospitals may not report many individual measures resulting in the generation of hospital summary scores of lower reliability and face validity. HVBP addresses this issue by setting several thresholds for measure groups in order for a hospital to be eligible for a Total Performance Score Calculation. The development team sought the TEP's feedback on setting measure and measure group thresholds in order for a hospital to be eligible to receive an overall star rating. Given HVBP's threshold and the TEP's feedback, the development team proposes setting a minimum measure threshold guided by a reliability calculation and expert input. A minimum measure threshold of three would exceed a desired reliability level of 0.75 for all measure groups. The development team proposes a minimum measure group threshold similar to HVBP, requiring hospitals report at least three of the seven groups with one being an outcome group. Together, these individual measure and measure group thresholds would result in 78% of hospitals reporting a star rating (Table 6).

The minimum measure and minimum group thresholds are applied solely for reporting purposes and have no effect on the calculation of the hospital summary score or the star categorization. In other words, if a hospital meets these thresholds and has additional measure groups, each with one to two measures, these group scores will be included in their star rating using standard weights.

**Table 6. Hospitals (N=4,746) receiving a star rating during dry run based on minimum thresholds (April 2015 data)**

	Minimum Measure Groups					
Minimum Measures	2	3	4	5	6	7
1	4,617 (97%)	4,330 (91%)	3,958 (83%)	3,713 (78%)	3,353 (71%)	3,009 (63%)
2	4,329 (91%)	4,020 (85%)	3,639 (77%)	3,319 (70%)	3,061 (64%)	2,789 (59%)
3	3,988 (84%)	3,709 (78%)	3,307 (70%)	3,044 (64%)	2,845 (60%)	2,411 (51%)
4	3,499 (74%)	3,277 (69%)	3,036 (64%)	2,801 (59%)	2,481 (52%)	1,831 (39%)

Note: The fixed number of minimum measure groups shown in Table 6 must include at least one outcome group.

### Considerations for Proposed Minimum Thresholds

- Setting increasingly high thresholds for both measures and measure groups would exclude more hospitals from the Overall Hospital Quality Star Ratings.
  - The development team will seek patients' and hospitals' input regarding how hospitals with fewer are displayed.

**We are seeking comment on the proposed minimum measure and minimum group thresholds for potentially presenting star ratings on *Hospital Compare*.**

## Section 8: Next Steps

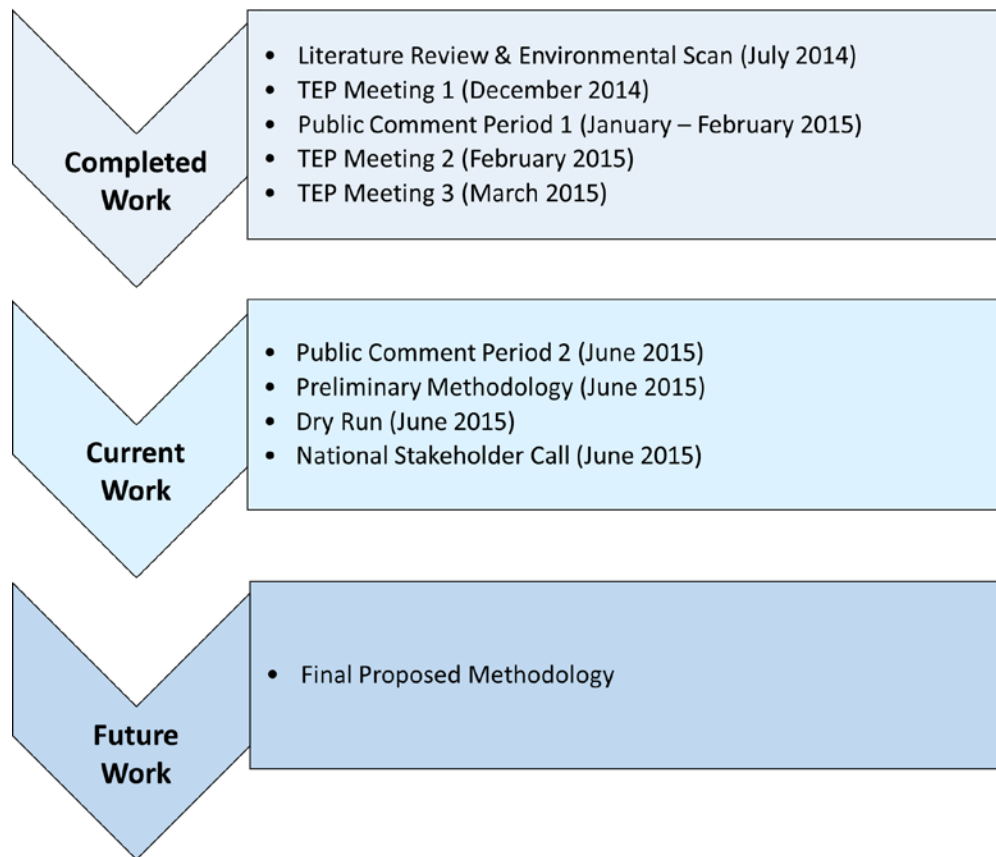
This section provides a summary of the next steps before finalizing a methodology for the Star Ratings on *Hospital Compare* (Figure 5). In addition to this public comment period, the contractors will hold a dry run in the summer of 2015 and gather feedback from hospitals. The development team will also present the Overall Hospital Quality Star Ratings project and display to a working group comprised of patients and patient advocates from the National Partnership for Women & Families (NPWF). The patient advocates will advise the development team on how to explain the star categories in a consumer-friendly way (e.g., legend) while accounting for the inherent limitations of the ultimate methodology. The working group will also advise the development team on how to display hospitals without enough information to receive a star rating. The development team will bring all comments received during the public comment period, dry run, and working group meetings to CMS for consideration.

For future work, the development team would like to investigate options for providing group- or domain-level information about the star ratings to patients and consumers. Group scores may reflect valuable information about aspects of quality at each hospital. Patients and consumers may find measure groups scores useful when comparing hospitals with similar star ratings given that each star rating may reflect different underlying performance across group scores. One way to provide group score information may be by categorizing a hospital's performance for each of its available groups as "better than," "worse than," or "same as the national average." This approach is currently used on *Hospital Compare* for displaying performance on individual measures.

