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Hospital Readmission Reduction Program for Heart Failure The Spread of Intended and Unintended Consequences *

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1 **The Spread of Intended and Unintended Consequences of the Hospital Readmission**
2 **Reduction Program for Heart Failure**

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21 *“Any observed statistical regularity will tend to collapse once pressure is placed upon it*
22 *for control purposes”* – Charles Goodhart

23

24The economist Charles Goodhart’s observed that a metric of production or performance, once
25operationalized with financial incentives no longer serves its original purpose. One classic
26example is that of government targets for factory production in the former Soviet Union. When
27the number of nails were incentivized, huge numbers of useless pin-like nails were manufactured
28(1). Healthcare policies that feature financial incentives for performance measures or outcomes
29that are not prone to manipulation and benefit patient-centered outcomes remain a largely elusive
30goal. More than a decade ago, healthcare researchers and policymakers observed that patients
31discharged with primary diagnoses of select conditions had high-rates of unplanned readmission
32within 30 days and that these readmissions were associated with substantial healthcare
33expenditures (2). The proportion of readmissions deemed preventable varied widely, but a meta-
34analysis suggests nearly a quarter may be avoidable (3). Policymakers suggested that effective
35strategies to prevent 30-day readmissions were readily available but were underutilized due to
36lack of financial incentives. The Centers for Medicaid and Medicare Services (CMS) thus sought
37to reduce early readmissions for common medical conditions among Medicare beneficiaries
38through the use of public reporting of 30-day readmission metrics and financial incentives,
39penalizing hospitals with excessive readmission rates though the Hospital Readmission
40Reduction Program (HRRP) of the Affordable Care Act (4). These incentives were intended to
41bolster efforts to improve transitions to home, early outpatient follow-up, and multifaceted to
42discharge planning approaches. While well intended, CMS implemented the policy for select
43conditions without prior testing, without consideration of how hospitals might respond to such

44metrics, and without monitoring the potential unintended consequences of such a substantial
45financial penalty.

46

47The introduction of HRRP was associated with reductions in readmissions among the initially
48targeted conditions of heart failure (HF), acute myocardial infarction, and pneumonia nationally
49and the program was declared a success by policymakers. Yet, the initial studies evaluating the
50impact of HRRP reported on temporal changes in readmissions rates, without fully evaluating
51how those reductions were achieved or whether there were any unintended consequences,
52particularly for HF patients who are among the most vulnerable. Further, relatively few studies
53evaluated how other patients not targeted by HRRP were impacted.

54

55In this issue of *JACC*, Blecker et al. report that observed trends in readmission rates are similar
56for patients with a primary diagnosis of HF, a secondary diagnosis of HF, or any history of HF
57across three large Medicare cohorts (5). As prior analyses demonstrate, preceding the passage of
58the ACA readmission rates were mostly flat. A shift and decline in readmissions by a modest 1%
59occurred during the period CMS penalties were determined based on risk-adjusted readmission
60rates from July 2010 to June of 2013. With the implementation of financial penalties instituted in
61October 2012 with 1% of all Medicare reimbursements at risk, readmission reductions remained
62flat. Financial penalties increased to 3% of Medicare reimbursements for the fiscal year of 2015,
63but further improvements readmission rates have not been notable. The study in this Journal
64suggests that any impact of the HRRP program not only influenced patient outcomes with a
65primary discharge diagnosis of HF, but were similar for any patient with diagnostic code for HF.

66While process measures and the HRRP program have only focused on patients with a primary
67diagnosis of HF, a much larger hospitalized population with HF is outside of the scope of any
68current quality improvement programs. Prior work has shown that a secondary discharge
69diagnosis is specific for a HF-related hospitalization and these patients experience similar or
70worse outcomes to those with primary diagnoses, but are not routinely targeted for quality
71improvement (6). The current distinction of primary or secondary discharge diagnoses is largely
72arbitrary and better identification of a cohort of hospitalized patients with HF benefiting from
73quality improvement efforts is needed.

74

75There remains uncertainty regarding whether the reported improvements in risk-adjusted HF
76readmission rates during the implementation of HRRP reflect actual improvements in hospital
77care and transition planning. There is evidence that the announcement of the policy led directly
78to a sudden increase in coding comorbidities to both enhance reimbursement and achieve better
79calculated risk-adjusted readmission rates (7). Other gaming under HRRP incentivized coding
80diagnoses as secondary issues to reduce the number of index events. Additionally, hospitals with
81better readmission rates have been more aggressive about triaging emergency room visits to
82home or observational status to limit the number of calculated readmissions (8, 9). With
83substantial financial incentives at stake, shifts in coding are often the most expeditious to
84implement for administrators, rather than hiring more clinicians or deploying resources that may
85improve the actual quality of care delivered. Process measures that might represent discharge
86prescriptions of guideline-directed medical therapies may be less prone to such gaming and
87encourage both receipt of evidenced-based therapies with improvements in both readmission and
88mortality risk (10). Even though the financial penalties were intended to incentive hospitals to

89invest in improved transitions of care, it now appears these penalties may have instead
90encouraged restriction of clinically indicated inpatient care and inappropriate triage strategies.

91

92One of the anticipated and observed consequences of the HRRP is that financial penalties are a
93substantial regressive tax on the most-vulnerable populations treated within strained healthcare
94systems. Since the program is implemented using only administrative coding without any
95race/ethnic or socioeconomic adjustments in the adjusted risk-adjustment models, hospitals
96serving larger proportions of dual eligible patients have endured the greatest financial penalties
97(11). How the removal of dollars and resources from strained healthcare systems is likely to
98benefit patients with greater complexity and less community resources is unclear and a
99potentially dangerous policy decision. CMS plans to address this criticism in 2019 with
100stratification of the HRRP risk-adjustment by the proportion of dual-eligible patients served by
101hospitals. Whether this will mitigate the current state of inequitable HRRP penalties remains to
102be seen.

103

104Of greatest concern has been studies that suggest that implementation of HRRP has been
105associated with increased mortality among patients with a primary discharge diagnosis of HF. A
106number of studies now describe the increasing short-term and long-term mortality rates for
107patients discharged with a primary diagnosis of HF (12, 13). Evaluation of Medicare data
108revealed a 1.3% absolute increase in 30-day risk-adjusted mortality post-HRRP starting in 2010
109in HF patients whereas 30-day unadjusted and risk-adjusted mortality rates had previously been
110declining (16). This would suggest as many as 5,200 to 10,400 extra deaths annual in patients

111with a primary discharge diagnosis of HF. If the impact of HRRP had spread to patients with
112secondary diagnoses in terms of readmissions reduction, then the potential unintended harm
113associated with HRRP in terms of increased mortality may have potentially and even greater
114number of patients. The National Center for Health Statistics highlighted the abrupt shift in HF
115related mortality during the same period HRRP was implemented for HF hospitalizations (14).

116

117Prioritizing our understanding of why HF mortality is worsening despite the increase in the
118number of evidence-based therapies that reduce both mortality and hospitalization risk are
119needed. Developing payment policies that reflect the relative value that patients place on averting
120mortality over hospital days might make for a more coherent patient-centered policy. For HRRP,
121the evidence for potential harms and gamification of healthcare metrics should give us pause.
122Any experimental health policies require close monitoring for adverse consequences and if they
123emerge rapid corrective action to avoid the trap of Goodhart's law.

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