

## Request for Public Comments on Two Leapfrog Hospital Safety Grade Policies

Leapfrog requests public comments on an amendment to the **Data Snapshot Date** policy that would take effect in spring 2026. We also invite public comments on our policy for dealing with **shared CMS Certification Numbers**. Comments may be submitted through **December 14, 2025**, at <https://publiccomments.leapfroggroup.org/forms/safety-grade>. Leapfrog will publish the final policies and responses to public comments by **December 31, 2025**.

### 1. Data Snapshot Date Amendment

**Existing Policy:** The Data Snapshot Dates have historically been January 31 for the spring Safety Grade and August 31 for the fall Safety Grade. On these dates, Leapfrog extracts public data (i.e., download data published by CMS or submitted to Leapfrog) to calculate Leapfrog Hospital Safety Grades. All data, including Leapfrog Hospital Survey Results, must be finalized by this date.

**Amendment:** If CMS publishes updated data for any measure(s) used to calculate the Leapfrog Hospital Safety Grades after the Data Snapshot Date, Leapfrog will consider using the data to calculate the Safety Grade if the update is available for download within seven (7) business days of the Data Snapshot Date. This will ensure that the most current data available is used to calculate the Safety Grades and that any updates are incorporated prior to the opening of the Courtesy Safety Grade Review Period.

### 2. Shared CMS Certification Numbers

**Existing Policy:** Since the launch of the Leapfrog Hospital Safety Grade in 2012, due to the use of several patient safety measures that are calculated and published by CMS, hospitals that share a CMS Certification Number (CCN) are assigned the same measure scores as reported by CMS for the CCN. Affected measures include the five HCAHPS measures, three DRA Hospital-Acquired Condition measures, five Healthcare-Associated Infections (if secondary data source is used), and the Patient Safety Indicators.

When hospitals are transitioning to a shared CCN (e.g., one hospital terminates their CCN and takes on the CCN of another hospital), despite the termination of their old CCN, the old CCN may continue to be included in the CMS Provider Datasets and be reported on the CMS Care Compare website after the CCN termination date.

On the Data Snapshot Date, Leapfrog will align with CMS' public reporting of data by CCN at that time. If the terminated CCN is still present in the CMS Provider Datasets, we will use the terminated CCN to assign data. If the terminated CCN is no longer present, we will use the newly adopted CCN to assign data regardless of the data collection period and prior CCN termination date.

Leapfrog continues to encourage hospitals to maintain separate CCNs for the purpose of transparency.

**Amendment:** None proposed. Leapfrog reviewed this policy at the request of several hospitals transitioning to shared CCNs and determined that there are no feasible and reliable alternatives at this time. We welcome public comments on alternatives.