

SAMPLE LETTER/MEMO

To:

From:

Date: February 2, 2009

Subject: Nursing Home 5-Star Ratings

The Centers for Medicare and Medicaid Services (CMS), the federal agency that oversees the Medicare and Medicaid programs, has issued a new nursing home “rating” system called the *5-Star Nursing Home Rating System*. Nursing homes receive from one-to-five stars (five being best) in the following three areas:

- **Health Inspections** – the results of the most recent annual surveys conducted by the Missouri Department of Health and Senior Services (DHSS);
- **Quality Measures** – some of the indicators of patient care, including such things as decline in ability to bathe, dress and eat; decline in mobility; urinary tract infections; pressure ulcers; amount of pain; etc.;
- **Staffing** – how many nursing staff hours there are per patient day.

We support a consumer-friendly rating system based on reliable quality information; but this new system is prematurely implemented. The information is not completely accurate nor does it take into account many of the special circumstances that lead each nursing home to its score. For example, a nursing home that specializes in wound care will have many residents with pressure ulcers but that home may have only 1 star for quality measures because a lot of its residents have pressure ulcers! Similarly, a nursing home may score low on health inspections, but the deficiencies may be due to flaws in documentation that are not related to providing high quality care. DHSS inspections can be inconsistent and subjective in nature, making it difficult to arrive at a fair rating.

I am very proud of the high quality of care that _____ and her entire team provide at our nursing center. However, our ratings in _____ of the _____ categories in this new system do not reflect that quality. I want you to understand the basis for the ratings and tell you why I am confident in the high standards of _____. These ratings will appear on the internet and will likely be featured in the local media as well.

Staffing: _____ has earned _____ stars. We are proud of our excellent staff and we are committed to staffing levels that meet our residents’ needs. If we had been exclusively a rehabilitation facility, we might have earned five stars for even higher staffing. This is another flaw in the rating system because it does not adjust for the kind of specialty services that each nursing home provides.

Health Inspections: _____ has earned only ____ stars. We had _____ of deficiencies in our survey a year ago; all related to documentation or to issues that we challenged were inaccurately cited by the surveyors. All the deficiencies we received were completely cleared in the first follow-up visit by DHSS and we have no outstanding citations. However, the most recent survey is weighted the heaviest, and it will not be until our next survey that we have the opportunity to see this rating changed.

Quality Measures: _____ has earned ____ stars. Quality measures are used to measure whether patients decline (in mobility, functioning, skin integrity, continence, etc.) or whether they improve. (Percentage of) our residents in our nursing center are in our dementia special care program; they have moderate to severe Alzheimer's disease and will experience decline even while they receive excellent care. Nursing homes with primarily rehabilitation residents will show the opposite trend and will have more stars.

A more accurate picture of quality should also take into account some of the areas where _____ is clearly at the forefront:

- Resident satisfaction: we have consistently scored far above the state average in resident and family satisfaction from the surveys conducted by the state.
- Use of a broader span of quality measures: _____ has been an active participant in (*Quality First, Advancing Excellence, any groups involved with*) statewide and nationally and was named a model of best practices for (*list any applicable special recognition*), one of the quality measures.
- Staff training and competence: _____ has been awarded a number of competitive state grants over the past six years and has been recognized regionally and nationally for innovative work in culture change, staff training and career ladder programs (*list any special projects, ventures, grants, etc., regarding work force development*).
- Accreditation: we are fully accredited by (*list any accreditations or quality groups participate in*).
- Occupancy: we consistently have higher occupancy than the local or state averages, at about ____ percent compared with a state average in the mid-80s.

This memo is not to criticize the CMS rating system's attempt to help consumers identify quality nursing homes. However, its limited scope and the complex way it has chosen to weight these limited factors has the result of making some nursing homes, _____ among them, appear to be low quality homes when in fact the opposite is true.

Please feel free to contact _____ or me if you have any questions or would like additional information.