



Measure Information

This document contains the information submitted by measure developers/stewards, but is organized according to NQF's measure evaluation criteria and process. The item numbers refer to those in the submission form but may be in a slightly different order here. In general, the item numbers also reference the related criteria (e.g., item 1b.1 relates to sub criterion 1b).

Brief Measure Information

NQF #: 0505

Corresponding Measures:

De.2. Measure Title: Hospital 30-day all-cause risk-standardized readmission rate (RSRR) following acute myocardial infarction (AMI) hospitalization.

Co.1.1. Measure Steward: Centers for Medicare & Medicaid Services

De.3. Brief Description of Measure: The measure estimates a hospital-level 30-day, all-cause, risk-standardized readmission rate (RSRR) for patients age 65 and older discharged from the hospital with a principal diagnosis of acute myocardial infarction (AMI). Readmission is defined as unplanned readmission for any cause within 30 days of the discharge date for the index admission. Readmissions are classified as planned and unplanned by applying the planned readmission algorithm. CMS annually reports the measure for patients who are 65 years or older and enrolled in fee-for-service (FFS) Medicare and hospitalized in non-federal hospitals or are patients hospitalized in Veterans Health Administration (VA) facilities.

1b.1. Developer Rationale: The goal of this measure is to improve patient outcomes by providing patients, physicians, and hospitals with information about hospital-level, risk-standardized readmission rates following hospitalization for AMI. Measurement of patient outcomes allows for a broad view of quality of care that encompasses more than what can be captured by individual process-of-care measures. Readmissions following AMI are influenced by complex and critical aspects of care, such as communication between providers, prevention of and response to complications, patient safety, and coordinated transitions to the outpatient environment; several studies have demonstrated that appropriate, timely, and high-quality treatment can contribute to patient outcomes but are difficult to measure by individual process measures. The goal of outcomes measurement is to risk-adjust for patients' conditions at the time of hospital admission and then evaluate patient outcomes. This measure was developed to identify institutions' whose performance is better or worse than would be expected based on their patient case mix, and therefore promote hospital quality improvement and better inform consumers about care quality.

By providing patients, physicians, hospitals, and policy makers with information about hospital-level, risk-standardized readmission rates following hospitalization for AMI, AMI readmission is a priority area for outcomes measure development. It is an outcome that is likely attributable to care processes and is an important outcome for patients. Measuring and reporting readmission rates will inform healthcare providers and facilities about opportunities to improve care, strengthen incentives for quality improvement, and ultimately improve the quality of care received by Medicare patients. The measure will also provide patients with information that could guide their choices, as well as increase transparency for consumers.

S.4. Numerator Statement: The outcome for this measure is 30-day all-cause readmissions. We define readmission as an inpatient acute care admission for any cause, with the exception of certain planned readmissions, within 30 days from the date of discharge from the index for patients 65 and older discharged from the hospital with a principal discharge diagnosis of AMI. If a patient has more than one unplanned admission (for any reason) within 30 days after discharge from the index admission, only the first one is counted as a readmission. The measure looks for a dichotomous yes or no outcome of whether each admitted patient has an unplanned readmission within 30 days. However, if the first readmission after discharge is considered planned, any subsequent unplanned readmission is not counted as an outcome for that index admission because the unplanned readmission could be related to care provided during the intervening planned readmission rather than during the index admission.

Additional details are provided in S.5 Numerator Details.

S.6. Denominator Statement: The cohort includes admissions for patients aged 65 years and older discharged from the hospital with a principal diagnosis of AMI; and with a complete claims history for the 12 months prior to admission.

Additional details are provided in [S.7 Denominator Details](#).

S.8. Denominator Exclusions: The 30-day AMI readmission measure excludes index admissions for patients:

- 1) Without at least 30 days of post-discharge enrollment in Medicare FFS (in the case of patients who are not VA beneficiaries);
- 2) Discharged against medical advice (AMA);
- 3) Same-day discharges; or
- 4) Admitted within 30 days of a prior index admission for AMI.

De.1. Measure Type: Outcome

S.17. Data Source: Claims, Enrollment Data, Other

S.20. Level of Analysis: Facility

IF Endorsement Maintenance – Original Endorsement Date: Oct 28, 2008 **Most Recent Endorsement Date:** Dec 09, 2016

IF this measure is included in a composite, NQF Composite#/title:

IF this measure is paired/grouped, NQF#/title:

De.4. IF PAIRED/GROUPED, what is the reason this measure must be reported with other measures to appropriately interpret results? This measure is paired with a measure of hospital-level, all-cause, 30-day, risk-standardized mortality (RSMR) following AMI hospitalization.

1. Evidence, Performance Gap, Priority – Importance to Measure and Report

Extent to which the specific measure focus is evidence-based, important to making significant gains in healthcare quality, and improving health outcomes for a specific high-priority (high-impact) aspect of healthcare where there is variation in or overall less-than-optimal performance. **Measures must be judged to meet all sub criteria to pass this criterion and be evaluated against the remaining criteria.**

1a. Evidence to Support the Measure Focus – See attached Evidence Submission Form

[NQF_evidence_AMI_readmission_Fall2020_final_7.22.20.docx](#)

1a.1 For Maintenance of Endorsement: Is there new evidence about the measure since the last update/submission?

Do not remove any existing information. If there have been any changes to evidence, the Committee will consider the new evidence. Please use the most current version of the evidence attachment (v7.1). Please use red font to indicate updated evidence.

Yes

1b. Performance Gap

Demonstration of quality problems and opportunity for improvement, i.e., data demonstrating:

- considerable variation, or overall less-than-optimal performance, in the quality of care across providers; and/or
- Disparities in care across population groups.

1b.1. Briefly explain the rationale for this measure (e.g., how the measure will improve the quality of care, the benefits or improvements in quality envisioned by use of this measure)

If a COMPOSITE (e.g., combination of component measure scores, all-or-none, any-or-none), SKIP this question and answer the composite questions.

The goal of this measure is to improve patient outcomes by providing patients, physicians, and hospitals with information about hospital-level, risk-standardized readmission rates following hospitalization for AMI. Measurement of patient outcomes allows for a broad view of quality of care that encompasses more than what can be captured by individual process-of-care measures. Readmissions following AMI are influenced by complex and critical aspects of care, such as communication between providers, prevention of and response to complications, patient safety, and coordinated transitions to the outpatient environment; several studies have demonstrated that appropriate, timely, and high-quality treatment can contribute to patient outcomes but are difficult to measure by individual process measures. The goal of outcomes measurement is to risk-adjust for patients' conditions at the time of hospital admission and then evaluate patient outcomes. This measure was developed to identify institutions' whose performance is better or worse than would be expected based on their patient case mix, and therefore promote hospital quality improvement and better inform consumers about care quality.

