2017 Consensus Development Process Redesign

FINAL REPORT

Background

The National Quality Forum's multi-step Consensus Development Process (CDP) is essential to providing a usable portfolio of measures that meets NQF's rigorous measure evaluation criteria and ensures that measures integrated into HHS' public reporting and pay-for-performance initiatives are up-to-date, reflective of the current evidence, reliable and valid, useful for accountability and quality improvement, and feasible. Since the first version of the CDP (approved in July 2000), NQF has continuously refined its process to address the needs of CMS, NQF members, and the healthcare industry more broadly. Many of these refinements have been incremental and others more substantive, requiring pilot testing and substantial operational changes. However, CMS and other stakeholders have raised concerns about the agility of the CDP – specifically, the time from measure submission to measure endorsement and the timeliness of measure evaluation/wait time for available projects (which in some cases is three or more years).

Approach

NQF hosted a process improvement, or Kaizen event on May 18-19, 2017, using LEAN tools to explore opportunities for a more agile and efficient CDP for measure endorsement. Over the two-day event, NQF, in collaboration with the Centers for Medicare & Medicaid Services (CMS), sought to address:

- Improving coordination among CMS, developers, and NQF to better facilitate timely evaluation of measures
- Increasing opportunities for submission and timely review of measures
- Reducing cycle time of the CDP
- Improving flow of information between the CDP and Measure Applications Partnership (MAP) processes

Objectives

Specifically, through the Kaizen, NQF was committed to examining the timeliness, efficiency, and effectiveness of the CDP with a view toward identifying its strengths and weaknesses and where it might be improved using a more agile process, including:

- Continuous availability of CDP for all measure types
- Improved management of the CDP measure pipeline
- Improved utilization of standing committee expertise
- Improved leveraging of NQF and external expertise

- Reduction in overall endorsement time to about 6 months[1]

More than 40 invited healthcare stakeholders from the public and private sectors participated in the event—including experts from CMS and other federal agencies, NQF's standing committees, and organizations that develop measures that represented a significant proportion of participants.

Proposed Redesign

Based on the outputs from the Kaizen event, NQF will undergo a significant CDP redesign that incorporates on-going measure submission opportunities. (Currently 63% of standing committees experience an average of three years of dormancy.) Offering more continuous and predictable submission pathways can increase the timeliness of endorsement decisions for measures that will drive value and fill prioritized gaps. Recommended changes include:

Proposed Changes	Implementation Timing
• **Increase and improve stakeholder training and education**	Summer 2017
• **Improve CDP and MAP information exchange and access**	Summer 2017-2019 (phased approach)
• **Implement Intent to Submit process**	Fall 2017
• **Form a newly-convened NQF Scientific Methods panel**	Fall 2017
• **Implement continuous commenting period and NQF member support of expression**	Beginning Fall 2017
• **Revise the technical report— content and structure**	Fall 2017
• **Designate Standing Committee as the final endorsement body[2]**	TBD
• **CSAC Role change and disbandment of the Appeals Board [3]**	TBD

Some of the changes intended to compress the endorsement process will help to reinforce process changes that have already proven to be effective (i.e., standing committees and staff preliminary analyses). While other changes will establish new processes that reflect increased efficiencies in stakeholder participation and engagement.

NQF will not implement all changes immediately, as this will require significant resources, input from several stakeholders like NQF's Governance Committee and Board of Directors (e.g. changes to the standing committee, CSAC and Appeals Board's roles), design and testing to ensure that the process works as intended for all stakeholders. Furthermore, NQF will initiate a phased implementation in order to monitor these recommendations to assess outcomes and ensure a more agile and effective process.

[1] Endorsement time begins from measure submission deadline through CSAC final endorsement decision

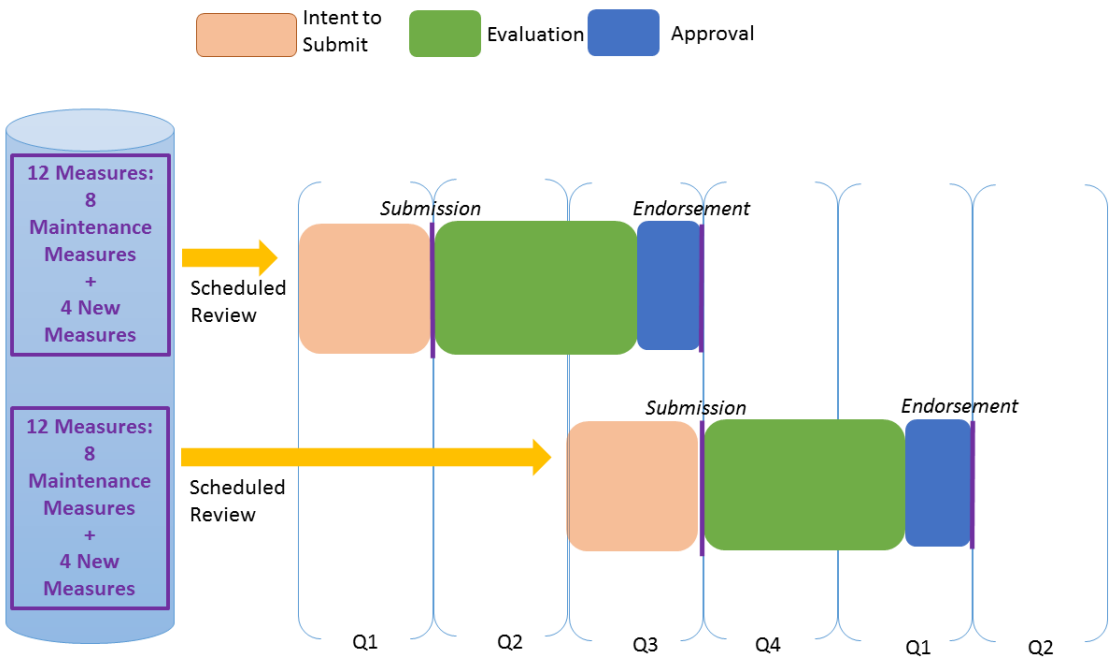
[2] If changes to the roles of the Standing Committee and the CSAC are approved, execution of these changes will be phased and implemented at a later date

[3] If the change in the role of the Appeals Board is approved, execution of this change will be phased and implemented at a later date

Increased Opportunities for Measure Submission: Scheduling/Frequency

NQF will offer two measure submission opportunities for each topic area, each year, instead of one opportunity for a select, few topic areas each year per the current CDP schedule (see Figure 1). However, because there would be more opportunities for submission, NQF will limit the number of measures evaluated by the standing committees in each cycle to a maximum of 12 (up to eight measures undergoing maintenance review and up to four new measures).[4] This was determined given that approximately 80% of the measures submitted for endorsement consideration are maintenance measures. The combination of maintenance and new measures may vary depending on the number of measures submitted, opportunities for related and competing measure review, and measure prioritization efforts. Per NQF's maintenance of endorsement policy, measures are due for reassessment every three years. NQF will remind measure stewards and developers of scheduled measure maintenance review several months prior to the review and notify each of their assigned review cycle.

Figure 1. Schedule of Measure Review Cycle[5]

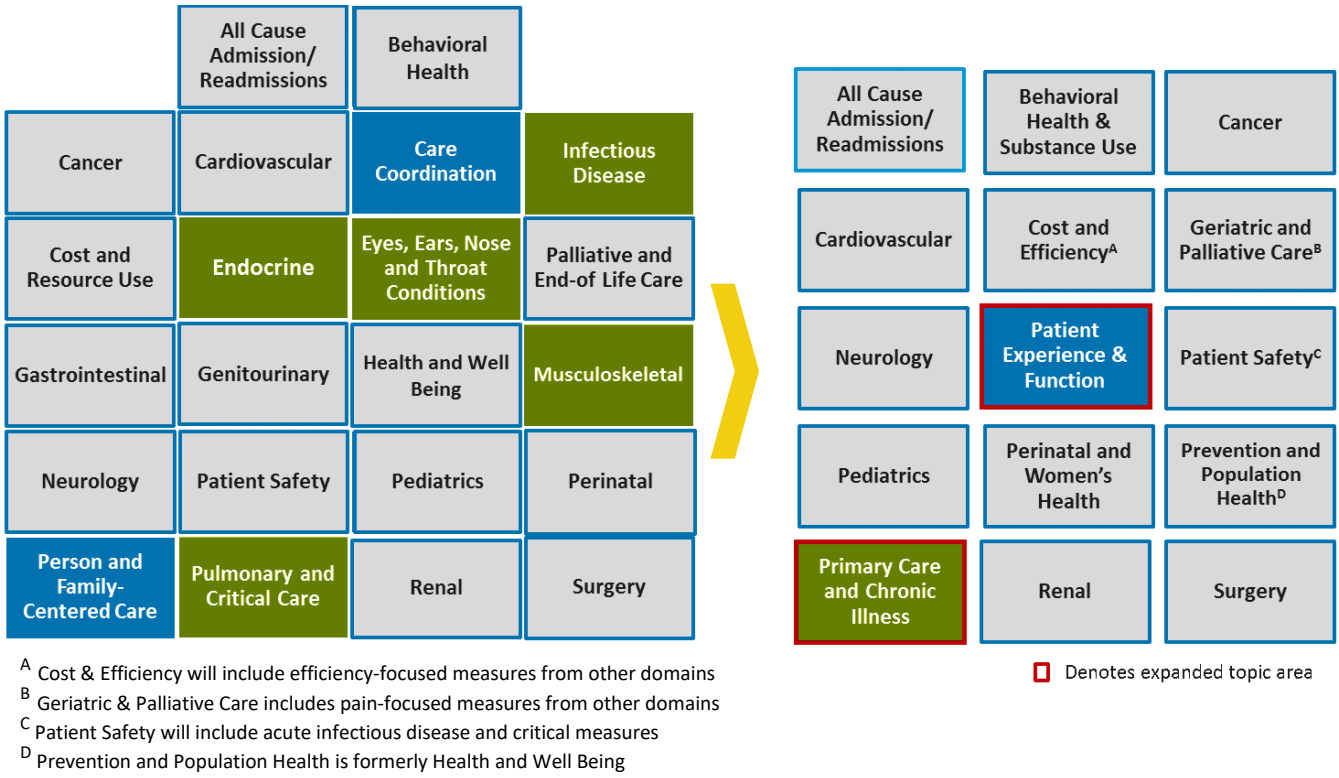


[4] NQF may consider including one or two additional measures within a cycle as needed.

[5] The proposed CDP timeline is based on a contract year and not a calendar year (i.e., Quarter 1 (Q1) is October 1-December 31).

Due to the anticipated increased opportunities for measure submission, NQF has consolidated the 22 measure review topical areas to 15 topical areas as shown in Figure 2 below[6]:

Figure 2. Measure Review Topical Areas



[A] Cost & Efficiency will include efficiency-focused measures from other domains
[B] Geriatric & Palliative Care includes pain-focused measures from other domains
[C] Patient Safety will include acute infectious disease and critical measures
[D] Prevention and Population Health is formerly Health and Well Being

In order to optimize the evaluation of NQF's library of measures, committees were consolidated or modified with the aim of balancing the size of the portfolio, grouping cross-cutting clinical areas, and distributing measures to committees with the needed expertise to conduct an evaluation. As a result, committees that represented larger measures sets with a clearly defined topic area, such as cardiology or cancer, remained fundamentally unchanged. Conversely, many of the smaller portfolios have been consolidated into committees with a broader clinical perspective. These consolidated committees were designed to reflect cross-cutting clinical areas such as Primary Care and Chronic Illness, Pediatrics, and Geriatrics and Palliative Care. The new committees' names were created to clearly reflect the breadth of measures in the set as well as to use familiar terms that easily resonate with multi-stakeholder groups. Accordingly, individual standing committees that will no longer convene for the following topical areas include:

- Person and Family-Centered Care

[6] These are recommended topic areas. Per NQF's current process, these topics will be reassessed periodically to ensure the appropriate measure groupings.

- Ears, Eyes, Nose and Throat Conditions
- Endocrine
- Musculoskeletal
- Infectious Disease
- Care Coordination
- Gastrointestinal
- Genitourinary

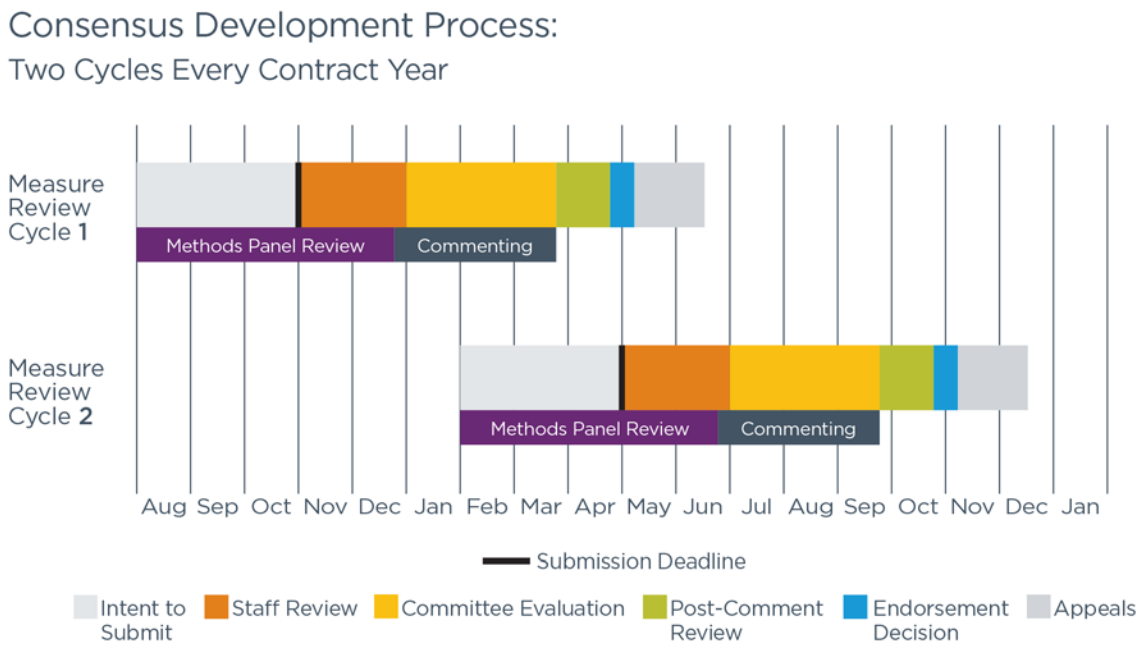
Each topical area will have a seated standing committee to help shape the endorsement project's scope, offer expert advice, ensure that input is considered from relevant stakeholders, and make recommendations to the NQF Consensus Standards Approval Committee (CSAC) on measures proposed for endorsement. For larger topic areas that include multiple conditions or cross-cutting areas, NQF will utilize technical expertise in specific areas as needed. All committee members will be subject to NQF's current Conflict of Interest Policy.

To allow more frequent measure submissions, committees will convene more often. While NQF received feedback from various stakeholders that in-person meetings are a great opportunity to build consensus and have direct interactions with committee members and developers, NQF must also consider the potential resource constraints of increasing the quantity of in-person meetings. NQF will host a combination of in-person meetings and virtual web meetings to evaluate submitted measures. Since there will be two review cycles each year, the committee will convene via in-person meeting for one cycle and convene via virtual web meeting for the other cycle to be cost efficient. NQF will make every effort to standardize how both in-person meetings and web meetings are conducted to ensure consistency in the committee's measure review and evaluation process.

Measure Cycle Review

This report includes descriptions of revised processes to the extent possible. However, implementation details and timing of some proposed changes may are pending further strategic discussions. Figure 3 below shows how a measure will move through the CDP for endorsement consideration. The newly condensed CDP begins at the measure submission deadline and ends with the Consensus Standards Approval Committee's final endorsement decision.

Figure 3. Proposed Consensus Development Process[7]



Prior to the start of an evaluation cycle, NQF will announce staggered measure submission deadlines twice per yearly --- for any measure, any topic. During this time, any measure steward/developer, assuming responsibility for making the necessary updates to the measure, can submit a new measure for endorsement consideration. In addition to newly submitted measures, NQF-endorsed measures undergo evaluation for maintenance of endorsement approximately every three years. All measures must be submitted by the cycle submission deadline and will be evaluated against NQF's Measure Evaluation Criteria. To submit a measure for an initial endorsement evaluation or a maintenance of endorsement evaluation, a measure steward /developer must complete or update the online measure submission form and submit an *Intent to Submit* form.

Intent to Submit

An intent to submit will require that all measure stewards/developers notify NQF of their readiness to submit measures for endorsement consideration. The *Intent to Submit* form will require the following information:

- **Submission Type**: maintenance measure (currently NQF-endorsed) or new measure (has never received NQF endorsement). Maintenance measures must indicate if new testing data will be available.
- **Measure type** – measure categorization (e.g., structure, process, etc.) and level of complexity (e.g., outcomes, cost or resource use, instrument-based, etc.)
- **Measure title** – concise description to convey who and what is being measured

[7] The proposed CDP timeline is based on a contract year and not a calendar year. The proposed contract year is October1-September 30.

- **Level of analysis** – levels for which the measure is assessed—specified and tested
- **Data source** – source(s) from which data are obtained for measurement
- **Measure description** – brief narrative of the measure that includes the type of score, measure focus, target population, or time frame
- **Numerator statement** – brief description of the measure focus or what is being measured
- **Denominator statement** – brief description of the target population being measured
- **Planned submission date** – cycle and year when all testing is completed and final submission is anticipated

Measure stewards/developers will need to notify NQF at least three months prior to the measure submission deadline of their intent to submit a measure to prepare for the committee's review in the upcoming cycle. This will allow NQF to adequately plan for measures in the pipeline and maintenance measures ready for re-evaluation in the various topic areas. NQF also encourages measure stewards/developers to take advantage of technical assistance during this time. Measure stewards/developers must submit measure specifications and testing information (i.e., measure testing attachment) along with the *Intent to Submit* form at least three months prior to the measure submission deadline.

Technical Review: NQF and Scientific Methods Panel Review

Kaizen participants noted the challenges many committee members face when reviewing measures and applying NQF's measure evaluation criteria to the technical aspects of reliability and validity analyses and results, and therefore recommended removing this responsibility from the committee. NQF will operationalize this recommendation through a "methods review". As noted above, the methods review will be conducted by the newly formed external NQF Scientific Methods Panel for complex measures. NQF staff will assess whether a measure is sufficiently 'complex' to require a methodological review by the Scientific Methods Panel, based on a set of criteria (details below). NQF will continue to provide a preliminary analysis, including a methods review, for non-complex measures. The opportunity for a methods review is seen as a value add for the standing committee and developers because it will reduce committee burden, particularly where committee members do not always have the needed expertise to adequately review and rate the scientific merits of a measure, and promote consistency across review committees. Furthermore, removal of this more technical review should encourage greater participation by consumers, patients, and purchasers in standing committees.

This methods review will apply to the *Scientific Acceptability* subcriteria (reliability and validity), both of which are "must-pass" subcriteria. It should be noted that the Scientific Methods Panel will not render endorsement recommendations. While important, the Scientific Methods Panel review will help to inform the standing committee's endorsement recommendation. The Scientific Methods Panel also will provide guidance to NQF for methods/testing-related issues.

Scientific Methods Panel Composition, Terms, Policies, and Processes

The new NQF Scientific Methods Panel will consist of 15 to 25 statisticians, epidemiologists, psychometricians, economists, performance measure methodologists, and individuals with expertise related to eMeasures and disparities. NQF will solicit and identify nominees through NQF's standard

nominations process. Preference will be given to individuals with experience on an NQF standing committee. As per NQF's current standing committee process, Scientific Methods Panel members will be randomly appointed, to an initial two- or three-year term, with an optional three-year term to follow. All panel members will complete an annual general disclosure of interest (DOI) form, as well as measure-specific disclosure forms to identify need for recusal for specific measures. NQF will assign measures to panel members based on identified conflicts of interest, relevant expertise, and availability. Much like guidance for standing committees, NQF will provide standard guidance on assessing the *Scientific Acceptability* criterion for a measure, using the current decision algorithm from NQF's Measure Evaluation Criteria. A minimum of three panel members will independently evaluate each measure undergoing an external panel review. Typically, the majority recommendation from the three evaluations will serve as the overall assessment of reliability and validity. However, if there is substantial disagreement in the ratings between the three reviewers (i.e., disagreement as to whether the measure does or does not "pass" the *Reliability* or *Validity* subcriteria), the panel co-chairs will evaluate the measure and determine the overall recommendation. NQF will share all evaluations, including those of the co-chairs, with the measure steward/developer and standing committee.

NQF will convene the Scientific Methods Panel via web meeting on a monthly basis, as well as via an in-person meeting once a year. The purpose of these meetings will be to discuss methodologies and other testing-related issues, provide guidance regarding these issues, and promote consistency in the evaluation of measures against NQF's endorsement criteria. At present, NQF does not anticipate discussion of specific measures during these monthly web meetings. The monthly web meetings and the in-person meeting will be open to the public.

Complex vs. Non-Complex Measures

Based on input from the Kaizen, the revised measure submission process will consider the complexity of the measure (see Figure 4). A measure will be categorized as 'complex' or 'non-complex' based on information provided in the *Intent to Submit* form.

The following types of measures are considered complex[8] and therefore may require an evaluation by the Scientific Methods Panel:

- Outcome measures, including intermediate clinical outcomes
- Instrument-based measures (e.g., PRO-PMs)
- Cost/resource use measures
- Efficiency measures (those combining concepts of resource use and quality)
- Composite measures

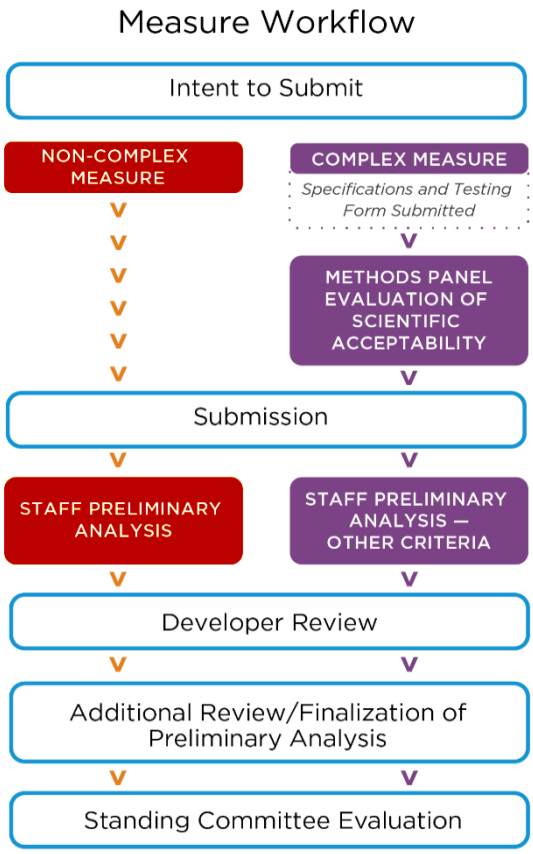
For complex measures, the Scientific Methods Panel will evaluate the measure's reliability and validity (or *Scientific Acceptability* criterion*)* and provide a preliminary recommendation to NQF staff and the standing committee. For non-complex measures (e.g., structure and process measures), NQF staff will complete the preliminary analysis against all measure evaluation criteria, including the *Scientific Acceptability* criterion.

