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To: Hospital Quality Liaisons

Cc: Hospital CFOs
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Justin Ziombra, MHA
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From: HSCRC Quality/Performance Measurement Team

Date: July 13, 2017

Re: Measure Changes for the Rate Year 2019 Maryland Hospital Acquired Conditions Program

This memo summarizes measure changes that will be implemented retrospectively to the Maryland Hospital Acquired Conditions (MHAC) program for rate year (RY) 2019. The HSCRC will implement changes at this juncture in response to clinical concerns raised during the most recent PPC vetting process. The HSCRC, the hospital industry, 3M, and the Maryland Hospital Association (MHA) all attend the PPC vetting meetings, with the stated purpose of ensuring that the PPC grouper be as clinically accurate as possible. The RY 2019 changes that the HSCRC will implement retrospectively are based on updates that 3M will make to the Potentially Preventable Complications (PPC) Version 34 (v.34) clinical logic, as well as policy decisions made by the HSCRC. 3M has also agreed to implement additional clinical logic changes in PPC Grouper v.35. The HSCRC anticipates using v.35 of the grouper in the RY 2020 MHAC Program.

Suspension of Three Obstetrical PPCs and One Surgical PPC for MHAC Payment

Considering the recommendations from the most recent HSCRC-MHA-3M PPC vetting meeting, HSCRC will not include the following PPCs in the MHAC Payment Policy:

- 1) PPCs 55 and 56 Obstetric Hemorrhage With and Without Transfusion (Combination PPC)
- 2) PPC 62 Delivery with Complications
- 3) PPC 39 Reopening Surgical Site

This policy decision is based on 3M's recommendation, pending additional evaluation and research on these measures (i.e., these measures may be modified and reintroduced in PPC Grouper v.35).

Changes to PPC Grouper Clinical Logic to be made in October 2017

3M will incorporate changes in response to issues raised about 3 PPCs listed below to the PPC v.34 clinical logic, in addition to other approved requests for PPC v.35. The three changes to PPC v.34 clinical logic will be released alongside of PPC v.35 in October 2017.

- 1) PPC 31 Pressure Ulcer staging impact with new coding guidelines – 3M will add a new pressure ulcer exclusion group for LOS >4 days. (See Appendix A for detail on 3M's response to address the request).
- 2) PPC 40 Post-Operative Hemorrhage & Hematoma without Hemorrhage Control Procedure or I&D Proc diagnosis exclusion logic is not applied correctly – 3M is updating PPC Version 34 PPC exclusion and assignment hierarchy logic:
 - a. In the PPC definition manual, PPC 40 has an exclusion criteria for Coagulation & Platelet Disorders (DX exclusion group 73). Within Exclusion group 73 Coagulation & Platelet Disorders, dx code D69.6 is part of this exclusion group when present on admission as a secondary diagnosis. D69.6 will be appropriately excluded for PPC 40.
 - b. PPC 40 cases will exclude PPC 20 Other GI complications w/o transfusion or significant bleeding (See Appendix A).
- 3) PPC 66 Catheter-Related Urinary Tract Infection exclusion group 108 expansion request – 3M is expanding exclusion group 108 (See Appendix A. This PPC is not included in the RY 2019 payment program as it is in monitoring only status).

MHA has indicated that they will send out a final summary of the updates that 3M will make to version 35 of the grouper, in light of concerns raised during the spring 2017 meeting.

MHAC Reports

HSCRC notes the current MHAC reports **do not** contain any of the changes listed in the memo above. Staff will re-run baseline and performance data and disseminate the results after the above changes are made to the v. 34 of the grouper in the October release. However, an updated calculation sheet without the three suspended PPCs is under development, and once finalized, will be posted to the website (http://hscrc.maryland.gov/Pages/init_gi_MHAC.aspx).

Please feel free to submit any questions or comments to hscrc.quality@maryland.gov.