By providing patients, physicians, hospitals, and policy makers with information about hospital-level, risk-standardized readmission

rates following hospitalization for AMI, AMI readmission is a priority area for outcomes measure development. It is an outcome that is likely attributable to care processes and is an important outcome for patients. Measuring and reporting readmission rates will inform healthcare providers and facilities about opportunities to improve care, strengthen incentives for quality improvement, and ultimately improve the quality of care received by Medicare patients. The measure will also provide patients with information that could guide their choices, as well as increase transparency for consumers.

1b.2. Provide performance scores on the measure as specified (current and over time) at the specified level of analysis. *(This is required for maintenance of endorsement. Include mean, std dev, min, max, interquartile range, scores by decile. Describe the data source including number of measured entities; number of patients; dates of data; if a sample, characteristics of the entities include.) This information also will be used to address the sub-criterion on improvement (4b1) under Usability and Use.*

Variation in readmission rates indicates opportunity for improvement. We conducted analyses using data from July 1, 2016 to June 30, 2019 Medicare claims and VA administrative data (n= 482,163 admissions from 4,074 hospitals).

The three-year hospital-level risk standardized readmission rates (RSRRs) have a mean of 16.2% and a range of 11.5-22.9% in the study cohort. As shown below, the median RSRR is 16.1%. The distribution of RSRRs across hospitals is shown below:

Distribution of Hospital AMI RSRRs over Different Time Periods (All Hospitals)

Results for each data year

Characteristic//07/2016-06/2017//07/2017-06/2018//07/2018-06/2019//07/2016-06/2019

Number of Hospitals//3634//3536//3452//4074

Number of Admissions//172148//160182//149833//482163

Mean(SD)//16.4(0.6)//16.2(0.5)//15.8(0.6)//16.2(0.8)

Range(Min-Max)//13.4 - 20.2//13.6 - 19.8//13.3 - 19.1//11.5 - 22.9

Minimum//13.4//13.6//13.3//11.5

10th percentile//15.8//15.7//15.2//15.3

20th percentile//16.1//16.0//15.5//15.7

30th percentile//16.2//16.1//15.6//15.9

40th percentile//16.3//16.2//15.7//16.0

50th percentile//16.3//16.2//15.7//16.1

60th percentile//16.4//16.3//15.8//16.2

70th percentile//16.5//16.4//15.9//16.3

80th percentile//16.7//16.5//16.0//16.6

90th percentile//17.0//16.8//16.4//17.1

Maximum//20.2//19.8//19.1//22.9

1b.3. If no or limited performance data on the measure as specified is reported in 1b2, then provide a summary of data from the literature that indicates opportunity for improvement or overall less than optimal performance on the specific focus of measurement.

N/A

1b.4. Provide disparities data from the measure as specified (current and over time) by population group, e.g., by race/ethnicity, gender, age, insurance status, socioeconomic status, and/or disability. *(This is required for maintenance of endorsement. Describe the data source including number of measured entities; number of patients; dates of data; if a sample, characteristics of the entities included.) For measures that show high levels of performance, i.e., "topped out", disparities data may demonstrate an opportunity for improvement/gap in care for certain sub-populations. This information also will be used to address the sub-criterion on improvement (4b1) under Usability and Use.*

Distribution of 30-day AMI RSRRs by Proportion of Dual-Eligible:

Data Source: Medicare FFS claims, VA claims and Medicare Beneficiary File (MBSF) data

Dates of Data: July 2016 through June 2019

Variation in RSRRs across hospitals (with at least 25 cases) by proportion of patients with social risk//

Description of Social Risk Variable//Dual-Eligibility

Quartile//Q1//Q4

Social Risk Proportion (%)//((0-8.57)//((30.02-100)

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of Hospitals//536//532
 100%Max//19.2//22.9
 90%//17.2//17.9
 75%//16.6//17.1
 50%//15.9//16.4
 25%//15.2//15.8
 10%//14.6//15.3
 0%Min//12.5//13.6

Distribution of 30-day AMI RSRRs by Proportion of Patients with AHRQ SES Index Scores:
 Data Source: Medicare FFS claims, VA data, and The American Community Survey (2013-2017) data
 Dates of Data: July 2016 through June 2019

Variation in RSRRs across hospitals (with at least 25 cases) by proportion of patients in lower and upper social risk quartiles//
 Description of Social Risk Variable //AHRQ SES Index
 Bottom/Top Quartile//Bottom Quartile//Top Quartile
 Quartile//Q1//Q4
 Social Risk Proportion (%)//(0-6.49)/(17.27-92.31)
 # of Hospitals//535//535
 100%Max//22.9//20.5
 90%//17.6//17.7
 75%//16.9//17.0
 50%//16.0//16.3
 25%//15.4//15.8
 10%//14.7//15.3
 0%Min//12.5//13.6

1b.5. If no or limited data on disparities from the measure as specified is reported in 1b.4, then provide a summary of data from the literature that addresses disparities in care on the specific focus of measurement. Include citations. Not necessary if performance data provided in 1b.4
 N/A

2. Reliability and Validity—Scientific Acceptability of Measure Properties

Extent to which the measure, as specified, produces consistent (reliable) and credible (valid) results about the quality of care when implemented. **Measures must be judged to meet the sub criteria for both reliability and validity to pass this criterion and be evaluated against the remaining criteria.**

2a.1. Specifications The measure is well defined and precisely specified so it can be implemented consistently within and across organizations and allows for comparability. eMeasures should be specified in the Health Quality Measures Format (HQMF) and the Quality Data Model (QDM).

De.5. Subject/Topic Area (check all the areas that apply):
 Cardiovascular, Cardiovascular : Coronary Artery Disease (AMI)

De.6. Non-Condition Specific(check all the areas that apply):
 Care Coordination, Safety, Safety : Complications, Safety : Overuse

De.7. Target Population Category (Check all the populations for which the measure is specified and tested if any):
 Elderly, Populations at Risk

S.1. Measure-specific Web Page (Provide a URL link to a web page specific for this measure that contains current detailed specifications including code lists, risk model details, and supplemental materials. Do not enter a URL linking to a home page or to general information.)

