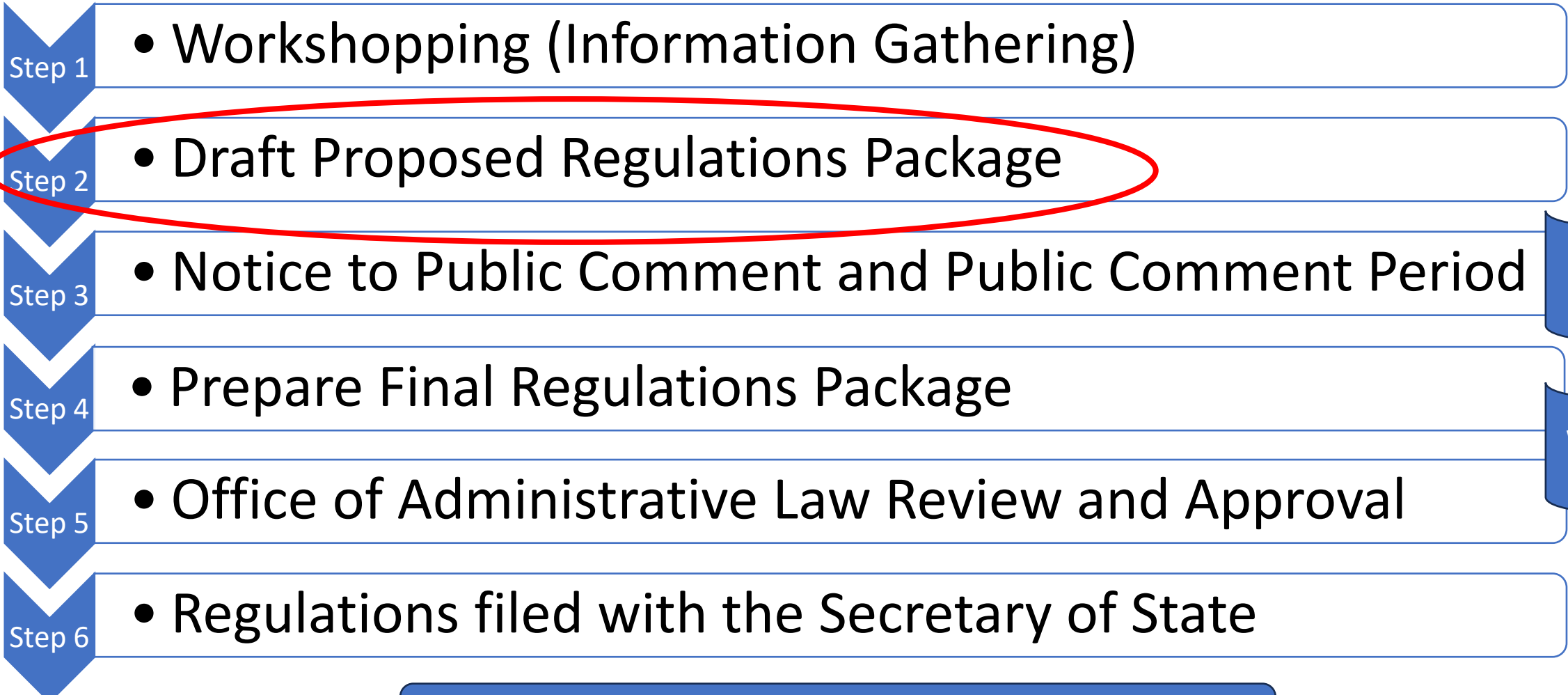# Agenda V: Hospital Equity Measures Program Updates

Tara Zimonjic, Chief Planning Officer, HCAI

Christopher Krawczyk, PhD, Chief Analytics Officer, HCAI

Robyn Strong, Chief Data Programs Officer, HCAI

Administrative Procedure Act - Regulations Process

Step 1	• Workshopping (Information Gathering)
Step 2	• Draft Proposed Regulations Package
Step 3	• Notice to Public Comment and Public Comment Period
Step 4	• Prepare Final Regulations Package
Step 5	• Office of Administrative Law Review and Approval
Step 6	• Regulations filed with the Secretary of State

Summer 2024

Winter 2024

Target Effective Date: January 1, 2025

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Final Measures for General Acute Care Hospitals Based on HEMAC Recommendations

Structural Measures

- Joint Commission's Health Care Disparities Reduction and Patient-Centered Communication Accreditation Standards:
  - Designate an individual to lead hospital health equity activities
  - Provide documentation of policy prohibiting discrimination
  - Report percentage of patients by preferred language spoken
- CMS Hospital Commitment to Health Equity Structural (HCHE) Measure
- CMS Screening for Social Drivers of Health
- CMS Screen Positive Rate for Social Drivers of Health

