

Planned Updates to the Leapfrog Hospital Safety Grade Methodology for Fall 2022: Request for Public Comments

Leapfrog is planning two updates to the Leapfrog Hospital Safety Grade methodology that will be used to calculate the fall 2022 Hospital Safety Grades. Leapfrog is inviting public comments on these proposed changes through **August 15, 2022**. Public comments can be submitted using the directions below.

The updates outlined in this document include:

1. [Hand Hygiene measure](#)
 - a. Scoring Update
 - b. Imputation Model Update
2. Shortened Courtesy Safety Grade Review Period
3. CMS Footnote 23 Policy

The first update described in this document is a methodology update regarding the Hand Hygiene measure scoring and imputation. The changes come under the guidance of Leapfrog's national expert panel, research team at Johns Hopkins Medicine, and in response to stakeholder feedback. The second and third updates described in this document are program updates.

[Appendix A](#) on pages 4-5 include the fall 2022 measure names, data sources, and reporting periods.

Instructions to Submit a Public Comment (**Deadline August 15, 2022**)

To submit a public comment:

1. Visit <https://leapfroghelpdesk.zendesk.com/>
2. Click on "Submit a Request" on the top right-hand corner of the webpage
3. Select "Hospital Safety Grade" as the name of the ratings program
4. Select "Submit a Public Comment" from the Safety Grade issue drop-down list
5. Include your public comments in the "Question" field
6. Click "Submit" after completing all required fields





Leapfrog will publish final methodology updates and responses to public comments prior to the Data Snapshot Date (August 31). More information can be found on the Hospital Safety Grade website at <https://www.hospitalsafetygrade.org/for-hospitals/key-dates-and-information>

1. Hand Hygiene Measure

a. Scoring Update

Beginning with the fall 2022 Hospital Safety Grade, the following Hospital Safety Grade scores will be assigned to **each** of the four performance categories from the **2022 Leapfrog Hospital Survey** for the Hand Hygiene measure:

Table 1. Hospital Safety Grade Measure Scores Assigned to Leapfrog Hospital Survey Performance Categories for the Hand Hygiene Measure, Beginning Fall 2022

Leapfrog Hospital Survey Performance Category for the Hand Hygiene Measure	Hospital Safety Grade Score
Achieved the Standard 	100
Considerable Achievement 	70
Some Achievement 	40
Limited Achievement 	15

b. Imputation Model Update

Also beginning with the fall 2022 Hospital Safety Grade, for hospitals that decline to respond to the 2022 Leapfrog Hospital Survey and are therefore publicly reported as “Declined to Respond” for the Hand Hygiene measure on Leapfrog’s [public reporting website](#), Leapfrog will now impute a Hospital Safety Grade score for the Hand Hygiene measure when calculating the Hospital Safety Grade.

Step 1: Use a hospital’s most recent score on the measure

Hospitals qualified for Step 1 include: Hospitals that submitted a 2020 or 2021 Leapfrog Hospital Survey and received a Hospital Safety Grade in the most recent four rounds (e.g., spring 2022, fall 2021, spring 2021, or fall 2020). For Step 1 of the imputation model, Leapfrog will assign a Hospital Safety Grade score based on the most recent performance category achieved via the Leapfrog Hospital Survey in 2020 or 2021, as outlined in [Table 1](#).

Step 2: Use the mean of the scores assigned to similar hospitals eligible for a Hospital Safety Grade

Hospitals qualified for Step 2 include: Hospitals that did not submit a 2020 or 2021 Leapfrog Hospital Survey or receive a Hospital Safety Grade in the most recent four rounds (e.g., spring 2022, fall 2021, spring 2021, or fall 2020). For Step 2 of the imputation model, Leapfrog will assign the hospital to a cohort of similar hospitals using up to four hospital characteristics obtained from either the 2022 Leapfrog Hospital [Survey Results](#) or the most recent CMS Impact file: (1) urban/rural status (from the Impact File), (2) safety net status (determined by disproportionate share hospital patient percentage from the Impact File), (3) number of beds (from the Impact file), and (4) teaching status. Teaching status is

obtained from the 2022 Leapfrog Hospital [Survey Results](#) if available; otherwise, it is determined from the Resident to Bed Ratio from the Impact file if available. Teaching status is only used for urban hospital cohorts.

Once assigned to a cohort, the hospital is assigned the lowest of the two mean scores for its cohort:

- **Mean of current and recent scores:** The mean score of the cohort is calculated based on the hospital Safety Grade scores in the current round (i.e., fall 2022) from either Leapfrog’s publicly reported Survey Results or Step 1 of the imputation model OR
- **Mean of scores obtained in the hospitals’ first year of reporting on Leapfrog’s Hand Hygiene via the Leapfrog Hospital Survey:** The mean score of the cohort is calculated based on the performance category each hospital in the cohort achieved the first time they reported on the Hand Hygiene measure via the Leapfrog Hospital Survey (e.g., from the 2020, 2021, or 2022 Leapfrog Hospital Survey). To calculate cohort scores, Leapfrog will assign a Hospital Safety Grade score to the performance category achieved via the 2020, 2021, or 2022 Leapfrog Hospital Survey, as outlined in [Table 1](#).

