

To Whom It May Concern:

I write on behalf of Blue Spark Technologies to express strong organizational support for the Centers for Medicare & Medicaid Services' (CMS) proposed sepsis quality measures currently released for public comment. These measures represent a pivotal opportunity to standardize structural requirements and outcome accountability for sepsis care across the United States and align with evidence-based practices shown to improve patient outcomes.

Sepsis remains one of the leading causes of morbidity and mortality in U.S. hospitals. Despite its prevalence and the well-documented clinical benefits of early recognition and intervention, sepsis has historically lacked CMS-mandated structural and outcome measures comparable to those used for conditions such as heart failure, stroke, and diabetes. The proposed measures appropriately address this gap and reflect necessary progress toward more objective, measurable, and accountable sepsis care.

Support for the Structural Measure: Hospital Sepsis Program Core Elements Score

Blue Spark Technologies strongly supports the proposed structural measure, the Hospital Sepsis Program Core Elements Score, which would require hospitals nationwide to implement and sustain sepsis programs based on the CDC's Hospital Sepsis Program Core Elements framework. This framework promotes early recognition, evidence-based treatment, recovery support, and systematic outcome monitoring—elements substantiated to reduce mortality, decrease length of stay, and lower healthcare costs.

Implementation of a structural measure tied to these core elements will promote uniform adoption of sepsis program best practices and provide hospitals with a clear, standardized roadmap to enhance programmatic maturity and care delivery. It will also support integration of clinical decision support and quality improvement processes into routine hospital operations.

Support for Outcome Measures: CO Sepsis SMR and 30-Day RSRR

We also strongly support the proposed outcome measures, including:

- Adult Community-Onset (CO) Sepsis Standardized Mortality Ratio (SMR)
- Hospital 30-Day, All-Cause, Risk-Standardized Readmission Rate (RSRR) Following Sepsis Hospitalization

Outcome measures are essential to objectively assess whether care is effective, reveal performance gaps, inform improvement strategies, and ensure accountability. These measures will provide robust, risk-adjusted data to track hospital performance over time and align sepsis care with established CMS outcome reporting frameworks.

Role of Technology in Sepsis Programs

Blue Spark Technologies develops and deploys technology-enabled clinical solutions that improve early detection and management of sepsis and other time-sensitive conditions. For example, continuous temperature monitoring integrated with clinical workflows enable earlier identification of fever and physiologic

deterioration compared with intermittent spot checks. Early fever detection has been associated with earlier intervention and improved outcomes in high-risk populations at risk for sepsis:

[https://www.cell.com/cancer-cell/pdfExtended/S1535-6108\(21\)00398-6](https://www.cell.com/cancer-cell/pdfExtended/S1535-6108(21)00398-6)).

Our experience in hospital environments demonstrates continuous monitoring:

- Enhances early recognition of sepsis triggers, including subtle temperature changes that may precede clinical deterioration.
- Improves clinician situational awareness through automated alerts and integration with electronic health records.
- Supports adherence to evidence-based protocols by providing timely data to guide sepsis screening, escalation, and documentation.

These technology-enabled capabilities directly support the goals of the proposed structural measure by operationalizing core elements of early recognition and timely intervention and providing data streams essential to the proposed outcome measures. Widespread adoption of structural sepsis programs that incorporate continuous monitoring technologies will strengthen hospitals' ability to achieve measurable improvements in sepsis outcomes.

Conclusion

In conclusion, Blue Spark Technologies strongly urges CMS to finalize and implement the proposed sepsis quality measures. Adoption of the Hospital Sepsis Program Core Elements Score and the proposed outcome measures will drive standardization, accountability, and quality improvement at a national scale. Moreover, these measures create a clear incentive for integrating advanced clinical technologies that support early detection, rapid response, and measurable patient benefit.

Thank you for the opportunity to provide comments. We appreciate CMS's leadership in advancing high-quality, patient-centered sepsis care and support the timely adoption of these transformative measures.

Respectfully submitted,

Blue Spark Technologies