

**Analysis of the Outcome of Leapfrog Comment Letter to
The Centers for Medicare and Medicaid Services (CMS)
Regarding the CMS Proposed Rule on Hospital Inpatient Prospective
Payment System (IPPS)**

Based on FY 2022 Final Rule Issued by CMS August 2, 2021

Leapfrog Group Recommendation	Page # in Leapfrog Letter	Are We Satisfied With the Outcome?	CMS Final Ruling
Add five measures to IQR as CMS proposed.	4	Yes	CMS added the five proposed measures to IQR. [p. 1563]
Add four specific maternity measures to IQR, which were not proposed by CMS.	4	No	CMS did not respond to our recommended maternity measures.
Removal of four of five proposed measures from IQR. The fifth measure (i.e. PSI-4) discussed immediately below.	4	Yes	CMS removed three of five measures from IQR. PSI-4 discussed immediately below. [p. 1654]
Retain PSI-4 in the IQR Program.	4-5	Yes	CMS retained PSI-4 in IQR. [p. 1654] CMS responses to Leapfrog recommendation. [p. 1657] [p. 1658]
Include a patient reported outcome measure for hip and knee replacement in IQR.	5-6	NA	As this was a solicitation for comments, CMS summarized comments & did not commit to a given course of action. [p 1694] CMS response to Leapfrog recommendation. [p. 1711]
Short term, private reports to hospitals that stratify hospital results by dual eligibility and race/ethnicity. Long term, publicly report such results.	6, 10	NA	As this was a solicitation for comments, CMS reiterated the request & did not commit to a given course of action. There was not a summary of comments. [IQR / HRRP: p. 1713]

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Use of a structural measure to assess hospital leadership engagement in health equity performance data.	6	NA	As this was a solicitation for comments, CMS summarized comments & did not commit to a given course of action. [p. 1715] CMS response to Leapfrog recommendation. [p 1718]
Regarding Measure Suppression Factors during current public health emergency (PHE): <ul style="list-style-type: none"> ● Provide clear / transparent definitions ● Prioritize impact to Medicare beneficiaries 	7, 9-10	No	CMS finalized Measure Suppression Factors as proposed. [HACRP: p. 1357] [HRRP: p. 1222] CMS response to Leapfrog recommendation. [HACRP: p 1366] [HRRP: p. 1231]
Regarding measure suppression policy for future PHEs: <ul style="list-style-type: none"> ● Provide clear criteria to suppress measures ● Allow for suppression when data are not possible to collect ● Avoid criteria that reflects quality of the provider entity 	7-8	No	CMS finalized Measure Suppression Factors as proposed. [HACRP: p. 1357] [HVPB: p. 1274] CMS response to Leapfrog recommendation. [HACRP: p 1366]
Regarding PSI-90 & the CDC HAIs: <ul style="list-style-type: none"> ● Keep measures in the HACRP ● Publicly report the measures ● Retain 3rd & 4th quarter 2020 data in the measures for the HACRP & public reporting, & risk adjust for COVID 	8	Somewhat	PSI-90 & the CDC HAIs will be used in the HACRP & will also be publicly reported. However, 3 rd & 4 th quarter 2020 data will be omitted from the HACRP, but will be used in publicly reported results. [p. 1368] CMS response to Leapfrog recommendation. [p. 1377]

Leapfrog Group Recommendation	Page # in Leapfrog Letter	Are We Satisfied With the Outcome?	CMS Final Ruling
Retain CMS PSI-90 in the HVBP Program.	8-9	No	<p>CMS PSI-90 will be removed from the HVBP Program beginning FY23 [p. 1308]</p> <p>CMS responses to Leapfrog recommendation. [p. 1312] [p. 1315]</p>
Only exclude COVID cases that were present on admission (POA) for the five 30 day mortality & readmission measures.	9-10	Yes	<p>CMS clarified / changed the specifications in that the COVID exclusion will be limited to cases with a principal or secondary COVID diagnosis POA. [HVBP: p. 1316] [HRRP: p. 1240]</p> <p>CMS response to Leapfrog recommendation. [HVBP: p. 1321]</p>

Links to Materials:

- Leapfrog Letter: https://www.leapfroggroup.org/sites/default/files/Files/CMS%20IPPS%20FY%2022%20_%20Full%20Letter%20with%20signatures_1.pdf
- CMS Final Ruling: <https://www.cms.gov/medicare/acute-inpatient-pps/fy-2022-ipps-final-rule-home-page>