

NATIONAL QUALITY FORUM

CONFERENCE CALL FOR THE RESOURCE USE STEERING COMMITTEE

October 20, 2010

Committee Members Present: Bruce Steinwald, MBA (co-chair); Paul Barnett, PhD; Jack Bowhan; Jephtha Curtis, MD; Kurtis Elward, MD, MPH; William Golden, MD; Lisa Grabert, MPH; Ethan Halm, MD, MPH; Ann Hendrich, RN, MSN, PhD; Renee Markus Hodin, JD; Thomas Lee, MD; Jack Needleman, PhD; Mary Kay O'Neill, MD, MBA; David Penson, MD, MPH; Steve Phillips, MPA; David Redfearn, PhD; Jeffrey Rich, MD; William Rich, MD; Barbara Rudolph, PhD, MSSW; Joseph Stephansky, PhD; Dolores Yanagihara, MPH

NQF Staff Present: Helen Burstin, MD, MPH; Sally Turbyville, MA, MS; Ashlie Wilbon, RN, MPH; Sarah Fanta

Others Present: Gabrielaena Alcala, Niall Brennan, Angela Franklin, Rita Gallagher, Rabia Khan, Jesse Levy

WELCOME AND INTRODUCTIONS

Ms. Wilbon welcomed the resource use Steering Committee members, reviewed the goals for the call, and gave an overview of the resource use project activities to date as well as upcoming milestones.

- Public and member comment period on the resource use evaluation criteria and the white paper was completed on October 12, 2010; approximately 130 comments were received including multiple letters.
- NQF project staff had numerous conference calls with select resource use Measure Developers in order to review the proposed resource use measure evaluation criteria and measure submission form; these calls were completed on October 12, 2010.

NQF plans to host webinars to educate resource use Technical Advisory Panels (TAPs), Steering Committee, and Measure Developers. These webinars will specifically review the adapted resource use measure evaluation criteria and on-line submission form. NQF staff will also use these interactions to further develop a list of frequently asked question (FAQs) to accompany the resource use evaluation criteria and submission form. These webinars are anticipated to occur in late November to early December 2010.

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PURPOSE

The purpose of this webinar conference was to obtain Steering Committee input and agreement on the resource use evaluation criteria and to discuss and respond to public and member comments.

RECAP OF DISCUSSIONS WITH MEASURE DEVELOPERS

- During the white paper comment period, NQF staff reached out to numerous Measure Developers for input on the items that will be included in the new online submission tool for resource use measures. Staff had previously received input that the current NQF quality submission form would not adequately accommodate the submission or evaluation or resource use measure specifications. Overall, the Measure Developers were supportive of the proposed submission items list and requested minor modifications and clarifications to the form. There was general consensus that the evaluation criteria were well aligned with the new submission form.
- Based on discussions with select Measure Developers, NQF staff anticipates measure submissions from Prometheus, The National Committee for Quality Assurance (NQCA), Ingenix and American Board of Medical Specialties (AMBS). The call for measures is slated to begin January 2011.

COMMENTS ON EVALUATION CRITERIA

Staff identified several criteria-related themes for Committee discussion based on the comments received. The Committee's discussion began with general questions and concerns about the approach for developing the criteria.

CRITERIA THEMES AND COMMITTEE RESPONSE

Comment theme 1: General approach to resource use measurement criteria and evaluation process

- Criteria as proposed is ambiguous and the application of the criteria will be difficult as it allows for too much Steering Committee discretion;
- Use cases should be developed to demonstrate how the criteria will be applied; and
- Using the quality measure evaluation criteria as foundation is not the best approach.

Steering Committee Comments

- There was no specific mention of which criteria or sub-criteria were ambiguous, therefore it is difficult for the Steering Committee to address this concern and further clarify the criteria.
- NQF Staff and the Committee agree that case examples using different types of resource use measures would be a great education tool for the TAP and Steering Committee members in preparation for their evaluation of submitted measures. The Steering

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Committee recommended that this tool not become part of a published document because it would not be able to count for all iterations, but rather solely be used for NQF staff and Steering Committee/TAP education. The Steering Committee agreed that using quality measure evaluation criteria as a foundation for resource use evaluation was a logical approach. The criteria are grounded in the evaluation of measurement properties and the adjustment of the submission tool to accommodate resource use measures aligns with adequate evaluation.

