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Sent: Tuesday, December 02, 2014 11:55 AM

To: Balovlenkov, Elena (CMS/CCSQ); Andress, Joel (CMS/CCSQ); Pratt, Mary J. (CMS/CCSQ); Goodrich, Kate (CMS/CCSQ)

Subject: Request for Correction of DFC Star Ratings under the Data Quality Act

Attached is CCSQ's courtesy copy of the Request for Correction we filed today under the Data Quality Act challenging the methodology to be used in the DFC Star Ratings.

The Data Quality Act and the HHS Information Quality Guidelines promulgated pursuant to the Act have been in existence for approximately as long as CMS has collected and reported quality measures. Over the past decade, no stakeholder has ever filed a Request for Correction with CMS pertaining to quality measurements. We take no joy in being the first, but we feel that the circumstances surrounding the formulation of this program—the lack of stakeholder input, the failure to conduct cognitive testing, the departures from best practices for quality measure reporting as enumerated by CMS' own experts, and expanding the use of the nationwide tournament format even as consensus acceptance of that practice has collapsed—merit our taking this unfortunate step.

We suspect that you share our concerns that much has been sacrificed in the rush to roll this out quickly. If the timetable for this program was dictated by others in the executive branch, and you have felt inhibited in pushing back against pressure to expedite it, we hope you will view this filing as an opportunity. If the program is delayed through the Data Quality process, you can assure its proponents outside the agency that CMS did everything it could to expedite implementation, but was thwarted by an OIRA requirement.

We therefore hope that you will consent to adjudication by a truly neutral arbiter outside of CCSQ—we would suggest Linda Magno or Niall Brennan as persons with the expertise and stature to render an impartial judgment—and that you will be candid in acknowledging the shortcomings of both the process and product to that arbiter.

We look forward to working with you in pursuit of our shared goal of strengthening the Medicare program.

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