[8]NQF will assess each submitted measure and determine whether it moves on to Methods Panel for review.

However, NQF staff may also submit non-complex maintenance measures to the Methods Panel for external review, if deemed necessary. Because updated reliability and validity testing is not required for maintenance measures, NQF staff will review previous testing results for complex maintenance measures and determine the adequacy of prior testing. When prior testing is inadequate (e.g., does not meet NQF's current measure evaluation criteria), updated testing is provided, or NQF staff determines an external review necessary for other reasons, the measure will be submitted to the external Scientific Methods Panel to evaluate the reliability and validity of the measure. Following the current process, NQF staff will perform a preliminary analysis against all of the other evaluation criteria for both new and maintenance measures.

For both complex and non-complex measures, when the preliminary analysis is complete, NQF staff will send the preliminary analysis to developers for review. Measures rated by NQF staff or the Scientific Methods Panel as "***Low***" or "***Insufficient***" for reliability or validity will be removed from the current evaluation cycle, allowing time for any additional testing, clarification, or NQF technical support prior to consideration of the measure in a future cycle. For all other measures, developers will have up to two weeks to review the preliminary analysis. NQF staff will then finalize the preliminary analysis and send the final submission materials to the standing committee for evaluation. If developers disagree with the staff or Scientific Methods Panel's review or ratings, they can use the two-week review period to provide additional clarification, which can be considered by NQF staff when finalizing the preliminary analysis. Developers will also have the opportunity to introduce their measures during the committee evaluation meeting and answer questions from the committee during the discussion.

Figure 4. Measure Workflow



The rating from the methods review—whether generated by NQF staff or the Scientific Methods Panel—will be used to rate the *Scientific Acceptability* of the measure. However, standing committees may raise concerns with the specifications of the measure or with potential threats to validity (e.g., selection of variables for risk adjustment model) and can therefore overturn the staff or Scientific Methods Panel rating. As part of its ongoing education efforts, NQF will provide clear guidance to standing committees regarding the circumstances wherein an overturn of the rating would be permissible.

The relevant standing committee will conduct a detailed review of all measures and its preliminary analysis. During this review process, the committee may meet several times, via web meetings, conference calls and/or in-person meetings, to discuss and evaluate the submitted measures in accordance with NQF criteria and guidance. After a standing committee completes its initial review of the submitted candidate standards, a draft of the committee's recommendations—or draft report—will be posted on the NQF website for review and comment by members of NQF and the public.

Measure Evaluation Technical Report – Content and Structure

After the standing committee completes its initial measure review, a draft of the committee's recommendations – or "draft report" – will be posted on the NQF website for the public and NQF membership to review and comment. To minimize the length and density of the technical report, NQF will revise the content and structure of the report.

This report will include:

- an executive summary that indicates the endorsement decision
- brief summaries of each measure reviewed
- details of the committee's deliberations on each measure against NQF's measure evaluation criteria (in appendix)
- full measure specifications for each measure reviewed (in appendix)

Any remaining background information on the topic area, including its alignment with the National Quality Strategy, and the NQF portfolio of topic- specific measures will be posted on NQF's public website. In addition, at the end of each two-cycle year, NQF will develop an annual cross-cutting report across all of the topic areas that will summarize trends and performance, high-priority gap areas in measurement for future development, and measure concepts submitted during the solicitation process for measures.

Continuous Public Commenting Period with Member Expression of Support

As part of NQF's commitment to transparency, both NQF members and interested members of the public can submit comments on the standing committee's recommendations through the NQF website. In place of two separate public commenting periods (14-day pre-meeting commenting and 30-day post-meeting commenting), NQF will have one continuous public commenting period. This commenting period will span at least 12 weeks to allow adequate time for the public and NQF member commenting. The commenting period would open approximately three weeks prior to the committee evaluation meeting and close 30 days after NQF posts the draft technical report on the NQF website. NQF will include all pre-evaluation comments received at least one week prior to the committee evaluation meeting into the committee materials for discussion during the meeting. NQF will ensure the measure steward/developer receives the submitted comments in a timely manner to prepare for the committee evaluation meeting. Measure stewards/developers are not required to provide written responses to the pre-evaluation comments received prior to the measure evaluation meeting. The committee will review any comments received after the committee evaluation meeting during the post-commenting period call. All submitted comments during this time will receive written responses from the standing committee, measure stewards/developers, and/or NQF, as appropriate. The standing committee may revise its recommendations in response to a specific comment or series of comments submitted during this phase of the process.

As part of this process, Kaizen participants recommended that NQF membership voting should no longer be a separate 15-day voting period. NQF members would have the opportunity to express their support ('*Support*' or '*Do Not Support*') for each measure to inform the committee's recommendations. This opportunity to express support/non-support from NQF members will promote membership engagement in the endorsement process. NQF is continuing to discuss the feasibility and timing of this proposed change, which may require approval from NQF's Governance Committee and Board of Directors. Depending on the outcome of this initiative, NQF could potentially implement this recommendation at a later time.

Endorsement Decision

Consensus Standards Approval Committee

As of early 2017, the Consensus Standards Approval Committee (CSAC) makes the final endorsement decisions on measures under review by NQF standing committees, following public and NQF Member comment and Member voting. The CSAC, a standing committee appointed by the NQF Board of Directors, serves in an advisory capacity to NQF leadership regarding enhancements to the CDP, the measure evaluation criteria, and emerging issues in performance measurement.

Kaizen participants recommended that standing committees make the final endorsement decisions, without ratification by the CSAC, noting that the CSAC rarely overturns the measure recommendations of the committee. NQF appreciates the comments received on this proposed recommendation; however, given important strategic considerations, NQF will not be able to implement a change of this magnitude at this time. Currently, the CSAC is comprised of a simple majority of consumers and purchasers. In order to ensure those two stakeholder perspectives remain part of the endorsement process, NQF will need to make certain there is adequate representation of these groups on each standing committee. NQF is committed to implementing a plan to identify and solicit ongoing engagement and participation opportunities from these stakeholder groups. Depending on the outcome of this initiative, NQF could potentially implement this proposed change at a later time.

Adjudication of Appeals

Once the CSAC's endorsement decisions are made public via the NQF website, a 30-day appeals period begins. Any interested party may file an appeal on an endorsed measure with the Appeals Board during this period. The Appeals Board reviews all appeals submitted to NQF for consideration. All decisions made by the NQF Appeals Board are final.

Kaizen participants recommended that the CSAC should adjudicate all submitted appeals for endorsed and non-endorsed measures, instead of the Appeals Board. Implementing this recommendation would result in disbanding the Appeals Board, which was established in fall 2016. NQF appreciates the comments received on this recommendation. However, given important strategic considerations, NQF will not be able to implement a change of this magnitude at this time.

Enhancing Training and Education

NQF currently provides various educational resources for stakeholders involved in the CDP. This includes virtual meetings and written materials for committee members, developers and staff. At the beginning of each CDP, NQF virtually convenes standing committees for an orientation to the CDP and an overview of the measure evaluation criteria. Prior to all committee calls and meetings, committee co-chairs meet with NQF staff to identify potential concerns and additional information that may be useful to the committee. In addition, NQF convenes measure developers on monthly webinars to provide educational and informational updates on ongoing NQF activities. NQF also conducts bimonthly internal staff training and education sessions that focus on the CDP.

Kaizen participants expressed a need for increased training and education for all stakeholders engaged in the CDP. NQF will expand and strengthen the current range of educational resources tailored to specific audiences and more opportunities for on-demand virtual references available for review at any time.

Committee Co-Chairs and Members

Prior to the onset of a measure evaluation cycle, standing committee co-chairs and all other members of standing committee will receive on-boarding education and training on changes to the process and expectations on their roles and responsibilities by webinar and one-on-one conference calls, as needed. Routine meeting facilitation training conducted by an experienced NQF facilitator will be required for standing committee co-chairs to promote consistency across measure evaluation meetings. In addition, NQF will provide committee members access to electronic materials including an updated committee guidebook, recording archives and a Frequently Asked Questions (FAQs) web page containing all necessary materials essential to being an effective committee member.

Measure Developers

NQF currently provides technical assistance to measure developers on the measure submission process through one-on-one calls and written guidance materials. NQF will continue to conduct ongoing webinars specifically targeted to developers to inform and educate them on changes to the process and information relevant at specific stages in the process. For example, prior to the initial Scientific Methods Panel review phase, NQF will conduct an in-depth tutorial of this process.

While NQF currently offers a monthly measure developer webinar, additional efforts will focus on engaging less experienced developers. NQF will host an education series by webinar (live and pre-recorded for on-demand usage). Relevant topics will include:

- an introduction to the CDP;
- understanding the NQF measure evaluation criteria;
- best practices for measure submission;
- roles/responsibilities and expectations throughout the CDP; and
- other topics as requested.

NQF will also offer developer-focused orientation sessions that will allow developers to pose specific questions, meet NQF staff, and discuss technical assistance needs.

NQF Members and the Public

NQF will create a specific set of educational materials targeted to NQF membership and interested stakeholders to promote awareness and encourage more engagement throughout the process. These materials will be easily accessible and available on the NQF website. NQF staff will be available on an as-needed basis to answer questions or provide additional, one-to-one training to interested parties.

Stakeholders will have the opportunity to attend live webinars addressing the process changes and updates; this information will also be available on the NQF website (for on-demand usage) that will include guidance documents applicable to promote stakeholder participation.

NQF Staff

Finally, NQF will work to improve consistency across projects by expanding internal educational resources offerings for staff on the process, measure evaluation criteria and meeting facilitation. NQF will implement specific staff-focused trainings on meeting facilitation conducted by internal and externally trained facilitators. All staff will receive trainings on the updates and changes to the CDP. These resources will include video trainings providing an overview/refresher course on each step of the CDP; enhanced written guidance; and ongoing small group and/or one on one training, on the specific steps within the CDP. NQF will also hold biweekly education sessions on measure methodology, which will be conducted by senior staff.

Improvements in Information Exchange and Access

NQF currently conducts two separate measure review processes: measurement endorsement through the CDP and input on measure use and selection through the Measure Applications Partnership (MAP). While each process has a different purpose and goal, there is significant overlap in the information submitted and produced. For MAP, brief measure specifications are provided by CMS in the form of the Measures under Consideration (MUC) list, and the MAP's final recommendations for each review year are stored in Excel files and reports on NQF's public website. For the CDP, developers provide measure specifications through NQF's online measure submission form (MSF), and the endorsement decisions and summaries of committee discussions are stored in reports on various project-specific webpages on NQF's public website. Summary information for endorsed or previously endorsed measures is included on NQF's public measure repository, the Quality Positioning System (QPS).

Kaizen participants recommended a centralized information system that would allow for a comprehensive and longitudinal view of a measure. This system would allow staff, developers, and the public to access information, including both MAP and CDP data, as the information is updated in real-time. Participants emphasized attributes such as version control, consistency between NQF projects, and the ability to easily pull and edit information as key to an ideal-state measure information repository. Kaizen participants also recommended creating a more consistent, transparent, and user-friendly tool for submitting, reviewing, and analyzing measures and comments. Lastly, participants recommended that NQF should purposefully incorporate methods to ensure the tool provides an intuitive user-friendly experience.

Ongoing Improvements: Short and Long Term Solutions

NQF will adopt a two-fold approach to addressing recommendations from Kaizen participants. Some aspects of the recommendations are resolvable through short-term solutions and adaptations of existing platforms. Other recommendations will be addressed through a long-term product development approach.

NQF will advance a short-term initiative to aggregate information by grouping MAP measure recommendations and rationale issued each year into one comprehensive and filterable document, accessible from the existing MAP homepage on the NQF website. Similarly, NQF will work to consolidate existing information from CDP reports to make it easier for users to access measure information.

NQF will also advance a short-term initiative to improve business rules around publishing timelines and meeting materials, to ensure developers, committee members, and members of the public are more aware of opportunities to participate in NQF's processes. Commenting opportunities will also be enhanced by increasing the character limit to 10,000 characters, real-time updates on comments forwarded to developers, and better regulated public comment periods during evaluation meetings.

NQF will begin to specify components and features of a centralized measure information system, for long-term implementation. This system could feature:

- comprehensive information about a measure, linking CDP and MAP evaluations in one central repository;
- alternative search tools, including measure identification or tags, to improve information accessibility;
- upgrades to facilitate user experience, particularly improving the speed of searches, and contextual information available to explain key terms.

Other considerations geared towards developer-oriented enhancements, include the usability and transmission of measure submission form content, and opportunities for "cross-talk" between major measure databases in use currently.

Public Comment

NQF solicited comments on the proposed recommendations from the Kaizen via an online tool located on the NQF website. The public comment period opened on June 6, 2017 and closed on June 23, 2017. A total of 33 organizations and individuals submitted comments (Appendix A), including but not limited to, consumers, purchasers, health professionals and providers. The majority of the comments focused on the Scientific Methods Panel. Specifically, commenters requested additional information about the role in relation to the standing committee, process, composition and other operational details. Overall, the comments were generally supportive of the proposed recommendations. Comments are included in Appendix A in the order in which they were received.

Finally, NQF presented the recommendations to the Consensus Standards Approval Committee (CSAC) during their June 21, 2017 monthly conference call and July 11-12, 2017 in-person meeting. The CSAC, constituted of a simple majority of consumers and purchasers, was generally supportive of the majority of recommendations and offered a number of suggestions to strengthen NQF consumer/patient and purchaser engagement throughout the consensus development process. NQF will present the redesign recommendations to the NQF Board of Directors at its July 20, 2017 in-person meeting. As NQF embarks on implementation of this new process, NQF will routinely solicit input from other stakeholder groups.

Appendix A: Comments Received

Robert Dent, Midland Memorial Hospital

Having a scheduled submission/review process is seen as an advantage. It should be easier for organizations to plan accordingly. Thank you

NQF Response:

Thank you for your comment. We appreciate your feedback on the proposed recommendations for the CDP Redesign.

Joseph Kunisch, Memorial Hermann Health Care System

Thank you for the opportunity to comment on this important proposal. I agree with all of the proposed changes and would like to comment on one in particular. Regarding the improvements in information exchange and access, I recommend the NQF reconsider the prioritization of the proposed changes. From the perspective of end user of the quality measures, having a coordinated, centralized system for a comprehensive longitudinal view of the measure would be extremely helpful. The current process requires a significant amount of time and work effort on the end user side to pull this information together and review in a manner that is understandable and provides the ability to communicate the changes to other stakeholders. As a person that uses this process to obtain feedback from clinical staff for commenting, I believe creating a centralized system as proposed by the Kaizen participants would not only be helpful for me but would also further the engagement of outside stakeholders by making the review process less labor intense.

I would also like to recommend that the NQF adopt a commenting process similar to the one used for commenting on the NQF's Common Formats for Patient Safety Data Document. This allows stakeholders to submit a single comment regarding a specific section of the document. I found this system to be very user friendly and significantly enhance the commenting process.

NQF Response:

Thank you for your comment. NQF has identified short-term solutions to ensure our current IT infrastructure is more user friendly that progresses towards developing a more centralized system. NQF will advance a short-term initiative to aggregate information by grouping MAP measure recommendations and rationale issued each year into one comprehensive and filterable document, accessible from the existing MAP homepage on the NQF website. Similarly, NQF will work to consolidate existing information from CDP reports to make it easier for users to access measure information

NQF will also strive to improve business rules around publishing timelines and meeting materials, to ensure developers, committee members, and members of the public are more aware of opportunities to participate in NQF's processes. Commenting opportunities will also be enhanced by increasing the character limit to 10,000 characters, real-time updates on comments forwarded to developers, and better regulated public comment periods during evaluation meetings.

Rikki Mangrum, American Institutes for Research

Thank you for the opportunity to comment on NQF's planned and deferred changed. I applaud the proposed changes, particularly the addition of a methodological panel and the expansion to continuous commenting. It may be helpful for NQF to consider in future the value of providing feedback to measure stewards/developers at the Intent to Submit phase. If NQF could identify, at the intent stage, that a measure is unlikely to meet with a warm reception, it would be helpful to share this with measure developers.

I am in favor of improving the measure technical reports, as these are often long and arcane. However, I urge NQF to consider test alternative formats for these reports, and not to rely solely on expert guidance on how to revise and restructure them. Much as we test measures to make sure they function as intended, it is equally important to test the efficacy of different ways of communicating measure-related information. Otherwise, we may still struggle to expand the "voices at the table" to those important stakeholders who don't wish to make a hobby of learning how to read measure reports. This need is also related to the barriers NQF notes for making a change to the endorsement decision process. Finding sufficient stakeholder perspectives for the standing committees may be more challenging without attention to their needs.

Regarding the information exchange and access recommendations, I am reminded that Henry Wei of Google sat on the stage at the NQF annual conference back in April and told us all that combining data from disparate sources is now “a trivial matter.” His co-panelists agreed wholeheartedly that this was true. I read about companies like Palantir that can rapidly bring together wildly different databases, including those that are entirely unstructured, into dashboards that allow users to access and combine data for new purposes. This makes me wonder whether a new system is truly beyond reach. Perhaps NQF has received input from the wrong experts. The problem may be the suggestion to build a big new centralized system. The answer may be in a smaller, more flexible infrastructure that allows transparent interaction with decentralized systems.

NQF Response:

Thank you for your comment.

NQF currently offers technical assistance to measure stewards and developers at any time. Stewards and developers do not have to wait until there is an active project to receive technical assistance. NQF welcomes measure stewards and developers to request technical assistance at the Intent to Submit phase. NQF has clarified the opportunity to receive technical assistance in the final report.

NQF will continue to identify ways to improve the structure and format of the technical reports to capture the needs of all stakeholder perspectives.

NQF has also identified short-term solutions to ensure our current IT infrastructure is more user friendly that progresses towards developing a more centralized system. NQF will advance a short-term initiative to aggregate information by grouping MAP measure recommendations and rationale issued each year into one comprehensive and filterable document, accessible from the existing MAP homepage on the NQF website. Similarly, NQF will work to consolidate existing information from CDP reports to make it easier for users to access measure information. Additionally, NQF will strive to improve business rules around publishing timelines and meeting materials, to ensure developers, committee members, and members of the public are more aware of opportunities to participate in NQF’s processes. Commenting opportunities will also be enhanced by increasing the character limit to 10,000 characters, real-time updates on comments forwarded to developers, and better regulated public comment periods during evaluation meetings.

David Longnecker, Coalition to Transform Advanced Care (C-TAC)

We at C-TAC support the spirit and intent of the Kaizen recommendations, which are intended to facilitate efficiency and inclusive participation in the CDP. We also respect NQF's responses regarding the logistical implications for their staff and systems, and their response that some of these cannot be implemented immediately. Further, we emphasize the need for careful deliberation that leads to thoughtful implementation of key "driver measures" that encourage performance improvement but do not stifle innovation regarding how to accomplish the desired outcome. In short, the goal is to drive for the end-product of performance improvement, not dictate every step in the improvement process.

NQF Response:

Thank you for your comment. NQF appreciates your feedback on the proposed recommendations for the CDP Redesign.

Sandra Pogones, American Academy of Family Physicians

The American Academy of Family Physicians (AAFP) is in general support of the proposed changes and offers the following comments and suggestions:

1) Increased opportunity for measures submission: We agree with the changes. We would like a better understanding of which topic areas will be consolidated, with assurance that family medicine will continue to be represented in areas that impact primary care.

2) Technical Review: Methods Panel: We agree this aspect of measure evaluation is best addressed by statistical experts. We hope the change will free-up time to devote to measure alignment, duplication and identification of best-in-class measures, an important task that frequently gets less attention than it deserves in the current process.

3) Measure Evaluation Technical Report: We agree with the proposed changes.

4) Public Commenting Period with NQF Member Expression of Support: We support the changes.

5) CSAC Role in Endorsement Decisions and Appeals: The AAFP agrees that standing committees are in the best position to make the final endorsement decisions. However, it is not clear if this change would require that workgroup seats previously filled by clinicians would instead be filled with consumers and purchasers. We would support adding one or two seats to workgroups for consumers and purchasers, but would oppose heavy weighting of workgroups with public members. Clinicians' professional work, payments, patient care and safety are significantly impacted by measures, and the endorsement process must remain scientific. It is also critical that enough seats be available for professional members to ensure cross-specialty evaluation, endorsement, and acceptance by the medical community. We support having CSAC function as the Appeals Board and agree with disbanding the separate appeals board. We also suggest that CSAC be more involved in identifying potential gaps in measures, an area where consumer input would be very valuable.

6) Enhancing Training and Education: We support increased training and education for those involved in CDP and for all stakeholders. We also encourage NQF to offer training opportunities to inexperienced professionals to help groom such professionals for measures evaluation work. We've found opportunities for this type of training are limited, and suggest that each workgroup offer a limited number of "observational" seats (1-2) to be filled by inexperienced members that wish to gain experience in the process.

7) Improvement in Information Exchange and Access: We support eliminating duplicative information sources and centralizing information in one location, accessible via a user-friendly tool.

NQF Response:

Thank you for your comment.

Increased opportunity for measure submissions: NQF has consolidated the 22 measure review topical areas into 15 topical areas. (The list of the topical areas is included in the final report). Topic areas were consolidated with the goal of reassessing and balancing NQF's library of measures, while distributing measures to committees with the needed expertise to conduct an evaluation. As a result, many of the smaller portfolios have been consolidated into cross-cutting topics with a broader range of experience. In addition, some clinical groupings of committees were made to reflect more cross-cutting clinical areas, such as primary care and chronic illness care, pediatrics and geriatrics and palliative care.

CSAC Role in Endorsement Decisions and Appeals: NQF appreciates your suggestion on the composition of the standing committees. Given current resources and other important strategic considerations, NQF will not be able to implement a change of this magnitude at this time. If or when this change occurs, NQF will consider your feedback on the approach.

Enhancing Training and Education: Thank you for the suggestion. As we develop our training and education plan, we will consider your recommendation.

Sandra Pogones, American Academy of Family Physicians

The American Academy of Family Physicians wishes to append our prior comments on the proposed Methods Review process, considering recent and important feedback we have received from our members.

While we see the value of having statistical expertise available for review of reliability and validity of measures, we are concerned that non-clinicians may not be able to identify certain issues that are apparent to clinicians in their daily practice. For example, different registries or EHRs may not equally measure certain specifications due to clinical or technical features and logic, which will impact reliability. A statistician may not have identified such differences because they are not actually using the EHR and may make assumptions about commonality that do not exist. We are concerned that once a measure "passes" the hurdles for scientific acceptability and a recommendation is made to the committee, the process will become a rubber stamp approval, and due consideration of reliability and validity will not be performed by the committee.

We believe there are committee members that are skilled enough to handle scientific acceptability review, although not all members may feel comfortable with this. We would not oppose having statistical experts review the measures and participate in discussion of scientific reliability with the committee, but prefer they withhold making prior recommendations. We feel it is important for all committee members to hear and participate in the full discussion of scientific acceptability, as such discussion spurs questions, enhances member understanding of the measures, and improves overall effectiveness of members in reviewing all measure criteria.

NQF Response:

Thank you for your additional comment. Although NQF staff or the Scientific Methods Panel will review and rate the reliability and validity of the measure, standing committees may raise concerns with the specifications of the

measure or with potential threats to validity (e.g., selection of variables for risk adjustment model) and can therefore overturn the staff or Scientific Methods Panel rating. As part of its ongoing education efforts, NQF will provide clear guidance to standing committees regarding the circumstances wherein an overturn of the rating would be permissible.

