

Monthly Measure Developer Webinar



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Monday, February 22, 2016

Agenda Items

- Welcome
- Measure Ratification and Appeals: New Process
- Intended Use Advisory Panel: Final Recommendations
- Material Change for Ad-Hoc Reviews: New Policy
- Q & A
- Next Steps/Announcements

Measure Ratification & Appeals: Revised Process



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Appeals and Ratification Process: Current Process

What is an appeal?

- After a consensus standard has been formally endorsed by NQF, any interested party may file an appeal of the endorsement decision with NQF's Board of Directors.

What are the current grounds for an appeal?

- An appeal may be filed in response to NQF endorsement of a candidate standard or set of standards. It must include written evidence that the appellant's interests are directly and materially affected by the measure and has had, or will have, an adverse effect on those interests.

What is Board ratification?

- All consensus standards that are recommended must be approved by the BOD for official NQF endorsement.

Appeals and Ratification: Current Process

Ratification Process

- The Standing Committee makes an endorsement recommendation on a submitted measure.
- Recommendations are submitted to the Consensus Standards Approval Committee (CSAC) for review.
- The Board of Directors ratifies endorsement decisions.

Appeals Process

- The Board of Directors ratifies endorsement decisions.
- An appeal is submitted challenging the Board's ratification of a measure
- Submitted appeals are presented to the Consensus Standards Approval Committee (CSAC) for review.
- The Board of Directors take action on an appeal based on the CSAC's recommendations.

Appeals and Ratification Process: Background

- NQF- endorsed measures face increased scrutiny from stakeholders, in part because measures are being used in pay-for-performance initiatives.
- NQF decided to re-assess the measure appeals and ratification process to:
 - Eliminate redundant decision-making
 - Prevent re-litigation of issues
 - Re-inforce the finality of decisions

Appeals and Ratification Process: Path Forward

NQF Board identified three key principles for the revised process:

- The Consensus Standards Committee (CSAC) will make final measure endorsement decisions, without ratification by another body.
- A newly created Appeals Board will decide measure appeals rather than the NQF Board of Directors.
- Appeals of a measure endorsement decision will go directly to the Appeals Board without a re-review by the CSAC.

Appeals and Ratification Process: Path Forward

NQF considered guiding principles for this proposed change:

- Grounds for appeal
- Appeals Board membership
- Range of decisions/actions taken by the Appeals Board

Appeals and Ratification Process: Path Forward

Grounds for appeal

- A measure endorsement decision may be appealed for two reasons:
 - Procedural errors reasonably likely to affect the outcome of the original endorsement decision, such as the failure to follow NQF's Consensus Development Process (CDP); **OR**
 - New information or evidence, unavailable at the time CSAC made its endorsement decision, that is reasonably likely to affect the outcome of the original endorsement decision.

Appeals and Ratification Process: Path Forward

Appeals Board membership

- The Appeals Board will consist of:
 - current Board members
 - former CSAC members
 - Former Standing Committee members

Appeals and Ratification Process: Background

Range of decisions/actions that may be taken by the Appeals Board

- Proposed decisions that may be rendered by the Appeals Board following its review of an appeal:
 - Uphold the CSAC endorsement decision
 - Overturn the CSAC endorsement decision
 - Dismiss the appeal

Appeals and Ratification: New Process

Ratification Process

- The Standing Committee makes an endorsement recommendation on a submitted measure.

- Endorsement recommendations are submitted to the Consensus Standards Approval Committee (CSAC) for review and ratification.

Appeals Process

- Endorsement recommendations are submitted to the Consensus Standards Approval Committee (CSAC) for review and ratification.

- An appeal is submitted challenging the Committee endorsement recommendation

- Submitted appeals are presented to the Appeals Board for review to determine if it should be upheld

Intended Use
Advisory Panel:
Final Recommendations



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Overview

- Introduction
- Background
- Panel Charge
- Process
- Recommendations

Introduction

- Stakeholder groups have questioned whether NQF should incorporate the specific intended or actual use(s) of a measure as part of the endorsement process
- This effort by the NQF Intended Use Advisory Panel sought to consider the merit of, and the various approaches to, considering a measure's specific intended or actual use(s) as part of the measure endorsement process.