**We seek public comment regarding whether to and how to present group scores to patients and consumers.**



**Figure 5. Timeline for Star Ratings Development and Stakeholder Engagement**



## References

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## Appendix A: Introduction to Statistical Terminology

In this Appendix, we define the statistical terms relevant to our initial analyses. We intend for this section to help streamline communication and develop a common, foundational understanding of the approaches to be discussed.

**Table A.1. Glossary of Key Terms**

Term	Definition/Explanation
Standardization	The process of converting an individual score into a dimensionless quantity. The standardized score is the number of standard deviations an individual score is above or below the average score. This process may also be referred to as normalizing.
Winsorization	A typical strategy used to set all outliers to a specified percentile of the data; for example, a 99% Winsorization would see all data below the 0.5th percentile set to the 0.5th percentile, and data above the 99.5th percentile set to the 99.5th percentile.
Weighting	Weighting considers the influence or importance of a component relative to the whole. Unequal weighting implies that some quantities contribute more than others.
Loading	A loading in structural equation modeling (SEM) is the regression coefficient between an indicator (measure) and its factor (summary score). It indicates the strength of the relationship on the path from the latent variable to the indicator.
Group	A subset of measures believed to be conceptually or empirically similar.
Summary score (latent variable)	An assumed, but unobserved, quantity that reflects some latent trait.

## Appendix B: Measure Selection

Table B.1. Measures by Measure Group (April 2015)

Measure Name	Measure Group
<b><u>MORT-30-AMI</u></b> Acute Myocardial Infarction (AMI) 30-Day Mortality Rate	Outcomes – Mortality
<b><u>MORT-30-COPD</u></b> Chronic Obstructive Pulmonary Disease (COPD) 30-Day Mortality Rate	Outcomes – Mortality
<b><u>MORT-30-HF</u></b> Heart Failure (HF) 30-Day Mortality Rate	Outcomes – Mortality
<b><u>MORT-30-PN</u></b> Pneumonia (PN) 30-Day Mortality Rate	Outcomes – Mortality
<b><u>MORT-30-STK</u></b> Acute Ischemic Stroke (STK) 30-Day Mortality Rate	Outcomes – Mortality
<b><u>PSI-4-SURG-COMP</u></b> Death Among Surgical Patients with Serious Treatable Complications	Outcomes – Mortality
<b><u>HAI-1</u></b> Central-Line Associated Bloodstream Infection (CLABSI)	Outcomes – Safety
<b><u>HAI-2</u></b> Catheter-Associated Urinary Tract Infection (CAUTI)	Outcomes – Safety
<b><u>HAI-3</u></b> Surgical Site Infection from colon surgery (SSI-colon)	Outcomes – Safety
<b><u>HAI-4</u></b> Surgical Site Infection from abdominal hysterectomy (SSI-abdominal hysterectomy)	Outcomes – Safety
<b><u>HAI-5</u></b> MRSA Bacteremia	Outcomes – Safety
<b><u>HAI-6</u></b> <i>Clostridium Difficile</i> ( <i>C.difficile</i> )	Outcomes – Safety
<b><u>COMP-HIP-KNEE</u></b> Hospital-Level Risk-Standardized Complication Rate (RSCR) Following Elective Primary Total Hip Arthroplasty (THA) and Total Knee Arthroplasty (TKA)	Outcomes – Safety
<b><u>PSI-90-Safety</u></b> Complication/Patient Safety for Selected Indicators (PSI)	Outcomes – Safety
<b><u>READM-30-AMI</u></b> Acute Myocardial Infarction (AMI) 30-Day Readmission Rate	Outcomes – Readmission
<b><u>READM-30-COPD</u></b> Chronic Obstructive Pulmonary Disease (COPD) 30-Day Readmission Rate	Outcomes – Readmission
<b><u>READM-30-HF</u></b> Heart Failure (HF) 30-Day Readmission Rate	Outcomes – Readmission
<b><u>READM-30-Hip-Knee</u></b> Hospital-Level 30-Day All-Cause Risk- Standardized Readmission Rate (RSRR) Following Elective Total Hip Arthroplasty (THA)/Total Knee Arthroplasty (TKA)	Outcomes – Readmission
<b><u>READM-30-PN</u></b> Pneumonia (PN) 30-Day Readmission Rate	Outcomes – Readmission
<b><u>READM-30-STK</u></b> Stroke (STK) 30-Day Readmission Rate	Outcomes – Readmission
<b><u>READM-30-HOSP-WIDE</u></b> HWR Hospital-Wide All-Cause Unplanned Readmission	Outcomes – Readmission
<b><u>H-CLEAN-HSP</u></b> Cleanliness of Hospital Environment (Q8)	Patient Experience
<b><u>H-COMP-1</u></b> Nurse Communication (Q1, Q2, Q3)	Patient Experience
<b><u>H-COMP-2</u></b> Doctor Communication (Q5, Q6, Q7)	Patient Experience
<b><u>H-COMP-3</u></b> Responsiveness of Hospital Staff (Q4, Q11)	Patient Experience