Amy Bennett, American Academy of Neurology

The American Academy of Neurology (AAN) an association of more than 28,000 neurologists and neuroscience professionals appreciates the opportunity to comment on the 2017 Kaizen Consensus Development Process. The AAN is grateful of NQF's efforts to improve the Consensus Development Process (CDP). Several questions arise from the NQF's plan to limit the number of measures to be reviewed twice yearly. It is anticipated that for many standing committees more than eight new measures will be submitted in a year. How will NQF prioritize measures in this situation, and how will NQF ensure endorsement review occurs in a timely manner? How will the 22 current topical areas be reduced to 16, and will the public have input on these future groupings? It is anticipated that there will be situations where measure developers disagree with the NQF staff or external methods panel determination of low or insufficient ratings. What recourse is available when a developer disagrees? Will there be an appeal process through the external methods panel or the standing committee?

The AAN is concerned the open comment period could result in confusion, and potentially standing committee members would not receive or review comments within the meaningful timeframe for action on the comments. The AAN notes there is a need for increased training and education, but there is little no discussion on how NQF will evaluate the effectiveness of training. The NQF may benefit from analyzing the effectiveness of standing committees, and developing a plan to address situations when a standing committee is not operating efficiently (e.g., poor direction from committee chairs, questions to NQF staff are unanswered, etc.). The AAN would also encourage NQF to make improvements in the information exchange and access. Submission to NQF is an arduous process taking no less than 40 hours for one submission in a large part due to lack of smart forms and the required resubmission of duplicative information.

NQF Response:

NQF appreciates your comment. NQF will prioritize measures based on the measure maintenance schedule and the submissions of the Intent to Submit forms.

NQF has consolidated the 22 measure review topical areas into 15 topical areas. (The list of the topical areas is included in the final report). Topic areas were consolidated with the goal of reassessing and balancing NQF's library of measures, while distributing measures to committees with the needed expertise to conduct an evaluation. As a result, many of the smaller portfolios have been consolidated into cross-cutting topics with a broader range of experience. In addition, some clinical groupings of committees were made to reflect more cross-cutting clinical areas, such as primary care and chronic illness care, pediatrics and geriatrics and palliative care. NQF will not formally open a public comment period on the consolidated list of topical areas. However, NQF welcomes your feedback on the list. If you have input, feel free to email NQF at NQFKaizen@qualityforum.org.

The process includes a two-week process for measure steward or developer to respond to the ratings. In addition, the standing committees can still discuss relevant issues, such as risk adjustment. Given the opportunity for more frequent submission, measures may need to be move to the next review cycle to address methodologic concerns.

Standing committees will receive all comments submitted during the measure review process. Comments submitted up to one week prior to the committee evaluation meeting will be included in the meeting materials for discussion during the evaluation meeting. All comments submitted after the evaluation meeting through the end of the public comment period will be included into the meeting materials for the committee discussion on the post-comment call.

NQF currently surveys standing committee members on their experience and solicits feedback on ways to improve their involvement in the CDP. NQF intends to assess the effectiveness of the education and training program.

NQF is working to identify solutions to enhance our current IT infrastructure to provide a more user-friendly experience when submitting a measure for endorsement consideration.

Ryan Clary, National Viral Hepatitis Roundtable

Thank you for the opportunity to comment on the National Quality Forum's proposed changes. The National Viral Hepatitis Roundtable (NVHR) is a coalition of approximately 500 member organizations working to fight, and ultimately end, the hepatitis B and C epidemics in the United States. NVHR believes this goal can be achieved by

addressing stigma and health disparities, removing barriers to prevention, care, and treatment, and ensuring respect and compassion for all affected communities.

We would like to express concern with the proposal to only consider NQF member input on measures under consideration. We think it is important that stakeholders with subject matter expertise continue to be allowed to provide input and feedback for measures under consideration. We would like to encourage NQF to continue to seek input and comments from all relevant stakeholders and not just those who have paid membership dues to NQF.

Recommendation: NQF should expand input on measures under consideration to the general public.

NQF's role in facilitating the Measure Applications Partnership (MAP) is to serve as a voluntary consensus standards body, which requires openness to stakeholder participation and input in line with Circular A-119 (please see note with additional details below). While NQF's proposal to only consider NQF member input on measures under consideration may pass a low bar for "openness," we generally believe that the openness criterion was not intended to mean receptivity to input from just those stakeholders who paid membership dues to NQF.

Note: OMB Circular A-119 defines voluntary consensus standards bodies as "domestic or international organizations which plan, develop, establish, or coordinate voluntary consensus standards using agreed-upon procedures. For purposes of this Circular, "voluntary, private sector, consensus standards bodies," as cited in Act, is an equivalent term. The Act and the Circular encourage the participation of federal representatives in these bodies to increase the likelihood that the standards they develop will meet both public and private sector needs. A voluntary consensus standards body is defined by the following attributes:

(i) Openness.

(ii) Balance of interest.

(iii) Due process.

(iv) An appeals process.

(v) Consensus, which is defined as general agreement, but not necessarily unanimity, and includes a process for attempting to resolve objections by interested parties, as long as all comments have been fairly considered, each objector is advised of the disposition of his or her objection(s) and the reasons why, and the consensus body members are given an opportunity to change their votes after reviewing the comments.

NQF Response:
Thank you for your comment. All stakeholders, regardless if the individual or organization is an NQF member, can submit comments and feedback on the measures during the 12-week comment period as well as provide comments during the committee evaluation meetings. The option to express support or non-support for the measures under consideration would only be limited to NQF members.

Eleanor Lederer, American Society of Nephrology

On behalf of the American Society of Nephrology (ASN), thank you for the opportunity to provide comment on the National Quality Forum (NQF) 2017 Kaizen Consensus Development Process Proposed Redesign draft report. ASN represents nearly 17,000 physicians, scientists, nurses, and other health professionals dedicated to treating and studying kidney diseases to improve the lives of people with kidney diseases. ASN is a not-for-profit organization dedicated to promoting excellence in kidney care and ensuring access to optimal patient-centered quality care, regardless of socioeconomic status, geographic location, or demographic characteristics.

ASN appreciates the opportunity to provide public comment on renal measures under consideration and regarding the annual Measures Application Partnership (MAP) process. The society values NQF's efforts to enhance healthcare value, make patient care safer, and achieve better outcomes, and commends NQF for undertaking this redesign initiative at this time.

In general, ASN is supportive of the proposed changes outlined in the draft report, particularly efforts to make the consensus development cycle more rapid. The proposal suggests a greater role for the NQF staff in guiding the measure consideration and endorsement process. ASN supports this shift, and believes more engagement and leadership roles by the staff will benefit the organization and help it achieve its goal of more efficient processes. The society offers a few additional comments and questions for consideration that we hope are helpful as NQF finalizes and implements the report.

Technical Review: Methods Panel

ASN applauds the proposal to create a separate technical advisory panel tasked with conducting methodological reviews of complex measures. This change would have several benefits, including ensuring a group of experts in this complex arena have a dedicated mission of assessing aspects that may not receive the optimal amount of attention or expertise they warrant in the current system. Additionally, it may create more consistency in the statistical validity of all measures across the NQF portfolio. In addition to having the Methods Panel assess the measures that the NQF staff categorize as "complex measures", ASN would also recommend that the Panel assess:

- All complex measures undergoing maintenance review for which there are performance data and/or when there are existing, new or updated testing data.
- Any measure for which a standing committee member moves to request a review by the methodology panel.

ASN also suggests that NQF develop a process to adjudicate situations where measure developers may disagree with the determination by NQF staff or external methods panel regarding low or insufficient ratings.

Public Commenting Period with NQF Member Expression of Support

NQF's proposal to create one continuous comment period directly addresses an area of concern for ASN, and the society strongly supports this recommendation. Providing a longer period for public comment will both allow more stakeholders to share input and to ensure that commenters have adequate time to consider the often very complex and technical issues that are under consideration—thereby increasing the value of the feedback.

Related to this positive change, ASN would also encourage NQF to provide more time for public comment regarding the annual MAP process. The society recognizes that NQF is also working with other stakeholders (such as the Department of Health and Human Services) and thus the timeline may not be fully within NQF's control, but anything that the organization can do to lengthen the amount of time for public comment on the MAP would make it possible to provide more thoughtful, meaningful input.

Endorsement Decision

ASN concurs with the draft report recommendation that NQF not prioritize efforts to switch final endorsement decisions from the Consensus Standards Approval Committee (CSAC) to the standing committees. Many other changes, outlined in this report, would have higher value and it is important to get those modifications right. In the future, while ASN supports the concept of encouraging participation of more patient and consumer voices, the society would have concerns about keeping the level of scientific discourse at an appropriately expert level. In general, the society would encourage NQF to consider providing more advance training and education about some of the more technical aspects of measure development to the lay persons participating in the CSAC (or any other NQF panels) in advance of the meetings to maximize their ability to contribute.

Enhancing Training and Education

ASN applauds the proposals to raise awareness about NQF's current training and education opportunities and to expand those efforts in the future. Offering developer-focused sessions that would allow developers—or those considering entering the measure development arena— to talk with NQF experts in an informal setting to pose questions and discuss opportunities and challenges about their area of interest would be of immense value.

Again, thank you for the opportunity to provide comment on the draft report. ASN would be pleased to discuss these comments with NQF if it would be helpful. To discuss ASN's comments, please contact ASN Director of Policy and Government Affairs Rachel Meyer at (202) 640-4659 or at rmeyer@asn-online.org.

NQF Response:

Thank you for your comments.

Technical Review: Methods Panel: Because updated reliability and validity testing is not required for maintenance measures, NQF staff will review previous testing results for complex maintenance measures and attest to the adequacy of prior testing. If prior testing is inadequate, updated testing is provided, or NQF staff deems an external review necessary, the measure will be submitted to the external Scientific Methods Panel to evaluate the reliability and validity of the measure.

The standing committees will not determine which measures will be sent to the Scientific Methods Panel. Upon submission of the Intent to Submit form, NQF will assess whether the measure will be reviewed by the Scientific Methods Panel.

The process includes a two-week process for measure steward or developer to respond to the ratings. In addition, the standing committees can still discuss relevant issues, such as risk adjustment. Given the opportunity for more frequent submission, measures may need to be move to the next review cycle to address methodologic concerns.

Public Commenting Period with NQF Member Expression of Support: Thank you for your comment. NQF will continue to make every effort to lengthen the public commenting period on the measures under consideration (MUC) list. However, this is contingent on the release of the MUC by CMS.

Endorsement Decision: Thank you for the suggestion. As we develop our training and education plan, we will consider your recommendation.

Anne Leddy, Member, Endocrine Standing Committee

Overall, the summary document is comprehensive and the recommendations are well conceived.

#1. Increased opportunities for measure submission – excellent having two measure submission cycles per year. I support limiting the number of measures to 12 per cycle, 8 being routine maintenance of endorsed measures, and 4 new measures. Reduction of topical areas to 16 also good. Also encourage that active standing committees have not only virtual web meetings but in-person meeting yearly. I understand there is limited funding.

#2. Intent to submit requirement for new measures – I support this. Should facilitate consideration of new measures

#3. Technical review: Methods Panel - Excellent recommendation. I am a clinician. I have a rudimentary grasp of statistics. I have spent countless hours boning up on the methods needed to review the material essential to determining reliability and validity. Would suggest that the "Methods Panel" provide a brief synopsis of their statistical review of each proposed measure and that be provided with other usual material for the standing committees. This is truly a "value add".

#4. Measure evaluation technical report – Encourage that these changes be implemented as soon as possible.

#5. Public Commenting Period – Implement as soon as feasible.

#6. Endorsement process – I approve of the suggestion that the standing committees make final endorsement decisions without ratification by the CSAC. I also understand that it will take time to bolster the membership of the standing committees with more representation by consumers and producers so their stakeholder perspectives remain part of the endorsement process.

#7. Adjudication of Appeals – I support tasking the CSAC with adjudicating appeals rather than being the endorsement body. Having a separate Appeals Board is redundant.

#8. Enhancing Training and Education – Bravo. This is absolutely essential. I am sure that the NQF will work toward providing these resources within the limits of the budget.

NQF Response:
Thank you for your comment. NQF appreciates your feedback on the proposed recommendations for the CDP Redesign.

John Bott, Consumer Reports

Preface

The following are comments from Consumer Reports regarding the NQF draft report titled "2017 Kaizen Consensus Development Process: Proposed Redesign", which appears at the following link: http://www.qualityforum.org/2017_Kaizen_Comment.aspx

If you have any questions about these comments please contact John Bott at jbott@consumer.org, Doris Peter at dpeter@consumer.org, or Lisa McGiffert at lmcgiffert@consumer.org.

Technical Review: Methods Panel

To summarize the draft NQF report a key component of the external methods panel (on page 4, last paragraph), it appears to propose the following for the defining and processing three types of measures:

[1] Newly submitted: Complex measures

Measure types: risk adjusted outcomes, composites, cost

Body: external methods panel

Charge: provide recommendation to standing committees

[2] Newly submitted: Non-complex measures

Measure types: such as process and structural measures

Body: NQF staff

Charge: provide recommendation to standing committees

[3] Currently endorsed: Measure maintenance

Measure types: endorsed measures reviewed in maintenance

Body: NQF staff

Charge: attest to adequacy of prior testing

Note regarding the above: Because measures in maintenance (i.e. #3) are called out separately from complex and non-complex measures (i.e. #1 and #2 respectively) as to use of an external methods panel, it appears that the references to complex and non-complex measures are in regard to newly submitted measures.

Consumer Reports provides the following recommended changes, recommended attributes and concluding comments:

Recommended changes

We recommend to use an external panel for measures noted above in #1, #2 and #3 above (vs. NQF staff for some measures and an external panel for others). Rationale:

Having a set of NQF staff evaluate some measures for Scientific Acceptability while an external methods panel evaluates other measures increases the likelihood of using differing standards to vet the measures against and a differing bar that the measures must meet to be deemed acceptable.

The above #3 is silent on the process for currently endorsed measures with changes to the measure as it relates to the Scientific Acceptability criterion. Note the draft NQF report states: *"Since requirements for Scientific Acceptability differ for maintenance measures, staff would review testing results for maintenance measures and attest to the adequacy of prior testing."*

> What occurs with measures where substantial changes are made, and thus pointing to the prior testing is irrelevant? Is the proposal that measures that are largely unchanged (and the measure steward attests to adequacy of prior testing) are reviewed by NQF staff, and measures that substantially change are reviewed by the external methods panel?
>
> If NQF adopt a framework where measures in maintenance with changes are channeled to the external methods panel, and measures without changes go to NQF staff, steps are added to the process to review and sort the measures to channel them accordingly. Such added steps have the consequence of: a) adding time, b) consuming resources and c) creating the opportunity of inappropriately sending measures to the incorrect group.

The definitions of the #1 and #2 groupings are: a) not mutually exclusive, b) unclear, and c) not encompassing of all measures. For example, there are risk adjusted process measures and there are outcome measures that are not risk adjusted. Sorting measures between "complex" and "non-complex" (where some measures go to NQF staff and others to the external methods panel) will add steps the process. In turn, this consumes resources and time, and increases the likelihood of misclassifying measures. Thus, the result is inappropriately sending some measures to down the "complex" path and "non-complex" path.

As noted above regarding #3, use of an external methods panel streamlines the review process as all measures are channeled to the panel. The result is reducing waste, which is a principle of Kaizen, as well as standardizing the process for evaluating scientific information.

Recommended attributes

The following are noted as recommended attributes vs. changes for the draft report is silent on a number of aspects of the proposed methods panel. The following are attributes we recommend that are used in building the framework for the external methods panel:

a) The external methods panel has a majority of consumers and purchasers.

b) The external methods panel meetings are open to the public, the same as standing committees (SC) are. This process needs to be transparent; transparency is another reason why NQF staff should not be making any decisions re measures (e.g., #3 above)

c) The external methods panel members are subject to review for conflict of interests. As a result of this review, qualifying panel members will be free from conflicts of interest.

d) NQF will vet the external methods panel nominations for sufficient competencies in the areas evaluated in the Scientific Acceptability criterion.

e) Draw on the recent National Academy of Medicine (NAM) report titled "Vital Directions for Health and Health Care" as it relates to the concept of creating a health care performance measurement parallel to the Financial Accounting Standards Board (FASB). Related to the FASB concept, we suggest to charge the external methods panel with responsibilities aimed at improving the standardization of measure review for Scientific Acceptability. For example, the panel's scope could state they are charged with standardizing across all measures being evaluated:

- How measures are reviewed for Scientific Acceptability;
- The acceptable minimum threshold a measure must pass for Scientific Acceptability

Concluding comments

As it currently stands, 16 NQF SCs are reviewing measures as to Scientific Acceptability. Needless to say, such a large number of bodies evaluating measures against this criterion increases the likelihood of inconsistent standards applied to measures being reviewed. This risk for inconsistency is exacerbated by the following existing NQF attributes, which are noted in the NAM's "Vital Directions" report:

- NQF criteria are not evaluated in a strict quantitative sense;
- The NQF does not define specific validity tests for different types of measures;
- NQF does not require a minimum bar for reporting a measure's validity and reliability;
- NQF does not define specific thresholds for validity and reliability for endorsement

The "Vital Directions" report goes onto provide recommendations that relate to this particular proposal in the draft NQF report, and suggests the potential for NQF to be part of the solution. Specifically, "Vital Directions" notes:

> "Policy-makers could create an inde-pendent body to write standards for healthcare performance measures.... One option would be to build on NQF… The entity charged with this work ideally would be a private, nongovernment self-regulating organization…"

Through this recommendation for one external methods panel on Scientific Acceptability, NQF can move a step closer to the NAM's vision for NQF.

<u>Endorsement Decision</u>

The NQF draft report indicates the Kaizen process recommended that: *"…standing committees should make the final endorsement decisions, without ratification by the CSAC."*

Consumer Reports generally supports the above stated proposal; however we strongly agree that final endorsement decisions should not move to the SCs until the membership of each SC is reconstituted to have a simple majority of consumers/purchasers.

<u>NQF staff ensuring procedures are adhered to during SC process</u>

A current role of the CSAC is to ensure the proper protocols were adhered to in the review and voting on the measures by the SC. Such review of appropriate adherence to procedures should occur concurrently during each step of the endorsement process. Thus, NQF staff should fulfill this role during the SC's work as well as the work of the external methods panel.

Rationale: Putting the procedural review on the back end of the endorsement process is illogical. Identifying if there were procedural issues after the fact is inefficient and runs counter to a stated Kaizen process. Specifically, the NQF draft reports notes one of the aims of changes to the endorsement process is: *"reducing cycle time of the CDP"*.

<u>Improvement in Information Exchange and Access</u>

We strongly agree with the recommendations of the Kaizen participants to create *"a centralized information system that would allow for a comprehensive and longitudinal view of a measure. This system would allow staff, developers, and the public to access information, including both MAP and CDP data, as the information is updated in real-time."* We encourage NQF to move toward such improvements in the future.

NQF Response:

Thank you for your comment.

Technical Review: Scientific Methods Panel:

Maintenance measures can be complex measures. Because updated reliability and validity testing is not required for maintenance measures, NQF staff will review previous testing results for complex maintenance measures and attest to the adequacy of prior testing. If prior testing is inadequate, updated testing is provided, or NQF staff deems an external review necessary, the measure will be submitted to the external Scientific Methods Panel to evaluate the reliability and validity of the measure.

Due to volume and capacity concerns, all submitted measures cannot be reviewed by the Scientific Methods Panel. NQF staff has the appropriate expertise to review the non-complex measures. NQF will train and provide resources to the Scientific Methods Panel to ensure consistency in applying the testing information submitted to the measure evaluation criteria.

Upon submission of the Intent to Submit form, NQF will assess whether the measure will be reviewed by the Scientific Methods Panel. No matter the classification of the measure (complex or non-complex), the review by NQF staff or the Scientific Methods Panel will not add additional time to the review process. All measures that are ready for committee review, will be sent to the committee with adequate time for the committee to review prior to the committee evaluation meeting.

In the final report, NQF has clarified the definition of a complex measure. The following types of measures will be considered complex and therefore may require an evaluation by the Scientific Methods Panel:

- Outcome measures, including intermediate clinical outcomes
- Instrument-based measures (e.g., PRO-PMs)
- Cost/resource use measures
- Efficiency measures (those combining concepts of resource use and quality)
- Composite measures

Additionally, NQF has also provided additional information on the composition and disclosure of interest of the Scientific Methods Panel in the final report. The new NQF Scientific Methods Panel will consist of 15 to 25 nominated statisticians, epidemiologists, psychometricians, economists, performance measure methodologists and individuals with expertise related to eMeasures and disparities. All nominees will complete an annual general disclosure of interest (DOI) form, as well as measure-specific disclosures to identify recusals from specific measures. NQF will assign measure review based on identified conflicts of interest, relevant expertise, and availability of panel members. All reviews provided by the Scientific Methods Panel will be shared not only with the committee but also with the steward/developer and the public. Furthermore, the Scientific Methods Panel's charge will include providing expertise for methods/testing-related issues for NQF and advance NQF's guidance on these issues.

Enhancing Training and Education: Improving the training and education for the standing committee members will assist in ensuring consistency across all 15 committees when applying the measure evaluation criteria.

Endorsement Decision: NQF appreciates your suggestion on the composition of the standing committees. Given current resources and other important strategic considerations, NQF will not be able to implement a change of this magnitude at this time. If or when this change occurs, we will consider your feedback on the approach.

Increased staff training and education will further ensure NQF procedures are adhered to during measure evaluation process. Furthermore, the CSAC also provides oversight on the consensus development process and performs a final review of the process prior to making an endorsement decision.

Anouk Lloren, Yale-CORE

We thank the National Quality Forum (NQF) for the opportunity to comment on the NQF Kaizen Draft Report.

First, we note that a key process change discussed at the Kaizen event is not reflected in the current draft report. To avoid steering committees wasting time on applications that are unclear or for which the NQF staff and developer views on the technical content differ, NQF staff and the developer will reach agreement on the application of NQF criteria to the measure (or articulate differences where necessary) before the measure goes to the steering committee. This would ensure that the developer does not have to separately rebut NQF staff application of NQF guidelines post-hoc in front of the committee where there are differences.

Second, we provide comments on the NQF Kaizen Draft Report in the table below.

Two measure submissions per year; 6 months each

We generally support this approach but would like to better understand:

- How will NQF prioritize which measures will go to the in-person vs. webinar session?
- What will NQF do if the submitted number of measures exceeds 8 maintenance and 4 new measures?
- Our preference would be an approach that accommodates all submitted measures in timely way.

Developer signals intent to submit

Requiring a developer to signal intent two months before submission deadline (3 months before review starts) is reasonable

For maintenance measures (i.e. measures that are currently NQF-endorsed), the report indicates that "measures must indicate if new testing data will be available." We request clarification on what NQF means by "new testing data." It is most helpful when NQF describes this in terms of the specific sections of the submission or testing forms that, if updated, require notification to NQF staff.

The draft report does not reflect that, at the Kaizen, we mapped out that NQF staff would review submissions and rate them against criteria prior to NQF's applications going to committees. Specifically, we discussed to have any disagreements adjudicated and resolved before the measure moves forward to the committee, so that the staff-developer differences are adjudicated in advance of the committee instead of in front of the committee. This is a critical step that would address a pain point, so it needs to be made explicit.

