

**U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
CENTERS FOR MEDICARE & MEDICAID SERVICES**

**OFFICE OF MANAGEMENT AND BUDGET
PAPERWORK REDUCTION ACT
CLEARANCE PACKAGE**

SUPPORTING STATEMENT-PART B

PRESSURE ULCER MEASURE DATA ELEMENTS
FOR THE COLLECTION OF DATA
PERTAINING TO THE RATE OF
PRESSURE ULCERS THAT ARE NEW OR WORSENERD IN PATIENTS IN
LONG TERM CARE HOSPITALS (LTCHs)

Supporting Statement for Paperwork Reduction Act Submissions
Part B

***Pressure Ulcer Measure Data Elements for the Collection of Data Pertaining To
the Rate of Pressure Ulcers That Are New or Worsened In Patients In Long
Term Care Hospitals (LTCHs)***

COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

1. Background

Section 3004 of The Affordable Care Act authorizes the establishment of a new quality reporting program for Long Term Care Hospitals (LTCHs). LTCHs that fail to submit quality measures data may be subject to a 2 percentage point reduction in their annual update to the standard Federal rate for discharges occurring during a rate year, beginning in FY 2014. One of the quality measures that we requiring LTCHs to collect and submit data on is the Percent of Residents with Pressure Ulcers That Are New or Have Worsened.

A new pressure ulcer data set has been developed specifically for use in LTCHs. This pressure ulcer data set incorporates data items contained in other, well known and clinically established pressure ulcer data sets, including but not limited to the Minimum Data Set 3.0 (MDS 3.0) and Continuity Assessment Record & Evaluation (CARE).

Beginning October 1, 2012, LTCH providers will begin to collect a newly created set of pressure ulcer measure data elements for the LTCH quality reporting program. This proposed data element set consists of the following components:

- (1) pressure ulcer documentation;
- (2) selected covariates related to pressure ulcers;
- (3) patient demographic information; and;
- (4) provider attestation section

The use of the pressure ulcer data element set is necessary in order to allow CMS to collect LTCH quality measures data in compliance with Section 3004 of the Affordable Care Act. There is no other reasonable alternative available to CMS to use for the collection of pressure ulcer data.

2. Burden Estimate For Pressure Ulcer Submissions (Total Hours and Wages)

Section 3004 of the Affordable Care Act states that the Secretary of the Department of Health and Human Services should establish a quality reporting program for Long Term Care Hospitals (LTCHs) by fiscal year 2014. To meet this requirement, the Centers for Medicare & Medicaid Services (CMS) is proposing to collect quality measure data regarding pressure ulcers that are new or that have become worsened since admission to LTCH hospitals.

To estimate the total time and cost burden associated with the pressure ulcer submissions contained in the pressure ulcer measure data elements data set, CMS made the following calculations (Note: all values rounded to whole numbers):

Total number of LTCHs= **435**

Total Number of LTCH discharges per year = **131,500**

Average Number of CARE Data Set responses per LTCH patient per admission = **2**
(Submission on admission & submission on discharge)

Average Number of LTCH CARE Data Set responses by all LTCHs per year = 263,000
(131,500 discharges per year x 2 submissions per patient = 263,000 submissions/LTCHs/year)

Average Number of LTCH CARE Data Set responses per each LTCH per year = 604
(131,500 discharges per year x 2 submissions per patient = 263,000 submissions per all LTCHs per year)
(263,000 submissions per all LTCHs per year / 435 LTCHs in U.S. = 604 submissions/all LTCHS per year)

Average Number LTCH CARE Data Set responses per each LTCH per month = 50
(604 pressure ulcer submissions per year/12 months/year = 50)

Number of LTCH CARE Data Set responses per patient per admission = 2
(Submissions done on admission and discharge)

Average Time Per LTCH CARE Data Set Response Per Patient = **5 minutes**

Average Time Per Total LTCH CARE Data Set Responses Per Patient Per Admission = **10 minutes**
(5 minutes x 2 submissions/per admission = 10 minutes)

Estimated Hour Burden Associated with Pressure Ulcer Data Set Responses

Estimated **Monthly** Hour Burden per **each** LTCH = **4.16** hour/month

Estimated **Annual** Hour Burden per **each** LTCH = **50** hour/year

Estimated **Annual** Hour Burden for **all** LTCHs = **21,750** hour/year

Estimated Cost Burden Associated with Pressure Ulcer Data Set Responses

Average Cost per **each** submission = **\$3.35**

Average Cost per **each** LTCH/year = **\$1,013.50**

Average Cost per **each** LTCH/month = **\$84.46**

Average Cost per **all** LTCHs/year = **\$440,872**

To estimate the total hour and cost burden, CMS consulted the following resources:

- Data Source – MedPAC Report To Congress: March 2011
(http://www.medpac.gov/chapters/Mar11_Ch10.pdf)
 - Data Source – U.S. Bureau of Labor wage statistics (www.bls.gov)
3. LTCH CARE Data Set responses will be required for all patients admitted to Long Term Care Hospitals. This requirement is outlined in the FY2012 IPPS/LTCH, FDMS Docket No. CMS-2011-0053.
 4. N/A
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