Measure Name	Measure Group
<b>H-COMP-4</b> Pain management (Q13, Q14)	Patient Experience
<b>H-COMP-5</b> Communication About Medicines (Q16, Q17)	Patient Experience
<b>H-COMP-6</b> Discharge Information (Q19, Q20)	Patient Experience
<b>H-HSP-RARTING</b> Overall Rating of Hospital (Q21)	Patient Experience
<b>H-QUIET-HSP</b> Quietness of Hospital Environment (Q9)	Patient Experience
<b>H-RECMND</b> Willingness to Recommend Hospital (Q22)	Patient Experience
<b>H-COMP-7</b> HCAHPS 3 Item Care Transition Measure (CTM-3)	Patient Experience
<b>HF-2</b> Evaluation of LVS Function	Process – Effectiveness
<b>IMM-2</b> Influenza Immunization	Process – Effectiveness
<b>IMM-3</b> Healthcare Personnel Influenza Vaccination	Process – Effectiveness
<b>OP-22</b> ED-Patient Left Without Being Seen	Process – Effectiveness
<b>OP-23</b> ED-Head CT or MRI Scan Results for Acute Ischemic Stroke or Hemorrhagic Stroke who Received Head CT or MRI Scan Interpretation Within 45 Minutes of Arrival	Process – Effectiveness
<b>OP-4</b> Aspirin at Arrival	Process – Effectiveness
<b>OP-6</b> Timing of Antibiotic Prophylaxis	Process – Effectiveness
<b>OP-7</b> Prophylactic Antibiotic Selection for Surgical Patients	Process – Effectiveness
<b>PC-01</b> Elective Delivery Prior to 39 Completed Weeks Gestation: Percentage of Babies Electively Delivered Prior to 39 Completed Weeks Gestation	Process – Effectiveness
<b>PN-6</b> Initial Antibiotic Selection for Community-Acquired Pneumonia (CAP) in Immunocompetent Patient	Process – Effectiveness
<b>SCIP-Card-2</b> Surgery Patients on Beta-Blocker Therapy Prior to Arrival Who received a Beta-Blocker During the Perioperative Period	Process – Effectiveness
<b>SCIP-Inf-1</b> Prophylactic Antibiotic Received Within One Hour Prior to Surgical Incision	Process – Effectiveness
<b>SCIP-Inf-2</b> Prophylactic Antibiotic Selection for Surgical Patients	Process – Effectiveness
<b>SCIP-Inf-3</b> Prophylactic Antibiotics Discontinued Within 24 Hours After Surgery End Time	Process – Effectiveness
<b>SCIP-Inf-9</b> Urinary Catheter Removed on Postoperative Day 1 (POD 1) or Postoperative Day 2 (POD 2) with day of surgery being day zero	Process – Effectiveness
<b>SCIP-VTE-2</b> Surgery Patients Who Received Appropriate Venous Thromboembolism Prophylaxis Within 24 Hours Prior to Surgery to 24 Hours After Surgery	Process – Effectiveness
<b>STK-1</b> Venous Thromboembolism (VTE) Prophylaxis	Process – Effectiveness
<b>STK-10</b> Assessed for Rehabilitation	Process – Effectiveness
<b>STK-2</b> Discharged on Antithrombotic Therapy	Process – Effectiveness
<b>STK-3</b> Anticoagulation Therapy for Atrial Fibrillation/Flutter	Process – Effectiveness
<b>STK-4</b> Thrombolytic Therapy	Process – Effectiveness
<b>STK-5</b> Antithrombotic Therapy By End of Hospital Day 2	Process – Effectiveness
<b>STK-6</b> Discharged on Statin Medication	Process – Effectiveness
<b>STK-8</b> Stroke Education	Process – Effectiveness
<b>VTE-1</b> Venous Thromboembolism Prophylaxis	Process – Effectiveness
<b>VTE-2</b> Intensive Care Unit Venous Thromboembolism Prophylaxis	Process – Effectiveness

Measure Name	Measure Group
<b><u>VTE-3</u></b> Venous Thromboembolism Patients with Anticoagulation Overlap Therapy	Process – Effectiveness
<b><u>VTE-4</u></b> Venous Thromboembolism Patients Receiving Unfractionated Heparin with Dosages/Platelet Count Monitoring by Protocol or Nomogram	Process – Effectiveness
<b><u>VTE-5</u></b> Venous Thromboembolism Warfarin Therapy Discharge Instructions	Process – Effectiveness
<b><u>VTE-6</u></b> Hospital Acquired Potentially-Preventable Venous Thromboembolism	Process – Effectiveness
<b><u>AMI-8a</u></b> Timing of Receipt of Primary Percutaneous Coronary Intervention (PCI)	Process - Timeliness
<b><u>ED-1b</u></b> Median Time from ED Arrival to ED Departure for Admitted ED Patients	Process - Timeliness
<b><u>ED-2b</u></b> Admit Decision Time to ED Departure Time for Admitted Patients	Process - Timeliness
<b><u>OP-18b/ED-3</u></b> Median Time from ED Arrival to ED Departure for Discharged ED Patients	Process - Timeliness
<b><u>OP-20</u></b> Door to Diagnostic Evaluation by a Qualified Medical Professional	Process - Timeliness
<b><u>OP-21</u></b> ED-Median Time to Pain Management for Long Bone Fracture	Process - Timeliness
<b><u>OP-3</u></b> Median Time to Transfer to Another Facility for Acute Coronary Intervention	Process - Timeliness
<b><u>OP-5</u></b> Median Time to ECG	Process - Timeliness
<b><u>OP-8</u></b> MRI Lumbar Spine for Low Back Pain	Efficiency – Imaging
<b><u>OP-10</u></b> Abdomen CT Use of Contrast Material	Efficiency – Imaging
<b><u>OP-11</u></b> Thorax CT Use of Contrast Material	Efficiency – Imaging
<b><u>OP-13</u></b> Cardiac Imaging for Preoperative Risk Assessment for Non-Cardiac Low-Risk Surgery	Efficiency – Imaging
<b><u>OP-14</u></b> Simultaneous Use of Brain Computed Tomography (CT) and Sinus CT	Efficiency – Imaging