New methodological panel

The draft captures the Kaizen conclusions fairly well, but it is unclear on the scope of the methods panel's review. Will the methodological panel always review reliability/validity as well as risk adjustment modeling for "complex measures?" If so, we support this approach.

We recommend more clarity about the type of experts NQF will seek for the method's panel and how that panel will reach decisions about recommendations to the committee assuming that all conclusions will not be unanimous.

Also, the report indicates that "standing committees may raise concerns with the specifications of the measure or with potential threats to validity (e.g., selection of variables for risk adjustment model)." We assume the intention of this statement is to make clear that clinical and other content experts on the committee, who may not be methodology experts, should be able to raise concerns about appropriateness of risk variables, cohort definitions, and the like. However, we recommend that committees receive clear guidance for overturning the recommendations of the methods panel and that someone from the panel be available during committee discussions and voting.

Continuous commenting

As under the current process, developers should have an opportunity to respond to comments. It is unclear how NQF will manage this input in a continuous comment process.

It will be important for the developers to also receive all comments submitted one week prior to the in-person meeting so that they will be prepared to discuss the comments at the meeting. We recommend that NQF not require developers to prepare written responses to comments prior to the in-person meeting as this short response window would put an undue burden on the developers.

We also assume, although not explicitly stated, that developers would receive comments at the close of the period (30 days after the posting of the committee report) and have some period of time to prepare written responses for the committee's consideration as is the current practice.

Simplifying technical report

We support this but only if it is accompanied by better on-going public access of the findings of NQF's review of measures and the specifications of endorsed measures (i.e., availability of materials on NQF's website).

Steering committees make final endorsement decision rather than CSAC;

CSAC adjudicates appeals rather than Board

We appreciate the effort to streamline processes and recognize that the CSAC often just follows the recommendations of the steering committee. However, we feel it is very valuable to have a single standing body with experience and diverse members confirm committee decisions. This is an opportunity to ensure some consistency in approach and guidance to committees from stakeholders. The steering committees have less experience with endorsement processes and therefore this change could lead to even more inconsistent results from committee to committee. We have experienced adjudication from the CSAC of issues that helped to clarify

and standardized approaches across committees. We think the CSAC role as a central endorsement committee remains very valuable.

Enhancing training and education

Support

Improvements in information exchange and access

Support

NQF Response:

We appreciate your feedback on the recommendations.

NQF has incorporated the steward/developer review process of the preliminary analysis of the measure in the final report.

Two measure submissions per year: The timing of review for the maintenance measures will depend on when the measures are scheduled to undergo maintenance. NQF will not prioritize measures based on the type of measure evaluation meeting.

NQF will limit 12 measures per topical area to regulate increased workload for the standing committees (and may include one or two measures as deemed appropriate). The combination of maintenance and new measures may vary depending on number of measures submitted, opportunities for related and competing measure review, and measure prioritization. Any Intent to Submit forms that are submitted once capacity has been reached for a particular cycle, NQF will notify the steward/developer and provide the date of the next cycle in which there is availability.

Intent to Submit: Steward/developers can submit prior testing data for maintenance measures as long as it continues to meet the measure evaluation criteria. However, if the steward/developer re-tested the maintenance measure, it is expected that the steward/developer would provide the updated testing data.

Technical Review: Scientific Methods Panel

The Scientific Methods Panel will review all measures deemed as complex. The following types of measures will be considered complex and therefore may require an evaluation by the Scientific Methods Panel:

- Outcome measures, including intermediate clinical outcomes
- Instrument-based measures (e.g., PRO-PMs)
- Cost/resource use measures
- Efficiency measures (those combining concepts of resource use and quality)
- Composite measures

Additionally, NQF has provided information on the Scientific Methods Panel composition and disclosure of interest process in the final report. The new NQF Scientific Methods Panel will consist of 15 to 25 nominated statisticians, epidemiologists, psychometricians, economists, performance measure methodologists and individuals with expertise related to eMeasures and disparities. All nominees will complete an annual general disclosure of interest (DOI) form, as well as measure-specific disclosures to identify recusals from specific measures. NQF will assign measure review based on identified conflicts of interest, relevant expertise, and availability of panel members. All reviews provided by the Scientific Methods Panel will be shared not only with the committee but also with the steward/developer and the public. Furthermore, the Scientific Methods Panel's charge will include providing expertise for methods/testing-related issues for NQF and advance NQF's guidance on these issues.

Continuous commenting: NQF has provided clarification regarding the developer's role in responding to comments during the commenting period. NQF will ensure the measure developer receives the submitted committees in order to prepare for the measure evaluation meeting. Measure developers will not be required to provide written responses to the comments received prior to the measure evaluation meeting. The committee will review any comments received after the committee evaluation meeting during the post-commenting period call. All submitted comments during this time will receive written responses from the standing committee, measure developers, and/or NQF, as appropriate.

Endorsement Decision: Given current resources and other important strategic considerations, NQF will not be able to implement a change of this magnitude at this time.

Jayne Hart Chambers, Federation of American Hospitals

The Federation of American Hospitals ("FAH") appreciates the opportunity to comment on the proposed changes to the consensus Development Process (CDP). We are encouraged that the National Quality Forum continues to work to improve the CDP, but we do not believe that the proposal in its current form provides sufficient detail to all us to completely understand the changes and their implications. The FAH also is concerned that a two-week commenting period does not permit adequate time for input from the NQF membership.

The following are initial questions about the various changes, particularly to ensure that the changes are consistent with the National technology Transfer and Advancement Act of 1995 and the Office of Management and Budget (OMB) Circular A-119 as updated in October 2012 (12). In addition, the FAH believes that any improvements made to the CDP must further reinforce the Standing Committees' and the NQF staff's ability to easily and transparently ensure the evaluation process and criteria are applied consistently across and within projects.

Overarching questions and comments

What is the impact and expected scope of the proposed increase in the number of topics to be considered twice a year. From the proposal, it is unclear what impact this would have for membership and committees. In any one year, how many additional measures and reports might be released for member and public comment? How does this compare to the current public comment periods, measures and projects?

To what degree will the measure submissions and comment periods be staggered? A graphic that depicts what the revised CDP would look like once all the proposed changes are implemented would be helpful. It is difficult to track projects in the current process. How will the new process make it easier to be thoughtful participants? Will the underlying computer systems be enhanced to support faster and more accurate searches? How will NQF members be able to easily track the projects? The final document needs to pull together more clearly every proposal so that members can see the entire process from start to finish.

Scheduling/Frequency

The FAH supports NQF providing an opportunity to allow more frequent submissions and reviews. The proposed approach still uses a "batching" methodology that will force decisions on measures within a certain timeframe and project. This process is fine for measures that are well developed and with little controversy. However, the proposed process till does not permit an iterative process where disagreements and concerns can be addressed before a final decision is made. The FAH believes there are way to create a process where measures can enter at any time, go to a committee for review when they are deemed ready and then go through multiple comment cycles or committee reviews until there is general agreement that the measure is ready to be endorsed. While the twice-yearly submission process meets some of those needs, it does not address the true need for the ability to submit and review a measure at any time nor the ability to achieve true consensus.

- The proposed change states that 22 topic areas are merged/reduced to 16, but additional detail is not provided. What are the 16 topic areas? How does this impact the number and composition of the Standing Committees, particularly for topics that are retired and the ones that are combined? How does this merging impact the limit of 12 measures per cycle since the number of measures in some topic areas may increase with the proposed shift? Is it possible that maintenance measures may not be reviewed in the 3-year cycle given the limited number of measures in each cycle?
- Will there be any flexibility on the maximum number of maintenance and new measures that can be included in any one cycle? If so, what are the parameters by which the numbers in each category may change? How will maintenance measures be selected for a cycle, particularly given the "intent to submit" requirement below?
- How will NQF prioritize which measures will be reviewed if there are more than four new measures in a cycle? Would it be first submitted or some other criterion? The FAH notes that prioritization must be balanced and not be partial to any one group (e.g., federal agencies vs. private sector developers).

Intent to submit

- How will this step be used for maintenance measures? Will NQF notify developers when maintenance is due? As drafted, it appears that the onus is on the developer regardless of whether the measure is new or maintenance.
- This section of the proposal also does not describe what NQF will do if it receives more than 12 measures in a review cycle? How does NQF decide which measures get moved to the next cycle? How will NQF prioritize which measures will be reviewed in a given cycle? How quickly will NQF inform developers if

their measure(s) cannot be reviewed (e.g. a month before the submission deadline, after the submission deadline.)?

Technical review: Methods panel

The creation of this panel has the potential to strengthen the evaluations for scientific acceptability and may be able to improve consistency across measures and projects. The FAH has several questions around the panel itself, the roles and responsibilities of this panel, NQF staff and Standing Committees, and the actual process and guidelines around these reviews.

- Who would be on the panel? Will it function similarly to a Standing Committee with terms? What level of education/training will be provided to its members if needed? If these questions are not answered up front, the same challenges experienced with the current Standing Committee members reporting difficulty in completing their reviews may still occur.
- Why does the creation of this panel allow for additional participation by consumers, patients, and purchasers? This statement implies that determinations of reliability and validity of measures are moved from the committee to NQF staff. This seems contrary to a process that is designed to achieve consensus across stakeholder groups. What is the process for assuring the scientific soundness of the review for technical specifications?
- Will the reviews for scientific acceptability be completed via email or will there be calls open to the membership and the public? What opportunity will developers have to provide additional information or clarify questions about their submissions? The FAH is concerned and sees the potential for this process to be a "black box" and not meet the openness/transparency and due process components of OMB circular A-119.
- Will Standing Committee members be able to "overrule" the methods panel or NQF staff and change the rating on reliability and/or validity? The language implies that the Standing Committee will only be able to raise concerns with the specifications or potential threats to validity. Are these the only items that committees will be able to address? If they do raise concerns, what happens to the preliminary ratings? Will it require a vote by the Committee?
- The proposal states that: "Generally, NQF will not forward measures with a "low" or "insufficient" rating from the methods review to the committee for further evaluation." What criteria will be used to determine if a measure with those ratings did or did not move forward to a committee? As the FAH understands the current process, if a measure fails on one of the 4 key criteria, it cannot move forward: i.e., if reliability or validity is low, then that is the an automatic Stop-Now indicator.
- Currently, staff preliminary analyses are inconsistent across the various committees and can be too prescriptive (e.g., testing is marked as insufficient because Kappa statistics are not provided; yet, percent agreement is near or at 100% and a Kappa statistic would not be meaningful). Or, assessment is too lax (e.g. SDS submissions with inadequate conceptual analyses are not rated as insufficient). A good indicator of the committee agreement (or lack thereof) with staff analyses is the number of times a committee's final decision aligns with the staff recommendation NQF should evaluate the degree of concordance and determine what the reasons for any lack of agreement may be. This exercise may be useful regardless of which group (i.e., NQF staff, methods panel, Standing Committee) is the one best able to perform the necessary preliminary analysis.
- The proposal calls for reviews not to move forward for non-complex measures that achieve low or insufficient ratings. The FAH has seen these low and insufficient ratings provided on maintenance measures that did not provide new testing. What would happen in those instances? What are the situations in which previous testing on maintenance measures would not be accepted? Would these measures not be put forward to the committee for evaluation? Would NQF just remove endorsement without any evaluation and adjudication by a committee?
- Because of this inconsistency, it would be preferable to have the methods panel review ALL measures or still ask the Standing committees to evaluate the less complex measures, while the methods panel reviews the complex measures. Since the process is designed to achieve consensus, it is unclear how having NQF staff serve as the arbiter/decision maker in the proposed process achieves the goal of consensus. The FAH is concerned about measures that are rated as low or insufficient by NQF staff, which means the review would stop at that point. The multi-stakeholder committee would not see the

measures. This process seems to be fraught with potential to not meet the balance and due process components of the OMB circular.

Measure Evaluation Technical Report

- The proposed changes seem reasonable and responsive to feedback provided by the FAH and other members.

Public Commenting Period with NQF member Expression of Support

It appears that at least one or two steps are missing in this process. The proposed change would eliminate the voting step, and it is not clear how the indications of support would be determined or how differences in opinion across the membership will be identified and/or adjudicated.

- What happens to comments that are submitted after the committee evaluation meeting? Will there be a follow-up conference call to review the comments and consider revising recommendations on measures based on member submissions? If the recommendations change, will this information be posted for members in an easily found site? Will members be given an opportunity to change their indications of support? Currently, it is not clear what the process is after the initial meeting to evaluate the measure and how differences of opinion will be adjudicated.
- How are these indications of support then used? Will it be the same process that is currently used for voting with results provided to the CSAC?
- Will other members and the public be able to see the comments and indications of support throughout the process? The FAH recommends ensuring that information is transparent to anyone who participates in the process.
- Additional information is needed on how these changes would be implemented and what the actual process steps would be before NQF moves forward with this proposed change. The membership needs more opportunity to discuss and provide input after the basic questions are answered. The FAH is concerned that there is potential to lose the consensus-based process in this step or at least weaken the consensus if this step is not handled carefully. The FAH is concerned that this step, in particular, may not meet the OMB circular guidance.

Endorsement Decision

The FAH is concerned about moving the final endorsement decision to Standing Committees. This change assumes that all committees evaluate measures in the same manner and are consistent in their decision-making. Removing an oversight body such as the CSAC seems premature. As a long-time NQF member, the FAH wants to see the system carefully specified and tested before such a drastic step is taken.

Adjudication of Appeals

The staff recommendation not to change the role of CSAC to be the arbiter of appeals appears reasonable at this point. The appeals board is new and whether this revised process works effectively or not must still be determined.

Enhancing training and Education

The proposal calls for additional steps to ensure that developers, committee members and staff are adequately trained. This is a positive step and should be undertaken no matter what happens to the overall proposal.

Improvements in Information Exchange and Access

The NQF is limited in the changes it can make at this time, but is making this public commitment to working on short-term solutions. The FAH strongly encourages NQF to solicit input from stakeholders involved in the CDP and MAP process. The two-week comment period on this broad and sweeping proposal to change the entire basis on which measures are endorsed is too limited for the import of the changes being put forth in this document. Many details have yet to be answered. It would be preferable for NQF to take the time to solicit input from the various stakeholders involved in the CDP and MAP processes to ensure that their issues of greatest significance are captured and addressed. Any finalized CDP process changes must ensure that the membership is fully on board. This short two-week comment period, which happens to fall right in the middle of the heaviest federal public commenting period on payment rules for the next fiscal year, is concerning. *It is highly unlikely that NQF members will feel they have been truly engaged with these proposed major changes to the CDP process*.

NQF Response:

Thank you for your comment. We appreciate your feedback on the proposed recommendations for the CDP Redesign. NQF hosted the Kaizen event in collaboration with CMS to inform the CDP redesign. CMS, as the funder of this initiative, has asked NQF to solicit public comment on the proposed recommendations and provide a final report outlining the new CDP by July 1, 2017. Thus, NQF had to limit the amount of time NQF members and the public had to provide feedback. However, as NQF continues to plan for implementation of the new CDP, additional feedback is welcomed.

Overarching questions and comments: To allow more frequent measure submissions, committees will convene more often. Additionally, there will be increased opportunities for NQF membership to engage in the process. As a result, NQF emphasizes the importance of stakeholder education.

After the standing committee completes its measure review, a summary of the committee's recommendations – or "draft report" – will be posted on the NQF website for the public and NQF membership to review and comment. Because there are more review cycles, NQF will revise the content and structure of the report to highlight key elements of interest. These elements are included in the final report.

To assist in planning and minimize burden for the measure stewards/developer, committee members and NQF, submission deadlines will be staggered. A graphic that outlines the new process is included in the final report.

Scheduling/Frequency: The process includes a two-week process for measure steward or developer to respond to the ratings. In addition, the standing committees can still discuss relevant issues, such as risk adjustment. Given the opportunity for more frequent submission, measures may need to be move to the next review cycle to address methodologic concerns.

The consolidated topic areas are included in the final report. For larger topic areas that include multiple conditions or cross-cutting areas, NQF will utilize technical experts as needed.

NQF will offer two measure submission opportunities for each topic area each year, limiting the number of measures evaluated by the standing committees in each cycle to a maximum of 12 (up to eight measures undergoing maintenance review and up to four new measures). This was determined given that approximately 80% of the measures submitted for endorsement consideration are maintenance measures. The combination of maintenance and new measures may vary depending on number of measures submitted, opportunities for related and competing measure review, and measure prioritization efforts. Per NQF's maintenance of endorsement policy, measures are due for reassessment every three years.

Intent to Submit: NQF will remind measure stewards and developers of scheduled measure maintenance review several months prior to the review and notify each of their assigned review cycle.

Technical review: Methods Panel: NQF has provided additional information on the composition and disclosure of interest of the Methods Panel in the final report. The new NQF Scientific Methods Panel will consist of 15 to 25 statisticians, epidemiologists, psychometricians, economists, performance measure methodologists and individuals with expertise related to eMeasures and disparities. All nominees will complete an annual general disclosure of interest (DOI) form, as well as measure-specific disclosures to identify recusals from specific measures. NQF will assign measure review based on identified conflicts of interest, relevant expertise, and availability of panel members. All reviews provided by the Scientific Methods Panel will be shared not only with the committee but also with the steward/developer and the public. Furthermore, the Scientific Methods Panel's charge will include providing expertise for methods/testing-related issues for NQF and advance NQF's guidance on these issues.

NQF will provide standard guidance on assessing the *Scientific Acceptability* criterion for a measure, using the current decision algorithm used from the measure evaluation criteria. As part of its ongoing education efforts, NQF will provide clear guidance to standing committees regarding the circumstances wherein an overturn of the rating would be permissible.

For both complex and non-complex measures, when the preliminary analysis is complete, NQF staff will send the preliminary analysis to developers by email for review. The process includes a two-week process for measure steward or developer to respond to the ratings. In addition, the standing committees can still discuss relevant issues, such as risk adjustment. The rating from the methods review—whether generated by NQF staff or the Scientific Methods Panel—will be used to rate the *Scientific Acceptability* of the measure. However, standing committees may raise concerns with the specifications of the measure or with potential threats to validity (e.g., selection of variables for risk adjustment model) and can therefore overturn the staff or Scientific Methods Panel ratings.

NQF will assess each measure based on the measure evaluation criteria outlined in guidance documents for both developers and committee members. Measures rated by NQF staff or the Scientific Methods Panel as "*Low*" or "*Insufficient*" for reliability or validity will be removed from the current evaluation cycle, allowing time for any additional testing, clarification or NQF technical support, or review prior to consideration of the measure in a future cycle. NQF always welcomes measure stewards/developers to request technical assistance prior to the submission deadline.

Public Commenting Period: The committee will review any comments received after the committee evaluation meeting during the post-commenting period call. All submitted comments during this time will receive written responses from the standing committee, measure steward/developers, and/or NQF, as appropriate. The standing committee may revise its recommendations in response to a specific comment or series of comments submitted. These changes will be communicated broadly prior to the CSAC's review.

Endorsement Decision: Given important strategic considerations, NQF will not be able to implement a change of this magnitude at this time. NQF is committed to implementing a plan to identify and solicit ongoing engagement and participation opportunities from the consumer and purchaser stakeholder perspective. Depending on the outcome of this initiative, NQF could potentially implement this proposed change at a later time.

Improvements in Information Exchange and Access: NQF will adopt a two-fold approach to addressing recommendations from Kaizen participants. Some aspects of the recommendations are resolvable through short-term solutions and adaptations of existing platforms. Other recommendations will be addressed through a long-term product development approach. NQF will solicit stakeholder input through this process as appropriate.

Koryn Rubin, American Medical Association

The American Medical Association (AMA) appreciates the opportunity to comment on the proposed changes to the Consensus Development Process (CDP). We support the ongoing efforts to continuously improve the CDP process and are encouraged by the possibility of submitting measures more frequently for review but are highly concerned with the lack of detailed information provided in the draft document. The brevity paired with the extremely quick turnaround time for review and comment does not allow adequate time or sufficient information to provide substantive comments. Rather, we have outlined our general thoughts and questions for each of the proposed changes. Any changes to the CDP and application of the measure evaluation criteria must be consistent within and across projects.

The following are questions and comments on the proposed changes:

<u>General Questions/Comments</u>

- It would be useful to understand what the increase in the number of topics twice a year would mean for NQF membership and committees. How many additional measures and reports might be released in a year for member and public comment compared to now? Currently, there are too many competing projects including measures under review and frameworks, which result in an extremely low member comment response rate, and the inability of members to adequately evaluate, review and comment on NQF activities.
- To what degree will the measure submissions and comment periods be staggered?
- A graphic or visual that shows what the revised CDP would look like once all of these changes are implemented would be helpful. There is nothing in this document that pulls everything together so that you can see the entire process from start to finish.

<u>Scheduling/Frequency</u>

The AMA supports the opportunity for more frequent submissions and reviews during the NQF CDP process. However, the proposed approach still uses a "batching" methodology that will force decisions to be made on measures within a certain timeframe and project. This process is fine for measures that are well developed and generate minimal controversy. What the process still does not allow for is an iterative process where disagreements and concerns can be addressed before a final decision is made. NQF should develop a process through which measures can enter at any time, be sent to a committee for review when they are deemed ready and then go through multiple comment cycles or committee reviews until there is general agreement that the measure is ready to be endorsed. The twice-yearly submission process meets some of those needs, but it does not address the true needs – the ability to submit a measure at any time and the ability to achieve true consensus. For instance, the process should incorporate some sort of tabling mechanism—where a controversial measure can be sidelined to allow issues to be worked through, and brought back for review when ready. The AMA has experience

in convening approval and evaluation processes and would be happy to explain how the CPT and RUC processes handle such issues.

While the document says that 22 topic areas are merged into 16 topics it lacks sufficient detail. The AMA has the following outstanding questions and issues that must be clarified before a new CDP can be finalized:

- *16 Topic Areas:* What are the 16 topic areas and what topics will sunset and/or merge? How did NQF define and arrive at the 16 topic areas? How does this impact the number and composition of the Standing Committees, particularly for topics that are retired and combined?
- Capping CDP at 12 Measures Per Cycle: We are concerned with capping the number of measures at twelve per cycle and the potential ramifications of this arbitrary cap do not appear to have been considered. It is unclear how NQF arrived at the number and why only a maximum of eight measures undergoing maintenance and up to four new measures can be considered per cycle. It is possible that NQF will receive more than twelve measures for one cycle. For instance, MIPS requires a physician to report on six measures, one of which must be an outcome or high priority measure. Therefore, we envision measure developers would put forward a suite of measures in a clinical topic area, but the revised process may not allow for review of multiple measures in one clinical area during a single cycle. Therefore, we are concerned that the arbitrary cap on new measures (up to four per cycle) may impact MIPS compliance and the transition to more innovative and meaningful measures by limiting the number of new measures that can undergo review. We, also request further clarification on the proposal to cap measure reviews at twelve per cycle:
    - How will NQF prioritize measures? What if there are more than four new measures in a cycle? Would priority be given to the first measures submitted or be based on some other criterion? We would note that prioritization must be balanced and not partial to any one group (e.g., CMS).
    - Will there be any flexibility on the maximum number of maintenance and new measures that can be included in any one cycle? If so, what are the parameters by which the numbers in each category may change? How will maintenance measures be selected for a cycle, especially given the "intent to submit" requirement?
    - How does capping the sixteen topic areas impact the limit on twelve measures per cycle since the number of measures in some of the topic areas may increase with this shift?
    - It is possible that maintenance measures may not be reviewed within the 3-year cycle given the limited number of measures within each cycle?

