ACP does not support this measure because it is not appropriately risk-adjusted. Recent literature identifies a set of patient characteristics for risk-adjustment that are significantly more robust than the characteristics currently used by CMS. Furthermore, this measure could have immediate financial impact on hospitals, and without accurate risk-adjustment, patient populations that need more care are going to be penalized. Targeting mortality rates would require significant resources to make minimal impact, but the hospitals that need the most impact have the most limited resources.

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