**Table B.2. Measures Excluded from April 2015 Star Ratings (N=31)**

Measure Name	Exclusion Criteria
<b>OP-15</b> Use of Brain CT in the Emergency Department (ED) for Atraumatic Headache	Retired or suspended from public reporting (N=11)
<b>SCIP-VTE-1</b> Surgery Patients with Recommended Venous Thromboembolism Prophylaxis Ordered	
<b>AMI-2</b> Aspirin Prescribed at Discharge	
<b>AMI-10</b> Statin Prescribed at Discharge	
<b>SCIP-Inf-4</b> Cardiac Surgery Patients with Controlled Postoperative Blood Glucose	
<b>SCIP-Inf-10</b> Surgery Patients with Perioperative Temperature Management	
<b>HF- 1</b> Discharge Instructions	
<b>HF-3</b> ACEI or ARB for LVSD	
<b>PN-3b</b> Blood Cultures Performed in the Emergency Department Prior to Initial Antibiotic Received in Hospital	
<b>SM-PART-STROKE</b> Participation in a Systematic Clinical Database Registry for Stroke Care	
<b>IMM-1a</b> Pneumococcal Immunization – Overall Rate	Not yet publicly reported (N=3)
<b>OP-29</b> Endoscopy/Polyp Surveillance: Appropriate Follow-Up Interval for Normal Colonoscopy in Average Risk Patients	
<b>OP-30</b> Endoscopy/Polyp Surveillance: Colonoscopy Interval for Patients with a History of Adenomatous Polyps – Avoidance of Inappropriate Use	
<b>OP-31 Cataracts</b> – Improvement in Patient’s Visual Function Within 90 Days Following Cataract Surgery	
<b>CAC-1</b> Relievers for Inpatient Asthma	Too few hospitals reporting (N=6)
<b>CAC-2</b> Systemic Corticosteroids for Inpatient Asthma	
<b>CAC-3</b> Home Management Plan of Care (HMPC) Document Given to Patient/Caregiver	
<b>AMI-7a</b> Fibrinolytic Therapy Received Within 30 Minutes of Hospital Arrival	
<b>OP-1</b> Median Time to Fibrinolysis	
<b>OP-2</b> Fibrinolytic Therapy Received Within 30 Minutes of ED Arrival	Structural Measures (N=8)
<b>SM-PART-NURSE</b> Participation in a Systematic Clinical Database Registry for Nursing Sensitive Care	
<b>SM-PART-CARD</b> Participation in a Systematic Clinical Database Registry for Cardiac Surgery	
<b>ACS-REGISTRY</b> Participation in a Multispecialty Surgical Registry	
<b>SM-PART-GEN-SURG</b> Participation in a Systematic Clinical Database Registry for General Surgery	
<b>OP-25</b> Safe Surgery Checklist Use	
<b>OP-12</b> The Ability for Providers with HIT to Receive Laboratory Data Electronically Directly into their ONC-Certified EHR System as Discrete Searchable Data	
<b>OP-17</b> Tracking Clinical Results between Visits	
<b>OP-26</b> Hospital Outpatient Volume Data on Selected Outpatient Surgical Procedures	Non-Directional Measures (N=3)
<b>MSPB-1/SPP-1</b> Medicare Spending per Beneficiary (MSPB)	
<b>OP-9</b> Mammography Follow-up Rates	
<b>PAYM-30-AMI</b> Acute Myocardial Infarction (AMI) Payment per Episode of Care	

## Appendix C: Technical Details of Two-Stage Approach

### Equation C.1. Latent Variable Model within Each Group, $d$

$$Y_{khd} = \mu_{kd} + \gamma_{kd}\alpha_{hd} + \varepsilon_{khd}, k=1, \dots, N_d$$

$$\alpha_{hd} \sim N(0,1) \text{ and } \varepsilon_{khd} \sim N(0, \sigma_d^2)$$

Let  $Y_{khd}$  denote the standardized score for hospital  $h$  and measure  $k$  in measure group  $d$ .  $\alpha_{hd}$  is the hospital-specific group-level latent trait (random effect) for hospital  $h$  and measure group  $d$ .  $\gamma_{kd}$  is the loading (coefficient) for measure  $k$ , which shows the relationship with the group score of measure group  $d$ .  $N_d$  is the total number of measures in measure group  $d$ .  $\alpha_{hd}$  follows a Normal distribution with mean 0 and variance 1. The assumption of unit variance here is an innocuous choice of units required to identify the parameter  $\mu_{kd}$  and  $\gamma_{kd}$ .

### Equation C.2. Weighted Likelihood for accounting for sampling variation within Each Group, $d$

$$L = \prod_{k=1}^K \prod_{h=1}^H (L(y_{khd}))^{w_{khd}}$$

$$w_{khd} = \frac{n_{khd}}{\sum_{h=1}^{N_{kd}} n_{khd}} \times N_{kd}$$

A weighted likelihood is used to account for sampling variation of each hospital for each measure.  $L$  is the likelihood function.  $N_{kd}$  is the total number of hospitals for measure  $k$  in measure group  $d$  and  $n_{khd}$  is the denominator for hospital  $h$  and measure  $k$  in measure group  $d$ . A hospital with larger denominator will be weighted more in the LVM.

### Equation C.3. Calculation of Hospital Summary Score from Group Scores

$$Summary\ Score_h = \frac{\sum_{d=1}^7 W_d \alpha_{hd}}{\sum_{d=1}^7 W_d}$$

The proposed weights,  $w_d$ , are listed in [Table 2](#).