<https://qualitynet.org/inpatient/measures/readmission/methodology>

S.2a. If this is an eMeasure, HQMF specifications must be attached. Attach the zipped output from the eMeasure authoring tool (MAT) - if the MAT was not used, contact staff. (Use the specification fields in this online form for the plain-language description of the specifications)

This is not an eMeasure Attachment:

S.2b. Data Dictionary, Code Table, or Value Sets (and risk model codes and coefficients when applicable) must be attached. (Excel or csv file in the suggested format preferred - if not, contact staff)

Attachment Attachment: [NQF_datadictionary_AMIreadmission_Fall2020_final_7.22.20.xlsx](#)

S.2c. Is this an instrument-based measure (i.e., data collected via instruments, surveys, tools, questionnaires, scales, etc.)? Attach copy of instrument if available.

No, this is not an instrument-based measure Attachment:

S.2d. Is this an instrument-based measure (i.e., data collected via instruments, surveys, tools, questionnaires, scales, etc.)? Attach copy of instrument if available.

Not an instrument-based measure

S.3.1. For maintenance of endorsement: Are there changes to the specifications since the last updates/submission. If yes, update the specifications for S1-2 and S4-22 and explain reasons for the changes in S3.2.

No

S.3.2. For maintenance of endorsement, please briefly describe any important changes to the measure specifications since last measure update and explain the reasons.

Updates consisted of updating the specifications to include new and modified ICD-10 CM/PCS codes.

S.4. Numerator Statement (Brief, narrative description of the measure focus or what is being measured about the target population, i.e., cases from the target population with the target process, condition, event, or outcome) **DO NOT** include the rationale for the measure.

IF an OUTCOME MEASURE, state the outcome being measured. Calculation of the risk-adjusted outcome should be described in the calculation algorithm (S.14).

The outcome for this measure is 30-day all-cause readmissions. We define readmission as an inpatient acute care admission for any cause, with the exception of certain planned readmissions, within 30 days from the date of discharge from the index for patients 65 and older discharged from the hospital with a principal discharge diagnosis of AMI. If a patient has more than one unplanned admission (for any reason) within 30 days after discharge from the index admission, only the first one is counted as a readmission. The measure looks for a dichotomous yes or no outcome of whether each admitted patient has an unplanned readmission within 30 days. However, if the first readmission after discharge is considered planned, any subsequent unplanned readmission is not counted as an outcome for that index admission because the unplanned readmission could be related to care provided during the intervening planned readmission rather than during the index admission.

Additional details are provided in S.5 Numerator Details.

S.5. Numerator Details (All information required to identify and calculate the cases from the target population with the target process, condition, event, or outcome such as definitions, time period for data collection, specific data collection items/responses, code/value sets – Note: lists of individual codes with descriptors that exceed 1 page should be provided in an Excel or csv file in required format at S.2b)

IF an OUTCOME MEASURE, describe how the observed outcome is identified/counted. Calculation of the risk-adjusted outcome should be described in the calculation algorithm (S.14).

The measure counts readmissions to any acute care hospital for any cause within 30 days of the date of discharge of the index AMI admission, excluding planned readmissions as defined below.

Planned Readmission Algorithm (Version 4.0)

The planned readmission algorithm is a set of criteria for classifying readmissions as planned using Medicare and VA administrative

claims data. The algorithm identifies admissions that are typically planned and may occur within 30 days of discharge from the hospital.

The planned readmission algorithm has three fundamental principles:

1. A few specific, limited types of care are always considered planned (transplant surgery, maintenance chemotherapy/immunotherapy, rehabilitation);
2. Otherwise, a planned readmission is defined as a non-acute readmission for a scheduled procedure; and,
3. Admissions for acute illness or for complications of care are never planned.

The algorithm was developed in 2011 as part of the Hospital-Wide Readmission measure. In 2013, CMS applied the algorithm to its other readmission measures.

In applying the algorithm to condition- and procedure-specific measures, teams of clinical experts reviewed the algorithm in the context of each measure-specific patient cohort and, where clinically indicated, adapted the content of the algorithm to better reflect the likely clinical experience of each measure's patient cohort. The planned readmission algorithm is applied to the AMI measure without modifications.

The planned readmission algorithm and associated code tables are attached in data field S.2b (Data Dictionary or Code Table).

S.6. Denominator Statement *(Brief, narrative description of the target population being measured)*

The cohort includes admissions for patients aged 65 years and older discharged from the hospital with a principal diagnosis of AMI; and with a complete claims history for the 12 months prior to admission.

Additional details are provided in S.7 Denominator Details.

S.7. Denominator Details *(All information required to identify and calculate the target population/denominator such as definitions, time period for data collection, specific data collection items/responses, code/value sets – Note: lists of individual codes with descriptors that exceed 1 page should be provided in an Excel or csv file in required format at S.2b.)*

IF an OUTCOME MEASURE, describe how the target population is identified. Calculation of the risk-adjusted outcome should be described in the calculation algorithm (S.14).

To be included in the measure cohort used in public reporting, patients must meet the following inclusion criteria:

1. Principal discharge diagnosis of AMI;
2. Enrolled in Medicare fee-for-service (FFS) Part A and B for the 12 months prior to the date of admission, and enrolled in Part A during the index admission, or those who are VA beneficiaries;
3. Aged 65 or over;
4. Discharged alive from a non-federal short-term acute care hospital or VA hospital; and,
5. Not transferred to another acute care facility.

S.8. Denominator Exclusions *(Brief narrative description of exclusions from the target population)*

The 30-day AMI readmission measure excludes index admissions for patients:

- 1) Without at least 30 days of post-discharge enrollment in Medicare FFS (in the case of patients who are not VA beneficiaries);
- 2) Discharged against medical advice (AMA);
- 3) Same-day discharges; or
- 4) Admitted within 30 days of a prior index admission for AMI.

S.9. Denominator Exclusion Details *(All information required to identify and calculate exclusions from the denominator such as definitions, time period for data collection, specific data collection items/responses, code/value sets – Note: lists of individual codes with descriptors that exceed 1 page should be provided in an Excel or csv file in required format at S.2b.)*

The AMI readmission measure excludes index admissions for patients:

1. Without at least 30 days of post-discharge enrollment in Medicare FFS (in the case of patients who are not VA beneficiaries), which is identified with enrollment data from the Medicare Enrollment Database.

