

Via: NQF Quality Position System

January 4, 2022

National Quality Forum  
1099 14th Street NW  
Suite 500  
Washington DC 20005

Re: Appeal Request—Consensus Standards Approval Committee Decision to Approve SEP 0500 Severe Sepsis and Septic Shock: Management Bundle

Dear National Quality Forum,

We, the undersigned organizations, appreciate National Quality Forum's (NQF) leadership in thoughtfully reviewing and endorsing performance metrics in healthcare. We share NQF's commitment to ensuring safe, efficient, equitable and accessible healthcare by developing and promulgating meaningful and measurable metrics.

We are writing to request an appeal to the Consensus Standards Approval Committee (CSAC) decision to approve the SEP 0500 Severe Sepsis and Septic Shock: Management Bundle metric due to concerns about the technical process and the availability of new evidence that was not considered in the patient safety committee deliberations.

First, we would respectfully like to raise some concerns with NQF leadership regarding the recent meetings in which the SEP-1 policy was discussed. We believe there were important technical irregularities and inconsistencies in the conduct of the Patient Safety Committee meeting June 24, 2021, and the review of public comment meeting October 13, 2021, that we fear may compromise the credibility and reliability of the vote for endorsement.

First, we are concerned that the technical process, as it occurred, did not allow for robust discussion on the scientific validity of the data to properly evaluate this metric.

- The measure stewards and CMS repeatedly interrupted the proceedings and forcefully redirected the conversation posing a conflict of interest. Our understanding is that measure stewards and CMS guests attend as information resources but are not empowered to interrupt or to stop panelists from pursuing various lines of query. We fear that these repeated interruptions and obstructions prevented the sharing of relevant data and perspectives that could have been relevant to the panel's final vote.
- We are unclear why two leading panelists with significant content expertise on SEP-1 were recused from the discussion and vote. We believe their deep understanding and experience working on SEP-1 and evaluating its impact in real-world settings should have been seen as assets to NQF's deliberations rather than barriers. The exclusion of these two panelists resulted in a process that was even more prone to bias given the behavior of the measure stewards, who have a much greater vested interest in a particular outcome than these two panelists.

Second, new Surviving Sepsis Campaign guidelines, on which the SEP-1 metric is based, were released in October 2021 and were not reviewed by the Scientific Committee or the Patient Safety Committee. These guidelines, based on critical review of sepsis literature and inclusive of newer data, are significantly different from previous sepsis guidelines with downgraded quality of evidence criteria for several key components of the SEP-1 metric. This should prompt a revisit of the evidence behind the current SEP-1 metric.

As NQF knows, the SEP-1 measure has been particularly contentious with both very strong advocates (mostly consumer advocates) and strong opponents (mostly hospitals and professional societies). Given the contentious nature of the measure we believe it behooves NQF to make the discussion and debate as data-driven, scientific, transparent, controlled, and inclusive as possible.

Given the concerns raised above, we respectfully ask NQF to reopen the deliberations on SEP-1 to fully evaluate and discuss all of the data on best practices in sepsis management, this time allowing all panel members to participate and assuring other parties do not dominate, interrupt, or unduly control the discussion.

Thank you very much for your consideration of our concerns. If you have any questions, please contact Lynne Jones Batshon, SHEA Director of Policy & Practice at 703-740-4949 or [lbatshon@shea-online.org](mailto:lbatshon@shea-online.org).

Sincerely,

American College of Emergency Physicians  
Infectious Diseases Society of America  
Pediatric Infectious Diseases Society  
Society for Healthcare Epidemiology of America  
Society of Hospital Medicine  
Society of Infectious Diseases Pharmacists

Cc: Matthew Pickering, National Quality Forum  
Dana Gelb Safran, National Quality Forum