

**Comments Submitted by the Office of Health Care Quality**

**June 12, 2018**

Hi Linda,

Comments per your request. These are from Mark Paugh, Trish and I did not have any comments.

Section 8- Not sure how they plan to ensure the facility has demonstrated an effective quality assurance program as effectiveness can be misunderstood and can be hard to define.

I'd suggest adding in section 8, compliance with CMS requirements for facility assessments and developing and implementing the quality assessment performance improvement plan. Submission of a copy of the most recent plans could be included for the MHCC file perhaps? With all the new Federal changes, I don't know if these planning requirements are effective under the current update or if they are phasing in in 2019.

9(a)(1) hospital readmission reduction in rates OR rates consistently less than State average. (Otherwise they may penalize providers with rates that are already low).

Margie Heald