

## #3636, Quarterly Reporting of COVID-19 Vaccination Coverage among Healthcare Personnel

The Federation of American Hospitals (FAH) appreciates the opportunity to comment on this measure. While the FAH supports the intent of this measure, we remain concerned that the current specifications are flawed given the lack of a stable definition of “up to date” and the numerator, which refers the end user to a document with varying definitions of “up to date,” could negatively impact the reliability and validity of the measure. We do not believe that the new testing addresses this concern and a standardized way to collect this information must be incorporated into the measure specifications.

The FAH continues to believe that it is too soon to include a measure on COVID-19 vaccinations since the underlying evidence for this measure is still emerging and methods to address measure collection challenges related to anticipated “booster” shots will likely be required. This measure should also not only allow medical contraindications but also capture when individuals decline vaccination. We also recommend CMS revise the measure specifications to require data to be submitted in monthly or quarterly periods instead of one week a month for each quarter, in line with other Quality Reporting Program measures.

As a result, we do not believe that this measure should have endorsement continued until these concerns are adequately addressed. Thank you for the opportunity to comment.