Figure C.1. Detailed Path Diagram of Two-Stage Approach

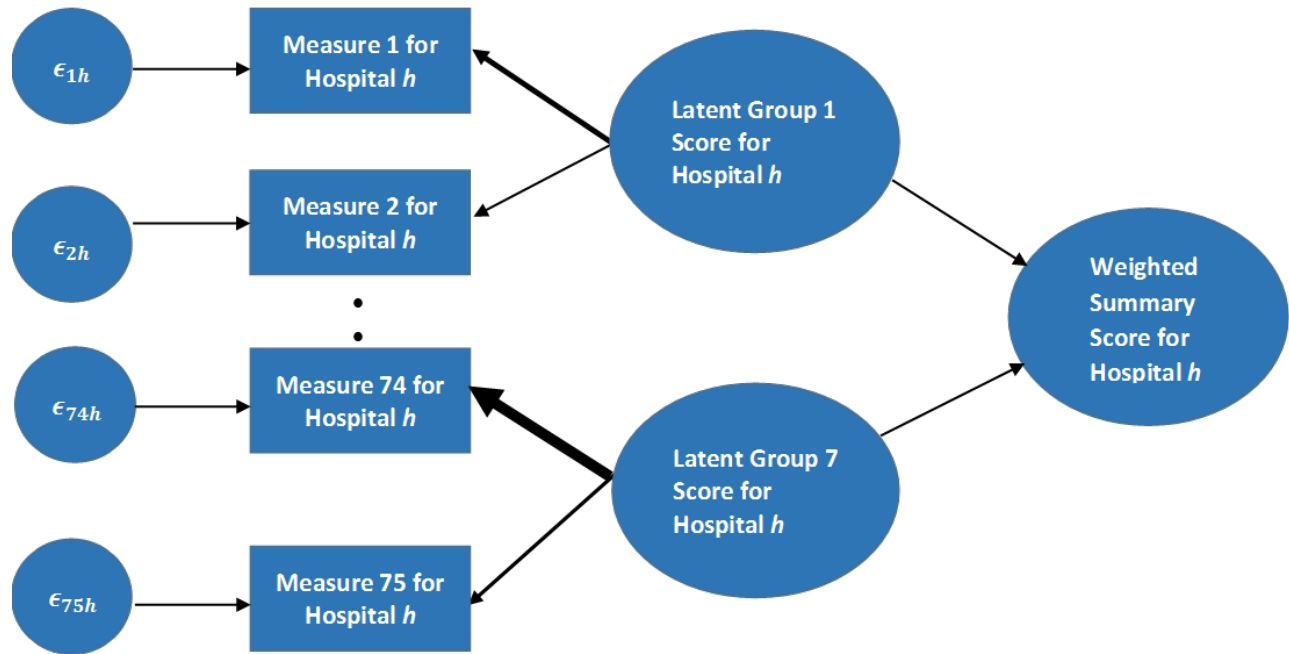


FIGURE DESCRIPTION: The ovals represent the group scores and the hospital summary score. The group score is the latent trait in [Equation C.1](#). This number is not directly observed, but is inferred from the individual measures  $Y_1, \dots, Y_{75}$ . The arrows between the group scores and each individual measure represent the relationship of that measure to the aspect of quality reflected by each measure with respect to the other measures in that group; each arrow has a different degree of association, also known as a “loading” or coefficient. The small circles on the left represent the residual error within each hospital for each of the 75 measures. The residual error ( $\epsilon$ ) is the variation which could not be explained by the group score (random effect). This example latent variable model can be estimated using standard software, SAS Proc NLMIXED. The ‘loadings’ are estimated by maximum likelihood method and the group scores for each hospital are estimated by empirical Bayes estimates. A weighting scheme then is applied to the measure groups, and the group scores are averaged using weights to create the hospital summary score. Ultimately, the hospital summary score is used to organize hospitals into overall star rating categories.

## Appendix D: Measure Loadings

Figure D.1 Loadings by Measure in Outcomes – Mortality Group (April 2015 data)

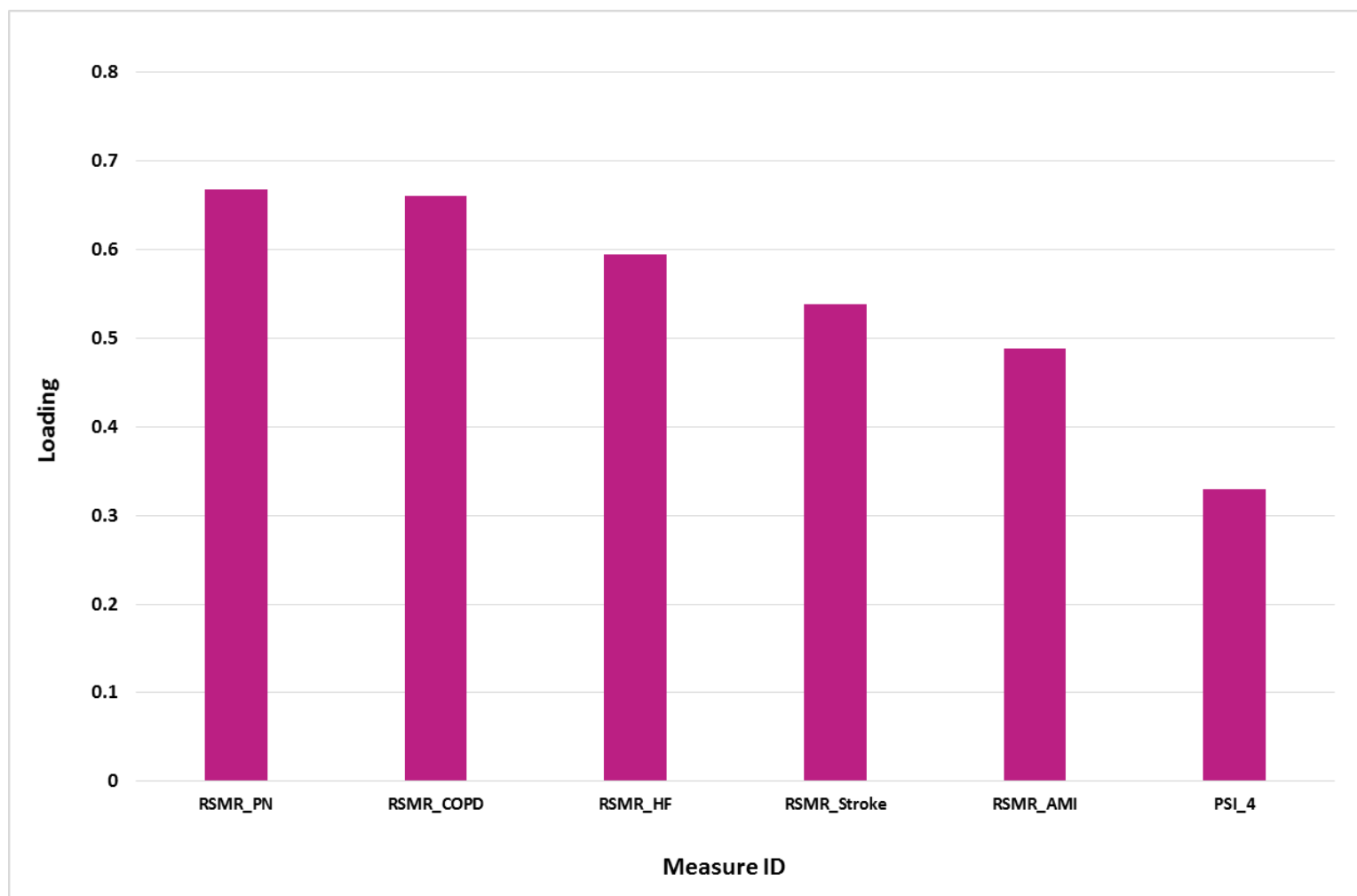


Figure D.2. Loadings by Measure in Outcomes – Safety Group (April 2015 data)

