



Update to the Quality of Patient Care Star (QoPC) Ratings

Background

In January 2017, CMS proposed two changes to the QoPC methodology during a Medicare Learning Network (MLN) Call. The changes presented during that call were the removal of the Influenza Immunization measure from the star rating calculation and the addition of the claims-based Emergency Department Use (without hospitalization) measure. Stakeholder comments and feedback following that call strongly supported the removal of the Influenza Immunization measure, but did not support the addition of the Emergency Department Use (without hospitalization) measure. After analyses of the data and discussion with internal experts, during a MLN call on October 10, 2017, CMS proposed only to remove the Influenza Immunization measure from the QoPC star rating calculation.

During the one month public comment period following the October 10, 2017 MLN Call, 24 comments were submitted. All comments were in support of the proposal to remove the Influenza Immunization measure from the QoPC star rating calculation. These comments are shown in the Appendix and generally provide the following rationales for removing the measure:

- Differences across states regulations regarding transporting and administering vaccinations
- No exclusion made for patients who were offered the vaccination and refused
- No exclusion made for patients who cannot receive the vaccination due to contraindications

Several commenters emphasized the importance of this measure and supported the continued reporting of this measure on Home Health Compare.

Final Decision

The Influenza Immunization measure will be removed from the QoPC Star Rating, but will continue to be reported on Home Health Compare. This measure will be monitored in the coming quarters to ensure rates do not decrease. There are now eight measures that comprise the QoPC Star Rating:

Process Measures	Outcome Measures
<ol style="list-style-type: none"> 1. Timely Initiation of Care 2. Drug Education on all Medications Provided to Patient/Caregiver 	<ol style="list-style-type: none"> 3. Improvement in Ambulation 4. Improvement in Bed Transferring 5. Improvement in Bathing 6. Improvement in Pain Interfering With Activity 7. Improvement in Dyspnea 8. Acute Care Hospitalization



Timeline

- Stakeholder webinar planned for December 2017
- First Preview Report using updated methodology provided in mid-January 2018
- Home Health Compare refresh displays updated QoPC Star Rating in April 2018
 - All measures (OASIS- and claims-based) will report on data from July 1, 2016 to June 30, 2017



Appendix. Public Comment Summary

Number	Remove Flu Vaccine Measure	Comment
1	Support	We support the removal of the Influenza measure.
2	Support	After recently attending a MLN presentation explaining the proposed change as well as the rationale behind the change I agree with this change. I don't think it will affect the promotion of the flu vaccine as many agencies are providing for that outside of this measure.
3	Support	I agree that this item should be removed from star ratings. Our agency in the state of Indiana is not licensed to allow meds in our place. It would be difficult to source and administer vaccinations. A person can go to any drug store and receive vaccine, but Home Care needs a physician order and a supply to provide. Frustrating situation - will be pleased to see it go away.
4	Support	I am in full support of the removal of Influenza Immunization Received for Current Flu Season from the QoPC Star Rating. Our agency diligently assesses patients prior receipt of the flu shot, educates the patient and family to its importance for the patient and our community, communicate with physicians to promote ordering and acceptance of the vaccination, we have collaborated with Walgreens pharmacists who are willing to go to patient's home's and vaccinate our homebound population, and yet we still have a significant number that refuse to receive it prior to their being discharged back to the community. Our agency has researched the possibility of purchasing and providing the vaccine ourselves, but the pharmaceutical and transportation standards make it prohibitive. We will continue to promote this important personal and community health initiative, but the patient's receiving it during our episode is not within our control. In response to the fear of disincentivization for encouraging vaccination, the measure will still be published on Home Health Compare and incorporated in VBP, but most importantly it is an important public health issue.
5	Support	I definitely support removing Influenza Immunization Received for Current Flu Season from the QOPC star rating. I agree that agencies still need to focus on encouraging patients to receive vaccination however have never agreed that star ratings should be effected negatively if a patient refuses the immunization. Your methodology of calculating the results from the effects of removal of this measure portray a consistent and fair result for all agencies with very little movement in ratings.
6	Support	We ask that the influenza vaccine be removed from star ratings due to our lack of control/ inability to force patients, that offered and refused as well as contraindications counted against the agency, the addition of pharmaceutical standards/costs if we store and transport vaccines, and varying state regulations on vaccine administration. PLEASE REMOVE!
7	Support	Some provider concerns included our lack of control/ inability to force patients, that offered and refused as well as contraindications counted against the agency, the addition of pharmaceutical standards/costs if we store and transport vaccines, varying state regulations on vaccine administration etc.
8	Support	Some provider concerns included our lack of control/ inability to force patients, that offered and refused as well as contraindications counted against the agency, the addition of pharmaceutical standards/costs if we store and transport vaccines, varying state regulations on vaccine administration etc.. CMS' concern was if agencies would stop promoting it, BUT it <u>will remain important</u> as it WILL be reported in Home Health Compare AND Value Based Purchasing. Most agencies (ours) will increase a bit with removal of measure. Their recommendation is to remove the "Influenza received" measure. I am for it to be removed from the star rating but we will continue to stress to patients the importance to receive the shot!



