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September 14, 2012

Carolyn M. Clancy, MD
Director
Agency for Healthcare Research and Quality
U.S. Department of Health and Human Services
540 Gaither Road, Suite 2000
Rockville, MD 20850

**Re: Patient Safety Organization (PSO) Common Format–Readmissions
Version 0.1 Beta**

Dear Dr. Clancy:

The American Medical Association (AMA) appreciates the opportunity to submit comments on the Agency for Healthcare Research and Quality's (AHRQ) Common Format–Readmissions Version 0.1 Beta. This common format allows hospitals to aggregate data that describes patients and the circumstances of readmissions. The factors covered in the readmissions common format include: actions taken at the index hospitalization to prevent a readmission; risk factors for readmission; length of stay; presence of an adverse event; and location of discharge setting. We are submitting a general comment letter in lieu of submitting comments online given that our recommendation is in response to the detailed data request included in this common format.

The measures outlined in the common format on readmissions are calculated from claims data only, and are not influenced by anything that health care providers already collect and submit. Therefore, there is little chance that the data collection envisioned by AHRQ under this common format would bear any resemblance to the rates that are already calculated by the Centers for Medicare & Medicaid Services (CMS) for its quality performance and payment programs. Moreover, it remains unclear why this data collection activity would occur under a Patient Safety Organization (PSO), when the data that is being collected is not confidential. In fact, the data this common format seeks to collect are already being calculated for payment and public reporting purposes through CMS' Hospital Compare Website. Requiring reporters to produce data that are already available runs counter to President Obama's January 18, 2011, Executive Order calling on federal agencies to reassess and minimize regulatory burdens on physicians and other health care providers.

The Patient Safety Act calls for the voluntary, confidential reporting of patient safety events through PSOs, which in turn would support health care providers' patient safety efforts, including initiatives to reduce readmissions. The AMA is very concerned that reporters will not trust this nascent reporting system when information they report in good faith on common formats loses its confidentiality and privileged status. **We therefore, urge that AHRQ not move forward with the proposed readmissions common format.**

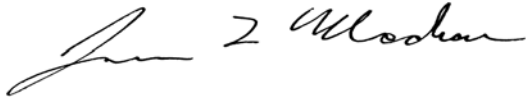
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The AMA is committed to providing AHRQ with feedback on a continuous basis on the common formats, and working with AHRQ on physician outreach and education initiatives and materials in order to maximize physician participation in patient safety event reporting. If you have any questions or need additional information, please do not hesitate to contact Jennifer Meeks, Division of Federal Affairs, at 202-789-4688 or by email at jennifer.meeks@ama-assn.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim L Madara". The signature is written in a cursive style with a large initial "J" and "M".

James L. Madara, MD