

March 29, 2019

PUBLIC COMMENT LETTER

Kate Goodrich, MD
Chief Medical Officer
Centers for Medicare & Medicaid Services
7500 Security Blvd.
Baltimore, MD 21244
Submitted Electronically: cmsstarratings@yale.edu

Re: Overall Hospital Quality Star Rating on *Hospital Compare* Public Input Request

Dear Dr. Goodrich:

On behalf of our over 460 member hospitals and health systems, the Texas Hospital Association (“THA”), appreciates the opportunity to provide comments on the above-referenced Public Input Request, published in February, 2019. THA and its members are committed to increasing access to appropriate health care and sharing hospital quality information to permit individuals to make informed decisions about their care. We appreciate your time and efforts in working through these issues.

Since the rating system’s inception, hospitals have raised concerns with the system and the potential for scores to inadequately and inaccurately reflect the care provided by the hospital. THA believes that the rating system should provide adequate transparency, continuity, and reliability to allow hospitals, patients, and providers equal opportunity to understand the measures and calculations behind a rating – which should translate to improve care outcomes for patients. Ultimately, we advocate for fairness among ratings, which would allow for hospitals that continuously provide high levels of care to be rated as doing such, and not suffer consequences based on unrelated and unknown metrics.

The topics presented for public comment within the Public Input Request indicate that CMS understands the concerns with the rating system’s potential for instability and unreliability. We applaud the efforts to consider improving areas such as measure precision, peer grouping, and providing explicit approaches to calculating ratings. These efforts will assist in providing transparency, consistency, and a uniform understanding to the rating process.

THA urges CMS to consider the comments submitted by the American Hospital Association, hospitals and systems located in Texas, and fellow hospital associations. Your attention to this is very much appreciated. We thank you for the opportunity to participate in the process, for your time and attention to this matter, and look forward to working with you. Please feel free to contact

me at (512) 465-1027 or clopez@tha.org with any questions, comments, or if there is anything else THA can assist with.

Very Truly Yours,



Cesar J. Lopez
Associate General Counsel