Core Quality Measures

- HCAHPS survey: Would recommend hospital
- HCAHPS survey: Received information and education
- AHRQ Quality Indicator Pneumonia Mortality Rate
- AHRQ Patient Safety Indicator Death Rate among Surgical Inpatients with Serious Treatable Conditions
- **CMQCC NTSV Cesarean Birth Rate**
- **CMQCC Vaginal Birth After Cesarean (VBAC) Rate**
- **CMQCC Exclusive Breast Milk Feeding**
- HCAI All-Cause Unplanned 30-Day Hospital Readmission Rate
- HCAI All-Cause Unplanned 30-Day Hospital Readmission Rate, stratified by behavioral health diagnosis

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Final Measures for Children's Hospitals Based on HEMAC Recommendations

Structural Measures

- Joint Commission's Health Care Disparities Reduction and Patient-Centered Communication Accreditation Standards:
  - Designate an individual to lead hospital health equity activities
  - Provide documentation of policy prohibiting discrimination
  - Report percentage of patients by preferred language spoken
- CMS Hospital Commitment to Health Equity Structural (HCHE) Measure
- CMS Screening for Social Drivers of Health
- CMS Screen Positive Rate for Social Drivers of Health

Core Quality Measures

- Pediatric experience survey with scores of willingness to recommend the hospital
- HCAI All-Cause Unplanned 30-Day Hospital Readmission Rate

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Final Measures for Acute Psychiatric Hospitals Based on HEMAC Recommendations

Structural Measures

- Joint Commission's Health Care Disparities Reduction and Patient-Centered Communication Accreditation Standards:
  - Designate an individual to lead hospital health equity activities
  - Provide documentation of policy prohibiting discrimination
  - Report percentage of patients by preferred language spoken
- CMS Hospital Commitment to Health Equity Structural (HCHE) Measure
- CMS Screening for Social Drivers of Health
- CMS Screen Positive Rate for Social Drivers of Health

Core Quality Measures

- HCAHPS survey: Would recommend hospital
- HCAHPS survey: Received information and education
- AHRQ Quality Indicator Pneumonia Mortality Rate
- HCAI All-Cause Unplanned 30-Day Hospital Readmission Rate in an inpatient psychiatric facility (IPF)
- HCAI All-Cause Unplanned 30-Day Hospital Readmission Rate, stratified by behavioral health diagnosis
- CMS Screening for Metabolic Disorders
- The Joint Commission's SUB-3: Alcohol and Other Drug Use Disorder Treatment Provided or Offered at Discharge and SUB-3a: Alcohol and Other Drug Use Disorder Treatment at Discharge

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DRAFT Stratification Groupings

Christopher Krawczyk, PhD, Chief Analytics Officer, HCAI

Stratification Requirements

- Assembly Bill 1204 requires a hospital equity report to include each measure broken down by each stratification category below, to the extent the data is available:
  - (a) Race /Ethnicity
  - (b) Age
  - (c) Sex Assigned at Birth
  - (d) Expected Payer
  - (e) Preferred Language
  - (f) Disability
  - (g) Gender Identity
  - (h) Sexual Orientation

- HCAI also added a "Behavioral Health Stratification" for readmissions as a required core quality measure.

DRAFT Stratification Groupings for Expected Payer

DRAFT Stratification Groupings for Sex Assigned at Birth

Expected Payer Standard Used: Based on HCAI Evaluation	Medicare
	Medicaid
	Private
	Self-Pay
	Other

Sex Assigned at Birth Standard Used: The Office of the National Coordinator (ONC) Interoperability Standards Advisory (ISA), HL7 Version 3. Link: USCDI Sex Assigned at Birth	Female
	Male
	Unknown/ Other

DRAFT Stratification Groupings for Age

Age (General Acute Care and Acute Psychiatric Hospitals) Standard Used: Based on HCAI Evaluation	Less than 18
	18 to 24
	25 to 34
	35 to 44
	45 to 54
	55 to 64
	65 to 74
	75 to 84
	85+

Age (Children's Hospitals) Standard Used: Age groups from the 2022 Population File for Use with 2023 AHRQ Quality Indicators, as well as HCAI evaluation. Link: [2022 Population File for Use with 2023 AHRQ Quality Indicators](#)	0–4 years
	5–9 years
	10–14 years
	15 years +

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DRAFT Stratification Groupings for Preferred Language

Preferred Language Standard Used: Based on HCAI Evaluation	English Language
	Asian/ Pacific Islander Languages
	Middle Eastern Languages
	Spanish Language
	Other/Unknown

