

To: Centers for Medicare and Medicaid Services

From: Brain Attack Coalition

Date: 1/24/11

Re: Proposed New Stroke Outcome Measures

The Brain Attack Coalition is a multidisciplinary group of health care professionals and other government and non-profit groups, agencies, and organizations involved in various aspects of stroke care. We have recently been made aware of the development of two new ischemic stroke performance measures for hospitals, namely 30 day all cause mortality and 30 day readmission rates, and we wish to present our concerns for your consideration.

The BAC and its member organizations are very aware of the importance of improving hospital based and out patient care of patients with a stroke. We support these ongoing efforts and appreciate how they can inform patients and improve outcomes.

However we are very concerned about various aspects of the recently circulated stroke performance measures as noted above. In particular, it seems that these new measures do not properly adjust for stroke severity by using contemporary and well validated scoring systems such as the NIH Stroke Scale. We are aware that many co-morbidities are being used to severity adjust, but we are concerned that the absence of the NIH Stroke Scale score (or another well validated severity measure) will produce flawed data and misleading outcome results. These erroneous results could unfairly penalize hospitals and lead to confusion in the marketplace.

In evaluating the development of the assessment tool proposed to CMS by the Yale group, we believe that the methodology contains serious flaws in terms of the qualitative and quantitative approaches, inclusion and exclusion of various confounders, included populations, and overall applicability. Many of these limitations have been nicely summarized in the response letters to CMS sent in by the American Heart Association/American Stroke Association and the American Academy of Neurology. The BAC agrees with the limitations that have been brought to your attention and the need for an improved tool before these measures are 'rolled out' and widely utilized to track outcomes and potentially affect reimbursements and other aspects of care.

As noted below, the BAC includes representatives from many diverse organizations that represent many stakeholders involved in the care of patients with acute strokes. Members of the BAC have a strong interest in improving stroke care, but also in making sure that any new programs or initiatives adhere to the highest standards of scientific rigor as well as clinical relevance and applicability. Based on these concerns and factors, we request that CMS carefully reassess the two new proposed stroke measures. We would suggest that their implementation be delayed

until they can be properly modified to include one or more validated measures of stroke severity.

We greatly appreciate your willingness to hear our concerns and hope you will see fit to act upon them. The BAC and its member organizations have a strong desire to work with CMS and its various agencies to further improve stroke care by developing comprehensive and fair outcome measures.

This letter has been approved by the following representatives from the indicated groups and organizations:

American Academy of Neurology, Lawrence R. Wechsler, M.D.

American Association of Neurological Surgeons, E. Sander Connolly, Jr., M.D.

American Association of Neuroscience Nurses, Barbara Mancini, R.N.

American College of Emergency Physicians, Andy Jagoda, M.D.

American Society of Neuroradiology, Richard E. Latchaw, M.D.

American Stroke Association, Stephen Prudhomme

Centers for Disease Control and Prevention* Division for Heart Disease and Stroke Prevention, Mary G. George, M.D. M.S.P.H. □

Congress of Neurological Surgeons, LTC Rocco A. Armonda, M.D.

Department of Veterans Affairs, Robert Ruff, M.D.

National Association of Chronic Disease Directors, Kathy Foell, M.S., R.D.

National Association of EMS Physicians, Todd J. Crocco, M.D.

National Association of State EMS Officials, Robert R. Bass, M.D.

National Stroke Association, Mr. James Baranski

Neurocritical Care Society, Daryl R. Gress, M.D. □

Society of NeuroInterventional Surgery, Mary E. (Lee) Jensen, M.D.

Stroke Belt Consortium, Mark J. Alberts, M.D.

* The findings and conclusions in this document are those of the authors and do not necessarily represent the official position of the Centers for Disease Control and Prevention.