<u>Intent to Submit</u>

- How will this step be used for maintenance measures? Will NQF notify developers when maintenance is due? As proposed, it appears that the onus is on the developer regardless of whether it is a new measure or maintenance measure.
- This section also does not say what NQF will do if they get more than 12 measures to be submitted in a cycle review? How will NQF decide which measures get moved to the next cycle? How will NQF prioritize which measures will be reviewed in a given cycle? How quickly will NQF let developers and the public know if that occurs (e.g., a month before the submission deadline, after the submission deadline)?

<u>Technical Review: Methods Panel</u>

The creation of this panel has the potential to strengthen the evaluations for scientific acceptability and may improve consistency across measures and projects. However, there are several questions around the panel itself, the roles and responsibilities of this panel along with NQF staff and Standing Committees, and the actual process and guidelines around these reviews. The AMA requests more detail on who would be on the Technical Review panel. Specifically, we seek more information on how the Technical Review panel will operate. Will the Technical Review panel operate similar to a Standing Committee with terms, level of education/training? The level of education, training and standardization will have a big impact on the success of the Technical Review panel. Otherwise, the same challenges which occurred with the Standing Committee, such as members reporting difficulties completing scientific and statistical reviews, may still occur. We are also concerned that this may create a diminished role for clinical perspective and expertise.

It is not clear how the creation of this panel would allow for additional participation by consumers, patients, and purchasers. This statement implies that determinations of reliability and validity of measures are moved from the

committee to NQF staff. This seems contrary to a process that is designed to achieve consensus across stakeholder groups.

We also seek further clarification on the operations of the Technical Review panel:

- Will the scientific acceptability reviews be completed via email or will there be calls open to the membership and public? What opportunity will developers have to provide additional information or clarify questions? There is the potential for this step in the process to be a "black box" and decrease transparency with the CDP.
- Will Standing Committee members be able to "overrule" the methods panel or NQF staff and change the rating on reliability and/or validity? As drafted, the proposal implies that Standing Committees will only be able to raise concerns with the specifications or potential threats to validity. Are these the only issues that committees will be able to address? If they do raise concerns, what happens to the preliminary ratings? Will it require a vote by the Committee?
- The document states that, "Generally, NQF will not forward measures with a '*low*' or '*insufficient*' rating from the methods review to the committee for further evaluation". What criteria would be used to determine if a measure with those ratings did or did not move forward to a committee?
- Currently, staff preliminary analyses are incredibly inconsistent across the various committees and can be too prescriptive (e.g., testing is marked as insufficient because Kappa statistics are not provided; yet, percent agreement is near or at 100% and a Kappa statistic would not be meaningful) or too lax (e.g., SDS submissions with inadequate conceptual analyses are not rated as insufficient). A good indicator of the committee agreement (or lack thereof) with staff analyses is the number of times a committee's final decision aligns with the staff recommendation. Therefore, NQF should look at the degree of concordance and determine the reasons for lack of agreement. Our recommended exercise may be useful regardless of which group (i.e., NQF staff, methods panel, Standing Committee) is best able to perform this preliminary analysis.
- Furthermore, it is proposed that if the reviews for non-complex measures are low or insufficient, the measures would not move forward. Based on our experience with the CDP, we have seen these low and insufficient ratings provided on maintenance measures that did not provide new testing. What would happen in those instances? What are the instances in which previous testing on maintenance measures would not be accepted? Would these measures not be put forward to the committee for evaluation? Would NQF remove endorsement without any evaluation and adjudication by a committee?
- Due to the potential continued inconsistency, it may be preferable to have the methods panel review ALL measures or to continue to have the Standing Committees evaluate the less complex measures, while the methods panel reviews the complex measures. Because the process is designed to achieve consensus, it is unclear how having NQF staff serve as an arbiter/decision maker in the process achieves that goal; particularly, if measures that are rated as low or insufficient by NQF staff would not go forward to a multi-stakeholder committee.

<u>Measure Evaluation Technical Report</u>

- These changes seem reasonable and responsive to feedback provided by the AMA and other members over the years.

<u>Public Commenting Period with NQF Member Expression of Support</u>

As proposed, it appears there are steps missing in the revised process because the proposed changes would eliminate voting. It is also unclear how the indications of support would be determined or how differences in opinion across membership will be adjudicated. We request clarification on the following questions related to public commenting and voting:

- What happens to comments that are submitted after the evaluation meeting? Will there be a follow-up conference call to review and consider revising recommendations on measures based on what is submitted? If the recommendations change, will this information be posted and members given an opportunity to change their indication of support? As proposed, it is not clear what the process is to evaluate a measure after the initial meeting and how differences of opinion will be adjudicated.
- How are the indications of support then used? Will it be the same process as is currently used for voting now with results provided to the CSAC?

- Will other members and the public be able to see the comments and indications of support throughout the process? It will be important to ensure that this information is transparent to anyone who participates in the process.

Additional information is also needed on how these changes would be implemented and what steps would be taken before NQF moves forward with this proposed change. There is significant potential that these changes could reduce the consensus-based nature of the process.

Endorsement Decision

We are concerned with moving the final endorsement decision(s) to Standing Committees. The change assumes that all committees evaluate measures in the same manner and are consistent in their decision-making. Removing an oversight body such as the CSAC seems premature.

Adjudication of Appeals

The staff recommendation not to change the role of CSAC to be the arbiter of appeals right now is very reasonable. The appeals board is new and whether this revised process works effectively or not must still be determined.

Enhancing Training and Education

The additional steps to ensure that developers, committee members and staff are adequately trained are very positive. Additional detail on exactly what will be provided (e.g., schedule of events) would be helpful.

Improvements in Information Exchange and Access

Since NQF is limited in the changes that can be made at this time but commits to working on short-term solutions, it would be preferable if they solicit input from various stakeholders involved in the CDP and MAP as they move forward in this effort to ensure that what is most important to membership is prioritized.

For questions or to discuss the AMA's comments further, please contact Koryn Rubin, Assistant Director, Federal Affairs at 202-789-7408 or koryn.rubin@ama-assn.org.

NQF Response:

Thank you for your comment. We appreciate your feedback on the proposed recommendations for the CDP Redesign. NQF hosted the Kaizen event in collaboration with CMS to inform the CDP redesign. CMS, as the funder of this initiative, has asked NQF to solicit public comment on the proposed recommendations and provide a final report outlining the new CDP by July 1, 2017. Thus, NQF had to limit the amount of time NQF members and the public had to provide feedback. However, as NQF continues to plan for implementation of the new CDP, additional feedback is welcomed. Additional details have been included in the final report for clarity.

General Questions/Comments: To allow more frequent measure submissions, committees will convene more often. Additionally, there will be increased opportunities for NQF membership to engage in the process. As a result, NQF emphasizes the importance of stakeholder education.

To assist in planning and minimize burden for the measure stewards/developer, committee members and NQF, submission deadlines will be staggered. A graphic that outlines the new process is included in the final report.

After the standing committee completes its measure review, a summary of the committee's recommendations – or "draft report" – will be posted on the NQF website for the public and NQF membership to review and comment. Because there are more review cycles, NQF will revise the content and structure of the report to highlight key elements of interest. These elements are included in the final report.

Scheduling/Frequency: The process includes a two-week process for measure steward or developer to respond to the ratings. In addition, the standing committees can still discuss relevant issues, such as risk adjustment. Given the opportunity for more frequent submission, measures may need to be move to the next review cycle to address methodologic concerns.

The consolidated topic areas are included in the final report. Topic areas were consolidated with the goal of reassessing and balancing NQF's library of measures, while distributing measures to committees with the needed expertise to conduct an evaluation. As a result, many of the smaller portfolios have been consolidated into cross-cutting topics with a broader range of experience. In addition, some clinical groupings of committees were made to reflect more cross-cutting clinical areas, such as primary care and chronic illness care, pediatrics and geriatrics and palliative care. NQF will offer two measure submission opportunities for each topic area each year, limiting the number of measures evaluated by the standing committees in each cycle to a maximum of 12 (up to eight measures undergoing maintenance review and up to four new measures). This was determined given that approximately 80% of the measures submitted for endorsement consideration are maintenance measures.

However, the combination of maintenance and new measures may vary depending on number of measures submitted, opportunities for related and competing measure review, and measure prioritization efforts. Per NQF's maintenance of endorsement policy, measures are due for reassessment every three years. NQF will remind measure stewards and developers of scheduled measure maintenance review several months prior to the review and notify each of their assigned review cycle.

Technical review: Methods Panel: NQF has provided additional information on the composition and disclosure of interest of the Scientific Methods Panel in the final report. The new NQF Scientific Methods Panel will consist of 15 to 25 statisticians, epidemiologists, psychometricians, economists, performance measure methodologists and individuals with expertise related to eMeasures and disparities. All nominees will complete an annual general disclosure of interest (DOI) form, as well as measure-specific disclosures to identify recusals from specific measures. NQF will assign measure review based on identified conflicts of interest, relevant expertise, and availability of panel members. All reviews provided by the Scientific Methods Panel will be shared not only with the committee but also with the steward/developer and the public. Furthermore, the Scientific Methods Panel's charge will include providing expertise for methods/testing-related issues for NQF and advance NQF's guidance on these issues.

NQF will provide standard guidance on assessing the *Scientific Acceptability* criterion for a measure, using the current decision algorithm used from the measure evaluation criteria. As part of its ongoing education efforts, NQF will provide clear guidance to standing committees regarding the circumstances wherein an overturn of the rating would be permissible.

For both complex and non-complex measures, NQF will send the preliminary analysis to developers by email for review. The process includes a two-week process for measure steward or developer to respond to the ratings. In addition, the standing committees can still discuss relevant issues, such as risk adjustment. The rating from the methods review—whether generated by NQF staff or the Scientific Methods Panel—will be used to rate the *Scientific Acceptability* of the measure. However, standing committees may raise concerns with the specifications of the measure or with potential threats to validity (e.g., selection of variables for risk adjustment model) and can therefore overturn the staff or Scientific Methods Panel ratings.

NQF will assess each measure based on the measure evaluation criteria outlined in guidance documents for both developers and committee members. Measures rated by NQF staff or the Scientific Methods Panel as "*Low*" or "*Insufficient*" for reliability or validity will be removed from the current evaluation cycle, allowing time for any additional testing, clarification or NQF technical support, or review prior to consideration of the measure in a future cycle. NQF always welcomes measure stewards/developers to request technical assistance prior to the submission deadline.

Public Commenting Period: The committee will review any comments received after the committee evaluation meeting during the post-commenting period call. All submitted comments during this time will receive written responses from the standing committee, measure steward/developers, and/or NQF, as appropriate. The standing committee may revise its recommendations in response to a specific comment or series of comments submitted. Any decisions will be communicated broadly prior to the CSAC's review.

Endorsement Decision: Given important strategic considerations, NQF will not be able to implement a change of this magnitude at this time. NQF is committed to implementing a plan to identify and solicit ongoing engagement and participation opportunities from the consumer and purchaser stakeholder perspective. Depending on the outcome of this initiative, NQF could potentially implement this proposed change at a later time.

Improvements in Information Exchange and Access: NQF will adopt a two-fold approach to addressing recommendations from Kaizen participants. Some aspects of the recommendations are resolvable through short-term solutions and adaptations of existing platforms. Other recommendations will be addressed through a long-term product development approach. NQF will solicit stakeholder input throughout this process as appropriate.

Norman Kahn, Council of Medical Specialty Societies

The Council of Medical Specialty Societies (CMSS) is pleased to comment on the proposed changes to the endorsement process of the National Quality Forum (NQF). CMSS is a long-time member of NQF and serves on the National Quality Partners Leadership Council.

On at least two occasions in the past decade, CMSS has requested that NQF streamline its endorsement process, and make it more "user-friendly." We are pleased that NQF has been responsive to such feedback in the past. At present, it appears that NQF's Kaizen process promises to modernize the critical measure endorsement function that NQF plays in the US health system.

CMSS supports NQF's proposed changes, with the following comments:

- We agree with NQF's proposed changes, but caution against replacing professional clinicians with consumers and payers on the workgroup committees (if CSAC is no longer responsible for final endorsement). While we support adding seats for the public on workgroups, we would oppose heavily weighting workgroups with consumers and payers, as we feel this may put at risk the scientific nature of workgroups. It is critical that enough seats be available for professional members to ensure cross-specialty evaluation, endorsement, and acceptance by the medical community.
- We encourage NQF to make improvements in information exchange and access. Submission to NQF is an arduous process taking no less than 40 hours for one submission, in large part due to lack of smart forms and the required resubmission of duplicative information.
- When several disciplines are lumped into one topic, a limitation of 4 new measures may be too restrictive. As an example, ENT, ophthalmology, and optometry are all in the same topic. This would restrict three disciplines to 4 new measures.
- Twice yearly cycles are good, but may very well result in a burden on the committee members. Each committee meeting tends to be two days plus conference calls, which is a significant work burden for volunteers.

In addition, CMSS has a few questions as NQF proposes changes:

- How will NQF prioritize measures in a situation where more than eight new measures are submitted in a year, and how will NQF ensure endorsement review occurs in a timely manner for these extra measures received?
- How will the 22 current topical areas be reduced to 16, and will the public have input on these future groupings?
- It is anticipated that there may be situations where measure developers may disagree with the determination by NQF staff or external methods panel of low or insufficient ratings. What recourse is available when a developer disagrees? Will there be an appeal process through the external methods panel or the standing committee?

CMSS appreciates efforts on the part of NQF to modernize and streamline the process of measure endorsement. We hope that our feedback will serve to continually improve the process.

Sincerely,
Norman Kahn MD
Executive Vice-president and CEO

NQF Response:

Thank you for your comment. NQF appreciate your feedback on the proposed recommendations for the CDP Redesign.

Endorsement Decision: NQF appreciates your suggestion on the composition of the standing committees. Given current resources and other important strategic considerations, NQF will not be able to implement a change of this magnitude at this time. If or when this change occurs, we will consider your feedback on the approach.

Improvement in Information Exchange and Access:

NQF is working to identify solutions to enhance our current IT infrastructure to provide a more user-friendly experience when submitting a measure for endorsement consideration.

NQF will advance a short-term initiative to aggregate information by grouping MAP measure recommendations and rationale issued each year into one comprehensive and filterable document, accessible from the existing MAP homepage on the NQF website. Similarly, NQF will work to consolidate existing information from CDP reports to make it easier for users to access measure information. In addition, NQF will advance a short-term initiative to improve business rules around publishing timelines and meeting materials, to ensure developers, committee members, and members of the public are more aware of opportunities to participate in NQF's processes. Commenting opportunities will also be enhanced by increasing the character limit to 10,000 characters, real-time updates on comments forwarded to developers, and better regulated public comment periods during evaluation meetings.

Scheduling and Frequency: NQF has conducted an analysis of the number and types of measures (maintenance and new) submitted for endorsement consideration for each topic area over the last several years. In addition, NQF

used a decision logic to inform which topical areas can be combined to create a comprehensive topical area portfolio. NQF will monitor the submissions closely to ensure developers have the opportunity to submit measures in each discipline within the combined topical areas.

NQF will limit the number of measures evaluated by the standing committees in each cycle to a maximum of 12 (up to eight measures undergoing maintenance review and up to four new measures). NQF may add one or two additional measures as deemed appropriate. However, the combination of maintenance and new measures may vary depending on number of measures submitted, opportunities for related and competing measure review, and measure prioritization efforts. Any Intent to Submit forms that are submitted once capacity has been reached for a particular cycle, NQF will notify the steward/developer and provide the date of the next cycle in which there is availability.

NQF has consolidated the 22 measure review topical areas into 15 topical areas. (The list of the topical areas is included in the final report). Topic areas were consolidated with the goal of reassessing and balancing NQF's library of measures, while distributing measures to committees with the needed expertise to conduct an evaluation. As a result, many of the smaller portfolios have been consolidated into cross-cutting topics with a broader range of experience. In addition, some clinical groupings of committees were made to reflect more cross-cutting clinical areas, such as primary care and chronic illness care, pediatrics and geriatrics and palliative care. NQF will not formally open a public comment period on the consolidated list of topical areas. However, NQF welcomes your feedback on the list. If you have input, feel free to email NQF at NQFKaizen@qualityforum.org.

Technical Review: Methods Panel: The process includes a two-week process for measure steward or developer to respond to the ratings. In addition, the standing committees can still discuss relevant issues, such as risk adjustment. Given the opportunity for more frequent submission, measures may need to be move to the next review cycle to address methodologic concerns.

Bob Rehm, National Committee for Quality Assurance

NCQA was pleased to participate in the recent Kaizen representing both the measure development community, but also as a measure implementer. Kudos for NQF to address CDP availability, management and expedited endorsement timeframe.

Scheduling/Frequency: We want to thank NQF for demonstrating flexibility in shifting maintenance measures to later (or earlier) CDP projects. Often measure developers are in the midst of a re-evaluation cycle when NQF schedules a CDP review. Having the flexibility to complete that internal work prior to engaging with NQF results in better measures and a more efficient process. A win-win. We agree with the reduction in topical areas and would recommend that NQF publish those for public comment.

During the recent Kaizen there was feedback that standing committees are structured to have a variety of experts, and so sometimes a measure will apply to only some of the committee members. This means that committee members may be reviewing measures for which they have limited experience/expertise. This might become an even bigger issue with the consolidation of topic areas. NQF might consider how to handle this so that committee members are discussing/voting on measures that are within their area of interest/expertise. One option would be the introduction of an "abstain" option in voting for panel members who do not feel they are in a position to vote on a specific criteria or suitability for endorsement. NQF could clarify this option during panel orientation and at the CDP endorsement meeting.

CDP Meetings: We agree with the proposal to alternate in-person and virtual meetings. However, we would like to ensure that quorum for any meeting is reached and that voting occur *at the same time* as the measures are presented and discussed. Voting off-line by committee members not present during discussion of the measure is inappropriate.

While not referenced in your proposal, we also recommend that public comment during standing committee meetings occur prior to voting on a given measure.

Intent to Submit: We strongly recommend that NQF (not the measure developer/steward) initiate this request for Maintenance Measures. NQF currently prepopulates the submission form and asks developers/stewards to verify that there are no significant changes to the measure. If none, then NQF incorporates the measure into the relevant CDP process. The current process for maintenance measures does not need to be changed. Measure developers/stewards should not have to "tee-up" measures already endorsed.

For New Measures, we support the new process and timing for intent to submit.

Technical Review: Methods Panel: We would like to emphasize the importance of NQF sharing the "initial staff review" with the measure developer/steward. This will ensure that any corrections, misinterpretations or inadvertent errors are addressed *prior* to distribution to the standing committee.

NQF should identify the criteria used to determine if a measure will undergo an NQF staff review of methods, or if that function will be performed by a technical advisory panel or ad hoc group composed of other convened standing committee members. Developers/stewards should be provided an opportunity to provide feedback on that criteria.

NQF should clarify that findings of the methods review will be presented to the standing committee as "recommendations" and that guidance be provided to a panel for over-riding these recommendations. Will developers have an opportunity to appeal the finding of the methods review? If so, NQF should provide guidance on that process. Will the standing committee continue to discuss and vote on scientific acceptability? Or will the vote be on the recommendation from the methods review? Will the same rules of voting still apply (< 40% - criteria not met; > 40 and < 60 - consensus not reached; > 60 - criteria met)? Is there time built in for the developer or steward to address issues that emerge from the methods review? We would like to recommend that NQF consider an option, short of a vote on endorsement, for the measure to be placed 'on hold' and allowing developers to come back to a future methods panel review for potential resolution. This alternate pathway may be more efficient and expedient for all concerned.

Due to the scale of changes put forth by NQF, we would recommend that a pilot project be initiated for a subset of CDP projects. Results of that pilot may be helpful in addressing issues and identifying strategies that work for NQF, the standing committees and the measure developers/steward, alike.

Measure Evaluation Technical Report – Content and Structure: We support additional streamlining. We also stress the importance and the value of providing measure developers/stewards an opportunity to review the technical report prior to posting?

Extended Public Comment Period: Can NQF clarify for maintenance measures, is this pre-committee evaluation public comment for the newly submitted maintenance measure or the maintenance measure from the last time it was reviewed/went through annual update? It seems it would be most helpful if the public was commenting on the newly submitted maintenance measure. This would avoid confusion, especially in cases where measures have been updated.

NQF should clarify the expectations for responses to public and member comment by the developer/steward during this "rolling" public comment period. This has the potential to add to, not reduce confusion, for all parties.

NQF should time stamp public and member comments; so they can be considered within the context of key events in the CDP process (e.g., comment received before materials published, comment received following standing committee meeting and vote). Commenters should attest that they have read and reviewed all available materials.

Endorsement Decision: We support CSAC's oversight role and agree that the current process of CSAC ratification serves the field well.

Adjudication of Appeals: We support the continued role of the Appeals Board and would recommend that NQF allow *all* measures the right of a formal appeal. Currently only measures recommended as suitable for endorsement by the standing committee and ratified by the CSAC can be appealed. We would recommend that the Appeals Board have a broader charge including review of measures not recommended for endorsement and not ratified by CSAC. We recommend that appeals continue to be considered when the measure developer/steward or other parties believe that NQF criteria was not applied correctly or the process was not followed. An option for NQF to consider: the Appeals Board could overturn decisions and send the measure back to consideration in the next cycle of the standing committee without the loss of endorsement. This would actually streamline the process and eliminate unnecessary repeat steps in the CDP process.

Enhancing Training and Education: We agree that further training and resources are needed for those engaged in the CDP process, including NQF staff, standing committee members, supporting advisory panels, developers/stewards, NQF members and the public. We would also recommend that new members to standing committees receive more concentrated support including holding of "dry runs" that can simulate the review process and expose them to a range of scenarios that test their understanding of the CDP process and interpreting the NQF evaluation criteria. Often times, this occurs during the first reivew of a measure by the panel, which is less than optimal. We would be delighted to support NQF in this effort.

Improvements in Information Exchange and Access: We support this innovative approach to integrating measure information across projects. The field will benefit and in the process become more knowledgeable about measure

development. In the meantime, as NQF works towards this ideal state, are there any immediate small successes that can be achieved? For example, creating an index that shows which MAP reports contain recommendations for each measure (so that users of this information do not have to search each report separately)?

Additional Comments: Intention to Submit-Review Process: The proposal includes the following language, *NQF staff will assess whether the measures will require a methodologic review based on a set of criteria.* While we support this approach, NQF should make this set of criteria available for feedback before finalization. NQF should ensure that reviewers have sufficient training, experience and oversight to perform this important assessment and share findings with the measure developer/steward, allowing 3 business days to respond.

NQF Response:
Thank you for your feedback on the Improvements in Information Exchange and Access comments. We concur that there are achievable short-term goals that will enhance usability. NQF will group measure recommendations & rationale issued each year into one comprehensive and filterable document, accessible from the existing MAP homepage. We expect this will address the challenge in tracking historical recommendations you highlighted.

Mark Stewart, Econometrica, Inc.

Econometrica, Inc. appreciates the opportunity to comment on the 2017 Kaizen on redesigning the Consensus Development Process. While we look forward to a more streamlined process with more frequent opportunities to submit measures to the Standing Committees, we have several questions and concerns regarding the proposed changes. First, will there be an opportunity to review or provide recommendations on the change from 22 to 16 Standing Committees? It is difficult to assess the impact of this change on the CDP without knowing what topic areas each Committee will cover.