2. Shortened Courtesy Safety Grade Review Period

The fall 2022 courtesy review period will last two, rather than three weeks. The anticipated dates are Monday, September 19, 2022, through Friday, September 30, 2022. During this time, hospitals can review their data for accuracy (i.e., identify recording errors, hospital name and address changes, hospital CCN changes, etc.) on a secure website, review the fall 2022 Safety Grade methodology, and access the fall 2022 Hospital Safety Grade calculator. Leapfrog will continue to hold a two-week Letter Grade Embargo Period after the close of the Courtesy Safety Grade Review Period, which will allow hospitals the opportunity to preview their letter grade prior to the public announcement. More information is available on the Safety Grade [website](#).

3. CMS Footnote 23 Policy

In previous rounds of the Hospital Safety Grade, Leapfrog did not use measure scores published by CMS if the measure score was accompanied by footnote 23, which indicates that "The data are based on claims that the hospital or facility submitted to CMS. The hospital or facility has reported discrepancies in their claims data." However, starting this fall and based on feedback from hospital leaders, Leapfrog will use measure scores accompanied by footnote 23 with written permission from the hospital’s CEO.

Therefore, beginning this fall, Leapfrog will contact hospitals directly if footnote 23 is present for any one of the CMS claims-based measures (e.g., DRA HAC measures or PSI measures) used to calculate the Hospital Safety Grade prior to the close of the Courtesy Safety Grade Review Period. Hospital CEOs will have until the end of the Review Period to submit written permission to use the measure score. If written permission is not received by the close of the Review Period, the measure will not be used to calculate the Hospital Safety Grade.

Appendix A: Fall 2022 Leapfrog Safety Grade Measures, Anticipated Reporting Periods, and Data Sources

PROCESS/STRUCTURAL MEASURES (12)				
Measure Name	Primary Data Source	Reporting Period	Secondary Data Source	Reporting Period
Computerized Physician Order Entry (CPOE)	2022 Leapfrog Hospital Survey	2022	Imputation Model Applied	N/A
Bar Code Medication Administration (BCMA)	2022 Leapfrog Hospital Survey	2022	Imputation Model Applied	N/A
ICU Physician Staffing (IPS)	2022 Leapfrog Hospital Survey	2022	Imputation Model Applied	N/A
Safe Practice 1: Culture of Leadership Structures and Systems	2022 Leapfrog Hospital Survey	2022	N/A	N/A
Safe Practice 2: Culture Measurement, Feedback & Intervention	2022 Leapfrog Hospital Survey	2022	N/A	N/A
Safe Practice 9: Nursing Workforce	2022 Leapfrog Hospital Survey	2022	N/A	N/A
Hand Hygiene	2022 Leapfrog Hospital Survey	2022	Imputation Model Applied	N/A
H-COMP-1: Nurse Communication	CMS	10/01/2020 - 09/30/2021	N/A	N/A
H-COMP-2: Doctor Communication	CMS	10/01/2020 - 09/30/2021	N/A	N/A
H-COMP-3: Staff Responsiveness	CMS	10/01/2020 - 09/30/2021	N/A	N/A
H-COMP-5: Communication about Medicines	CMS	10/01/2020 - 09/30/2021	N/A	N/A
H-COMP-6: Discharge Information	CMS	10/01/2020 - 09/30/2021	N/A	N/A

OUTCOME MEASURES (10)				
Measure Name	Primary Data Source	Reporting Period	Secondary Data Source	Reporting Period
Foreign Object Retained	CMS	07/01/2019 – 12/31/2019 AND 07/01/2020 – 6/30/2021*	N/A	N/A
Air Embolism	CMS	07/01/2019 – 12/31/2019 AND 07/01/2020 – 6/30/2021*	N/A	N/A
Falls and Trauma	CMS	07/01/2019 – 12/31/2019 AND 07/01/2020 – 6/30/2021*	N/A	N/A
CLABSI	2022 Leapfrog Hospital Survey	01/01/2021 – 12/31/2021	CMS	10/01/2020 - 09/30/2021
CAUTI	2022 Leapfrog Hospital Survey	01/01/2021 – 12/31/2021	CMS	10/01/2020 - 09/30/2021
SSI: Colon	2022 Leapfrog Hospital Survey	01/01/2021 – 12/31/2021	CMS	10/01/2020 - 09/30/2021
MRSA	2022 Leapfrog Hospital Survey	01/01/2021 – 12/31/2021	CMS	10/01/2020 - 09/30/2021
C. Diff.	2022 Leapfrog Hospital Survey	01/01/2021 – 12/31/2021	CMS	10/01/2020 - 09/30/2021
PSI 4: Death rate among surgical inpatients with serious treatable conditions	CMS	TBD	N/A	N/A
CMS Medicare PSI 90: Patient safety and adverse events composite**	CMS	TBD	N/A	N/A

*CMS notified hospitals on June 17 that the 2022 Hospital-Specific Reports (HSRs) for the Publicly Reported Deficit Reduction Act Hospital-Acquired Condition (DRA HAC) Measures are available in the Hospital Quality Reporting (HQR) system Managed File Transfer (MFT) inbox for subsection (d) hospitals (that is, general acute care hospitals paid under the Inpatient Prospective Payment System, as well as Maryland hospitals). The 30-day Preview Period began June 20, 2022, and ended July 20, 2022, at 11:59 p.m. P.T. Leapfrog anticipates these updated rates will be publicly reported by August 31. If the rates are not updated by August 31, Leapfrog will use whatever data is publicly available at data.cms.gov.

** CMS calculates PSI 90 using the ten (10) component PSIs. While scores for each of the 10 component PSIs will not be used to calculate fall 2022 Hospital Safety Grades, they will be publicly reported on the Hospital Safety Grade [website](#).