Appendix A:

3M Response to PPC 31 Concerns

Issue
PPC-31- Decubitus Ulcer - JHH is requesting an exclusion for present on admission due to the double coding of POA and not POA pressure ulcer staging implemented by the new coding guideline (Oct 2016). This new coding guideline requires coding of pressure ulcers at time of admission and at time of discharge. Pressure ulcer staging can be subjective and therefore should be excluded if POA and any stage. According to "May 2016 Meeting Summary of Issues & Determinations", page 6, rationale for 3M non-agreement is as follows "Patients transferred from a nursing home or from another hospital who have a pressure ulcer at the time of arrival should obviously have the ulcer coded as POA." This would also negate that pressure ulcers be considered a "never event" if POA is no longer an applicable exclusion. JHH also feels that the staging of pressure ulcers can be subjective.
Decision
3M has agreed to create a Pressure Ulcer exclusion group to PPC 31 - Decubitus Ulcer - LOS > 4. The exclusion group will consist of the following codes present on admission: L89.000 Pressure ulcer of unspecified elbow, unstageable L89.001 Pressure ulcer of unspecified elbow, stage 1 L89.002 Pressure ulcer of unspecified elbow, stage 2 L89.003 Pressure ulcer of unspecified elbow, stage 3 L89.004 Pressure ulcer of unspecified elbow, stage 4 L89.010 Pressure ulcer of right elbow, unstageable L89.011 Pressure ulcer of right elbow, stage 1 L89.012 Pressure ulcer of right elbow, stage 2 L89.013 Pressure ulcer of right elbow, stage 3 L89.014 Pressure ulcer of right elbow, stage 4 L89.020 Pressure ulcer of left elbow, unstageable L89.021 Pressure ulcer of left elbow, stage 1 L89.022 Pressure ulcer of left elbow, stage 2 L89.023 Pressure ulcer of left elbow, stage 3 L89.024 Pressure ulcer of left elbow, stage 4 L89.100 Pressure ulcer of unspecified part of back, unstageable L89.101 Pressure ulcer of unspecified part of back, stage 1 L89.102 Pressure ulcer of unspecified part of back, stage 2 L89.103 Pressure ulcer of unspecified part of back, stage 3 L89.104 Pressure ulcer of unspecified part of back, stage 4 L89.110 Pressure ulcer of right upper back, unstageable L89.111 Pressure ulcer of right upper back, stage 1 L89.112 Pressure ulcer of right upper back, stage 2

L89.113 Pressure ulcer of right upper back, stage 3
L89.114 Pressure ulcer of right upper back, stage 4
L89.120 Pressure ulcer of left upper back, unstageable
L89.121 Pressure ulcer of left upper back, stage 1
L89.122 Pressure ulcer of left upper back, stage 2
L89.123 Pressure ulcer of left upper back, stage 3
L89.124 Pressure ulcer of left upper back, stage 4
L89.130 Pressure ulcer of right lower back, unstageable
L89.131 Pressure ulcer of right lower back, stage 1
L89.132 Pressure ulcer of right lower back, stage 2
L89.133 Pressure ulcer of right lower back, stage 3
L89.134 Pressure ulcer of right lower back, stage 4
L89.140 Pressure ulcer of left lower back, unstageable
L89.141 Pressure ulcer of left lower back, stage 1
L89.142 Pressure ulcer of left lower back, stage 2
L89.143 Pressure ulcer of left lower back, stage 3
L89.144 Pressure ulcer of left lower back, stage 4
L89.150 Pressure ulcer of sacral region, unstageable
L89.151 Pressure ulcer of sacral region, stage 1
L89.152 Pressure ulcer of sacral region, stage 2
L89.153 Pressure ulcer of sacral region, stage 3
L89.154 Pressure ulcer of sacral region, stage 4
L89.200 Pressure ulcer of unspecified hip, unstageable
L89.201 Pressure ulcer of unspecified hip, stage 1
L89.202 Pressure ulcer of unspecified hip, stage 2
L89.203 Pressure ulcer of unspecified hip, stage 3
L89.204 Pressure ulcer of unspecified hip, stage 4
L89.210 Pressure ulcer of right hip, unstageable
L89.211 Pressure ulcer of right hip, stage 1
L89.212 Pressure ulcer of right hip, stage 2
L89.213 Pressure ulcer of right hip, stage 3
L89.214 Pressure ulcer of right hip, stage 4
L89.220 Pressure ulcer of left hip, unstageable
L89.221 Pressure ulcer of left hip, stage 1
L89.222 Pressure ulcer of left hip, stage 2
L89.223 Pressure ulcer of left hip, stage 3
L89.224 Pressure ulcer of left hip, stage 4
L89.300 Pressure ulcer of unspecified buttock, unstageable
L89.301 Pressure ulcer of unspecified buttock, stage 1
L89.302 Pressure ulcer of unspecified buttock, stage 2
L89.303 Pressure ulcer of unspecified buttock, stage 3
L89.304 Pressure ulcer of unspecified buttock, stage 4
L89.310 Pressure ulcer of right buttock, unstageable
L89.311 Pressure ulcer of right buttock, stage 1