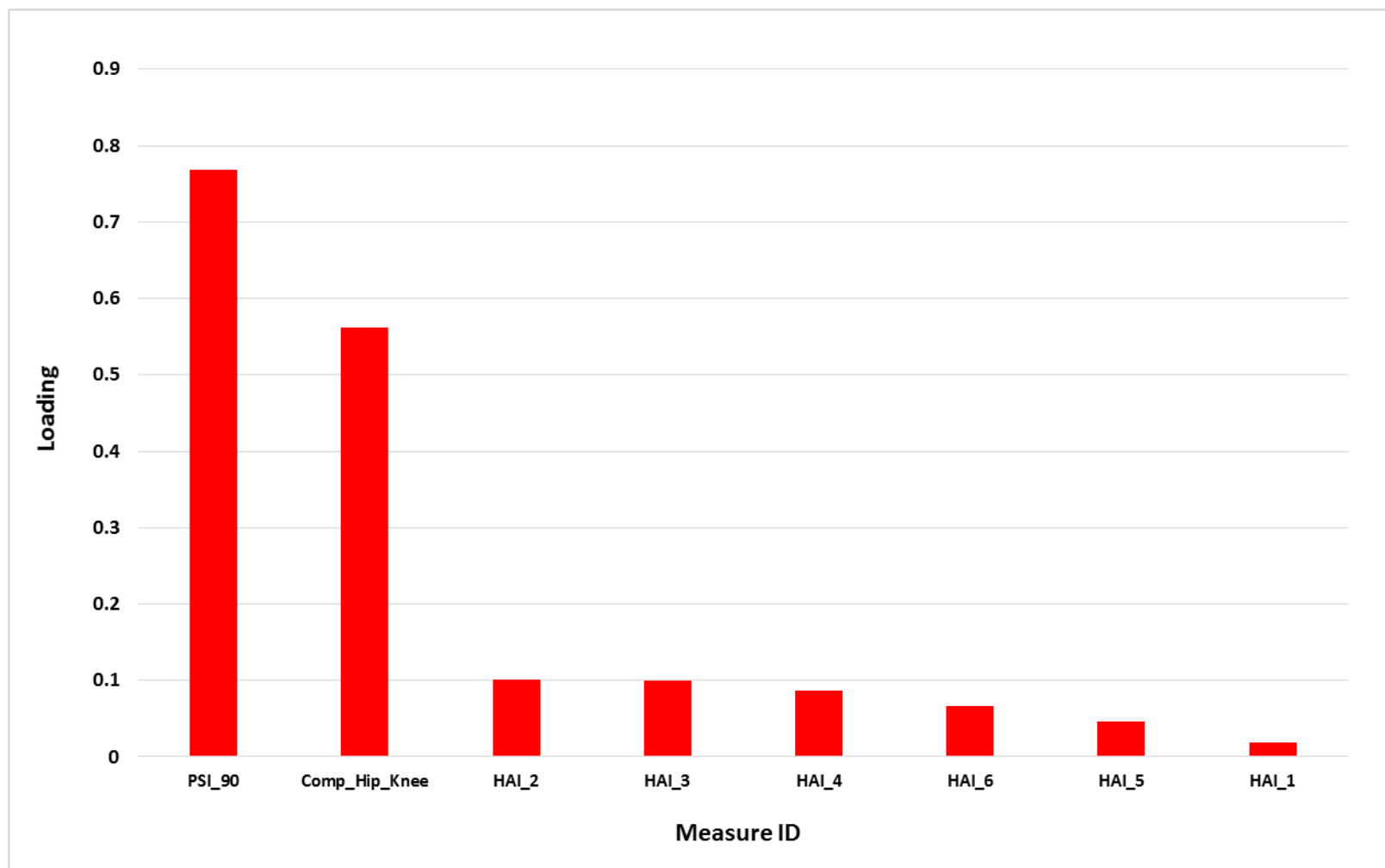


Figure D.3. Loadings by Measure in Outcomes – Readmission Group (April 2015 data)

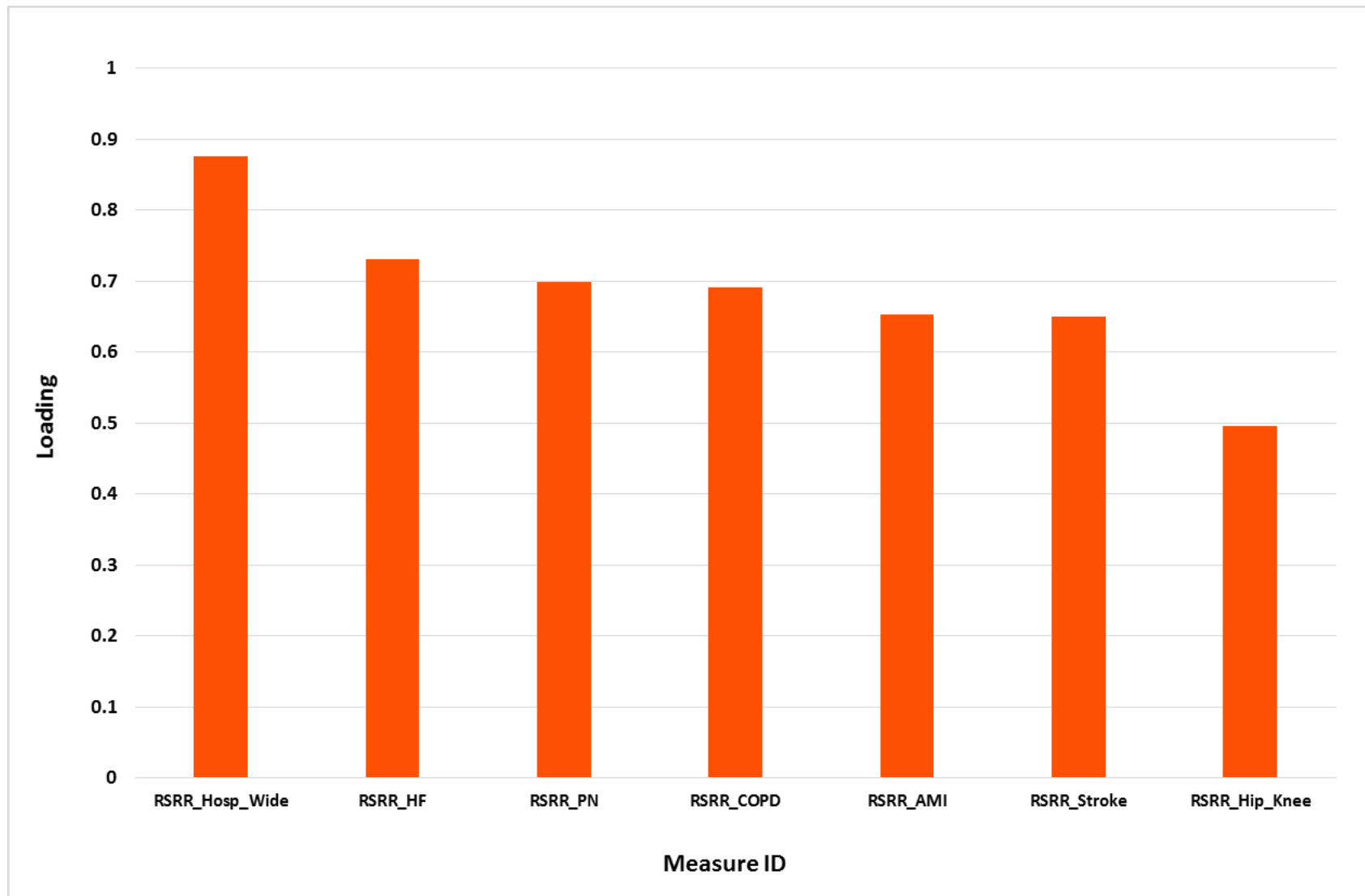


Figure D.4. Loadings by Measure in Patient Experience Group (April 2015 data)

