

Response to Public Comments on Two Leapfrog Hospital Safety Grade Policies

On November 13, 2025, Leapfrog published two Leapfrog Hospital Safety Grade Policies and held a public comment period through December 16, 2025. We invited public comments on 1) an amendment to the Safety Grade Data Snapshot Date policy that would take effect in spring 2026, and 2) our policy for shared CMS Certification Numbers (CCN).

We received five comments on the amendment to the Safety Grade Data Snapshot Date policy. No comments or recommendations were received regarding the shared CCN policy. We thank all the commenters for their insights and have provided responses below.

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., downloads data published by CMS and/or Leapfrog Hospital Survey Results) 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 measures used to calculate the Leapfrog Hospital Safety Grades after the Data Snapshot Date, Leapfrog will utilize the updated 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.

Public Comments and Responses:

- a) **Two commenters requested that Leapfrog revise the language of the Data Snapshot Date Amendment to clearly state whether Leapfrog will use the data for calculation purposes.**
We appreciate these commentors' concern for a more definitive statement and have updated the language to make the policy clearer. If CMS updates their data within seven (7) business days of the Data Snapshot Date, Leapfrog will utilize (previously "will consider using") the updated data in the Hospital Safety Grade.
- b) **Two commenters requested that the policy of seven (7) business days be extended to ten (10) business days to extend the window and provide hospitals with more time to review the data.**
Further extension of the Data Snapshot Date will have no impact on a hospital's ability to fully review the data. The CMS data review periods for hospitals are always far in advance of CMS releasing the data to Leapfrog. Hospitals are encouraged to utilize all CMS data

preview periods. During Leapfrog's Safety Grade Courtesy Review Period, Leapfrog will make corrections to a hospital's data if their CCN is incorrect or a scoring error is identified. Additionally, Leapfrog must have adequate time to accurately score the Hospital Safety Grade prior to the opening of the Safety Grade Courtesy Review Period. Extending the Data Snapshot Date additional business days would result in a delayed start to the scheduled Safety Grade Courtesy Review Period. We update the Safety Grade twice per year and have introduced this amendment because we value using current data, but we must also ensure that hospitals can rely upon our timely and regular release of the Hospital Safety Grades.

c) One commenter expressed support for the Data Snapshot Date Amendment.

We thank the commentor for their support.

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, all hospitals that share a CMS Certification Number (CCN) are assigned the same measure scores as reported by CMS. Affected measures include the five HCAHPS measures, three DRA Hospital-Acquired Condition measures, five Healthcare-Associated Infections (if Leapfrog Hospital Survey Results are not 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 download 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 individual hospitals within systems 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.

Public Comments: None Received. We continue to welcome public comments on alternatives.