

May 30, 2018

Submitted via E-Mail: [cmsstarratings@lantanagroup.com](mailto:cmsstarratings@lantanagroup.com)

**Re: Feedback on Methodology for the Overall Hospital Quality Star Rating**

Dear Hospital Compare Overall Rating Team:

Vizient, Inc. appreciates the opportunity to provide feedback on the Centers for Medicare and Medicaid Services' (CMS) methodology for the Overall Hospital Quality Star Rating.

### **Background**

Vizient, Inc. is the largest member-driven health care performance improvement company in the country. At Vizient, our purpose is to ensure our members deliver exceptional, cost-effective care. Vizient is member-driven and member-minded, working tirelessly to amplify every organization's impact by optimizing every interaction along the continuum of care.

Vizient provides innovative data-driven solutions, expertise and collaborative opportunities that lead to improved patient outcomes and lower costs. Vizient serves a diverse membership and customer base including academic medical centers, pediatric facilities, community hospitals, integrated health delivery networks and non-acute health care providers. Vizient is headquartered in Irving, TX with locations in Chicago, Washington, D.C., and other cities across the country.

### **Recommendations**

In response to member-expressed concerns regarding their CMS Hospital Star Rating July 2018 Preview Report, Vizient has identified issues with the Safety Group measure loading coefficients which we would like bring to your attention.

Within the Safety Group, 3 of the 8 measure loading coefficients show negative values as reported in the Hospital Specific Report, Table 4 Appendix A: Measure Load tab, shown below. As a result, hospitals with lower (better) performance in CAUTI, SSI-Colon Surgery and SSI-Abdominal Hysterectomy infections have a worse Safety Group score. Conversely, hospitals with higher rates (poor performing), are rewarded.

Table 4: Appendix A. National Measure Loadings for the Overall Hospital Quality Star Rating - July 2018 Release  
*The loading coefficients in this tab are the same for all hospitals across the nation in this release of the Star Rating.*  
Results corresponding with data for July 2018 public reporting on Hospital Compare.

Measure Group [a]	Measure ID [b]	Measure Name [c]	Loading Coefficient [d]
Safety of Care	HAI-1	Central-Line Associated Bloodstream Infection (CLABSI)	0.02
Safety of Care	HAI-2	Catheter-Associated Urinary Tract Infection (CAUTI)	-0.004
Safety of Care	HAI-3	Surgical Site Infection from colon surgery (SSI-colon)	-0.04
Safety of Care	HAI-4	Surgical Site Infection from abdominal hysterectomy (SSI-abdominal hysterectomy)	-0.01
Safety of Care	HAI-5	MRSA Bacteremia	0.03
Safety of Care	HAI-6	Clostridium Difficile (C.difficile)	0.03
Safety of Care	COMP-HIP-KNEE	Hospital-Level Risk-Standardized Complication Rate (RSCR) Following Elective Primary Total Hip Arthroplasty (THA) and Total Knee Arthroplasty (TKA)	0.96
Safety of Care	PSI-90-Safety	Patient Safety for Selected Indicators (PSI)	0.17

While this is not the first instance of negative loading coefficients included in the Star Rating calculation (July, October, December 2016 release), this July 2018 Preview Report does represent the first instance of three negative coefficients reported within the same domain. Additionally, the -0.04 for SSI-Colon is the largest negative loading coefficient reported in the history of the CMS Hospital Star Ratings. This is particularly concerning as the Safety Group is one of the highest weighted groups within the Star Rating calculation. Coupled with significant swings in PSI-90 and Total Hip & Knee Complication loading coefficients from the December 2017 report, (PSI-90: July 2018 = 0.17 vs. December 2017 = 0.94, THK complication: July 2018 = 0.96 vs. December 2017 = 0.21), the July 2018 Safety Domain scores are potentially confounded.

Vizient [previously submitted public comments](#) providing feedback on the Star Ratings methodology, and encourages CMS to reevaluate their methodological approaches.

### **Conclusion**

Vizient appreciates the opportunity to provide feedback on the Overall Hospital Quality Star Rating, and to inform the agency on how the methodology is impacting our members.

Vizient membership includes a wide variety of hospitals ranging from independent, community-based hospitals to large, integrated health care systems that serve acute and non-acute care needs. Additionally, many are specialized, including academic medical centers and pediatric facilities. Individually, our members are integral partners in their local communities, and many are ranked among the nation's top health care providers.

In closing, on behalf of Vizient, Inc., I would like to thank CMS for providing us this opportunity to comment on the proposed rule. Please feel free to contact me at (202) 354-2600 or Chelsea Arnone, Director of Regulatory Affairs and Government Relations ([chelsea.arnone@vizientinc.com](mailto:chelsea.arnone@vizientinc.com)), if you have any questions or if Vizient can provide any assistance as you consider these issues.

Respectfully submitted,



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