Rationale: The 30-day readmission outcome cannot be assessed in this group since claims data are used to determine whether a patient was readmitted.

2. Discharged against medical advice (AMA) are identified using the discharge disposition indicator in claims data.

Rationale: Providers did not have the opportunity to deliver full care and prepare the patient for discharge.

3. Same-day discharges. This information is identified in claims data.

Rationale: Patients admitted and then discharged on the same day are not included as an index admission because it is unlikely that these patients had clinically significant AMIs.

4. AMI admissions within 30 days of discharge from a qualifying AMI index admission are identified by comparing the discharge date from the index admission with subsequent admission dates.

Rationale: Additional AMI admissions within 30 days are excluded as index admissions because they are part of the outcome. A single admission does not count as both an index admission and a readmission for another index admission.

S.10. Stratification Information (Provide all information required to stratify the measure results, if necessary, including the stratification variables, definitions, specific data collection items/responses, code/value sets, and the risk-model covariates and coefficients for the clinically-adjusted version of the measure when appropriate – Note: lists of individual codes with descriptors that exceed 1 page should be provided in an Excel or csv file in required format with at S.2b.)

N/A

S.11. Risk Adjustment Type (Select type. Provide specifications for risk stratification in measure testing attachment)

Statistical risk model

If other:

S.12. Type of score:

Rate/proportion

If other:

S.13. Interpretation of Score (Classifies interpretation of score according to whether better quality is associated with a higher score, a lower score, a score falling within a defined interval, or a passing score)

Better quality = Lower score

S.14. Calculation Algorithm/Measure Logic (Diagram or describe the calculation of the measure score as an ordered sequence of steps including identifying the target population; exclusions; cases meeting the target process, condition, event, or outcome; time period for data, aggregating data; risk adjustment; etc.)

The measure estimates hospital-level 30-day, all-cause, RSRRs following hospitalization for AMI using hierarchical logistic regression models. In brief, the approach simultaneously models data at the patient and hospital levels to account for variance in patient outcomes within and between hospitals (Normand and Shahian, 2007). At the patient level, it models the log-odds of readmission within 30 days of index admission using age, sex, selected clinical covariates, and a hospital-specific intercept. At the hospital level, it models the hospital-specific intercepts as arising from a normal distribution. The hospital intercept represents the underlying risk of a readmission at the hospital, after accounting for patient risk. The hospital-specific intercepts are given a distribution to account for the clustering (non-independence) of patients within the same hospital. If there were no differences among hospitals, then after adjusting for patient risk, the hospital intercepts should be identical across all hospitals.

The RSRR is calculated as the ratio of the number of “predicted” to the number of “expected” readmissions at a given hospital, multiplied by the national observed readmission rate. For each hospital, the numerator of the ratio is the number of readmissions within 30 days predicted on the basis of the hospital’s performance with its observed case mix; and the denominator is the number of readmissions expected based on the nation’s performance with that hospital’s case mix. This approach is analogous to a ratio of “observed” to “expected” used in other types of statistical analyses. It conceptually allows for a comparison of a particular hospital’s performance given its case mix to an average hospital’s performance with the same case mix. Thus, a lower ratio indicates lower-than-expected readmission rates or better quality, and a higher ratio indicates higher-than-expected readmission rates or worse quality.

The “predicted” number of readmissions (the numerator) is calculated by using the coefficients estimated by regressing the risk factors and the hospital-specific intercept on the risk of readmission. The estimated hospital-specific intercept is added to the sum of the estimated regression coefficients multiplied by the patient characteristics. The results are transformed and summed over all patients attributed to a hospital to get a predicted value. The “expected” number of readmissions (the denominator) is obtained in the same manner, but a common intercept using all hospitals in our sample is added in place of the hospital-specific intercept. The

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results are transformed and summed over all patients in the hospital to get an expected value. To assess hospital performance for each reporting period, we re-estimate the model coefficients using the years of data in that period.

This calculation transforms the ratio of predicted over expected into a rate that is compared to the national observed readmission rate. The hierarchical logistic regression models are described fully and in the original methodology reports posted on QualityNet (<https://qualitynet.org/inpatient/measures/readmission/methodology>)

References

Normand S-LT, Shahian D, M., Statistical and Clinical Aspects of Hospital Outcomes Profiling. *Statistical Science*. 2007;22(2):206-226

S.15. Sampling (If measure is based on a sample, provide instructions for obtaining the sample and guidance on minimum sample size.)

IF an instrument-based performance measure (e.g., PRO-PM), identify whether (and how) proxy responses are allowed.

N/A. This measure is not based on a sample or survey.

S.16. Survey/Patient-reported data (If measure is based on a survey or instrument, provide instructions for data collection and guidance on minimum response rate.)

Specify calculation of response rates to be reported with performance measure results.

N/A

S.17. Data Source (Check ONLY the sources for which the measure is SPECIFIED AND TESTED).

If other, please describe in S.18.

Claims, Enrollment Data, Other

S.18. Data Source or Collection Instrument (Identify the specific data source/data collection instrument (e.g. name of database, clinical registry, collection instrument, etc., and describe how data are collected.)

IF instrument-based, identify the specific instrument(s) and standard methods, modes, and languages of administration.

Data sources for the Medicare FFS measure:

Medicare Part A Inpatient and Part B Outpatient claims: This data source contains claims data for FFS inpatient and outpatient services including Medicare inpatient hospital care, outpatient hospital services, as well as inpatient and outpatient physician claims for the 12 months prior to an index admission.

Medicare Enrollment Database (EDB): This database contains Medicare beneficiary demographic, benefit/coverage, and vital status information. This data source was used to obtain information on several inclusion/exclusion indicators such as Medicare status on admission as well as vital status. These data have previously been shown to accurately reflect patient vital status (Fleming et al., 1992). The Master Beneficiary Summary File (MBSF) is an annually created file derived the EDB that contains enrollment information for all Medicare beneficiaries including dual eligible status. Years 2016-2019 were used.

Veterans Health Administration (VA) Data: This data source contains administrative data for VA inpatient and outpatient services including: inpatient hospital care, outpatient hospital services, skilled nursing facility care, some home health agency services, as well as inpatient and outpatient physician data for the 12 months prior to and including each index admission. Unlike Medicare FFS patients, VA patients are not required to have been enrolled in Part A and Part B Medicare for the 12 months prior to the date of admission.