It seems likely that a Standing Committee will receive Intent to Submit for more than four measures in any given review cycle, particularly in the period immediately following the implementation of the new process, because many developers and stewards have been waiting for existing projects to open a new review cycle. How will the Standing Committees select which measures they will review when they receive notification regarding more than four new measures? Will the selection be based solely upon the timing of submission of the Intent notice, or will more than 4 measures be allowed to proceed to methodological review first? In the case that one or more of the measures do not end up being submitted to the Standing Committee, will there be a waiting list or some other process to allow the queue to remain filled?

As a developer working on multiple measures simultaneously, we also wonder whether any attempt will be made to keep multiple measures submitted to a single Standing Committee by the same developer or steward together? If multiple measures for a single program are split up based on limiting each review cycle to 4 new measures, this will limit the potential benefit to shortening the process by requiring developer/steward presence at an additional round of Committee meetings, and by potentially delaying implementation of measures while the steward waits for the remaining measures to enter the endorsement process.

In terms of a methodological review panel, Econometrica does not have specific objections to this change. We would like to encourage NQF to ensure that the training and guidance provided to this review panel is also provided to developers so that the panel's expectations and processes can be clearly understood.

NQF Response:
Thank you for your comment.

Scheduling/Frequency: NQF has consolidated the 22 measure review topical areas into 15 topical areas. (The list of the topical areas is included in the final report). Topic areas were consolidated with the goal of reassessing and balancing NQF's library of measures, while distributing measures to committees with the needed expertise to conduct an evaluation. As a result, many of the smaller portfolios have been consolidated into cross-cutting topics with a broader range of experience. In addition, some clinical groupings of committees were made to reflect more cross-cutting clinical areas, such as primary care and chronic illness care, pediatrics and geriatrics and palliative care. NQF will not formally open a public comment period on the consolidated list of topical areas. However, NQF welcomes your feedback on the list. If you have input, feel free to email NQF at NQFKaizen@qualityforum.org.

NQF will limit the number of measures evaluated by the standing committees in each cycle to a maximum of 12 (up to eight measures undergoing maintenance review and up to four new measures). The combination of maintenance and new measures may vary depending on number of measures submitted, opportunities for related and competing measure review, and measure prioritization. NQF will notify the steward/developer and provide the date of the next cycle in which there is availability.

Technical Review: Methods Panel: Enhancing training and education for the standing committee and scientific methods panel members, developers, NQF members and the public is a top priority for NQF. In the final report, NQF has provided additional details regarding the training and education plan for each audience.

Amir Qaseem, American College of Physicians

We applaud NQF for addressing the critical issue of improving the consensus development process. Overall, the changes seem to be a positive step in the right direction. We particularly support the addition of a dedicated methods review team that utilizes individuals with methodological expertise. This method will help standardize the endorsement process while reducing the burden of clinical reviewers. Furthermore, we support embedding key stakeholders such as consumers and purchasers from the CSAC within the standing committee. Doing so will not only improve the timeliness of committee approvals, but also involves these stakeholders in the critical work of assessing performance measures in a more direct and accountable manner.

While we agree with the proposed changes, we encourage NQF to move towards pushing endorsement decisions to the standing committee. We also encourage NQF to make improvements in information exchange and access to include transparency in the process.

NQF Response:

Thank you for your comment.

CSAC Role in Endorsement Decisions and Appeals: We appreciate your feedback on the role of the standing committee as the final endorsement body, however given current resources and other important strategic considerations, NQF will not be able to implement a change of this magnitude at this time. If or when this change occurs, we will consider your feedback on the approach.

Enhancing Training and Education: Thank you for the suggestion. As we develop our training and education plan, we will consider your recommendation.

Jeffrey Plagenhoef, American Society of Anesthesiologists

On behalf of more than 52,000 members of the American Society of Anesthesiologists® (ASA), I welcome the opportunity to offer comments on the 2017 Kaizen Consensus Development Process: Proposed Redesign issued by the National Quality Forum (NQF). ASA looks forward to these and future NQF improvements to the measure endorsement process.

ASA supports continuous improvement to the NQF Consensus Development Process.

ASA supports NQF's commitment to simplifying the measure development and endorsement process and ensuring stakeholders, including specialty societies, have ample opportunity to engage in the Consensus Development Process. We support several components of the proposed redesign, especially those aimed at simplifying the current process and providing a more transparent, streamlined process for submitting measures for endorsement to NQF and inclusion in federal payment programs.

ASA supports increased opportunities for measure submission to NQF.

ASA supports instituting two measure submission periods per year for each topic area, as it will allow for stakeholders to have standard expectations of when measures may be submitted for endorsement. Increasing measure submission opportunities throughout the year will improve continuity of measure development for stakeholders and reduce dormancy previously experienced by standing committees.

NQF should reconsider the twelve (12) measure cap for bi-annual topic opportunities.

The proposed twelve measure limit for each topic area during each measure submission period is limiting and will slow the measure development process for dense topic areas such as in surgical care. This cap would stall the measure development process for new measures, as NQF has proposed that only eight (8) new measures will be considered in each topic area each year. NQF should consider expanding the number of measures to review during each submission period or, at a minimum, allow for flexibility with this cap. Additionally, ASA recommends the close monitoring of this cap, to ensure it is appropriately meeting stakeholder demand.

ASA supports increased frequency of standing committee meetings throughout the Consensus Development Process.

With increased measure opportunities throughout the year, standing committees should meet more frequently to discuss submissions. While ASA supports more frequent convening of standing committees, NQF should closely monitor both review cycles to ensure measures reviewed in in-person meetings versus virtual web meeting are

held to the same rigorous standards. When choosing standing committee members, NQF must strike an appropriate balance between clinicians who will be assessed on a majority of endorsed measures, with other stakeholders.

NQF should remove Consensus Standards Approval Committee (CSAC) authority to overturn standing committee decisions.

Removing the CSAC's authority to overturn decisions from standing committees will eliminate an unnecessary layer to the Consensus Development Process that is rarely used. Standing committees possess the subject matter expertise related to the measures in which they review, and the CSAC often defers to each standing committee for recommendations. ASA recommends NQF focus more energy on ensuring standing committees have diverse stakeholder representation and receive final endorsement authority.

ASA supports the use of methodologists and staff experts to conduct "methods review" and make recommendations on "complex" measures.

ASA supports shifting the responsibility of "methods review" from each standing committee to NQF staff experts or an external methods panel. This will ensure a standardized methodological review process for each measure under consideration and allow experts to make recommendations to standing committees in a consistent manner. Additionally, ASA supports the engagement of the external methods panel to review measures requiring complex methodological analysis, such as risk-adjusted outcome and composite measures. ASA recommends that NQF engage both physicians and non-physicians in the "methods review" as part of both expert staff or the external methods panel to ensure a well-rounded analysis from clinical and methodological perspectives.

NQF should allow stakeholders to vote on individual measures and not require voting on all measures within a measure set.

The current process requires stakeholders to declare support for an entire suite of measures, even if only one measure applies to their interests. Stakeholders should have the opportunity to indicate "Support," "Do Not Support," "Abstain" or "Not Voting" for individual measures within a report. A la carte voting will allow stakeholders to vote for or against specific measures within their area of specialty and expertise. In previous cycles, an NQF member who voted "Abstain" had their vote, for all intents and purposes, count against the measure. ASA appreciates NQF's effort to combine comment periods into one continuous public comment period throughout each measure cycle as this will reduce redundancy, compared to the current process of two comment periods.

ASA supports increased training and education for stakeholders engaged in the Consensus Development Process.

Education and training are essential to ensure continued success in measure development and endorsement processes. The ASA thanks NQF for their routine education and training webinars related to the Consensus Development Process. These activities equip measure developers with tools to efficiently and effectively develop measures suitable for NQF endorsement with the end desire of inclusion in federal payment programs.

Thank you for the opportunity to submit comments for your consideration. ASA looks forward to continued work with NQF in the future and appreciates its effort to improve the Consensus Development Process and improve opportunities for measure submission and endorsement. If you have any questions or would like to discuss any of our comments further, please contact Matthew Popovich, Ph.D., ASA Director of Quality and Regulatory Affairs at 202-591-3703 or Leslie Kociemba, M.P.H., ASA Quality Associate at 847-268-9266. They may also be reached at qra@asahq.org.

NQF Response:

Thank you for your comment. We appreciate your feedback on the proposed recommendations for the CDP Redesign.

Increased Opportunities for Measure Submission: NQF has consolidated the 22 measure review topical areas into 15 topical areas. (The list of the topical areas is included in the final report). NQF will limit the number of measures evaluated by the standing committees in each cycle to a maximum of 12 (up to eight measures undergoing maintenance review and up to four new measures). This may vary depending on number of measures submitted; opportunities for related and competing measure review, and measure prioritization.

NQF will make every effort to standardize how both in-person meetings and web meetings are conducted to ensure consistency in the Committee's measure review and evaluation process.

Consensus Standards Approval Committee: NQF appreciates the comments received on the recommendation of this endorsement body. However, given important strategic considerations, NQF will not be able to implement a

change of this magnitude at this time. Currently, the CSAC is comprised of a simple majority of consumers and purchasers. In order to ensure those two stakeholder perspectives are a key part of the endorsement process, NQF will need to make certain there is adequate representation of these groups on each standing committee. NQF is committed to implementing a plan to identify and solicit ongoing engagement and participation opportunities from these stakeholder groups. Depending on the outcome of this initiative, NQF could potentially implement this proposed change at a later time

Technical Review: Methods Panel: The new NQF Scientific Methods Panel will consist of 15 to 25 statisticians, epidemiologists, psychometricians, economists, performance measure methodologists, and individuals with expertise related to eMeasures and disparities. NQF will solicit and identify nominees through NQF's standard nominations process.

Samantha Shugarman, American Psychiatric Association

The American Psychiatric Association (APA), the leading psychiatric organization in the world, represents more than 37,000 members involved in psychiatric practice, research, and academia representing the diversity of the patients for whom they care. We applaud the National Quality Forum's (NQF) newest effort to "streamline its measure endorsement process and encourage greater participation by consumers, patients, and payers on standing committees" as specified in the "2017 Kaizen Consensus Development Process: Proposed Redesign" draft report.

The APA supports the proposed changes included within this redesign. However, we do have some questions about the details involved in some of these potential changes. We applaud the effort made by NQF to provide more than one measure submission opportunity per year to measure developers/stewards. This change will promote a more rapid response to the developers/stewards waiting to learn the status of their measure. Moreover, we welcome the new *Intent to Submit* period, required of developers/stewards to engage in, before measures are officially submitted into the official endorsement review process. Not only will this process allow NQF to gain insight on what to expect during the official measure submission process, but it safeguards developers by ensuring that their measures meet conditions that promote endorsement. Without this step, developers/stewards learn late in the process that their measures didn't include necessary details, only after not being recommended for endorsement by the standing committee. This step creates an efficiency of time that the developers did not previously have. They can either fix the measure or opt out of the endorsement process. Thankfully due to this new step, they will not have to wait years before being able to resubmit for endorsement.

The draft report states that the number of measures subject to endorsement in each phase is 8 maintenance measures and 4 new measures. Given these limitations on the number of measures subject to the endorsement process, how will NQF prioritize additional new measures, should more than eight be submitted in a year? Given the submission of extra measures, how will NQF ensure that the endorsement review occurs in a timely manner? APA is also interested in learning how the 22 current topical areas will be reduced to 16. Will the public have an opportunity to provide input on these new topical area groups?

The APA supports the suggestion to shift responsibility for assigning the degree to which candidate measures meet the NQF scientific acceptability to "NQF staff or an external methods panel, as needed, given their expertise." We hope that this change will implement a high degree of standardization and objectivity for this crucial aspect of the endorsement process. However, with this shift, we anticipate that measure developers/stewards might disagree with the NQF staff or external methods panel on the determination of low or insufficient test ratings. How will the appeal process, or the chance for developers/stewards to make the case for the strength of the test results, be implemented?

Considering that the standing committee mainly consists of clinical experts and the Consensus Standards Approval Committee (CSAC), primarily includes consumers and payers, the APA supports the NQF's decision to maintain the process by which the endorsement decision is currently made. We do agree that consumer and payer perspective, informed by the standing committee expert opinions, have great value on the determination to endorse measures. We would support removing the CSAC, should seats for consumers and payers become available on the standing committees. However, we would oppose heavily weighting the standing committees with consumers and payers, as we feel this could threaten the scientific nature of the NQF endorsement process. It is critical that enough seats be available for professional members to ensure multi-stakeholder evaluation, endorsement, and acceptance by the medical community.

Lastly, the APA suggests that the NQF develop a better process for standing committee members to employ when evaluating "candidate measures" (measures under review for endorsement) against the criteria in the NQF

Guidance on Evaluating Importance to Measure and Report. Though candidate measures are currently reviewed based on steps diagramed in a decision tree, the criteria described in the decision tree is subjectively interpreted by each standing committee member. Clear and consistent criteria for the data elements that standing committee participants apply in this process would ensure a more uniform review of candidate measures. Unfortunately, some candidate measures have failed to achieve endorsement largely because the experts appointed to the standing committee had varying interpretations of the NQF Guidance criteria. Standardizing this process and providing advance education to standing committee members would strengthen the NQF endorsement process and avoid unnecessary rejection of meaningful quality measures, and contribute to increasing the NQF compendium of measures.

The APA appreciates the opportunity to comment on these proposed changes, and looks forward to the implementation of a more efficient and effective quality measure endorsement process.

NQF Response:

Thank you for your comment.

Scheduling/Frequency: NQF has consolidated the 22 measure review topical areas into 15 topical areas. (The list of the topical areas is included in the final report). NQF will not formally open a public comment period on the consolidated list of topical areas. However, NQF welcomes your feedback on the list. If you have input, feel free to email NQF at NQFKaizen@qualityforum.org.

NQF will limit the number of measures evaluated by the standing committees in each cycle to a maximum of 12 (up to eight measures undergoing maintenance review and up to four new measures) and may include one or two additional measures as deemed appropriate. This may vary depending on number of measures submitted; opportunities for related and competing measure review, and measure prioritization efforts. NQF will notify the steward/developer and provide the date of the next cycle in which there is availability.

NQF has consolidated the 22 measure review topical areas into 15 topical areas. (The list of the topical areas is included in the final report). Topic areas were consolidated with the goal of reassessing and balancing NQF's library of measures, while distributing measures to committees with the needed expertise to conduct an evaluation. As a result, many of the smaller portfolios have been consolidated into cross-cutting topics with a broader range of experience. In addition, some clinical groupings of committees were made to reflect more cross-cutting clinical areas, such as primary care and chronic illness care, pediatrics and geriatrics and palliative care.

Technical Review: Methods Panel: The process includes a two-week process for measure steward or developer to respond to the ratings. In addition, the standing committees can still discuss relevant issues, such as risk adjustment. Given the opportunity for more frequent submission, measures may need to be move to the next review cycle to address methodologic concerns.

Endorsement Decision: We appreciate your suggestion on the composition of the standing committees. Given current resources and other important strategic considerations, NQF will not be able to implement a change of this magnitude at this time. If and when this change occurs, we will consider your feedback on the approach.

Enhancing Training and Education: Improving the training and education for the standing committee members will assist in ensuring they are applying the measure evaluation criteria appropriately when reviewing measures.

Rebecca Swain-Eng, American Academy of Allergy, Asthma and Immunology

Thank you for the opportunity to submit comments on behalf of Swain Eng and Associates, LLC (SEA), a healthcare quality measurement and improvement organization focused on helping organizations to act as the catalysts to improvement the quality of care that patients receive. SEA has the privilege to help medical specialty societies and others with the development and testing of quality measures as well as assistance with advancing measures through the NQF consensus development process.

We applaud NQF for continually seeking improvements on the endorsement process to make it more nimble, coordinated and faster. SEA would ask that NQF consider answering/clarifying the following questions and comments:

- In order to move forward with the suggested changes to the CDP process, will NQF need to seek additional funding (that could delay its implementation)? What does the timeline look like for the phased implementation of the new recommendations to the CDP process?

- How and who will be involved with the change from 22 to 16 topics areas? Will stakeholders be given the opportunity to provide feedback?
- As several other commenters have noted, the limitation of 4 new measures per period/8 new measures in a 12 month period may create significant problems. How will you decide/prioritize which 4 new measures to review each period? How will measure sets with >4 measures on a specific topic be reviewed-will they be able to be reviewed in the same period or need to be split up? This change in theory could take longer than the old process when there are greater than 4/8 measures waiting for review per topic area.
- Will a virtual meeting be as effective as an in-person meeting? Will developers be able to pick if their measure(s) are reviewed at an in-person meeting vs. a virtual meeting?
- "NQF staff will assess whether the measures will require a methodological review based on a set of criteria." What are these criteria? Will stakeholders be able to comment on the criteria?
- Who and how many individuals do you envision will be on the external methods panel? How will you assess whether they have adequate knowledge/training to provide the necessary expertise?

Enhanced Training and Education: "NQF will work to better promote available education offerings to ensure all stakeholders are fully aware of available resources." How are you going to measure that you are improving knowledge about NQF resources and that said resources are stronger?

- SEA agrees with the Kaizen participants that it is very important that NQF harmonize their CDP submission process with MAP to create a centralized information system that would allow for a comprehensive and longitudinal view of a measure. A user-friendly tool would be a significant benefit to the medical specialty society members of NQF as well as many other stakeholders. SEA understands that this would take significant investment of resources from NQF, however the NQF membership and other stakeholders would greatly benefit from and find great value from a user-friendly centralized system. Given the resource limitations, SEA would encourage the NQF to consider incremental changes or "short term advancements" to move towards this centralized information system as soon as possible.

NQF Response:

Thank you for your comment. We appreciate your feedback on the proposed recommendations for the CDP Redesign.

Scheduling/Frequency: NQF's ability to solicit measures for endorsement consideration is contingent upon receiving federal funding.

In the final report, NQF has communicated the implementation time frame for each of the proposed recommendations. NQF plans to implement the frequency of submission, the Intent to Submit form and the Scientific Methods Panel, to name a few, by the end of the year. Given the magnitude of some recommendations, such as the endorsement decision and a centralized IT system, implementation will occur at a later date.

NQF has consolidated the 22 measure review topical areas into 15 topical areas. (The list of the topical areas is included in the final report). Topic areas were consolidated with the goal of reassessing and balancing NQF's library of measures, while distributing measures to committees with the needed expertise to conduct an evaluation. As a result, many of the smaller portfolios have been consolidated into cross-cutting topics with a broader range of experience. In addition, some clinical groupings of committees were made to reflect more cross-cutting clinical areas, such as primary care and chronic illness care, pediatrics and geriatrics and palliative care. NQF will not formally open a public comment period on the consolidated list of topical areas. However, NQF welcomes your feedback on the list. If you have input, feel free to email NQF at NQFKaizen@qualityforum.org.

NQF will limit the number of measures evaluated by the standing committees in each cycle to a maximum of 12 (up to eight measures undergoing maintenance review and up to four new measures). NQF may include one or two additional measures as deemed appriopate This may vary depending on number of measures submitted; opportunities for related and competing measure review, and measure prioritization efforts.

Technical Review: Methods Panel: NQF will make every effort to standardize how both in-person meetings and web meetings are conducted to ensure consistency in the Committee's measure review and evaluation process.

The measure steward/developer will need to notify NQF of their plan submission date. The timing of review for the maintenance measures will depend on when the measures are scheduled to undergo maintenance.

In the final report, NQF has clarified the definition of a complex measure. The following types of measures will be considered complex and therefore may require an evaluation by the Scientific Methods Panel:

- Outcome measures, including intermediate clinical outcomes
- Instrument-based measures (e.g., PRO-PMs)
- Cost/resource use measures
- Efficiency measures (those combining concepts of resource use and quality)
- Composite measures

Additionally, NQF has also provided additional information on the composition and disclosure of interest of the Scientific Methods Panel in the final report. The new NQF Scientific Methods Panel will consist of 15 to 25 statisticians, epidemiologists, psychometricians, economists, performance measure methodologists and individuals with expertise related to eMeasures and disparities. All nominees will complete an annual general disclosure of interest (DOI) form, as well as measure-specific disclosures to identify recusals from specific measures. NQF will assign measure review based on identified conflicts of interest, relevant expertise, and availability of panel members. All reviews provided by the Scientific Methods Panel will be shared not only with the committee but also with the steward/developer and the public. Furthermore, the Scientific Methods Panel's charge will include providing expertise for methods/testing-related issues for NQF and advance NQF's guidance on these issues.

Enhancing Training and Education: NQF currently surveys standing committee members on their experience and solicits feedback on ways to improve their involvement in the CDP. NQF intends expand the audience of the survey (to include developers, NQF members and the public) to assess the effectiveness of the education and training program.

Improvement of Information Exchange and Access: NQF is working to identify short-term solutions to ensure our current IT infrastructure is more user friendly as we progress towards developing a more centralized system. NQF will advance a short-term initiative to aggregate information by grouping MAP measure recommendations and rationale issued each year into one comprehensive and filterable document, accessible from the existing MAP homepage on the NQF website. Similarly, NQF will work to consolidate existing information from CDP reports to make it easier for users to access measure information.

NQF will also advance a short-term initiative to improve business rules around publishing timelines and meeting materials, to ensure developers, committee members, and members of the public are more aware of opportunities to participate in NQF's processes. Commenting opportunities will also be enhanced by increasing the character limit to 10,000 characters, real-time updates on comments forwarded to developers, and better regulated public comment periods during evaluation meetings.

Marlene Matosky, Health Resources and Services Administration

On behalf of the Health Resources and Services Administration, we appreciate that National Quality Forum held a kaizen focused on the consensus development process and applaud National Quality Forum for inviting feedback on the recommendations. We recently submitted measures for review and experience many of the challenges presented in the recommendations. We highly encourage and fully support National Quality Forum to follow through in making changes to the consensus development process. Thank you.

NQF Response:

Thank you for your comment. We appreciate your feedback on the proposed recommendations for the CDP Redesign.

Ellen Schultz, American Institutes for Research

Overall, I think the proposed refinements will be beneficial. In particular, offering more frequent opportunities for submission is likely to lead measure developers to wait until their measure is fully mature before submitting. This will make committee reviews more efficient.

Regarding the intent to submit plan: what will be the approach taken if more than 12 measures are expected for a particular committee review cycle? How will NQF decide which measures to defer to a later cycle? I think this bears considerations.

Regarding the addition of a methods review by a separate body: based on my experience, you do have some deep methods expertise on your existing committees, even if only a few individuals on each committee possess this. I would recommend that (1) your methods review panel include experienced NQF committee members from across different topic areas who possess methods expertise and are very familiar with its application to NQF's CDP. And (2) that you ask those members of each committee who do possess methods expertise to review the

recommendations of either NQF staff and/or the methods advisory panel to assess the recommendation in the context of the particular topic area and measure. There may be times that a committee would want to be either more flexible (ie, need for innovation in measurement) or more stringent (ie, many existing measures) in the methods review.

I agree that an annual cross-cutting report looking at measure trends, gaps and priorities across top areas would be extremely valuable.

Regarding change in the role of CSAC: I would very much encourage NQF to integrate consumer and purchaser perspectives more thoroughly into the standing committees so that these perspectives are reflected throughout measure review. Given that CSAC rarely overturns the committees' recommendations, relegating these important perspectives to a rubber-stamp role at the end of the CDP does a disservice to both consumers and purchasers.