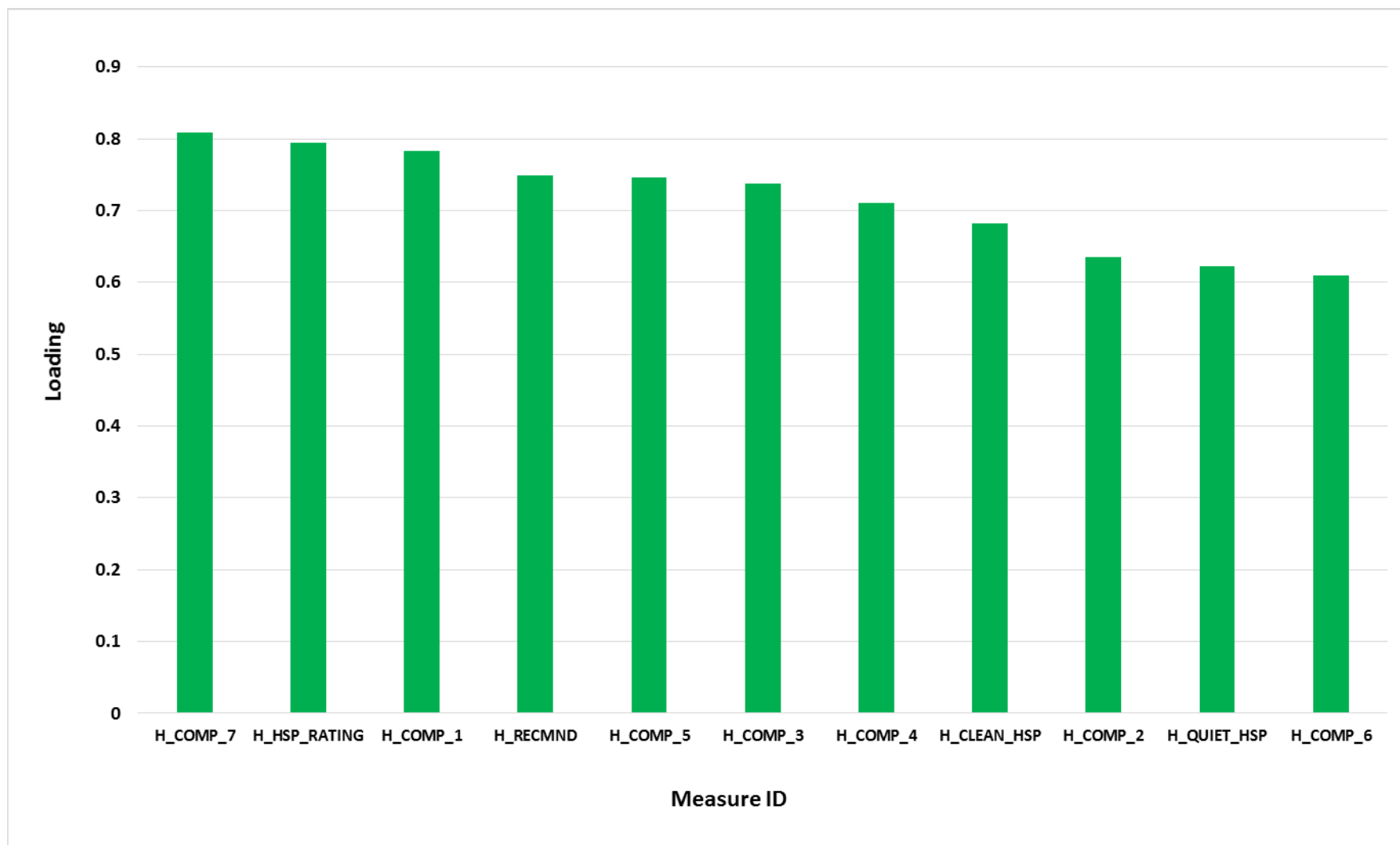


Figure D.5. Loadings by Measure in Process – Effectiveness Group (April 2015 data)