L89.312 Pressure ulcer of right buttock, stage 2
L89.313 Pressure ulcer of right buttock, stage 3
L89.314 Pressure ulcer of right buttock, stage 4
L89.320 Pressure ulcer of left buttock, unstageable
L89.321 Pressure ulcer of left buttock, stage 1
L89.322 Pressure ulcer of left buttock, stage 2
L89.323 Pressure ulcer of left buttock, stage 3
L89.324 Pressure ulcer of left buttock, stage 4
L89.41 Pressure ulcer of contiguous site of back, buttock and hip, stage 1
L89.42 Pressure ulcer of contiguous site of back, buttock and hip, stage 2
L89.43 Pressure ulcer of contiguous site of back, buttock and hip, stage 3
L89.44 Pressure ulcer of contiguous site of back, buttock and hip, stage 4
L89.45 Pressure ulcer of contiguous site of back, buttock and hip, unstageable
L89.500 Pressure ulcer of unspecified ankle, unstageable
L89.501 Pressure ulcer of unspecified ankle, stage 1
L89.502 Pressure ulcer of unspecified ankle, stage 2
L89.503 Pressure ulcer of unspecified ankle, stage 3
L89.504 Pressure ulcer of unspecified ankle, stage 4
L89.510 Pressure ulcer of right ankle, unstageable
L89.511 Pressure ulcer of right ankle, stage 1
L89.512 Pressure ulcer of right ankle, stage 2
L89.513 Pressure ulcer of right ankle, stage 3
L89.514 Pressure ulcer of right ankle, stage 4
L89.520 Pressure ulcer of left ankle, unstageable
L89.521 Pressure ulcer of left ankle, stage 1
L89.522 Pressure ulcer of left ankle, stage 2
L89.523 Pressure ulcer of left ankle, stage 3
L89.524 Pressure ulcer of left ankle, stage 4
L89.600 Pressure ulcer of unspecified heel, unstageable
L89.601 Pressure ulcer of unspecified heel, stage 1
L89.602 Pressure ulcer of unspecified heel, stage 2
L89.603 Pressure ulcer of unspecified heel, stage 3
L89.604 Pressure ulcer of unspecified heel, stage 4
L89.610 Pressure ulcer of right heel, unstageable
L89.611 Pressure ulcer of right heel, stage 1
L89.612 Pressure ulcer of right heel, stage 2
L89.613 Pressure ulcer of right heel, stage 3
L89.614 Pressure ulcer of right heel, stage 4
L89.620 Pressure ulcer of left heel, unstageable
L89.621 Pressure ulcer of left heel, stage 1
L89.622 Pressure ulcer of left heel, stage 2
L89.623 Pressure ulcer of left heel, stage 3
L89.624 Pressure ulcer of left heel, stage 4
L89.810 Pressure ulcer of head, unstageable