The American Community Survey (2013-2017): We used the American Community Survey (2013-2017) to derive an updated AHRQ SES index score at the patient nine-digit zip code level for use in studying the association between our measure and SRFs.

References

Fleming C., Fisher ES, Chang CH, Bubolz D, Malenda J. Studying outcomes and hospital utilization in the elderly: The advantages of a merged data base for Medicare and Veterans Affairs Hospitals. *Medical Care*. 1992; 30(5): 377-91.

S.19. Data Source or Collection Instrument (available at measure-specific Web page URL identified in S.1 OR in attached appendix at A.1)

No data collection instrument provided

S.20. Level of Analysis (Check ONLY the levels of analysis for which the measure is SPECIFIED AND TESTED)

Facility

S.21. Care Setting (Check ONLY the settings for which the measure is SPECIFIED AND TESTED)

Inpatient/Hospital

If other:

S.22. COMPOSITE Performance Measure - Additional Specifications (Use this section as needed for aggregation and weighting rules, or calculation of individual performance measures if not individually endorsed.)

N/A

2. Validity – See attached Measure Testing Submission Form

[NQF_testing_AMIreadmission_Fall2020_final_11.02.20-637418995716049007.docx](#)

2.1 For maintenance of endorsement

Reliability testing: If testing of reliability of the measure score was not presented in prior submission(s), has reliability testing of the measure score been conducted? If yes, please provide results in the Testing attachment. Please use the most current version of the testing attachment (v7.1). Include information on all testing conducted (prior testing as well as any new testing); use red font to indicate updated testing.

Yes

2.2 For maintenance of endorsement

Has additional empirical validity testing of the measure score been conducted? If yes, please provide results in the Testing attachment. Please use the most current version of the testing attachment (v7.1). Include information on all testing conducted (prior testing as well as any new testing); use red font to indicate updated testing.

Yes

2.3 For maintenance of endorsement

Risk adjustment: For outcome, resource use, cost, and some process measures, risk-adjustment that includes social risk factors is not prohibited at present. Please update sections 1.8, 2a2, 2b1,2b4.3 and 2b5 in the Testing attachment and S.140 and S.11 in the online submission form. NOTE: These sections must be updated even if social risk factors are not included in the risk-adjustment strategy. You MUST use the most current version of the Testing Attachment (v7.1) -- older versions of the form will not have all required questions.

Yes - Updated information is included

3. Feasibility

Extent to which the specifications including measure logic, require data that are readily available or could be captured without undue burden and can be implemented for performance measurement.

3a. Byproduct of Care Processes

For clinical measures, the required data elements are routinely generated and used during care delivery (e.g., blood pressure, lab test, diagnosis, medication order).

3a.1. Data Elements Generated as Byproduct of Care Processes.

[Coded by someone other than person obtaining original information \(e.g., DRG, ICD-9 codes on claims\)](#)

If other:

3b. Electronic Sources

The required data elements are available in electronic health records or other electronic sources. If the required data are not in electronic health records or existing electronic sources, a credible, near-term path to electronic collection is specified.

3b.1. To what extent are the specified data elements available electronically in defined fields (i.e., data elements that are needed to compute the performance measure score are in defined, computer-readable fields) Update this field for maintenance of endorsement.

[ALL data elements are in defined fields in electronic claims](#)

3b.2. If ALL the data elements needed to compute the performance measure score are not from electronic sources, specify a credible, near-term path to electronic capture, OR provide a rationale for using other than electronic sources. For maintenance of endorsement, if this measure is not an eMeasure (eCQM), please describe any efforts to develop an eMeasure (eCQM).

N/A

3b.3. If this is an eMeasure, provide a summary of the feasibility assessment in an attached file or make available at a measure-specific URL. Please also complete and attach the NQF Feasibility Score Card.

Attachment:

3c. Data Collection Strategy

Demonstration that the data collection strategy (e.g., source, timing, frequency, sampling, patient confidentiality, costs associated with fees/licensing of proprietary measures) can be implemented (e.g., already in operational use, or testing demonstrates that it is ready to put into operational use). For eMeasures, a feasibility assessment addresses the data elements and measure logic and demonstrates the eMeasure can be implemented or feasibility concerns can be adequately addressed.

3c.1. Required for maintenance of endorsement. Describe difficulties (as a result of testing and/or operational use of the measure) regarding data collection, availability of data, missing data, timing and frequency of data collection, sampling, patient confidentiality, time and cost of data collection, other feasibility/implementation issues.

IF instrument-based, consider implications for both individuals providing data (patients, service recipients, respondents) and those whose performance is being measured.

This measure uses administrative claims and enrollment data and as such, offers no data collection burden to hospitals or providers.

3c.2. Describe any fees, licensing, or other requirements to use any aspect of the measure as specified (e.g., value/code set, risk model, programming code, algorithm).

N/A

4. Usability and Use

Extent to which potential audiences (e.g., consumers, purchasers, providers, policy makers) are using or could use performance results for both accountability and performance improvement to achieve the goal of high-quality, efficient healthcare for individuals or populations.

4a. Accountability and Transparency

Performance results are used in at least one accountability application within three years after initial endorsement and are publicly reported within six years after initial endorsement (or the data on performance results are available). If not in use at the time of initial endorsement, then a credible plan for implementation within the specified timeframes is provided.

4.1. Current and Planned Use

NQF-endorsed measures are expected to be used in at least one accountability application within 3 years and publicly reported within 6 years of initial endorsement in addition to performance improvement.

Specific Plan for Use	Current Use (for current use provide URL)
	Public Reporting Hospital Compare https://www.medicare.gov/hospitalcompare/search.html Hospital Compare https://www.medicare.gov/hospitalcompare/search.html Payment Program Hospital Readmission Reduction (HRRP) Program https://www.qualitynet.org/inpatient/hrrp Hospital Readmission Reduction (HRRP) Program https://www.qualitynet.org/inpatient/hrrp

4a1.1 For each CURRENT use, checked above (update for maintenance of endorsement), provide:

- Name of program and sponsor
- Purpose
- Geographic area and number and percentage of accountable entities and patients included

- Level of measurement and setting

Public Reporting

Program Name, Sponsor: Hospital Compare, Centers for Medicare and Medicaid Services (CMS)

Purpose: Under Hospital Compare and other CMS public reporting websites, CMS collects quality data from hospitals, with the goal of driving quality improvement through measurement and transparency by publicly displaying data to help consumers make more informed decisions about their health care. It is also intended to encourage hospitals and clinicians to improve the quality and cost of inpatient care provided to all patients. The data collected are available to consumers and providers on the Hospital Compare website at: <https://www.medicare.gov/hospitalcompare/search.html>. Data for selected measures are also used for paying a portion of hospitals based on the quality and efficiency of care, including the Hospital Value-Based Purchasing Program, Hospital-Acquired Condition Reduction Program, and Hospital Readmissions Reduction Program.

