

May 26, 2015

Elizabeth Dudek
Secretary
Agency for Health Care Administration
2727 Mahan Drive
Tallahassee, FL 32308

Dear Secretary Dudek:

The Florida Hospital Association (FHA) is in receipt of your May 23, 2015 letter on behalf of the Commission on Healthcare and Hospital Funding.

Florida hospitals believe in, and fully support, quality and price transparency. We are always open to fair-minded, rigorous inquiries with the goal of understanding hospital financing and improving care for all Floridians. It is in this spirit that hospitals will continue to assist the Agency for Health Care Administration (AHCA) and the Commission in carrying out its duties.

For decades, Florida hospitals have partnered with the State of Florida to ensure uniform and consistent reporting of the vast majority of data requested on behalf of the Commission. Throughout this partnership, AHCA has acknowledged that collecting data is a detailed, complex and time-intensive process that requires dedicated resources. In recognition, AHCA has traditionally provided hospitals with up to 120 days to submit requested data.

In order to provide meaningful data for Commissioners, FHA urges AHCA to consider the following:

1. **We strongly advise the Commission to use data that has been previously submitted under strict standards, definitions and instructions that show comparable results.** AHCA has in its possession, decades of hospital financial, operational and patient data that has been submitted by hospitals working in partnership with your Agency. This hospital data is recognized nationally as some of the most reliable, timely and substantive data in the United States. It is more data than other providers have submitted here in Florida, or across the country. Since the Commission is focused on the effective use of tax dollars, we suggest a good place to start is with the efficient use of data collection. Health care data collection is costly and time consuming. It is unnecessary to create new data formats when a nationally recognized data source already exists. It is also extremely inefficient to collect data that is not comparable. Policy decisions should be made on uniform data such as Florida Hospital Uniform Reporting System (FHURS) data.
2. **Provide a reasonable amount of time to respond to future data requests.** Both of the Commission requests (May 13, May 23) have come just days before Commission meetings. Because of the volume of data being requested for a 9-10 year period, it is unreasonable to expect responses from organizations whose primary purpose is to provide care for the sick and injured. In addition to the fact that AHCA already has nearly 90 percent of this data, and that the short notice period will rush data to be reported, some of the data requested is not readily available or currently reported.

- 3. Clear direction is needed on new data elements to ensure uniform and consistent reporting.** As noted in our May 18 letter to Commission Chair Carlos Beruff, the survey requests responses to new data fields that are vague and open to differing interpretations. Due to this ambiguity and lack of instruction, several of the questions are flawed. In addition, the survey changed from what was originally distributed. The FHURS data set is the most complete data on hospitals and has already been submitted using AHCA rules, definitions and instructions to ensure the data is meaningful and comparable.

Your most recent request includes data on executive compensation and quality outcomes. The request for executive compensation is unclear and conflicts with similar data already submitted under FHURS.

Regarding patient outcome data, Florida's hospitals are deeply committed to providing safe, effective, high quality care. Currently, hospitals submit 72 quality measures each quarter to the Centers for Medicare and Medicaid Services (CMS). These measures are vetted through the National Quality Forum to ensure validity and reliability. Any data reported to CMS is publicly available. FHA staff will gladly assist AHCA with accessing the data.

Additionally, hospitals collect other information to study quality and report data to other organizations such as the Joint Commission, the National Database of Nursing Quality Indicators, the Center for Disease Control and Prevention and several quality collaboratives through the FHA, including our Hospital Engagement Network (HEN). These data allow hospitals to identify opportunities for improvement and track progress. For example, over the past three years, 77 hospitals participated in the FHA HEN and achieved tremendous results. Initial estimates show that our hospitals were able to prevent over 27,500 cases of harm and saved an estimated \$170 million in health care costs.

As demonstrated through our partnership and dedication to reporting quality outcomes, Florida hospitals stand ready to continue to assist the Commission in its work.

Sincerely,

A handwritten signature in blue ink, appearing to read "William A. Bell". The signature is fluid and cursive, with the first name "William" being the most prominent.

William A. Bell
General Counsel