

June 2, 2003

Attn: Rita Shapiro and Bob Connelly
CMS-CBC-QMHAG
7500 Security Blvd.
Baltimore, MD 21244
Sent via email: mds30comments@cms.hhs.gov

Re: Comments for Town Hall Meeting on the Refinement of the Minimum Data Set (MDS), Version 3.0

On behalf of the American Health Quality Association (AHQA), the membership organization of state-based Quality Improvement Organizations (QIOs), thank you for the opportunity to provide comments on the proposed Minimum Data Set (MDS) Draft Version 3.0. AHQA presents comments on the following two issues for your consideration:

1) AHQA Supports the Addition of Immunization Measures.

MDS is the source of data for the quality improvement efforts contained in the national Nursing Home Quality Improvement (NHQI) effort funded by CMS and supported by AHQA, the National Quality Forum (NQF), the American Health Care Association (AHCA), American Association of Homes and Services for the Aging (AAHSA), and other stakeholders. AHQA is especially pleased about the inclusion of immunization surveillance in the new "Section X" of the proposed data set. MDS 2.0 lacks the ability to track immunizations and MDS 3.0 addresses this deficiency. This will facilitate efforts by the Center for Disease Control and Prevention, CMS, and the QIOs to reduce vaccine-preventable diseases that take tens of thousands of lives annually, many in nursing homes. We believe a field should be added to document patient refusal to be immunized. This would best be done by adding as additional option to answer for each immunization, e.g. "0. No 1. Yes 2. Refused 3. Unknown."

2) AHQA Encourages Prompt Update of MDS 3.0.

We do not support further delay in the MDS update originally due over a year ago. At the same time, the National Quality Forum (NQF) has invested over 18 months and tens of thousands of dollars to provide CMS with reliable, validated quality improvement indicators. The work of the NQF is almost complete. Once the NQF finishes their work on a set of nursing home quality indicators endorsed by consumers, purchasers, researchers, quality improvement organizations, and providers, it will be timely to begin the process of amending the MDS 3.0 to make measurement possible.

We urge CMS to plan now for further MDS modifications to take into account the NQF quality indicators (and their specifications) so these can be made a part of the MDS 3.0. If the measure sets do not conform, the providers, the QIOs, and CMS will be faced with the unnecessary burden and cost of collecting more data than would otherwise be necessary.

For questions regarding our comments, feel free to contact Sylvia Gaudette Whitlock at the address or phone number on our stationery or by e-mail at swhitlock@ahqa.org.

Sincerely,

David G. Schulke
Executive Vice President