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Via email: [Lisa.Smith@ahca.myflorida.com](mailto:Lisa.Smith@ahca.myflorida.com)

Dear Ms. Smith,

Thank you for the opportunity to comment on the recent discussions of the Nursing Home Prospective Payment Working Group. The Joint Commission respectfully submits the following comments with respect to the proposal to eliminate credentialing points for facilities if they have under three stars in the CMS 5-Star Quality Rating System:

The Joint Commission cautions against the proposed change to require nursing homes to have 3+ star rating in order to also receive payment for Quality Credentials. The Joint Commission believes that the proposed change is in conflict with the goals of the PPS program, which are to balance financial incentives for high quality care with incentives for efficiency.

Philosophically, The Joint Commission is focused on making the accreditation process available and accessible to all nursing homes, no matter where they are on their journey to improve performance and quality of care provided to their patients and residents. To this end, The Joint Commission does not set any 'exclusionary' eligibility criteria that nursing homes must have already achieved 3+ stars on the CMS 5-star rating scale—or any specific star rating—in order to be eligible to participate in the accreditation process. Instead, The Joint Commission's focus is on having organizations adapt and implement performance improvement approaches that are required by the accreditation standards—and begin to make improvements no matter what point they start from—whether that be as a 1-star rated nursing home or a 5-star rated nursing home. Throughout the accreditation process, The Joint Commission holds nursing homes accountable for continuous compliance with state-of-the-art accreditation standards for nursing homes and for implementing organizationwide performance improvement processes and systems throughout the nursing home.

As the Agency is aware, there are published reports showing that Joint Commission-accredited organizations achieve better 5-star scores than non-accredited nursing homes, suggesting there is a

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correlation between accreditation and higher 5-star ratings and other key indicators in the CMS quality measurement process.

The most recent report, [Comparing Public Quality Ratings for Accredited and Non-accredited Nursing Homes](#), JAMDA, January 2017, was shared with the Agency and as part of the consultant's review process used to develop the Medicaid Prospective Payment System. Stressing the the main point of the study--that accredited organizations have better 5-star ratings--The Joint Commission views accreditation as a tool that helps organizations achieve better outcomes on the performance/quality measures included in the 5-star rating system. Therefore, we support the conclusion that Joint Commission accreditation be viewed as a related tool within the Florida Medicaid Prospective Payment System to *incent* the desired outcomes of higher quality and efficiency, instead of a credential reserved only for those organizations that have already achieved higher ratings on the CMS 5-star rating scale.

The Joint Commission further supports the options the Agency has provided to Florida nursing homes for the quality credential criteria in the PPS program. The opportunity to choose between The Joint Commission, American Health Care Association's Quality Award, and the Florida Governor's Gold Seal Award provides nursing homes with the choice to pursue a tool that best meets their needs and organizational strategies around improving care, quality and performance improvement programming within the nursing home setting.

Respectfully submitted,

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