Payment Program

Program Name, Sponsor: Hospital Readmission Reduction Program (HRRP), Centers for Medicare and Medicaid Services (CMS)

Purpose: Section 3025 of the Affordable Care Act added section 1886(q) to the Social Security Act establishing the Hospital Readmissions Reduction Program, which requires CMS to reduce payments to IPPS hospitals with excess readmissions, effective for discharges beginning on October 1, 2012. The regulations that implement this provision are in subpart I of 42 CFR part 412 (§412.150 through §412.154).

Geographic area and number and percentage of accountable entities and patients included: The HRRP program includes only Subsection (d) hospitals and hospitals located in Maryland. Subsection (d) hospital encompasses any acute care hospital located in one of the fifty states or the District of Columbia which does not meet any of the following exclusion criteria as defined by the Social Security Act: psychiatric, rehabilitation, children's, or long-term care hospitals, and non-IPPS cancer hospitals. Critical access hospitals, cancer hospitals, and hospitals located in U.S territories will not be included in the calculation. The number and percentage of accountable entities included in the program, as well as the number of patients included in the measure, varies by reporting year.

4a1.2. If not currently publicly reported OR used in at least one other accountability application (e.g., payment program, certification, licensing) what are the reasons? (e.g., Do policies or actions of the developer/steward or accountable entities restrict access to performance results or impede implementation?)

N/A, this measure is currently publicly reported

4a1.3. If not currently publicly reported OR used in at least one other accountability application, provide a credible plan for implementation within the expected timeframes -- any accountability application within 3 years and publicly reported within 6 years of initial endorsement. (Credible plan includes the specific program, purpose, intended audience, and timeline for implementing the measure within the specified timeframes. A plan for accountability applications addresses mechanisms for data aggregation and reporting.)

N/A, this measure is currently publicly reported

4a2.1.1. Describe how performance results, data, and assistance with interpretation have been provided to those being measured or other users during development or implementation.

How many and which types of measured entities and/or others were included? If only a sample of measured entities were included, describe the full population and how the sample was selected.

The exact number of measured entities (acute care hospitals) varies with each new measurement period. For the period between 2016 – 2019, all non-federal short-term acute care hospitals (including Indian Health Service hospitals), critical access hospitals, and VA hospitals (4,074 hospitals) were included in the measure calculation. Only those hospitals with at least 25 AMI admissions were included in public reporting.

Each hospital generally receives their measure results in April/May of each calendar year through CMS's QualityNet website. The results are then publicly reported on CMS's public reporting websites in the summer of each calendar year. Since the measure is risk standardized using data from all hospitals, hospitals cannot independently calculate their score.

However, CMS provides each hospital with several resources that aid in the interpretation of their results (described in detail

below). These include Hospital-Specific Reports with details about every patient from their facility that was included in the measure calculation (for example, dates of admission and discharge, discharge diagnoses, outcome [died or not], transfer status, and facility transferred from). These reports facilitate quality improvement activities such as review of individual deaths and patterns of deaths; make visible to hospitals post-discharge outcomes that they may otherwise be unaware of; and allow hospitals to look for patterns that may inform quality improvement (QI) work (e.g. among patient transferred in from particular facilities). CMS also provides measure FAQs, webinars, and measure-specific question and answer inboxes for stakeholders to ask specific questions.

The Hospital-Specific Reports also provide hospitals with more detailed benchmarks with which to gauge their performance relative to peer hospitals and interpret their results, including comorbidity frequencies for their patients relative to other hospitals in their state and the country.

Additionally, the code used to process the claims data and calculate measure results is written in SAS (Cary, NC) and is provided each year to hospitals upon request.

4a2.1.2. Describe the process(es) involved, including when/how often results were provided, what data were provided, what educational/explanatory efforts were made, etc.

During the Spring of each year, hospitals have access to the following list of updated resources related to the measure which is provided directly or posted publicly for hospitals to use:

1. Hospital-Specific Reports (HSR): available for hospitals to download from QualityNet in April/May of each calendar year; includes information on the index admissions included in the measure calculation for each facility, detailed measure results, and state and national results.
2. HSR User Guide: available with the HSR and posted on QualityNet; provides instructions for interpreting the results and descriptions of each data field in the HSR.
3. Mock HSR: posted on QualityNet; provides real national results and simulated state and hospital results for stakeholders who do not receive an HSR.
4. HSR Tutorial Video: A brief animated video to help hospitals navigate their HSR and interpret the information provided.
5. Public Reporting Preview and Preview Help Guide: available for hospitals to view from QualityNet in Spring of each calendar year; includes measure results that will be publicly reported on CMS's public reporting websites.
6. Annual Updates and Specification Reports: posted in April/May of each calendar year on QualityNet with detailed measure specifications, descriptions of changes made to the measure specifications with rationale and impact analysis (when appropriate), updated risk variable frequencies and coefficients for the national cohort, and updated national results for the new measurement period.
7. Frequently asked Questions (FAQs): includes general and measure-specific questions and responses, as well as infographics that explain complex components of the measure's methodology, and are posted in April/May of each calendar year on QualityNet.
8. The SAS code used to calculate the measure with documentation describing what data files are used and how the SAS code works. This code and documentation are updated each year and are released upon request beginning in July of each year.
9. Measure Fact Sheets: provides a brief overview of measures, measure updates, and are posted in April/May of each calendar year on QualityNet.

During the summer of each year, the publicly-reported measure results are posted on CMS's public reporting websites, a tool to find hospitals and compare their quality of care that CMS created in collaboration with organizations representing consumers, hospitals, doctors, employers, accrediting organizations, and other federal agencies. Measure results are updated in July of each calendar year.

4a2.2.1. Summarize the feedback on measure performance and implementation from the measured entities and others described in 4d.1.

Describe how feedback was obtained.

