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Maine
Hospital
Association

Representing community hospitals and the patients they serve.

TESTIMONY OF THE MAINE HOSPITAL ASSOCIATION

Chapter 270: Uniform Reporting System for Quality Data Sets

Public Hearing December 3, 2015

Good morning, I am Sandra Parker, Vice President and General Counsel for the Maine Hospital Association. The Maine Hospital Association (MHA) is a non-profit organization representing all 36 of our state's community-governed hospitals, which include 33 non-profit acute care hospitals, two private psychiatric hospitals, and one acute rehabilitation hospital.

On behalf of Maine's hospitals, the MHA fully supports all of the proposed changes, and respectfully requests an additional amendment.

In the interest of efficiency for all hospitals, as well as the Maine Health Data Organization (MHDO), we very much appreciate the MHDO's proposed changes that promote further alignment with Centers for Medicare & Medicaid Services data collection requirements. While we have been ardent supporters of the public reporting mission of the MHDO and Maine Quality Forum, we also have struggled when different agencies collect ever-so-slightly different data sets.

Our member hospitals also appreciate and fully support the proposal to delete the nursing-sensitive data set. These measures are very time and resource intensive for hospitals to collect and submit to the MHDO, and apparently of little value as these data are rarely requested, and the MHDO has never publicly reported them. The same is true for NSPC-1, NSPC-2 and NSPC-4, therefore we request that these three measures also be deleted. Deleting measures that are not comparatively reported in useable formats to consumers, purchasers, providers, insurers and policy makers is consistent with the statutory charge to the Maine Quality Forum regarding the collection of comparative quality data:

> 24-A MRSA §6951(2) The forum shall adopt a set of measures to evaluate and compare healthcare quality and provider performance. The measures must be adopted with guidance from the advisory council pursuant to section 6952. The quality measures adopted by the forum must be the basis for the rules for the collection of quality data adopted by the Maine Health Data Organization pursuant to Title 22, section 8708-A.
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> 24-A MRSA §4 The forum shall work collaboratively with the Maine Health Data Organization, healthcare providers, health insurance carriers and others to report in useable formats comparative healthcare quality information to consumers, purchasers, providers, insurers and policy makers. The forum shall produce annual quality reports in conjunction with the Maine Health Data Organization pursuant to Title 22, section 8712. No later than September 1, 2010, the forum shall make provider-specific information regarding quality of services available on its publicly accessible website.

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Finally, we also offer some technical corrections for the MHDO to consider:

- There are five defined words remaining in Section 1 that are not used anywhere in the draft rule and so could be deleted: licensed vocational nurse/licensed practical nurse, nosocomial, registered nurse, unlicensed assistive personnel, voluntary uncontrolled separation. If the MHDO deletes NSPC-4, the definition of vest or limb restraint may also be deleted.
- Section 4(C) of the rule relating to the data submission timeline refers to "the provisions of Sections 2, 4, 5 and 6." Under the proposed changes, there is no longer a section 5 or 6 of data submission categories.

Thank you very much for the opportunity to provide comment, and I'd be happy to answer any questions you may have.