DRAFT Stratification Groupings for Behavioral Health

Behavioral Health	Mental Health Disorder
	Co-Occurring Disorder
	Substance Use Disorders

DRAFT Stratification Groupings for Disability Status

Disability Status Standard Used: Federal standards from ONC ISA, HL7 Version 1.1.0 and the CDC PLACES disability measure Link: HL7 Disability Status Additional Resources: CDC PLACES Disability Measure	Does not have disability
	Mobility Disability
	Cognition disability
	Hearing Disability
	Vision Disability
	Self-Care disability
	Independent Living disability

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DRAFT Stratification Groupings for Sexual Orientation and Gender Identity

Sexual Orientation Standard Used: Federal standards from ONC ISA, SNOMED CT, HL7 Version 3 Link: [USCDI Sexual Orientation](#)	Lesbian, gay or homosexual
	Straight or heterosexual
	Bisexual
	Something else
	Don't know
	Choose not to disclose

Gender Identity Standard Used: Federal standards from ONC ISA, SNOMED CT, HL7 version 3 Link: [USCDI Gender Identity](#)	Female
	Female-to-Male (FTM)/Transgender Male/Trans Man
	Male
	Male-to-Female (MTF)/Transgender Female/Trans Woman
	Genderqueer, neither exclusively male nor female
	Additional gender category or other
	Choose not to disclose

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Questions/Discussion

Race/Ethnicity Stratification

Robyn Strong, Chief Data Programs Officer, HCAI

OMB Race/Ethnicity Category Update – March 28, 2024

Statistical Policy Directive 15 Key Revisions:

- Combined question for race and ethnicity
- Encourages making selection of multiple options as they apply
- Adds Middle Eastern or North African (MENA) as a separate category – in 1997 version grouped under "White"
- Requires collection of additional detail for most situations to ensure further disaggregation when useful and appropriate.

What is your race and/or ethnicity?
Select all that apply and enter additional details in the spaces below.

☐ **American Indian or Alaska Native** – _Enter, for example, Navajo Nation, Blackfeet Tribe of the Blackfeet Indian Reservation of Montana, Native Village of Barrow Inupiat Traditional Government, Nome Eskimo Community, Aztec, Maya, etc._

[   ]

☐ **Asian** – _Provide details below._
☐ Chinese ☐ Asian Indian ☐ Filipino
☐ Vietnamese ☐ Korean ☐ Japanese
Enter, for example, Pakistani, Hmong, Afghan, etc.

[   ]

☐ **Black or African American** – _Provide details below._
☐ African American ☐ Jamaican ☐ Haitian
☐ Nigerian ☐ Ethiopian ☐ Somali
Enter, for example, Trinidadian and Tobagonian, Ghanaian, Congolese, etc.

[   ]

☐ **Hispanic or Latino** – _Provide details below._
☐ Mexican ☐ Puerto Rican ☐ Salvadoran
☐ Cuban ☐ Dominican ☐ Guatemalan
Enter, for example, Colombian, Honduran, Spaniard, etc.

[   ]

☐ **Middle Eastern or North African** – _Provide details below._
☐ Lebanese ☐ Iranian ☐ Egyptian
☐ Syrian ☐ Iraqi ☐ Israeli
Enter, for example, Moroccan, Yemeni, Kurdish, etc.

[   ]

☐ **Native Hawaiian or Pacific Islander** – _Provide details below._
☐ Native Hawaiian ☐ Samoan ☐ Chamorro
☐ Tongan ☐ Fijian ☐ Marshallese
Enter, for example, Chuukese, Palauan, Tahitian, etc.

[   ]

☐ **White** – _Provide details below._
☐ English ☐ German ☐ Irish
☐ Italian ☐ Polish ☐ Scottish
Enter, for example, French, Swedish, Norwegian, etc.

[   ]

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Currently in draft regulations – based primarily on OMB 1997 Standards for Race/ Ethnicity

Race/Ethnicity	American Indian or Alaskan Native
	Asian
	Black or African American
	Hispanic or Latino
	Native Hawaiian or Other Pacific Islander
	Other Race
	White

Discussion Questions

- Should HCAI align with 2024 race/ethnicity OMB groupings (add MENA grouping) , even if not all hospitals are collecting the more granular data?

- Are there any concerns if HCAI does add MENA to the list of stratification categories if some hospitals continue to group those patients under "White"?

- Are there other considerations HCAI should take into account when determining the race/ethnicity stratification grouping?

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Next Steps

Finalize draft regulations → Post Regulations for Public Comment (45 days) → Review & Respond to Public Comment; Make any necessary adjustments → IF NEEDED: 2nd Round of Public Comment → Finalize Regulations Packaged → Target Effective Date January 1 2025

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