Questions and Answers (Q&A)

The measured entities (acute care hospitals) and other stakeholders or interested parties submit questions or comments about the measure through an email inbox (CMSreadmissionmeasures@yale.edu). Experts on measure specifications, calculation, or implementation, prepare responses to those inquiries and reply directly to the sender. We consider issues raised through the Q&A process about measure specifications or measure calculation in measure reevaluation.

Literature Reviews

In addition, we routinely scan the literature for scholarly articles describing research related to this measure. We summarize new information obtained through these reviews every 3 years as a part of comprehensive reevaluation as mandated by the Measure Management System (MMS) Blueprint.

4a2.2.2. Summarize the feedback obtained from those being measured.

Summary of Questions or Comments from Hospitals submitted through the Q & A process:

For the AMI readmission measure inquiries received from hospitals since the last endorsement maintenance cycle

1. Requests for detailed measure specifications including and ICD-9 and ICD-10 codes used to define the measure cohort or in the risk-adjustment model;
2. Requests for the SAS code used to calculate measure results;
3. Questions about how transfers are handled in the measure calculation;
4. Requests for and queries regarding hospital-specific measure information, such as data included in the HSRs;
5. Queries about financial penalties in relation to the existing AMI readmission measure under HRRP; and
6. Questions on how readmissions are capture for patients admitted for an AMI and have a CABG procedure during the index admission.

4a2.2.3. Summarize the feedback obtained from other users

Summary of Question and Comments from Other Stakeholders:

For the AMI readmission measure, feedback received from other stakeholders since the submission of the last endorsement maintenance cycle:

1. Requests for detailed measure specifications including the CC-to-ICD-9 code crosswalks, and ICD-9 and ICD-10 codes used to define the measure cohort or in the risk-adjustment model;
2. Requests for the SAS code used to calculate measure results;
3. Requests for clarification of how inclusion and exclusion criteria are applied;
4. Queries about how cohorts and outcomes are defined; and
5. Queries about how to calculate the measure and interpret the results;

Summary of Relevant Publications from the Literature Review:

Since 2016, we have reviewed 264 articles related to readmission following an AMI admission. Relevant articles shared key themes related to: spillover effects of the AMI readmission measure on readmission rates for other conditions; considerations for additional risk adjustment variables, including social risk factors and other clinical comorbidities; potential unintended consequences of readmission measures on mortality outcomes; impact of not including Medicare Advantage patients in readmission measures; effectiveness of transitional care models on reducing readmissions; differential outcomes between patients who have Type I versus Type II AMIs; and, the impact of potential strategies to avoid readmissions within the 30-day timeframe.

Researchers have conducted considerable investigation of potential unintended consequences since the implementation of the AMI readmission measure. More specifically, the relationship between the implementation of the AMI, heart failure, and pneumonia readmission measures in the Hospital Readmissions Reduction Program (HRRP) and subsequent trends in their respective mortality rates has been studied.

Some studies have speculated that between 2006–2014, readmissions for AMI decreased but post-discharge mortality may have increased, suggesting a potential unintended consequence that readmission measures may be incentivizing hospitals to not readily admit patients with AMI, and as a result, mortality rates increased. Importantly, the same studies and others have acknowledged that AMI mortality specifically has declined since HRRP implementation (Khera et al., 2018; Wadhera et al. 2018; Dharmarajan et al., 2017; Stensland et al., 2019; MedPAC, 2018).

Given the importance of this potential issue on patient outcomes, CMS commissioned an independent group to investigate whether there have been increases in mortality rates after HRRP implementation. CMS found through this investigation that no sufficient evidence exists to suggest that mortality has increased because of the HRRP readmission measures. CMS is committed to continuing to monitor trends in same-condition readmission and mortality rates through annual measure reevaluation and surveillance tasks.

References:

Dharmarajan K, Wang Y, Lin Z, et al. Association of Changing Hospital Readmission Rates With Mortality Rates After Hospital Discharge. *JAMA*. 2017;318(3):270-278.

Khera R, Dharmarajan K, Wang Y, et al. Association of the Hospital Readmissions Reduction Program With Mortality During and After Hospitalization for Acute Myocardial Infarction, Heart Failure, and Pneumonia. *JAMA Netw Open*. 2018;1(5):e182777.
Medicare Payment Advisory Commission. Mandated report: The effects of the Hospital Readmissions Reduction Program. Washington, DC 07/18/2018.

Stensland J. MedPAC evaluation of Medicare's Hospital Readmission Reduction Program: Update. In:2019.

Wadhwa RK, Joynt Maddox KE, Wasfy JH, Haneuse S, Shen C, Yeh RW. Association of the Hospital Readmissions Reduction Program With Mortality Among Medicare Beneficiaries Hospitalized for Heart Failure, Acute Myocardial Infarction, and Pneumonia. *JAMA*. 2018;320(24):2542-2552.

4a2.3. Describe how the feedback described in 4a2.2.1 has been considered when developing or revising the measure specifications or implementation, including whether the measure was modified and why or why not.

Each year, issues raised through the Q&A process or in the literature related to this measure are considered by measure and clinical experts. Any issues that warrant additional analytic work due to potential changes in the measure specifications are addressed as a part of annual measure reevaluation. If small changes are indicated after additional analytic work is complete, those changes are usually incorporated into the measure in the next measurement period. If the changes are substantial, CMS may propose the changes through rulemaking and adopt the changes only after CMS received public comment on the changes, and finalizes those changes in the IPPS or other rule. There were no questions or issues raised by stakeholders requiring additional analysis or changes to the measure since the last endorsement maintenance cycle.

Improvement

Progress toward achieving the goal of high-quality, efficient healthcare for individuals or populations is demonstrated. If not in use for performance improvement at the time of initial endorsement, then a credible rationale describes how the performance results could be used to further the goal of high-quality, efficient healthcare for individuals or populations.

4b1. Refer to data provided in 1b but do not repeat here. Discuss any progress on improvement (trends in performance results, number and percentage of people receiving high-quality healthcare; Geographic area and number and percentage of accountable entities and patients included.)

If no improvement was demonstrated, what are the reasons? If not in use for performance improvement at the time of initial endorsement, provide a credible rationale that describes how the performance results could be used to further the goal of high-quality, efficient healthcare for individuals or populations.

The median hospital 30-day, all-cause, RSRR for the AMI readmission measure for the 3-year period between July 1, 2016 and June 30, 2019 was 16.1%. The median RSRR decreased by 0.6 absolute percentage points from July 2016-June 2017 (median RSRR: 16.3%) to July 2018-June 2019 (median: RSRR: 15.7%).

