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June 8, 2015

Mr. Andrew M. Slavitt
Acting Administrator
Centers for Medicare and Medicaid Services
U.S. Department of Health and Human Services
Room 445-G
Hubert H. Humphrey Building
200 Independence Avenue, SW
Washington, DC 20201

Re: CMS-1624-P: Medicare Program; Inpatient Rehabilitation Facility Prospective Payment System for Federal Fiscal Year 2016

Dear Mr. Slavitt:

The Association for Professionals in Infection Control and Epidemiology (APIC) wishes to thank the Centers for Medicare & Medicaid Services (CMS) for the opportunity to provide comments on the proposed Inpatient Rehabilitation Facility (IRF) Prospective Payment System for Federal Fiscal Year 2016. APIC commends CMS for continuing to utilize National Quality Forum (NQF)-endorsed healthcare-associated infection (HAI) measures, reported through the Centers for Disease Control and Prevention (CDC)'s National Healthcare Safety Network (NHSN) in which standardized definitions are utilized, in its Quality Reporting Programs. We continue to urge CMS to choose indicators that utilize electronic data capture so as to reduce the burden of data collection and reporting for facilities.

Proposed Public Display of Quality Measure Data for the IRF QRP

APIC applauds CMS for choosing the NHSN CAUTI Outcome Measure (NQF #0138) as one of the initial three quality measures proposed for public display. APIC appreciates that CMS continues to focus on measures that have high impact and those in which improvement would result in significant benefit to Medicare beneficiaries. We applaud this important step in promoting transparency in improvement efforts utilizing standardized surveillance definitions and metrics. Display of the facility data in the Standardized Infection Ratio (SIR) format accounts for variances among IRF facilities, provides risk adjustment for these differences, and displays the data in a format the public can easily interpret.

Recommendation: APIC endorses the display of the NHSN CAUTI Outcome Measure (NQF #0138) in the form of the facility NHSN SIR as one of the initial three quality measures proposed for public display.



Proposed Revision to the Previously Adopted Data Collection Timelines and Submission Deadlines

APIC approves of the proposal to modify data collection and submission timelines, as it would simplify and/or clarify the data collection and reporting process for those responsible for reporting.

Recommendation: APIC endorses the proposal to modify data collection timelines and submission timelines from fiscal year to calendar year for all metrics unless there is a clinical reason for an alternative timeframe.

APIC appreciates the opportunity to comment on the proposed measures and continues to applaud CMS's commitment to improving quality and promoting patient safety. Our organization continues to support transparency in healthcare improvement efforts, and reporting of HAIs as a means to that end. We stand ready to assist CMS in all efforts to reduce preventable HAIs based upon standardized validated measures and evidence-based guidelines.

Sincerely,

A handwritten signature in blue ink that reads "Mary Lou Manning". The signature is written in a cursive, flowing style.

Mary Lou Manning, PhD, CRNP, CIC, FAAN, FNAP
2015 APIC President