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Comments on Proposed CMS PPS-Exempt Cancer Hospital Measures

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The National Coalition for Cancer Survivorship (NCCS) appreciates the opportunity to comment on measures that will assess quality of care provided to Medicare beneficiaries in the prospective payment system-exempt (PPS-exempt) cancer hospitals.

The measures advance the mission of public reporting that is defined in section 3005 of the Affordable Care Act. The information to be reported is clearly defined, and the data source for each measure is also clearly identified. We will focus our comments on measure three – Potentially Avoidable Admissions and Emergency Department Visits Among Patients Receiving Outpatient Chemotherapy.

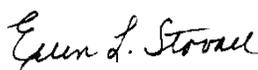
The measurement of avoidable admissions and emergency department visits among outpatient chemotherapy patients will permit assessment of the quality of chemotherapy administration and supportive care at the PPS-exempt cancer hospitals. The ability to make this assessment is important for Medicare patients served by these institutions and the integrity of the Medicare program. The PPS-exempt cancer hospitals provide a significant volume of outpatient chemotherapy, which makes the measure especially important for beneficiaries and the program.

The requirement to report chemotherapy outcomes related to hospital admission or emergency department care will encourage adherence to well-established clinical guidelines by professional societies, e.g., American Society of Clinical Oncology, National Comprehensive Cancer Network, and others, which are widely disseminated. Medicare patients would benefit from systematic utilization of these guidelines in PPS-exempt institutions. NCCS believes that reference to and reliance on these guidelines will encourage quality care during chemotherapy administration and will also enhance the ability of the PPS-exempt institutions to avoid hospital admissions and emergency department care for Medicare beneficiaries receiving outpatient chemotherapy.

Sincerely,



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