4b2. Unintended Consequences

The benefits of the performance measure in facilitating progress toward achieving high-quality, efficient healthcare for individuals or populations outweigh evidence of unintended negative consequences to individuals or populations (if such evidence exists).

4b2.1. Please explain any unexpected findings (positive or negative) during implementation of this measure including unintended impacts on patients.

N/A

4b2.2. Please explain any unexpected benefits from implementation of this measure.

Health services researchers have also explored potential spillover effects of the AMI readmission measure's implementation and reductions in readmissions for non-targeted conditions. Several studies support positive spillover effects, as there has been systematic improvement in risk-standardized readmission rates for patients not included in HRRP measures (Carey et al., 2015; Angraal et al., 2018; Demiralp et al., 2018; Sukul et al., 2017).

References:

Angraal S, Khera R, Zhou S, et al. Trends in 30-Day Readmission Rates for Medicare and Non-Medicare Patients in the Era of the Affordable Care Act. *Am J Med*. 2018;131(11):1324-1331 e1314.

Carey K, Lin MY. Readmissions To New York Hospitals Fell For Three Target Conditions From 2008 To 2012, Consistent With Medicare Goals. *Health Aff (Millwood)*. 2015;34(6):978-985.

Demiralp B, He F, Koenig L. Further Evidence on the System-Wide Effects of the Hospital Readmissions Reduction Program. *Health Serv Res*. 2018;53(3):1478-1497.

Sukul D, Sinha SS, Ryan AM, Sjoding MW, Hummel SL, Nallamothu BK. Patterns of Readmissions for Three Common Conditions Among Younger US Adults. Am J Med. 2017;130(10):1220 e1221-1220 e1216.

5. Comparison to Related or Competing Measures

If a measure meets the above criteria and there are endorsed or new related measures (either the same measure focus or the same target population) or competing measures (both the same measure focus and the same target population), the measures are compared to address harmonization and/or selection of the best measure.

5. Relation to Other NQF-endorsed Measures

Are there related measures (conceptually, either same measure focus or target population) or competing measures (conceptually both the same measure focus and same target population)? If yes, list the NQF # and title of all related and/or competing measures.

Yes

5.1a. List of related or competing measures (selected from NQF-endorsed measures)

0230 : Hospital 30-day, all-cause, risk-standardized mortality rate (RSMR) following acute myocardial infarction (AMI) hospitalization

0330 : Hospital 30-day, all-cause, risk-standardized readmission rate (RSRR) following heart failure (HF) hospitalization

0730 : Acute Myocardial Infarction (AMI) Mortality Rate

1789 : Hospital-Wide All-Cause Unplanned Readmission Measure (HWR)

2431 : Hospital-level, risk-standardized payment associated with a 30-day episode-of-care for Acute Myocardial Infarction (AMI)

2473 : Hybrid hospital 30-day, all-cause, risk-standardized mortality rate (RSMR) following acute myocardial infarction (AMI)

2879 : Hybrid Hospital-Wide Readmission (HWR) Measure with Claims and Electronic Health Record Data

2881 : Excess days in acute care (EDAC) after hospitalization for acute myocardial infarction (AMI)

5.1b. If related or competing measures are not NQF endorsed please indicate measure title and steward.

0698: 30-Day Post-Hospital AMI Discharge Care Transition Composite Measure (Measure Steward: Centers for Medicare and Medicaid Services)

5a. Harmonization of Related Measures

The measure specifications are harmonized with related measures;

OR

The differences in specifications are justified

5a.1. If this measure conceptually addresses EITHER the same measure focus OR the same target population as NQF-endorsed measure(s):

Are the measure specifications harmonized to the extent possible?

Yes

5a.2. If the measure specifications are not completely harmonized, identify the differences, rationale, and impact on interpretability and data collection burden.

We did not include in our list of related measures any non-outcome (e.g., process) measures with the same target population as our measure. Because this is an outcome measure, clinical coherence of the cohort takes precedence over alignment with related non-outcome measures. Furthermore, non-outcome measures are limited due to broader patient exclusions. This is because they typically only include a specific subset of patients who are eligible for that measure (for example, patients who receive a specific medication or undergo a specific procedure).

5b. Competing Measures

The measure is superior to competing measures (e.g., is a more valid or efficient way to measure);

OR

Multiple measures are justified.

5b.1. If this measure conceptually addresses both the same measure focus and the same target population as NQF-endorsed measure(s):

Describe why this measure is superior to competing measures (e.g., a more valid or efficient way to measure quality); OR provide a rationale for the additive value of endorsing an additional measure. (Provide analyses when possible.)

N/A

Appendix

A.1 Supplemental materials may be provided in an appendix. All supplemental materials (such as data collection instrument or methodology reports) should be organized in one file with a table of contents or bookmarks. If material pertains to a specific submission form number, that should be indicated. Requested information should be provided in the submission form and required attachments. There is no guarantee that supplemental materials will be reviewed.

Available at measure-specific web page URL identified in S.1 Attachment:

Contact Information

Co.1 Measure Steward (Intellectual Property Owner): Centers for Medicare & Medicaid Services

Co.2 Point of Contact: Helen, Dollar-Maples, Helen.Dollar-Maples@cms.hhs.gov, 410-786-7214-

Co.3 Measure Developer if different from Measure Steward: Yale New Haven Health Services Corporation/Center for Outcomes Research and Evaluation (YNHHC/CORE)

Co.4 Point of Contact: Doris, Peter, Doris.peter@yale.edu

Additional Information

Ad.1 Workgroup/Expert Panel involved in measure development

Provide a list of sponsoring organizations and workgroup/panel members' names and organizations. Describe the members' role in measure development.

We held a technical consultation call to obtain feedback on key decisions during measure development. We had the following members on the call:

Vincent Bufalino, MD

John E. Brush, Jr., MD, FACC

Brahmajee Nallamotheu, MD, MPH, FACC

Measure Developer/Steward Updates and Ongoing Maintenance

Ad.2 Year the measure was first released: 2009

Ad.3 Month and Year of most recent revision: 03, 2013

Ad.4 What is your frequency for review/update of this measure? Annual

Ad.5 When is the next scheduled review/update for this measure? 2020

Ad.6 Copyright statement: N/A

Ad.7 Disclaimers: N/A

Ad.8 Additional Information/Comments: N/A