



June 12, 2017

[Submitted electronically at www.regulations.gov]

Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1677-P
P.O. Box 8011
Baltimore, MD 21244-1850

Re: CMS-1655-P — Medicare Program; Hospital Inpatient Prospective Payment Systems for Acute Care Hospitals and the Long-Term Care Hospital Prospective Payment System and Proposed Policy Changes and Fiscal Year 2017 Rates; Quality Reporting Requirements for Specific Providers; Graduate Medical Education; Hospital Notification Procedures Applicable to Beneficiaries Receiving Observation Services; and Technical Changes Relating to Costs to Organizations and Medicare Cost Reports

ASHP is pleased to submit comments regarding the proposed changes to the Hospital Inpatient Prospective Payment System (IPPS) (the “proposed rule”). ASHP represents pharmacists who serve as patient care providers in acute and ambulatory settings. The organization’s more than 43,000 members include pharmacists, student pharmacists, and pharmacy technicians. For over 75 years, ASHP has been at the forefront of efforts to improve medication use and enhance patient safety.

ASHP thanks the Centers for Medicare & Medicaid Services (CMS) for the opportunity to comment on the proposed rule. Our comments are designed to assist CMS in refining the proposed IPPS quality measures and patient surveys to best support and facilitate improved quality and outcomes.

I. Proposed Quality Measures

ASHP is a proud inaugural member of the Measures Application Partnership (MAP) and is heavily engaged in the activities of the National Quality Forum. As a member of the National Quality Forum (NQF), ASHP strongly recommends that, with rare exceptions, CMS include only those measures that have been endorsed through NQF’s rigorous consensus-building development process. NQF endorsement ensures that the great breadth of stakeholders involved in developing, testing, implementing, and using measures provides valuable feedback in maintaining and validating quality measures used in federal payment programs. Consensus achieved during the measure-development process, through broad acceptance and use of a measure or through public comment, does not incorporate the robust and comprehensive process used to establish NQF endorsement.

In general, ASHP supports the quality measures outlined in the IPPS rule. As efforts to further strengthen and refine these measures continue, we encourage CMS to consider the following measure-specific feedback.

a. Safe Use of Opioids – Concurrent Prescribing (p. 20060)

While ASHP strongly urges CMS to seek full NQF endorsement of this measure, considering the depth and breadth of the opioid epidemic, ASHP would support its inclusion at this time. However, we encourage CMS to continue reviewing and refining the measure in response to issues raised by stakeholders, including the need for supplementary clinical baseline data. In addition to this measure, we encourage CMS to prioritize development and adoption of measures designed to improve identification of, and intervention with, patients at risk for developing a substance abuse disorder.

II. Consumer Assessment of Healthcare Providers and Systems (CAHPS)

ASHP understands and appreciates the concerns related to the previous iteration of the CAHPS pain questions. Thus, we support efforts to revise pain survey questions to better capture the efficacy of patient-provider communications regarding pain. We thank CMS for seeking additional feedback from the Measures Application Partnership (MAP) on the questions and we strongly encourage the agency to work closely with clinicians and other healthcare stakeholders to develop the new questions. As CMS seeks stakeholder input on the new questions, we request that CMS allow pharmacists, physicians, and other members of the healthcare team sufficient time and opportunity to provide meaningful input and recommendations.

ASHP appreciates this opportunity to provide comments. Please contact me if you have any questions regarding ASHP's comments on the proposed rule. I can be reached by telephone at 301-664-8698 or by email at jschulte@ashp.org.

Sincerely,

A handwritten signature in black ink that reads "Jillanne M. Schulte". The signature is written in a cursive, flowing style.

Jillanne Schulte Wall, J.D.
Director, Federal Regulatory Affairs