



February 28, 2013

**Health Resources Services Administration**

Reports Clearance Officer, Room 10–29,  
Park lawn Building, 5600 Fishers Lane,  
Rockville, MD 20857

Subject: [FR Doc. 2012–31399 Medicare Rural Hospital Flexibility Grant Program Performance Measure Determination.

To Whom It May Concern:

The National Organization of State Offices of Rural Health (NOSORH) is pleased to have the opportunity to respond to the Health Resources and Services Administration comment request regarding information collection for the Medicare Rural Hospital Flexibility Grant Program Performance Measure Determination.

NOSORH is the national non-profit membership organization of the fifty State Offices of Rural Health (SORH). Our mission is to promote the capacity of State Offices of Rural Health to improve health care in rural America through leadership development, education, and partnerships. The SORH are anchors of rural health activity throughout the nation and have responsibility for information dissemination, coordination, data collection and technical assistance to support rural communities. There are 45 Medicare Rural Hospital Flexibility Grantees; most are State Offices of Rural Health or are contracted by the State Office of Rural Health.

In response to the request for comment the NOSORH Board of Directors (23 SORH) reviewed the federal register notice and voted that NOSORH should file a response to the call for comments from HRSA to ensure the voice of the SORH on this important issue. Please note that in preparing these comments we requested the data collection plans and draft instruments as directed in the first paragraph of the federal register notice, but have been informed that the draft instrument and plans are not available. The comments below are provided on the four key areas for which information has been requested, without benefit of any knowledge of the data collection plans or draft instruments.

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**NATIONAL ORGANIZATION OF STATE OFFICES OF RURAL HEALTH**

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### **The necessity and utility of the proposed information collection for the proper performance of the agency's functions**

NOSORH strongly supports appropriate reporting requirements to obtain a measure of the accomplishment of the FLEX program major aims. Reporting requirements for FLEX grantees should only include data that are unique to the measurement of the grantees' objectives, and data which cannot be captured from other data sources. The measurement of the federal Office of Rural Health Policy's "agency functions" should include an analysis of data sets reported directly by CAH. Data from the MBQIP reporting could be used for some measure of the overall program performance.

### **The accuracy of the estimated burden**

NOSORH lauds any future effort by HRSA to keep the reporting requirement burden at 6 hours or less for this program. Anecdotal information provided by SORH indicates that during the 2012-13 grant year, the time required to develop, acquire, validate, verify and disclose the required data exceeds the 6 hours cited in the federal register notice. Some SORH report the need to staff this effort with a .50 FTE position or more. Without a copy of the proposed instrument it is impossible to cite a more realistic estimated burden. NOSORH is poised to help the Office of Rural Health Policy to assess a more accurate estimate of the reporting burden when more details about proposed measures become available.

### **Ways to enhance the quality, utility, and clarity of the information to be collected**

In order to ensure that the data reported to measure the effectiveness of FLEX grantee interventions, it is essential that FLEX grantees be engaged in the planning and development of standards for measurement. HRSA should tap the expertise and knowledge of SORH, the Technical Assistance Service Center and NOSORH. SORH insight is needed to establish standards of measurement which will not be a burden, will provide management the necessary information to monitor the accomplishment of objectives and to evaluate the impact of the program activities in the future. NOSORH provides SORH with a web-based performance measure tool (TruServe) for their use in tracking all SORH activity. Approximately 70% of FLEX grantees currently utilize this web-based performance measurement tool to collect measures of some of their program activities. An analysis of measures voluntary input to TruServe may provide a starting point from which future measures could be identified and tested.


### **The use of automated collection techniques or other forms of information technology**

The use of automated collection techniques must be fostered in order to document the collective impact of the FLEX program. Any requirements for the use of automated collection tools should ensure no additional burden of reporting.

NOSORH appreciates the opportunity to offer our comments early in the process of identifying meaningful measures of the FLEX grant program. We are committed to ensuring the impact of the FLEX program is quantified in a meaningful way and look forward to future work with HRSA.

For clarification, additional comment or questions, please don't hesitate to contact me by email at any time [teryle@nosorh.org](mailto:teryle@nosorh.org).

Sincerely,

A handwritten signature in cursive script that reads "Teryl Eisinger".

Teryl E. Eisinger, MA

Director