Comment theme 2: Connection to quality measures

- Requiring or preferring resource measures that were known to be used with existing endorsed quality measures may limit the number of measures submitted or endorsed.

Steering Committee Comments

- The Steering Committee believes it may be beneficial to change this specification of linkage with an endorsed quality measure to an informational statement to further emphasize that it is not a requirement.
- The evaluation criteria itself makes no reference to a preference for those resource use measures associated with quality measures; this language is housed in the white paper only.
- With the goal of efficiency measures in mind, a resource use measure linked to quality measures would be a stronger indicator than stand alone resource use measures. The Committee also recognized that resource use measures used as stand-alone measures can also be useful for some purposes.
- There were concerns among some Steering Committee members that resource use measures may not be readily linked to quality measures at this time. The preference or request for a list of associated quality measures imposes a higher bar than is expected for quality measures currently submitted to NQF. Further, this opens the door for the resource measures to be judged based on the quality measures listed. More importantly, if it is a quality measure that is not favored it may be difficult to disentangle the impressions of the quality measure from the value-add of the resource use measure alone.
- Ultimately, the Steering Committee agreed that the question should be asked if there are existing quality measures that can be linked to resource use measures on the submission form, but it will be used for informational purposes only and not be a required component of the submission. Importantly, it was noted that this type of information may be useful by users and implementers of an endorsed measure.

Comment Theme 3: Importance criteria--*high or unexplained variation* requirement

- NQF should not limit the evaluation of resource use measures to only those that examine "...high or unexplained variation..."

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Steering Committee Comments:

- The Steering Committee agreed to change the word from “high or unexplained variation” to just those areas demonstrating “high impact or variation”.

Comment theme 4: Testing requirements

- Clarify and provide examples for the reliability and validity testing of resource use measures.
- How should the reliability criteria be defined, is it strictly repeatability or is it statistical reliability?
- Is there a gold standard for validity testing?
- What are NQF’s/Committee’s expectations of testing data?

Steering Committee Comments

- The NQF testing taskforce report was recently reviewed by the NQF Board of Directors; the information regarding the specific elements of what is expected of submitted measures will be made publicly available shortly. Currently, there is not a prescriptive approach to testing and the evaluation process enables the Steering Committee to determine how well the testing data submitted meets the criteria. For resource use, it is necessary to use a different form of validity testing, as it is more about counting rather than science. Therefore, the requirements for validity and reliability for resource use measures may be different from quality measures.
- A gold standard for validity testing may not be applicable to resource use measures. The lack of a gold standard, however, should not preclude the necessity to do validity testing.
- The Steering Committee does not wish to prescribe the levels and type of validity and reliability testing. Developers should use their expertise and discretion to determine the rigor and type of testing that should occur. As done with all submitted measures, the Steering Committee will evaluate the testing rigor and results for each measure submitted for endorsement consideration.

Comment theme 5: Module components subject to *evaluation*

- Clarification on the evaluation of the data protocol and the reporting modules
- Consider the need for flexibility (which specifications do not have) for these two modules. Should these modules be specified or submitted as guidance to users?

Steering Committee Comments

- If changed, this would be reflected in the notes for 2a of the evaluation criteria.
- These modules may be too detailed to be required for submission; it may set the bar too high. The Committee agreed that this information should be included as part of the Measure Developers submission, but not as specifications. This would be clarified in the

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notes and the white paper, explaining this area requires a greater extent of flexibility in order to accommodate measure implementation needs.

- Some components of the data protocol (e.g., how to deal with zero dollar claims) and the reporting module should be included in the specifications and these should be disentangled from the items that will suffice as guidance. NQF staff will review this and determine what these items should be and update the criteria notes and submission items list accordingly.