Educational materials and support for patient, family and consumer participants in NQF's work is vitally important. I am thrilled to hear that NQF wants to take a leadership position in this important area.

I agree with the Kaizen participants that there is much need to make information on a measure easier to find. A central repository the links endorsement submissions and MAP would be fantastic. As an early step in this direction, is it possible to at least list where on NQF site a particular measure is referenced, with a link out to relevant reports, excel files, etc?

NQF Response:

Thank you for your comment.

Increased Opportunities for Measure Submission:

NQF has consolidated the 22 measure review topical areas into 15 topical areas. (The list of the topical areas is included in the final report). NQF will limit the number of measures evaluated by the standing committees in each cycle to a maximum of 12 (up to eight measures undergoing maintenance review and up to four new measures), however may include one or two additional measures as deemed appropriate. This may vary depending on number of measures submitted; opportunities for related and competing measure review, and measure prioritization.

Jane Lucas, Quality Insights

Thank you for the opportunity to comment on the 2017 Kaizen Consensus Development Process: Proposed Redesign.

Quality Insights has been developing measures since 2007 and has successfully presented measures to NQF for initial and maintenance endorsement. We were pleased to review the proposed redesign and share our observations and comments.

The proposed process of offering two measure submission opportunities for each topic area seems to apply better to new measure endorsement rather than maintenance.

The majority of Quality Insights measures' are submitted under maintenance review and have been reviewed every 3 years. The schedule you are proposing seems to be open in that the measure developer notifies NQF of readiness to submit rather than NQF informing the developer of the assigned project and subsequent timeline. How will "intent to submit" be implemented? Also, it was not apparent in the document if the maintenance cycle will continue to be on the 3 year cycle.

Quality Insights supports the concept of having trained staff review the Scientific Acceptability of the measure, the proposed change to the public comment process, and the proposed change for the standing committee to determine the endorsement status.

Quality Insights appreciates the guidance the project staff has provided over the years and we welcome and encourage the proposal of increased training and resources to be included in the redesign.

Thank you for your time and consideration.

NQF Response:

Thank you for your comment.

<u>Intent to Submit:</u>

Measure stewards/developers will need to notify NQF at least three months prior to the measure submission deadline to prepare for the committee's review in the upcoming cycle. This will allow NQF to adequately plan for

measures in the pipeline and maintenance measures ready for evaluation in the various topic areas. NQF will continue to schedule maintenance measure evaluations based on a three-year cycle from its last endorsement review.

Jane Han, Society of Thoracic Surgeons

The Society of Thoracic Surgeons (STS) was pleased to send Mark Antman, STS Senior Manager, Quality Metrics & Initiatives to participate in the recent Kaizen meeting, and we appreciate the opportunity to comment on the draft "*Proposed Redesign"* report. Thank you in advance for your consideration of our comments.

Increased Opportunities for Measure Submission

We strongly support the proposed redesign of the Consensus Development Process (CDP) to allow for two measure submission opportunities for each topic area per year. We are also pleased to see that you have reduced the number of topical areas for measure review (and corresponding standing committees) from 22 to 16; we look forward to seeing specific information on how the current topical areas have been reorganized. However, we have some concerns related to the proposal to convene one measure review cycle per year via an in-person meeting and the other cycle via virtual web meeting. Measure developer participation in the review process and our ability to respond directly to questions on our measures is enhanced greatly by the opportunity to engage directly with standing committee members at the in-person meeting. Substituting a web-based meeting for one review cycle per topic area per year may introduce some limitations to the full engagement of measure developers and may lead to subtle disparities in standing committee recommendations from one review cycle to the other. The STS recognizes the challenges created by limited resources, but we encourage NQF to use the same meeting format and methodology for all standing committee meetings and review cycles.

Intent to Submit

We support the proposal to require an "intent to submit" notification from measure developers prior to the measure submission deadline.

Technical Review: Methods Panel

We support the proposal to move the *Scientific Acceptability* assessment of measures outside of the standing committees to NQF staff or an external methods panel, as appropriate. This change in the CDP will not only accommodate the lack of statistical expertise among standing committee members and encourage greater participation by consumers, patients, and purchasers, it will also promote greater consistency in *Scientific Acceptability* ratings across measure topic areas and review cycles.

Measure Evaluation Technical Report – Content and Structure

We support the proposal to reduce the amount of measure information included in the technical report, with other information provided either in an appendix or on NQF's public web site.

Public Commenting Period with NQF Member Expression of Support

We support the proposal to consolidate the public comment periods and to eliminate the separate member voting period, in favor of an expanded opportunity for NQF members to comment and express support/non-support for measures.

Endorsement Decision

The STS recognizes that elimination of the CSAC role in all measure endorsement decisions may not be feasible due to the absence of some stakeholder perspectives in the standing committees, as they are typically constituted. However, we encourage NQF to consider the more conservative change recommended by Kaizen participants: to allow CSAC members to review a list of measures recommended for endorsement by the standing committees and to select those they wish to discuss by exception. This "consent calendar" approach is analogous to that used by the Measure Applications Partnership (MAP) Coordinating Committee and would provide an opportunity for the perspectives of the consumer and purchaser representatives on the CSAC to be heard and accommodated, without requiring a re-adjudication of all endorsement recommendations.

Adjudication of Appeals

We agree that shifting the adjudication of all submitted appeals to the CSAC and disbanding the Appeals Board is not a feasible recommendation to implement at this time.

Enhancing Training and Education

We strongly support the proposed enhancements in training and education for all stakeholders engaged in the CDP. We are particularly pleased to see the recommendation for routine meeting facilitation training for NQF staff and standing committee co-chairs, which we agree is needed to improve consistency in the measure review process and in the endorsement recommendations made across projects.

Improvements in Information Exchange and Access

It is certainly understandable that NQF cannot proceed at this time with development of a new, centralized information system to link CDP and MAP processes – an "ideal-state" and resource-intensive recommendation from Kaizen participants. It will be disappointing, however, if NQF does not explore the various, smaller-scale innovations that were also proposed at the Kaizen event, such as:

- using measure information from the CDP to auto-populate data fields and forms for MAP review of the same measures;
- consolidating duplicative comment periods; and
- identifying junctures in CDP and MAP processes at which measure information and status updates can be shared.

In general, we hope that NQF will take advantage of all opportunities to eliminate redundancies in data submission and measure evaluation for any measures that are reviewed both for endorsement and for implementation in federal programs.

Again, thank you for the opportunity to comment on the draft "*Proposed Redesign"* report. If you would like any additional input from STS related to our comments above, please contact Mark Antman, DDS, MBA, Senior Manager, Quality Metrics and Initiatives, at 312-202-5856 or mantman@sts.org.

NQF Response:

Thank you for your comment.

Increased Opportunities for Measure Submission: NQF recognizes the limitations in stakeholder engagement during an in-person versus a web meeting. NQF will make every effort to standardize how both in-person meetings and web meetings are conducted to ensure consistency in the Committee's measure review and evaluation process.

Endorsement Decision: Thank you for the suggestion. Given current resources and other important strategic considerations, NQF will not be able to implement a change of this magnitude at this time. If and when this change occurs, we will consider your feedback on the approach.

Improvements in Information Exchange and Access: NQF will advance a short-term initiative to aggregate information by grouping MAP measure recommendations and rationale issued each year into one comprehensive and filterable document, accessible from the existing MAP homepage on the NQF website. Similarly, NQF will work to consolidate existing information from CDP reports to make it easier for users to access measure information.

NQF will also work to improve business rules around publishing timelines and meeting materials, to ensure developers, committee members, and members of the public are more aware of opportunities to participate in NQF's processes. Commenting opportunities will also be enhanced by increasing the character limit to 10,000 characters, real-time updates on comments forwarded to developers, and more regulated public comment periods during evaluation meetings.

PCPI Foundation

The PCPI is pleased to comment on the National Quality Forum's (NQF) *2017 Kaizen Consensus Development Process: Proposed Redesign* draft report. While we support the refinement of the CDP and the approach NQF has taken in developing this report, we respectfully submit the following comments.

Increased Opportunities for Measure Submission

The PCPI shares many of the concerns regarding the current CDP process, including the operational aspects addressed in this draft report as well as timeliness of the endorsement process and the length of time between measure cycles. We are pleased that NQF is taking steps to provide continuous and predictable measure submission opportunities and to condense the measure endorsement process.

NQF plans to consolidate the measure topic areas from 22 to 16 but does not provide detailed information on what the resulting topic areas will comprise. NQF committees will be convened each year via in-person meeting for one cycle and via a web-based meeting for the second. It is our experience that committee members tend to be

more engaged during in-person meetings. We are interested in learning what steps NQF will take to ensure the same level of committee member engagement and discussion is given to measures regardless of meeting type.

During each measure submission phase, standing committees will review a maximum of 12 measures – up to 8 measures undergoing maintenance review and up to 4 new measures. PCPI seeks clarification on the distinction between maintenance and new measures. The PCPI has submitted maintenance measures that have undergone considerable review similar to new measures. Furthermore, we are interested in hearing more about how measure prioritization will take place in cases where the number of either maintenance or new measures exceeds these limits but the total number of measures remain within the limit of 12.

Intent to Submit

Currently, measure developers are informed of upcoming measure submission opportunities and provided a list of maintenance measures that are relevant to the topic area and eligible for submission. For maintenance measures, the redesigned process would require substantial coordination and communication between NQF staff and measure stewards/developers. The PCPI strongly recommends that NQF staff indicate which maintenance measures are eligible for submission especially given the consolidation of topic areas. Rather than needing to provide an intent to submit for maintenance measures, stewards/developers can focus on providing the required information for new measures.

Endorsement Decision

We share the perspective that standing committees should make the final endorsement decisions without ratification by the CSAC. The standing committees are in the best position to make the final endorsement decisions as they have first-hand knowledge of the deliberations that took place for each measure. The PCPI encourages NQF to fully consider this proposed change.

Technical Review: Methods Panel

Stakeholders recommended removing the detailed technical review and evaluation of measures from the standing committee responsibilities. NQF staff or an external methods panel would undertake the technical review depending on measure complexity. The PCPI supports the rigorous yet consistent review of all measures regardless of complexity. We request clarification on how NQF will ensure the consistent application of the measure evaluation criteria when two groups will undertake the review independently of each other. We recommend that an external methods panel be involved in the review of all measures submitted for consideration of endorsement. Furthermore, we recommend that the external methods panel have the expertise to review the technical specifications and feasibility of electronic clinical quality measures.

Additionally, the PCPI strongly supports the inclusion of the clinical perspective in all aspects of the measure development and consideration of endorsement. Therefore, we recommend that the standing committee have an opportunity to review and provide input on the external methods panel recommendations before making any endorsement decisions. The measure developer should also be provided the opportunity to review the recommendations of the external methods panel and clarify any questions or concerns regarding the testing methodology and results.

Public Commenting Period with NQF Member Expression of Support

The PCPI considers the opportunity for public comments an integral aspect in measure development and endorsement. A continuous public commenting period will provide stakeholders and the general public with ample opportunity to provide input. We have found that we generally receive little pre-meeting comments. If others have similar experiences and receive minimal pre-meeting comments, NQF may wish to revisit the need for this commenting phase.

Enhancing Training and Education

We are very pleased that NQF plans to expand educational and training opportunities for standing committee members, NQF staff and measure developers/stewards. Enhanced training and education will help ensure that the NQF evaluation criteria are applied rigorously and consistently across all topic areas and projects. We look forward to seeing this plan in action.

Improvements in Information Exchange and Access

We appreciate NQF's consideration of the recommendation to establish a centralized and comprehensive measure information system. We certainly make use of NQF measure information systems and would support easier access and navigation to find complete measure information across all aspects of the NQF structure. We understand that

long-term solutions take time and resources but would support any short-term solutions to enhancing information exchange and access.

NQF Response:
Thank you for your comment.

Frequency/Scheduling: NQF has consolidated the 22 measure review topical areas into 15 topical areas. (The list of the topical areas is included in the final report). Topic areas were consolidated with the goal of reassessing and balancing NQF's library of measures, while distributing measures to committees with the needed expertise to conduct an evaluation. As a result, many of the smaller portfolios have been consolidated into cross-cutting topics with a broader range of experience. In addition, some clinical groupings of committees were made to reflect more cross-cutting clinical areas, such as primary care and chronic illness care, pediatrics and geriatrics and palliative care. Individual standing committees that will no longer convene for the following topical areas include:

Since 80% of the measures submitted for endorsement consideration are maintenance measures, NQF determined that eight of the 12 measures in each cycle would be maintenance measures.

NQF will limit the number of measures evaluated by the standing committees in each cycle to a maximum of 12 (up to eight measures undergoing maintenance review and up to four new measures). This may vary depending on number of measures submitted; opportunities for related and competing measure review, and measure prioritization.

Technical Review: Methods Panel: NQF will make every effort to standardize how both in-person meetings and web meetings are conducted to ensure consistency in the Committee's measure review and evaluation process.

Intent to Submit: NQF will schedule the evaluation of maintenance measures and notify measure stewards and developers in advance. Measure stewards/developers will need to notify NQF at least three months prior to the measure submission deadline to prepare for the committee's review in the upcoming cycle. An intent to submit will signal to NQF of the measure stewards/developers' plan and readiness to submit measures for endorsement consideration.

Endorsement Decision: NQF appreciates the comments received on the recommendation of this endorsement body. However, given important strategic considerations, NQF will not be able to implement a change of this magnitude at this time. Currently, the CSAC is comprised of a simple majority of consumers and purchasers. In order to ensure those two stakeholder perspectives are a key part of the endorsement process, NQF will need to make certain there is adequate representation of these groups on each standing committee. NQF is committed to implementing a plan to identify and solicit ongoing engagement and participation opportunities from these stakeholder groups. Depending on the outcome of this initiative, NQF could potentially implement this proposed change at a later time.

Technical Review: Methods Panel: The new NQF Scientific Methods Panel will consist of 15 to 25 statisticians, epidemiologists, psychometricians, economists, performance measure methodologists, and individuals with expertise related to eMeasures and disparities. NQF will solicit and identify nominees through NQF's standard nominations process. Much like guidance for standing committees, NQF will provide standard guidance on assessing the *Scientific Acceptability* criterion for a measure, using the current decision algorithm from NQF's Measure Evaluation Criteria. To ensure impartiality, three panel members will independently evaluate each measure undergoing an external panel review. The majority recommendation will serve as the overall assessment of reliability and validity. NQF will share all evaluations with the measure steward/developer.

JohnMarc Alban, The Joint Commission

The Joint Commission appreciates the opportunity to comment on the 2017 Kaizen Consensus Development Process: Proposed Redesign.

Increased Opportunities for Measures Submission: The Joint Commission supports these changes. We would like a better understanding of the consolidated topic categories. We would also like clarification around maintenance measures and whether the bi-annual consideration includes both annual review as well as the 3 year re-endorsement.

Technical Review: Methods Panel: The Joint Commission agrees that the Scientific Acceptability section of the measure submission should be reviewed by statistical experts with the knowledge and expertise to base a determination on the reliability and validity of the measure. We would suggest that the Methods Panel should be a standing committee across topic areas to promote consistency of interpretation, as well as, the feedback provided to measure developers. Furthermore, we are recommending that the measure submission process

should be amended to allow for submission of the Specifications and Scientific Acceptability sections of the submission first prior to completion of the entire measure submission form. For measures rated by the Methods Panel as "high" or "moderate" respecting Scientific Acceptability, the measure developer could then complete and submit the other sections of the submission (i.e., Importance, Feasibility, Use and Usability, Related or Competing Measures). These sections could then be scheduled for review by the standing committee during the next cycle period. Division of the measure submission process in this fashion would remove the potential for unnecessary work, conserve measure developer resources, and make the process more user-friendly.

Measure Evaluation Technical Report: The Joint Commission supports the proposed changes.

Public Commenting Period with NQF Member Expression of Support: The Joint Commission supports the proposed changes.

Endorsement Decision and Adjudication of Appeals: The Joint Commission supports the proposed changes.

Enhancing Training and Education and Improvements in Information Exchange and Access: The Joint Commission supports the proposed changes. We agree with the Kaizen recommendation to create a more consistent, transparent, and user-friendly tool for submitting, reviewing and analyzing measures and comments.

Other Comments

The Joint Commission would like clarification on whether evidence criterion is to remain the first vote in the proposed process or if scientific acceptability would be the first pass.

The Joint Commission suggests the current submission form process be amended and simplified into a single form format. The current process of completing 3 separate forms includes redundancies that create confusion and consume unnecessary resources on the part of the developers.

NQF Response:

Thank you for your comment.

Increased Opportunities for Measures Submission: NQF will offer two measure submission opportunities for each topic area each year. However, because there would be more opportunities for submission, NQF will limit the number of measures evaluated by the standing committees in each cycle to a maximum of 12 (up to eight measures undergoing maintenance review and up to four new measures). This was determined given that approximately 80% of the measures submitted for endorsement consideration are maintenance measures. The combination of maintenance and new measures may vary depending on number of measures submitted, opportunities for related and competing measure review, and measure prioritization efforts. Per NQF's maintenance of endorsement policy, measures are due for reassessment every three years. NQF will remind measure stewards and developers of scheduled measure maintenance review several months prior to the review and notify each of their assigned review cycle.

NQF's portfolio of measures have been consolidated from 22 topical areas to 15 topical areas. Topic areas were consolidated with the goal of reassessing and balancing NQF's library of measures, while distributing measures to committees with the needed expertise to conduct an evaluation. As a result, many of the smaller portfolios have been consolidated into cross-cutting topics with a broader range of experience. In addition, some clinical groupings of committees were made to reflect more cross-cutting clinical areas, such as primary care and chronic illness care, pediatrics and geriatrics and palliative care.

Technical Review: Methods Panel: NQF staff will assess whether a measure is sufficiently 'complex' to require a methodological review by the Scientific Methods Panel, based on a set of criteria (details below). Because the newly formed Scientific Methods Panel will evaluate the Scientific Acceptability of new (and some previously endorsed) complex measures, measure stewards/developers must submit measure specifications and testing information along with the Intent to Submit form at least three months prior to the measure submission deadline.

Other Comments: The *Evidence* criterion will remain as the first must pass criterion for review during the measure evaluation process.

Thank you for the suggestion. As we develop ongoing IT solutions to enhance and improve the measure submission form, we will consider your recommendation.

Janis Orlowski, Association of American Medical Colleges

The Association of American Medical Colleges (AAMC or the Association) welcomes the opportunity to comment on the National Quality Forum (NQF)'s 2017 Kaizen Consensus Development Process (CDP): Proposed Redesign. The AAMC represents all 147 accredited U.S. medical schools, nearly 400 major teaching hospitals and health

systems, and more than 80 academic and scientific societies. Through these institutions and organizations, the AAMC represents 160,000 faculty members, 83,000 medical students, and 115,000 resident physicians.

General questions/comments

- The AAMC has concerns that the NQF is proposing significant changes to the CDP without sufficient opportunity for stakeholders to comment. In addition to a comment period extension, we believe that changes should be made through an iterative process in which NQF staff frequently seek feedback from stakeholders to improve the measure review and endorsement process.
- NQF should provide additional details on its website to allow stakeholders to more easily understand the specifications and history of any single quality measure. On the NQF-Endorsed Standards section of the website, users should be able to clearly see which project the measure is currently placed in, the full measure specifications and developer discussion notes, whether the measure was reviewed during the trial period, and other pertinent information.
- NQF should take steps to improve the email notification process. Members should have the opportunity to receive emails for specific projects, and all of the distribution lists should be easy to find on the website. Reminders for upcoming comment period deadlines should also be an option for members.

Increased Opportunities for Measure Submission

- AAMC supports greater opportunity for developers and stakeholders to submit and review measures. We have concerns, however, that the CDP changes may force the committees to make final decisions on a measure without sufficient review. NQF should ensure that there is an iterative process where disagreements and concerns can be addressed before a final decision is made.
- NQF plans to decrease the topic areas from 22 to 16 – however, no detail is provided on these 16 topic areas or how this will impact the number and composition of the Standing Committees. In addition, how does this impact the proposed 12 measures per cycle limit since the number of measures in some of the topic areas may increase with this shift?

Intent to Submit

- What will be the process for measure maintenance? Will NQF notify developers when maintenance is due?
- What will be the process when NQF receives more than 12 measures during a cycle review period? Who will decide which measures get moved to the next cycle?

Technical review: Methods Panel

- AAMC supports the creation of the technical review panel, however, we have some questions we ask NQF to address:
    - Who will be on this panel?
    - Will it be similar to how the Standing Committees operate?
    - Will there be one methods panel or many panels?
    - What opportunity will developers have to provide additional information or clarify questions?
    - Will Standing Committee members be able to "overrule" the methods panel or NQF staff and change the rating on reliability and/or validity?
    - The document states that, "Generally, NQF will not forward measures with a '*low*' or '*insufficient*' rating from the methods review to the committee for further evaluation". What criteria would be used to determine if a measure with those ratings did or did not move forward to a committee?

Public Commenting Period with NQF Member Expression of Support

- The AAMC requests clarification on how comments submitted after the evaluation meeting be incorporated into the measure recommendation decision. If recommendations are revised due to these comments, how will that be reflected?

Endorsement Decision

- AAMC has concerns with allowing the standing committees to make the final decision on measure endorsement, since the standing committees may be inconsistent in their evaluation process. The AAMC agrees with keeping the CSAC in place as an oversight body for the time being.

Improvements in Information Exchange and Access

- Since NQF is limited in the changes that can be made at this time but commits to working on short-term solutions, it would be preferable if they solicit input from the various stakeholders involved in the CDP and MAP as they move forward in this effort.

NQF Response:

Thank you for your comments. We appreciate your feedback on the proposed recommendations for the CDP Redesign. NQF hosted the Kaizen event in collaboration with CMS to inform the CDP redesign. CMS, as the funder of this initiative, has asked NQF to solicit public comment on the proposed recommendations and provide a final report outlining the new CDP by July 1, 2017. Thus, NQF had to limit the amount of time NQF members and the public had to provide feedback. However, as NQF continues to plan for implementation of the new CDP, additional feedback is welcomed.

Increased Opportunities for Measure Submission: Standing Committees will meet more often to allow for more frequent measure submissions. However, the time needed for committee reviews remains unchanged. NQF has consolidated the 22 measure review topical areas into 15 topical areas (The list of the topical areas is included in the final report). Topic areas were consolidated with the goal of reassessing and balancing NQF's library of measures, while distributing measures to committees with the needed expertise to conduct an evaluation. As a result, many of the smaller portfolios have been consolidated into cross-cutting topics with a broader range of experience. In addition, some clinical groupings of committees were made to reflect more cross-cutting clinical areas, such as primary care and chronic illness care, pediatrics and geriatrics and palliative care

Due to the increased workload for the standing committees, NQF cannot accept more than 12 measures per cycle per topical area, however may include one or two additional measures as deemed appropriate. Any *Intent to Submit* forms that are submitted once capacity has been reached for a particular cycle, NQF will notify the steward/developer and provide the date of the next cycle in which there is availability.

Intent to Submit: NQF will schedule the evaluation of maintenance measures and notify measure stewards and developers. Any *Intent to Submit* forms that are submitted once capacity has been reached for a particular cycle, NQF will notify the steward/developer and provide the date of the next cycle in which there is availability.