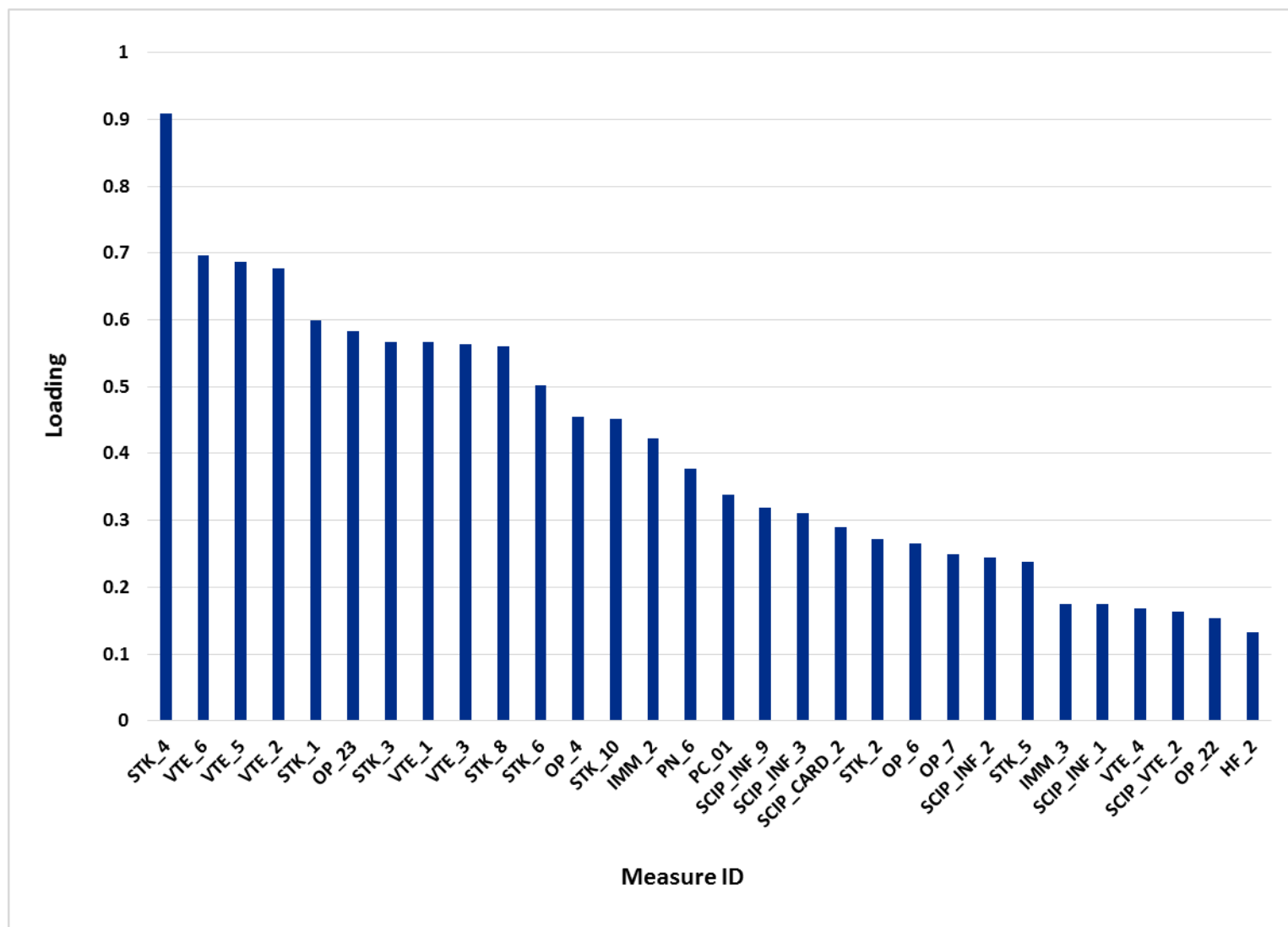


Figure D.6. Loadings by Measure in Process – Timeliness Group (April 2015 data)

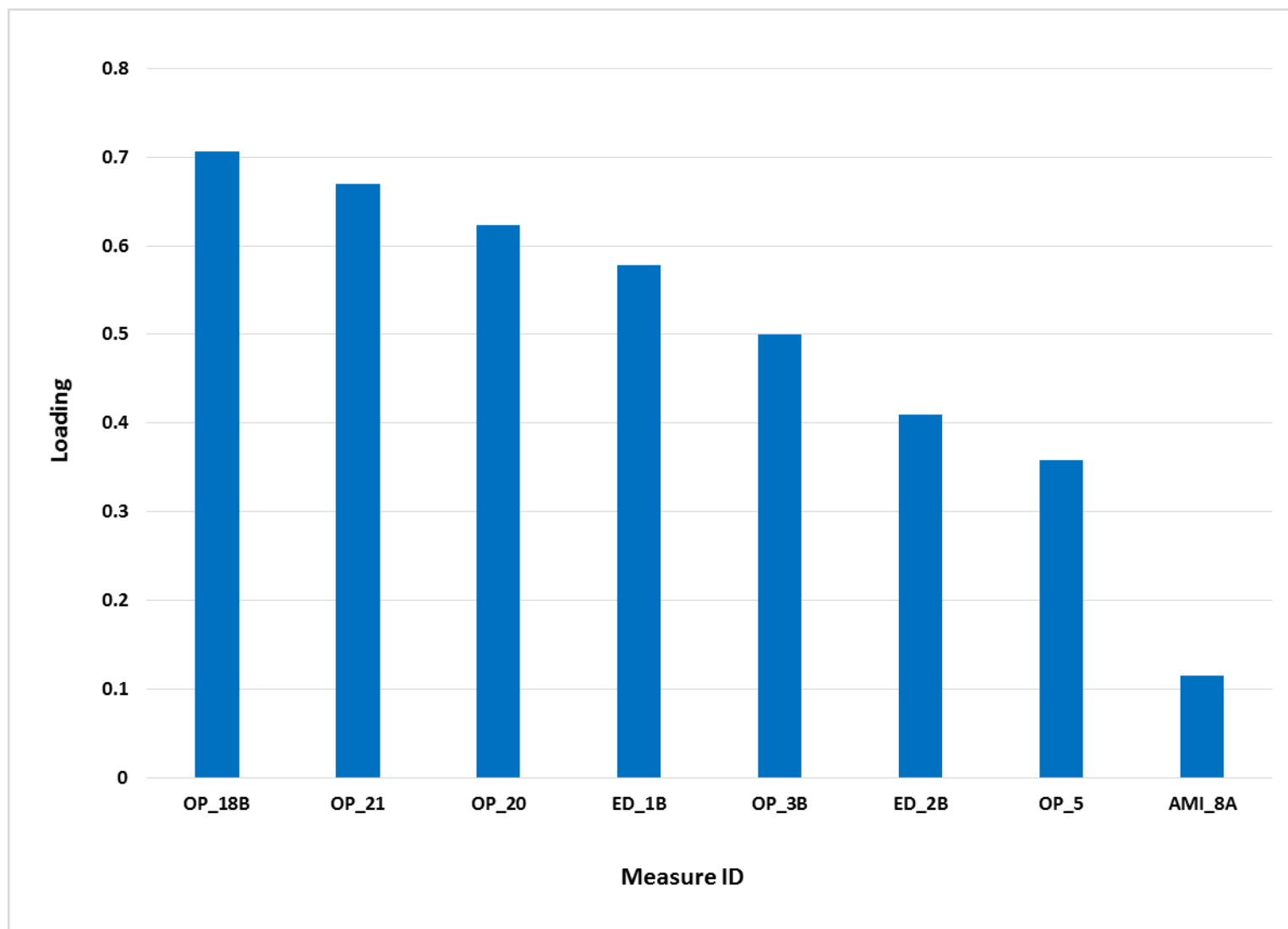


Figure D.7. Loadings by Measure in Efficiency – Imaging Group (April 2015 data)

