

**Feedback Received from All Sources Regarding NQF #0678:  
Percent of Residents or Patients with Pressure Ulcers that are  
New or Worsened (short-stay)**

Concern or Recommendation	NH/SNF TEP	LTCH TEP	IRF TEP	NQF	LTCH Public Comments	IRF Public Comments	MDS, LTCH, IRF Help Desks	Interviews	Cross- Setting PU TEP
Concern Regarding the Word "Worsening"		X	X	X	X	X			X
Device Related Pressure Ulcer			X			X	X	X	X
Staff Training/Burden of Implementation		X				X		X	X
Data Collection and Accuracy	X	X	X				X	X	X
Include Stage 1 Ulcers						X	X	Mixed response	Mixed response
Switch to Partial/Full Thickness Classification System	X	X						X	X
Document Complete Trajectory of Every Ulcer						X		Mixed response	
Pressure Ulcers Present on Admission: <i>Recently Healed and/or Not Fully Declared Ulcers that Re-Appear or Declare at a Later Stage After Admission</i>	X						X		X
Inconsistent Staging Definitions: Align with NPUAP	X	X	X	X			X	X	X
Reconsider Unstageable Pressure Ulcers & DTIs	X	X	X	X	X		X	X	X
Update Risk Adjustment <sup>1</sup>	X	X	X	X	X	X		X	X
Exclude Residents/Patients at End of Life		X	X			X		X	X
Account for Seasonal Variation	X			X					
Give Credit for Healing Pressure Ulcers			X		X	X	X		X
Three-Day Interrupted Stay: <i>Accountability for Patients who are Transferred from and Return to the Facility within Three Days</i>			X		X		X	X	
Limit Measure to Stage 3 and 4 Pressure Ulcers		X	X			X			
Consistency of Definitions for Electronic Data Collection								X	X
Consideration of Unique Needs of Home Health and Acute Inpatient Hospital Patients								X	X

**NOTE:**

<sup>1</sup> Recommendations regarding modifications to risk adjustment varied across the different sources of feedback. Examples of risk factors that warrant further consideration include: Malnutrition, history of pressure ulcers or pressure ulcers present on admission, and the use of devices that place patients at greater risk. Experts also recommend that CMS consider developing risk adjustment specifications that are specific to the needs of each individual health care setting.