Number	Remove Flu Vaccine Measure	Comment
9	Support	Some provider concerns included our lack of control/ inability to force patients, that offered and refused as well as contraindications counted against the agency, the addition of pharmaceutical standards/costs if we store and transport vaccines, varying state regulations on vaccine administration etc..
10	Support	Some provider concerns included our lack of control/ inability to force patients, that offered and refused as well as contraindications counted against the agency, the addition of pharmaceutical standards/costs if we store and transport vaccines, varying state regulations on vaccine administration. We recommend the flu shot be removed from star ratings.
11	Support	Some provider concerns included our lack of control/ inability to force patients, that offered and refused as well as contraindications counted against the agency, the addition of pharmaceutical standards/costs if we store and transport vaccines, varying state regulations on vaccine administration etc.
12	Support	It is a challenge to provide the influenza vaccinations to our population as medical records are often incomplete as providers are spread across a 200+ mile radius, patients refuse and or cannot remember if they have had vaccinations. The complicated OASIS answers are easily confused by nursing staff while documenting the nurse/patient exchange when speaking about vaccinations. This item has affected our star ratings for quite some time. The removal of this would help our agency's star rating.
13	Support	Some provider concerns included our lack of control/ inability to force patients, that offered and refused as well as contraindications counted against the agency, the addition of pharmaceutical standards/costs if we store and transport vaccines, varying state regulations on vaccine administration etc..
14	Support	Some provider concerns included our lack of control/ inability to force patients, that offered and refused as well as contraindications counted against the agency, the addition of pharmaceutical standards/costs if we store and transport vaccines, varying state regulations on vaccine administration etc.
15	Support	Some provider concerns included our lack of control/ inability to force patients, that offered and refused as well as contraindications counted against the agency, the addition of pharmaceutical standards/costs if we store and transport vaccines, varying state regulations on vaccine administration etc.
16	Support	This e-mail serves as part of the call for public comment to the Jan 2017 proposed changes to Star Rating, specifically removing Influenza Immunization and adding Emergency Dept use without hospitalization. I am in agreement with this proposed change because of the Home Health Agency's lack of control and inability to force patients to receive it. Additionally, "offered and refused" as well as contraindications count against the agency as well as the challenge to store and transport vaccines.
17	Support	Some provider concerns included our lack of control/ inability to force patients, that offered and refused as well as contraindications counted against the agency, the addition of pharmaceutical standards/costs if we store and transport vaccines, varying state regulations on vaccine administration etc.
18	Support	Some provider concerns included our lack of control/ inability to force patients, that offered and refused as well as contraindications counted against the agency, the addition of pharmaceutical standards/costs if we store and transport vaccines, varying state regulations on vaccine administration etc..
19	Support	I am writing to express my concern over the removal of this OASIS question. I feel that it should be removed, as our agency has had lack of control, with inability to force patients to receive it. Many patients are offered the vaccine but refuse, as well as contraindications, which are counted against the agency. There is also the addition of pharmaceutical standards and costs if we store and transport vaccines, with varying state regulations on vaccine administration. It will still remain important, as it will be reported in Home Health Compare and Value Based Purchasing, so it will continue to be addressed with our patients.



Number	Remove Flu Vaccine Measure	Comment
20	Support	As a hospital affiliated home care agency with access to hospital stay information, which includes Flu vaccination information, our scores are still poor because the reality is that despite the inpatient and outpatient education given to the patients by the various healthcare professionals, this is a personal choice. Providers should not be penalized by the patients acceptance of the vaccine but rather if education and offering of the vaccine was done. The provider concerns include lack of control/ inability to force patients, that offered and refused as well as contraindications counted against the agency, the addition of pharmaceutical standards/costs if we store and transport vaccines, varying state regulations on vaccine administration etc. We are in favor of removing this metric from our Star Rating as it does not depict the appropriate quality measure.
21	Support	Some provider concerns included our lack of control/ inability to force patients, that offered and refused as well as contraindications counted against the agency, the addition of pharmaceutical standards/costs if we store and transport vaccines, varying state regulations on vaccine administration etc..
22	Support	Please Remove. Some provider concerns included our lack of control/ inability to force patients, that offered and refused as well as contraindications counted against the agency, the addition of pharmaceutical standards/costs if we store and transport vaccines, varying state regulations on vaccine administration etc..
23	Support	We support changes to flu vaccine. Some provider concerns included our lack of control/ inability to force patients, that offered and refused as well as contraindications counted against the agency, the addition of pharmaceutical standards/costs if we store and transport vaccines, varying state regulations on vaccine administration etc.
24	Support	We support removing the Influenza Immunization Received for Current Flu Season measure from the Quality of Patient Care Star Rating and supports CMS' decision to not recommend the addition of the Emergency Department Use without Hospitalization measure.