L89.811	Pressure ulcer of head, stage 1
L89.812	Pressure ulcer of head, stage 2
L89.813	Pressure ulcer of head, stage 3
L89.814	Pressure ulcer of head, stage 4
L89.890	Pressure ulcer of other site, unstageable
L89.891	Pressure ulcer of other site, stage 1
L89.892	Pressure ulcer of other site, stage 2
L89.893	Pressure ulcer of other site, stage 3
L89.894	Pressure ulcer of other site, stage 4
L89.91	Pressure ulcer of unspecified site, stage 1
L89.92	Pressure ulcer of unspecified site, stage 2
L89.93	Pressure ulcer of unspecified site, stage 3
L89.94	Pressure ulcer of unspecified site, stage 4
L89.95	Pressure ulcer of unspecified site, unstageable

3M Response to PPC 40 Concerns

Issue
<p>Female patient with uterine fibroid admitted for surgical intervention developed postoperative hemoperitoneum. Return to OR was required for further intervention. Coding of postoperative hemorrhage / hemoperitoneum generated two mhac's for what is the same condition.</p>
<p>Two codes are required to report the postoperative hemoperitoneum: N99828, postprocedural hemorrhage of a GU system organ following a GU system procedure and K66.1, hemoperitonuem. Both PPC 40 and PPC 20 are generated for this condition.</p>
<p>Multiple PPC's for one diagnosis. The patient was coded for a hemoperitoneum and also coded for a hematoma for the GU system. This caused a flag for 2 PPC's (20 and 40). The patient was coded K66.1 Hemoperitoneum, which flagged for PPC 20 Other Gastrointestinal Complications without Trasfusion or Significant Bleeding. They were also coded as N99.820 Postprocedural hemorrhage and hematoma of a genitourinary system organ or structure following, which flagged for PPC 40 Peri-Operative Hemorrhage & Hematoma without Hemorrhage Control Procedure or I&D Procedure. Patient was a post vaginal delivery patient that had elective sterilization done. Patient had to go back to the OR and it was found they had a hemoperitoneum in the abdomen that was estimated to be 1500-1800ml of blood. No active bleeding was observed. HgB was stable and did not require any blood transfusions. The area was drained and irrigated.</p>

Decision

PPC Version 34 hierarchy logic was updated: PPC 40 (Operative Hemorrhage & Hematoma without Hemorrhage Control Procedure or I&D Procedure) will exclude PPC 20 (Other GI complications w/o transfusion or significant bleeding).

3M Response to PPC 66 Concerns**Issue**

PPC can potentially be assigned for pediatric patients that would be excluded if the patients were adult or children with acquired rather than congenital fistulas.
In 2015 (See Attached, "Resolved Issue List – 2015", row 46), 3M agreed to add the following congenital codes to Exclusion group 108:
7538 - "congenital anomaly of bladder urethra" is the code for congenital urethral fistula
753.8 (congenital anomaly of bladder urethra)
752.39 (anomalies of uterus)
Congenital version (code) for the fistula is not on the exclusion list. See Exclusion Group 108 – excludes intestinal/bladder fistula and urogenital fistula (but only acquired – not congenital).
JHH requests that the new codes be added to V34 for congenital anomalies.

Decision

3M will add to PPC 35 the following diagnoses to exclusion group 108 Colovesical and Urogenital Tract Fistulas
Q51.818 Other congenital malformations of uterus
Q51.9 Congenital malformation of uterus and cervix, unspecified
Q64.11 Supravesical fissure of urinary bladder
Q64.5 Congenital absence of bladder and urethra
Q64.6 Congenital diverticulum of bladder
Q64.70 Unspecified congenital malformation of bladder and urethra
Q64.71 Congenital prolapse of urethra
Q64.72 Congenital prolapse of urinary meatus
Q64.73 Congenital urethrorectal fistula
Q64.74 Double urethra
Q64.75 Double urinary meatus
Q64.79 Other congenital malformations of bladder and urethra