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Centers for Medicare & Medicaid Services
Office of Research, Development and Information
Mail Stop C3-19-26, 7500 Security Boulevard
Baltimore, MD 21244-1850

Project Title: Quality measures to satisfy Improving Medicare Post-Acute Care Transformation Action of 2014 (IMPACT Act) domain of: Transfer of Health Information and Care Preferences When an Individual Transitions – Medication Profile transferred to Provider/ Medication Profile Transferred to Patient.

CMS Contract No. HHSM-500-2013-13015I (RTI International)

CMS Contract No. HHSM-500-2013-13001I (Abt Associates)

The Association for Professionals in Infection Control and Epidemiology (APIC) appreciates the opportunity to provide input into the proposed quality measures to fulfill the IMPACT Act domain of Transfer of Health Information and Care Preferences When an Individual Transitions:

- 1) Medication Profile Transferred to Provider; and
- 2) Medication Profile Transferred to Patient.

We are pleased that CMS continues to demonstrate its commitment to improving the quality of patient care across the healthcare continuum. As more complex care is provided in post-acute care settings, facilitation of communication across the spectrum of healthcare is essential to ensure residents/patients are properly prepared for transitions of care and their providers have the information necessary to provide safe care. We applaud the agency for emphasizing person-centered care by establishing standardized processes that include care settings such as skilled nursing facilities, inpatient rehabilitation facilities, long term acute care hospitals, and home health agencies. Providing standardized information during care transitions is essential, since this is often the time when critical and valuable information is lost, which can create complications and adverse events for residents/patients.

APIC is a nonprofit, multidisciplinary organization representing over 15,000 Infection Preventionists whose mission is to create a safer world through prevention of infection. Due to our interest in antimicrobial stewardship and reduction of multidrug-resistant organisms, our comments are focused solely on antimicrobials.

Types of medications to be included in the medication profile

APIC supports the inclusion of information regarding all antimicrobials (i.e.: antibacterial, antifungal, and antiviral agents)



Data elements to include in a medication profile

APIC believes it is important to include the following elements in the transfer of medication profiles for all antimicrobials:

- indication
- dose
- duration
- start and stop dates
- route of administration, and prescriber.

We believe it is equally important to highlight the next dose due at all transitions of care.

Whether discontinued medications should be included in the medication profile

Although we recognize the burden of documentation at care transitions, APIC supports the inclusion of discontinued antibiotics that were administered during the current episode of care in the transfer medication profile. Prior antibiotic exposure is a risk factor for the development of drug-resistant organisms and *Clostridium difficile*, which can be serious life-threatening infections to which older adults are at increased risk. Having ready access to the antibiotic history may aid with early diagnosis of *Clostridium difficile* infection, or infections which are not treatable with first-line antibiotics. This information can be key in guiding treatment choices and timely infection prevention and control response, including initiation of contact isolation precautions, thus reducing the risk to others in the care setting.

Whether it is feasible and important to include an assessment of a patient's ability to understand/accept his or her condition and the importance of taking medications as prescribed

Our members believe that when a resident/patient is transitioning to home they must clearly understand the dose, duration, route, and timing of all antimicrobials. Equally important is the completion of all antimicrobials. Missed doses or incomplete courses of antimicrobials can lead to inadequately treated infections and/or the development of resistant organisms.

Thank you for the opportunity to provide input on the critical medication information that should be communicated during transitions of care. Comprehensive information sharing when a resident/patient is discharged or transferred to another location is important to assure quality and continuity of care. We look forward to continuing to work with CMS as the agency continues this essential work. If you have any questions or need additional information, please contact Nancy Hailpern, APIC Director of Regulatory Affairs at 202-454-2643 or nhailpern@apic.org.

Sincerely,

A handwritten signature in black ink that reads "Janet Haas".

Janet Haas, PhD, RN, CIC, FSHEA, FAPIC
2018 APIC President