



American Association on Health & Disability

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AAHD - Dedicated to better health for people with disabilities through health promotion and wellness



LAKESHORE

December 19, 2017

Re: NQF Catheter-Associated Urinary Tract Infections (CAUTI) Measure 0138 – Impact on Persons with Spinal Cord Injury and Challenges

Shantanu Agrawal, M.D., MPhil
President and CEO

Elisa Munthali
Acting Senior Vice President, Quality Measurement

National Quality Forum
1030 15th Street NW
Suite 800
Washington DC 20005

Dear Dr. Agrawal and Ms. Munthali [Shantanu and Elisa]

The American Association on Health and Disability and the Lakeshore Foundation write sharing concerns with the unintended consequences on persons with spinal cord challenges in implementing CAUTI Measure 0138. These concerns were shared with you in a December 11 letter by the American Spinal Injury Association, United Spinal Association, and Academy of Spinal Cord Injury Professionals (their letter is attached). AAHD and the Lakeshore Foundation support these organizations request that the NQF conduct a review of the risks and benefits of Quality Measure 0138 for patients, consumers, and beneficiaries with spinal cord challenges.

The American Association on Health and Disability (AAHD) (www.aahd.us) is a national non-profit organization of public health professionals, both practitioners and academics, with a primary concern for persons with disabilities. The AAHD mission is to advance health promotion and wellness initiatives for persons with disabilities.

The Lakeshore Foundation (www.lakeshore.org) mission is to enable people with physical disability and chronic health conditions to lead healthy, active, and independent lifestyles through physical activity, sport, recreation and research. Lakeshore is a U.S. Olympic and Paralympic Training Site; the UAB/Lakeshore Research Collaborative is a world-class research program in physical activity, health promotion and disability linking Lakeshore's programs with the University of Alabama, Birmingham's research expertise.

Over the past two weeks, we have worked closely on this issue with Matthew E. Davis, M.D., Chair, ASIA HPAC; Chair, ASCIP Advocacy Committee; American Spinal Injury Association; and Clinical Assistant Professor and Director, Spinal Cord Injury Fellowship Program University of Texas Health Science Center at Houston.

In the spring of 2014, care providers of patients with spinal cord injury reported a surge in unsafe bladder management practices. Their letter included data documenting unintended consequences that threaten the health of such patients. The care providers argue that the duration of indwelling catheterization is directly related to the risk for developing urinary tract infections (UTI). These unintended consequences seem associated with the implementation of NQF CAUTI measure 0138. The care providers request a NQF structured approach of review and monitoring the implementation of measure 0138 with a particular focus on bladder management and outcomes for persons with spinal cord challenges. These care providers reference existing clinical practice guidelines used by specialty spinal cord providers. We are aware of the existing NQF "ad hoc review policy" approach. AAHD and the Lakeshore Foundation encourage the NQF to launch such a review process.

Thank you for the opportunity to comment. If you have any questions please contact Clarke Ross at clarkross10@comcast.net.

Sincerely,



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