

# Agenda II: February 2023 Meeting Recap & Follow-up Items

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# Hospital Equity Measures 2023 Roadmap





# Hospital Equity Measures 2024 to 2027 Roadmap



\*Note: Due dates are set per statute as the CMS Health Equity Measures were finalized in August 2022.

## Summary of Simpson's Paradox

- A statistical phenomenon where an association between two variables in a population emerges, disappears or reverses when the population is divided into subpopulations.
- Occurs in research analysis when the distribution of data into groups results in some groups having an unequal representation when compared with others. This event is known as a confounding variable and it may be because of the imbalance association between two variables.
- Happens because disaggregation of the data (e.g., splitting it into subgroups) can cause certain subgroups to have an imbalanced representation compared to other subgroups.

# How might Simpson's Paradox occur in hospital equity measure analyses?

- Evaluating an entire health system vs its individual hospitals
- Performing multi-level analyses:
  - Readmissions by SDOH and behavioral health
  - Age and payor type
- Aggregating (or disaggregating) across different regions
- Disaggregating by racial/ethnic subcategory
- Comparing different hospital types by equity category
  - Safety net, rural/urban, investor owned/not for profit, academic, small/large





Provide technical assistance to hospitals in the development of first annual hospital equity reports

**January 2026 to September 2027**

By September 30, 2027, **Advisory Committee** to develop and recommend second set of recommendations regarding the submitted hospitals' health equity plans.



Target to finalize regulations by **January 2025**

- Specify the measures to be analyzed
- Reporting specifications



**Hospitals and hospital systems:**

- Identify data sources for measures that are specified in regulations
- Analyze and stratify each of those measures for the patient population based on available data
- **For Systems:** Aggregate all of the data across all individual hospitals
- Apply data de-identification guidelines to the data



**January through December (calendar year)**

- Hospitals and hospital systems to input the de-identified data into the standardized reporting format as specified by HCAI

**September 30, 2025 – Report due date**

- Individual and Hospital Systems Reports for the prior year are due September 30
- **For Systems:** Submit an equity report that is disaggregated at the individual hospital level **and** aggregated across all hospitals in the system.

**January 2026**



Post Equity Reports to HCAI website and Open Data Portal (ODP)



**Hospitals and hospital systems** to post Equity Reports to their website



**October to December 2025**

- Basic Report Compliance Check (data validation to be determined)

*Flow Chart for first year reporting.*

*Will be generalizable to future year reporting, based on reporting deadlines as specified in regulations.*