Background

- Consensus Taskforce (CTF)
 - CTF advised the NQF Board to convene an Advisory Panel to consider transitioning from a binary endorsement decision (endorsed/not endorsed) to a more nuanced recommendation of endorsement
- CTF recommended that this Advisory Panel consider two potential options:
 - Endorsement of measures for a specific intended or actual use(s)
 - Distinguish levels or grades of endorsement

The Intended Use Advisory Panel Charge

- Discuss several critical topic areas, including identifying various use cases for NQF-endorsed measures, distinguishing among the use cases, and identifying the need, if any, for different measure attributes, depending on the specific intended or actual measure use(s);
- Determine whether the NQF measure endorsement criteria requires updating;
- Propose a path forward on whether, and if so, how, to incorporate the specific use of measures in the endorsement process.

Advisory Panel Milestones

- June 2015: Oriented to panel charge and key considerations outlined by the NQF Board
- July 10, 2015: Considered the various uses for NQF-endorsed performance measures
- July 29, 2015: Considered how NQF endorsement criteria might vary based on the various use cases
- October 20, 2015: Reviewed public and member comments on draft report and updated recommendations
- November 19, 2015: CSAC reviewed and approved report with suggested changes
- January 6, 2016: Executive Committee of Board reviewed and approved report with suggested change

Five Recommendations from the Advisory Panel: An Overview

- **Recommendation 1:** Endorsement should not try to distinguish between the measures used in pay-for-performance, public reporting, and other types of accountability applications
- **Recommendation 2:** Create a new designation for endorsed measures that exceed the criteria for endorsement in key areas, and include a requirement for vetting by those being measured
- **Recommendation 3:** NQF endorsement should focus on endorsement of measures intended for accountability applications, such as public reporting and payment applications
- **Recommendation 4:** Encourage the Measures Applications Partnership (MAP) to consider how the new designation can be used in the selection of measures for programs
- **Recommendation 5:** Pursue future work to consider the interaction between program attributes and individual measure attributes

Next Steps

- Transition planning for incorporating these changes into upcoming CDP projects is ongoing
- The transition team will focus on:
 - How the recommendations affect the current CDP criteria?
 - How the recommendations affect the review of maintenance and new measures?
 - Which projects will be affected?

Material Change for Ad-Hoc Reviews: New Policy



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Background

NQF reviewed previous definitions and guidance used when defining “material change” and concluded that more clarity and guidance is needed to understand:

- why changes were made in the specifications
- the impact on the measure results when changes are submitted during annual updates; and
- when a material change prompts an *ad hoc* review

Definition of material change

Material change is defined as any modification to the measure specifications that significantly affects the measure result such as:

- change to the population being measured (e.g., changes in age inclusions, changes in diagnoses or other inclusion criteria, changes in excluded populations);
- changes to what is being measured (e.g., changes in target values like blood pressure or lipid values);
- inclusion of new data source(s); or
- change or expansion of the level of analysis or care settings.

Examples of material change

- Adding a new variable or deleting an element/component of the numerator/denominator or inclusion/exclusion specifications.
- Change in the timeframe of the measure Change to the age groups in the measured population.
- The addition or deletion of an diagnostic code that that represents a different or new classification/category
- A change in the risk adjustment methodology involving statistical analysis (e.g. changing from logistical regression to stratification) or the addition or deletion of a variable that produces a statistically significant change in the outcome of the calculation.

NOT Material Changes

- Updating codes, to reflect current coding nomenclature for a specific condition, disease, procedure, test, or drug.
- Adding a new drug to a family of drugs already specified in the measure.
- A change in the risk adjustment involving a modification to the value of a coefficient. (e.g., the statistical model remains the same, but new data updates the relationships among the variables, so that the estimates of the coefficients change).
- Clarifying or adding a clarifying detail to a numerator or denominator, inclusions or exclusions, or other specification elements that does not change the measure result.

New Annual Update Requirements

- Answer the following questions during an annual update:
 - Why was the change in specifications made?
 - How does the change in specifications affect the measure results?

*If a material change in the specifications is identified, data from re-testing of the measure with the new specifications is required for the **ad hoc review**.*



Q&A

Next Steps

- Next scheduled NQF Measure Developer webinar will be Monday, March 21, from 1:00-2:00 PM EST.
- MMS Information Session Webinar is February 25 on CMS Measures Inventory.
- **Appeals Process:**
 - Commenting Period through February 22nd
- ***SAVE THE DATE***
 - Measure Developer Workshop: May 4-5, 2016