Comment theme 6: Resource use composite measures

- Request that NQF provide more guidance about resource use composite measures
- Conflicting comments about resource use composite measures:
 - Endorsing composite resource use measures should be a priority.
 - Composite resource use measures should be handled separately and delayed. A request that a white paper that focuses solely on composite resource use measures to inform a future Call focused is necessary prior to NQF implementing a call for these types of measures. .

Steering Committee Comments

- The Steering Committee requested that NQF clearly define composite resource use measure and comprehensive resource use measure. These definitions will be added to the white paper and FAQs that will accompany the call for measures.
- During the call, NQF staff stated that their proposed definition of a composite resource use measure are those approaches that roll-up resource use across delineated resource use measures. This would be an approach (and specifications) that estimates a provider's total resource use for several or numerous resource use measures. For example, the total resource use for a provider that combines diabetes, heart failure, and acute low back pain resource use. Comprehensive measures, on the other hand, are measures that account for numerous resources service categories (e.g., pharmacy, evaluation and management, and emergency department use) within one resource use measures.
- The Steering Committee agrees that for this first effort at evaluating and endorsing resource use measures, it should be limited to single and comprehensive measures, and that more time is required to consider the adequacy of the criteria to evaluate composite resource use measures.

Comment theme 7: Reporting module—attribution, peer group

- Several comments expressed preferences for attribution approaches (i.e., multiple versus single attribution), and at what level attribution is appropriate depending on the type of measure (i.e., attribution of per capita measures versus episode-based measures).
- Some comments requested that attributions approaches be standardized; others note the need for flexibility depending on the implementation and measure user needs.

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Steering Committee Comments

- At this time, there are no known best attribution approaches, but there is a push for Measure Developers to provide well thought out and tested attribution recommendations and alternatives for the measures they produce. Currently, the submission form implies the submission of a single method of attribution. The form should be flexible to allow for explanation if there are alternative attribution approaches in addition to the primary suggested method. This is useful for the Measure Developer, but also for the consumer who may intend the use of the measure for a specific purpose. The Steering Committee recommends that this area of measurement approach be submitted for evaluation but strictly as guidance; this allows users and consumers to have flexibility to meet their needs while still adhering to the endorsed properties of the measure. NQF staff will modify the language based on the Steering Committee suggestions.

Comment Theme 8: Allow time-limited (i.e., un-tested) resource use measures endorsement for simple measures

- Request to reconsider current approach to not consider resource use measures for time-limited endorsement. Measures that have been fully developed but not tested may be eligible for time-limited endorsement allowing Developers 12 months to submit testing data for review if the measures are deemed not complex. Resource use measures have been defined by NQF and the Steering Committee as strictly complex and therefore not eligible for time-limited endorsement.
- Some disagreed that all resource use measures are complex.
- By limiting the Call for Measures to those that have been tested, the numbers that are eligible endorsed is immediately reduced.

Steering Committee Comments

- The majority of the Steering Committee felt that simple resource measures are not never really simple. Therefore, time limited endorsement may push forward measures that are not ready for prime time. Further, given the implications of misuse or misinterpretation most Steering Committee members expressed the importance of the measures being fully tested and that the testing needed to be evaluated.
- The majority of the Steering Committee agreed, that especially during this first effort, untested resource use measures should not be allowed.

COMMITTEE CONSENSUS ON MEASURE EVALUATION CRITERIA

- The Steering Committee reached consensus on the approval of the proposed NQF resource use evaluation criteria. This approval is based on the agreement that NQF staff will make changes requested and agreed upon during the webinar; the updated criteria will be emailed to the Steering Committee, and provided to the Consensus Standards Approval Committee (CSAC) for their review and approval.

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NEXT STEPS

- The criteria will be updated based on the Steering Committee webinar conference input and the final proposed criteria will be submitted to the CSAC for review and approval on November 3 and 4, 2010.
- The white paper and comment table will be updated with Steering Committee responses on the public and member comments. There will be follow-up conversations with the white paper sub-committee as needed.
- Staff may schedule an additional Committee call to discuss the remaining white paper comments.