Technical Review: Methods Panel: The new NQF Scientific Methods Panel will consist of 15 to 25 statisticians, epidemiologists, psychometricians, economists, performance measure methodologists, and individuals with expertise related to eMeasures and disparities. NQF will solicit and identify nominees through NQF's standard nominations process. Much like guidance for standing committees, NQF will provide standard guidance on assessing the *Scientific Acceptability* criterion for a measure, using the current decision algorithm used from the measure evaluation criteria. To ensure impartiality, three panel members will independently evaluate each measure undergoing an external panel review. The majority recommendation will serve as the overall assessment of reliability and validity. NQF staff will send the preliminary analysis to developers for review prior to finalizing and sending to the standing committee. If developers disagree with the staff or Scientific Methods Panel review or ratings, they can use the two-week review period to provide additional clarification, which can be considered by staff when finalizing the preliminary analysis. Developers will also have the opportunity to introduce their measures during the committee evaluation meeting and answer questions from the committee during the discussion.

Measures will be rated by the Scientific Methods Panel and NQF staff against the measure evaluation criteria. Standing committees may raise concerns with the specifications of the measure or with potential threats to validity (e.g., selection of variables for risk adjustment model) and can therefore overturn the staff or Scientific Methods Panel rating. As part of its ongoing education efforts, NQF will provide clear guidance to standing committees regarding the circumstances wherein an overturn of the rating would be permissible.

Public Commenting Period with NQF Member Expression of Support: NQF has provided clarification regarding the developer's role in responding to comments during the commenting period. NQF will ensure the measure developer receives the submitted committees in order to prepare for the measure evaluation meeting. Measure developers will not be required to provide written responses to the comments received prior to the measure evaluation meeting. The committee will review any comments received after the committee evaluation meeting during the post-commenting period call. All submitted comments during this time will receive written responses

from the standing committee, measure developers, and/or NQF, as appropriate. The standing committee may revise its recommendations in response to a specific comment or series of comments submitted during this phase of the process.

Endorsement Decision: Kaizen participants recommended that standing committees make the final endorsement decisions, without ratification by the CSAC. Participants noted that the CSAC rarely overturns the measure recommendations of the committee. NQF appreciates comments on the recommendation of this endorsement body. However, given important strategic considerations, NQF will not be able to implement a change of this magnitude at this time.

Improvements in Information Exchange and Access: NQF will advance on short-term initiatives to improve business rules around publishing timelines and meeting materials, to ensure developers, committee members, and members of the public are more aware of opportunities to participate in NQF's processes.

Nancy Foster, American Hospital Association

On behalf of our nearly 5,000 member hospitals, health systems and other health care organizations, and our clinician partners – including more than 270,000 affiliated physicians, 2 million nurses and other caregivers – and the 43,000 health care leaders who belong to our professional membership groups, the American Hospital Association (AHA) appreciates the opportunity to comment on the National Quality Forum's (NQF) proposed redesign of the consensus development process (CDP).

The measure endorsement process has been at the core of the NQF's work since its inception. Health care providers, consumers, and public and private payers engage with the CDP to help identify those quality measures that are sufficiently important, scientifically sound, useful and feasible. However, the execution of the CDP is a daunting task given the heterogeneity of health care, the high demand for measures in accountability applications, the lack of consistency in data infrastructure across the health care system, and the ever-evolving science of quality measurement. These factors, among many others, make it more challenging to achieve a timely, consistent CDP that permits the meaningful engagement that members want and that NQF's position as a voluntary national consensus-standards body demands.

The AHA appreciates NQF's commitment to improving its process, and we believe some of the CDP redesign ideas outlined in the draft report merit serious consideration. In particular, we generally support NQF's efforts to streamline its technical report content, improve information access, and enhance education.

However, we are concerned that the report's recommendations are far too narrowly focused on improving the timeliness of the CDP, and may undermine the CDP's consistency and the ability for stakeholders to engage. We also question the feasibility of using a single methodological panel to support the review of up to 384 measures per year. Lastly, we are disappointed that the CDP redesign misses the opportunity to improve NQF's process for identifying and cultivating measures that will advance our understanding of quality and safety and its process for selecting best-in-class measures. The NQF's engagement on these issues is urgently needed as hospitals, other providers, and the public are drowning in overlapping, conflicting measurement that takes time away from what matters most –using measures to improve care.

As we understand it, NQF would move to a model in which 16 standing committees would conduct two measure reviews per year, with up to 12 measures in each (i.e. up to 384 measures per year). In addition, public comment would be a continuous process paired with voting in which stakeholders could change their vote at any time. Lastly, each standing committee would be the final arbiter of endorsement, and the CSAC would become an "appeals board."

We appreciate the desire among some stakeholders to get measures through the NQF endorsement process more quickly. However, we seriously question the ability for NQF members to track 16 committees at once and continually update their votes. Before embarking on such a change, NQF's website and communications must be enhanced to ensure members can select the committees and measures they care about, and receive sufficient notice about a measure being "active" in the review process to ensure they can comment. This infrastructure is especially important because opportunities other than the NQF endorsement process for providing input on measures abound – including CMS proposed rules, measure developer requests for comment, the JIRA tool used to provide input on electronic clinical quality measures (eCQMs), and so forth. Implementing this new process without the needed underlying infrastructure could impede its success.

Yet, even better infrastructure likely will be insufficient to enable all interested parties to follow the NQF endorsement activities in which they have an interest if there are nearly 400 measures being processed each year. The intended virtue of developing standards through a voluntary consensus development agency is that at

the end of the review, all interested stakeholders are supposed to agree that the standard is the best in class approach available. Without sufficient engagement, that will not happen.

We observed a couple of years ago that the routine level of engagement of organizations in commenting on and voting on most measures processed by NQF is extremely low. We worry that the implied expectation of continuous involvement in measure endorsement process envisioned by these proposals would prove too burdensome for even those of us who are routinely following NQF's work. Without the multi-stakeholder engagement that NQF was created to foster, the steering committees become just another technical expert panel with a different name. We urge NQF to think about ways in which to foster greater stakeholder involvement. We would be disappointed if these proposed changes in the CDP further diminished engagement.

The AHA also believes the concept of using a "methods review" panel has merit, particularly for highly complex outcome measures whose submissions are accompanied by a large amount of testing information. However, given that the health care field is increasingly moving towards outcome measures, as well as measures collected and reported using electronic health records, we fear that a single review panel could become a process bottleneck. Before fully supporting this idea, we urge NQF to provide more detailed information about the circumstances under which the panel will be used, what kinds of expertise will be needed on it, how it will be resourced, and how quickly they will be expected to complete their reviews.

Lastly, the AHA strongly urges NQF to take more aggressive steps to select "best-in-class" measures. The endorsed measures are called voluntary national consensus standards that become broadly adopted to reduce the burden of data collection and to provide one "source of truth" about their relative performance of providers. However, there are numerous instances in which NQF has endorsed multiple measures assessing the same aspect of care, and reached the conclusion that one measure is not clearly superior to the others. While we agree that it is entirely plausible that such "competing measures" can have strengths and weaknesses that make it difficult to choose one based solely on merit, NQF must choose anyway.

To endorse more than one measure of an aspect of care defeats the concept of a voluntary national consensus standard. According to the American National Standards Institute, voluntary consensus standards work behind the scenes to make everyday life work. They define the size, shape and information contained on bank cards so that they can be used at any ATM in the world. They describe the size and dimensions of the end of a light bulb so that it will fit into a socket made by any manufacturer. They define the spacing on railway tracks so that a train car made by any manufacturer will ride the rails smoothly. In the same way, the voluntary standards set by NQF should identify and define key aspects of measuring quality so that attention can be focused on improving quality.

NQF Response:
Thank you for your comment. We appreciate your feedback on the proposed recommendations for the CDP Redesign.

This revised process is designed to allow more opportunities for public input and measure discussion and to ensure best practices in building consensus for performance measurement and standards-setting are put into place. While the final report provides descriptions of proposed processes to the extent possible, there are many details that may change as implementation continues. NQF will continue to keep all stakeholders informed and will solicit ongoing feedback as deemed appropriate.

If you have specific input or suggestions, feel free to email NQF at NQFKaizen@qualityforum.org.

Neha Agrawal, The American Academy of Orthopaedic Surgeons

On behalf of over 18,000 board-certified orthopaedic surgeons, the American Academy of Orthopaedic Surgeons (AAOS) would like to offer comments on the *NQF 2017 Kaizen Consensus Development Process: Proposed Redesign*. Overall, the AAOS applauds the National Quality Forum's (NQF) efforts to streamline its measure endorsement process and reduce the cycle time for measure submission and review. We agree with the NQF that a more agile and efficient consensus development process (CDP) for measure development is needed, given the lack of performance measures available to orthopaedics and other specialties. We realize it may not be feasible for the NQF to implement all of its recommendations at once, so a prioritized list that includes both short and long term actions is appropriate. The AAOS also requests clarity on how the proposed changes will result in the "significant reduction in overall endorsement time to about six months," as stated in the "Objectives" section of the proposed redesign document. AAOS comments on specific aspects of the NQF proposal are below.

Increased Opportunities for Measure Submission: The NQF proposes to offer two measure cycles per topic area per year, and limit the number of measures evaluated by the standing committees in each cycle to a maximum of

12 measures. The AAOS agrees with increasing the opportunities for measure submission, but requests further detail on the consolidation of 22 measure review topic areas to 16 topical areas. Second, the AAOS requests more detail on the breakdown of the 12 measures per cycle; for example, if there are fewer than eight measures undergoing maintenance review for a given cycle, can more than four *new* measures be evaluated by the standing committees?

Intent to Submit: The NQF proposes to require all measure stewards/developers to notify NQF of their plan to submit measures for endorsement via an *Intent to Submit* form at least two months prior to the measure submission deadline. The AAOS agrees with this proposal, including the timeframe and information required on the *Intent to Submit* form.

Technical Review: Methods Panel: The NQF proposes to conduct a "methods review" internally or via an external technical advisory panel, for the scientific acceptability section of a measure. The NQF staff and/or the methods panel would provide their review, ratings, and comments of the technical aspects of reliability and validity analyses and results, to the relevant standing committee. The standing committees will still ultimately make a recommendation. The AAOS agrees with this proposal, as a standing committee of physicians may not have the time or may not be as qualified to evaluate the scientific acceptability of a measure. Physicians on the standing committee can focus more on their area of expertise, as it relates to review of the measure. This change would be especially good for complex outcome measures, which require a more thorough evaluation of the scientific acceptability.

Measure Evaluation Technical Report: The NQF proposes to reduce the amount of information provided in the technical report, with the remaining background information on the topic area to be included on NQF's public website. The AAOS agrees with this proposal, and in particular supports having an annual report which summarizes endorsement activities and identifies prioritized gaps in measurement across all topic areas.

Public Comment Period: The NQF proposes to have one continuous public commenting period spanning 12 weeks, in place of two separate public comment periods spanning six weeks. The AAOS requests additional detail on how "earlier and more continuous expression of support/non-support from NQF members" will have a "more significant impact on the measure evaluation," per the proposed redesign. The AAOS also requests more detail on how increasing the public comment period from 6 weeks to 12 weeks contributes to the NQF goal of reducing overall endorsement time to about six months.

Enhanced Training and Education: The NQF proposes to expand and strengthen the current range of educational resources offered for staff, committee members, and measure developers, including on-demand virtual references, developer educational webinars, written guidance materials, consumer/patient-focused webinar training, and meeting facilitation training. The AAOS agrees with this recommendation and urges the NQF to keep to their schedules as best as possible, as there have been many monthly webinars cancelled at the last minute. The AAOS requests that the NQF identifies a staff point person for each measure steward/developer to improve communication between measure stewards/developers and the NQF. Currently the AAOS sends an e-mail to a general e-mail box and historically the technical support has been limited and vague. We urge the NQF to offer specific instructions and guidance on the submission process.

Improvements in Information Exchange and Access: Kaizen participants recommended a centralized information system that would allow for a comprehensive and longitudinal view of a measure, including real-time updates and Measure Applications Partnership (MAP) and CDP data accessible by staff, developers, and the public. The NQF notes that it will not be able to implement this change at this time, given available resources and other strategic considerations. The AAOS agrees with this Kaizen recommendation and urges the NQF to prioritize this as a long-term goal as it would have significant positive benefits to both NQF and measure stewards/developers.

Thank you for considering our comments on this important matter. If you have any questions, please do not hesitate to contact our Medical Director, William O. Shaffer, MD at (202) 548-4145 or shaffer@aaos.org.

NQF Response:

Thank you for your comment.

Increased Opportunities for Measure Submission: NQF has consolidated the 22 measure review topical areas into 15 topical areas. The list of the topical areas is included in the final report. NQF will limit the number of measures evaluated by the standing committees in each cycle to a maximum of 12 (up to eight measures undergoing maintenance review and up to four new measures). This may vary depending on number of measures submitted; opportunities for related and competing measure review, and measure prioritization efforts.

Public Comment Period: In place of two separate public commenting periods (14-day pre-meeting commenting and 30-day post-meeting commenting), NQF will have one continuous public commenting period. This will allow sufficient time for the public and NQF membership to submit comments on measures under review. Comments received a week prior to the measure evaluation meeting will be submitted to the Committee for their consideration.

Enhanced Training and Education: Thank you for the suggestion. As we develop our training and education plan to educate and inform measure developers, we will consider your recommendation.

Frank Maddux, Kidney Care Partners (KCP)

KCP appreciates the opportunity to comment on NQF's *2017 Kaizen Consensus Development Process Proposed Redesign Draft Report*. KCP is a coalition of members of the kidney care community that includes the full spectrum of stakeholders related to dialysis care—patient advocates, healthcare professionals, dialysis providers, researchers, and manufacturers and suppliers—organized to advance policies that improve the quality of care for individuals with both chronic kidney disease and end stage renal disease. We commend NQF for undertaking this important work and offer comment on one proposed CDP revision—*creation of a technical advisory panel to assist in conducting methodological reviews of complex measures*—and recommend one additional area we ask NQF to address in the CDP redesign.

Generally speaking, KCP agrees that the creation of a methodology panel would enhance the NQF process and better align the consideration of statistically complex measures that might otherwise be evaluated dissimilarly across different standing committees with variable statistical expertise. We thus support NQF's proposal to utilize a methods panel to assist in conducting methodological reviews of complex (e.g., risk-adjusted outcome, composite, cost) measures. However, we are deeply concerned about the proposal that NQF staff would review the *Scientific Acceptability* criterion of *all* endorsement maintenance measures—*including* complex measures. Under this scenario, previously endorsed complex measures would be held to a less rigorous statistical standard than similar or related newly submitted metrics, potentially creating methodological inconsistencies in the publically-reported and penalty-based systems within which such measures are frequently deployed. Currently-endorsed measures that a knowledgeable methodology panel might readily identify as statistically-flawed or ineffective at identifying statistically significant and meaningful differences in performance might "pass" a staff review of *Scientific Acceptability* requiring only an attestation as to "the adequacy of prior testing." To address this concern, *we request that NQF amend this proposal to also require review by the methodology panel of two additional categories of measures:*

1. *All complex measures undergoing maintenance review for which there are performance data and/or new or updated testing data.*
2. *Any measure for which a standing committee member moves to request a review by the methodology panel*.

Adoption of this amendment would create a pathway under which already-endorsed measures with significant methodological or performance issues could be reassessed and subjected to a more informed and intense statistical scrutiny during endorsement maintenance. Likewise, *any* measure for which methodological issues are identified or suspected—regardless of measure type or endorsement status—could be appropriately assessed by the methodology panel by request of the standing committee.

Additionally, we note that the draft report does not address the issue of requests for ad hoc measure reviews. We assume that it is NQF's intention that these would be incorporated into the proposed twice yearly measure reviews by the relevant standing committees, but *we recommend that NQF explicitly address the issue of ad hoc reviews in the report for stakeholder consideration.*

KCP again thanks you for the opportunity to comment on this important work. If you have any questions, please do not hesitate to contact Lisa McGonigal, MD, MPH (lmcgon@msn.com or 203.530.9524).

NQF Response:

Thank you for your comment.

Methods Panel for Technical Review: NQF appreciates your recommendations and have included these concerns within the final report. For complex measures, the Scientific Methods Panel will evaluate the measure's reliability and validity (or *Scientific Acceptability* criterion*)* and provide a preliminary recommendation to NQF staff and the standing committee. Because updated reliability and validity testing is not required for maintenance measures, NQF staff will review previous testing results for complex maintenance measures and determine the adequacy of

prior testing. If prior testing is inadequate, updated testing is provided, or NQF staff deems an external review necessary, the measure will be submitted to the external Scientific Methods Panel to evaluate the reliability and validity of the measure. Following the current process, NQF staff will perform a preliminary analysis against all of the other evaluation criteria for both new and maintenance measures. For non-complex measures (e.g., structure and process measures), NQF staff will complete the preliminary analysis against all measure evaluation criteria, including the *Scientific Acceptability* criterion.

For both complex and non-complex measures, when the preliminary analysis is complete, NQF staff will send the preliminary analysis to developers for review. Measures rated by NQF staff or the Scientific Methods Panel as "*Low*" or "*Insufficient*" for reliability or validity will be removed from the current evaluation cycle, allowing time for any additional testing, clarification or NQF technical support, or review prior to consideration of the measure in a future cycle.

NQF will continue to follow the same ad-hoc process. An ad hoc review may be carried out at the same time as an active measure review cycle. This will minimize committee and developer burden in managing various reviews under different schedules.

Colleen McKiernan, The Lewin Group

The Lewin Group appreciates the opportunity to provide feedback on changes to the consensus development process. In general, we are in support of the proposed changes included in the draft report; our feedback on each section follows:

Increased Opportunities for Measure Submission: Lewin appreciates NQF proposing two opportunities for measure submission per topic each year. These additional opportunities for measure stewards to submit CQMs for review by Steering Committees will help better align NQF review with existing development and maintenance lifecycles. By identifying the project and timeline for maintenance review well in advance of the submission deadline, developers will be able to track the dates by which reviews of the literature, updates to the specifications, and measure testing must be completed to present Steering Committees the most accurate and up-to-date evidence available during measure review. Lewin encourages NQF to ensure in-person and virtual reviews are as similar as possible to help standardize the evaluation of each criterion for measures discussed on site and via webinar; examples of some scenarios in which disparate reviews could occur include voting during the meeting vs. polling Standing Committee members after the webinar (the latter of which prevents some voters from having context for results or asking questions) and ensuring the meeting facilitation for in-person and virtual webinars is as similar as possible.

Intent to Submit: Lewin supports creation of an *Intent to Submit* form to pipeline measures that will come forward for review by a Standing Committee, moving forward. We encourage NQF staff to build in additional transparency to the timeline by which maintenance measures must be reviewed before losing endorsement to ensure that measure stewards have multiple CDP options to which they could submit.

Technical Report Content and Structure: Lewin supports the streamlining of the evidence presented therein into a short, more usable document. Lewin also favors preparation of a cross-cutting annual report in which themes from CDPs held each year and gaps identified by Standing Committees are summarized.

Methods Panel for Technical Review: Lewin supports the creation of a methods panel for review of complex scientific acceptability submissions. We would appreciate clarification on how and when the method panel's feedback will be built into the CDP process to help estimate the additional level of effort required by stewards/developers for this second level of review. We also encourage representatives from the methods panel to liaise directly with Standing Committees (attending the in-person meetings/webinars for each measure's review) to answer questions posed by SC members. We recommend NQF prepare a Methods Panel guidebook, similar to the documents used by SCs during the CDP process, to help standardize the approach methods panel members take to reviewing *Scientific Acceptability* results. We also suggest NQF create an algorithm or flowchart to clarify how measures will be selected for review by the methods panel (vs. by NQF staff); this selection process should include discussion of the appropriate review body with the measure steward. Finally, we suggest NQF to stand up a process for Standing Committees to override the vote of a methods panel or NQF staff member if they interpret the reliability and/or validity findings for a measure differently than is recommended.

Public Comment Period: Lewin supports the revised approach proposed by NQF to hold a single, continuous comment period during which members of the public could submit feedback on measures undergoing endorsement review. Lewin encourages NQF to provide as much time as possible to measure stewards and developers to prepare responses to public comments to ensure that we provide the most meaningful, well-

thought-out feedback to comments as is possible; Lewin suggests delivering comments to measure stewards in near-real time (or as rapidly as is feasible) to maximize our response time.

Enhancing Training and Education: Lewin agrees that NQF should provide as many public-facing education resources as possible, including increased promotion of technical assistance support for measure developers, on-demand and real-time webinars for those new to the measure development/NQF submission processes, and creation of orientation sessions for those less experienced in submitting measures to NQF. Lewin also supports standardization of NQF staff competencies through trainings on meeting facilitation and other shared operational skills that can apply across Committees.

NQF Response:

Thank you for comment.

Increased opportunities for measure submission: NQF will make every effort to standardize how both in-person meetings and web meetings are conducted to ensure consistency in the Committee's measure review and evaluation process.

Intent to Submit: NQF will provide a schedule for all maintenance measures in advance to allow developers adequate time to prepare accordingly. All maintenance measures are due every three years from its last endorsement review. Developers are required to maintain their measure in accordance with the Measure Steward Agreement. Failure to do so may result in removal of endorsement; however, NQF will continue to identify potential options with the developer prior to removing endorsement.

Technical Report Content and Structure: Thank you for your comment.

Methods Panel for Technical Review: The complexity of a measure, complex vs. non-complex, will be based on information provided in the *Intent to Submit* form. Measures that are considered complex may require an evaluation by the Scientific Methods Panel. For both complex and non-complex measures, NQF staff will send the preliminary analysis to developers for review prior to finalizing and sending to the standing committee. A flowchart illustrating this process is included in the final report.

Standing committees may raise concerns with the specifications of the measure or with potential threats to validity (e.g., selection of variables for risk adjustment model) and can therefore overturn the staff or Scientific Methods Panel rating. NQF will provide the Scientific Methods Panel and standing committees education and training on changes to the process and expectations on their roles and updated written guidance documents. As part of its ongoing education efforts, NQF will provide standing committees clear guidance regarding the circumstances wherein an overturn of the rating would be permissible.

Public Comment Period: NQF will make every effort to provide developers with public comments in real-time to the extent possible.

Enhancing Training and Education: Thank you for your comment.

Kyle N. Campbell, Health Services Advisory Group, Inc.

Information Exchange and Access: It would be helpful if this section were separated into short term and long term actions rather than listing everything in this section collectively as not feasible. The revision to the submission form should be called out as a key recommendation.

Overall this is a very concise summary of the key themes of the meeting. However, I would suggest adding a summary section that would detail how the proposed short-term changes would impact the overall endorsement timeline. A key theme/goal of the meeting was reducing the length of the process. It would be helpful to highlight if a reduction in length was achieved given the changes NQF is committed to implementing short term. Further, I believe separating into short term and long term actions throughout versus the statements concerning current feasibility would be more strategic.

NQF Response:

Thank you for your comment. We appreciate your feedback on the proposed recommendations for the CDP Redesign.

Information Exchange and Access: NQF will adopt a two-fold approach to addressing recommendations from Kaizen participants. Some aspects of the recommendations are resolvable through short-term solutions and adaptations of existing platforms. Other recommendations will be addressed through a long-term product development approach. This is outlined in the final report.

This revised process is designed to allow more opportunities for public input and measure discussion and to ensure best practices in building consensus for performance measurement and standards-setting are put into place. While the final report provides descriptions of proposed processes to the extent possible, there are many details that may change as implementation continues. NQF will continue to keep all stakeholders informed and will solicit ongoing feedback throughout this process.