

Memo

May 24, 2021

To: Behavioral Health and Substance Use Standing Committee

From: NQF staff

Re: Post-comment web meeting to discuss public comments received and NQF member expression

of support and review consensus not reached measure

Introduction

NQF closed the public commenting period for the measures submitted for endorsement consideration on April 23, 2021.

Purpose of the Call

The Behavioral Health and Substance Use Standing Committee will meet via web meeting on May 24, 2021 from 12:00 - 2:00 pm ET. The purpose of this call is to:

- Review and discuss comments received during the post-evaluation public and member comment period;
- Review and discuss NQF members' expression of support of the measures under consideration;
- Review consensus not reached measure and finalize recommendation.

Standing Committee Actions

- 1. Review this briefing memo and draft report.
- 2. Review and consider the full text of all comments received and the proposed responses to the post-evaluation comments (see comment table and additional documents included with the call materials).
- 3. Review the NQF members' expressions of support of the submitted measures.
- 4. Be prepared to provide feedback and vote on consensus not reached measure.

Conference Call Information

Please use the following information to access the conference call line and webinar:

Speaker dial-in #: 844-621-3956 (Passcode 173 903 2043)

Web link: https://nqf.webex.com/nqf/j.php?MTID=ma3a65dd54b622a5a04302b1cc89f41ae

Background

Behavioral health refers to the study of how cognitive habits and conditions affect overall well-being, biology, and behavior. Sometimes used interchangeably with mental health, behavioral health encompasses broader concepts that include mental wellness and its effects on human behaviors and choices. Thus, behavioral health comprises not only mental health but also substance use disorders (SUDs). These two important components of behavioral health represent a key construct of healthcare

across the globe, unified by brain-based etiology and behavioral symptomology. The review and evaluation of behavioral health measures have long been priorities of the National Quality Forum (NQF), with endorsement for mental health and SUD measures going back more than a decade. At present, there are 43 NQF-endorsed behavioral health measures. This project aims to advance accountability and quality in the delivery of behavioral health and substance use services through the evaluation of quality measures focused on behavioral health.

On February 8 and 11, 2021, NQF convened a multistakeholder Standing Committee consisting of 24 individuals to evaluate two measures undergoing maintenance review and two new measures. The Behavioral Health and Substance Use Standing Committee recommended three measures for endorsement but did not reach consensus on one measure.

The Standing Committee recommended the following three measures:

- #0576 Follow-Up After Hospitalization for Mental Illness (National Committee for Quality Assurance)
- #3589 Prescription or Administration of Pharmacotherapy to Treat Opioid Use Disorder (RTI International)
- #3590 Continuity of Care After Receiving Hospital or Residential Substance Use Disorder (SUD) Treatment (RTI International)

The Standing Committee did not reach consensus on the following measure:

• #3205 Medication Continuation Following Inpatient Psychiatric Discharge (Mathematica)

Comments Received

NQF solicits comments on measures undergoing review in various ways and at various times throughout the evaluation process. First, NQF solicits comments on endorsed measures on an ongoing basis through the Quality Positioning System (QPS). Second, NQF solicits member and public comments during a 16-week comment period via an online tool on the project webpage.

Pre-evaluation Comments

NQF solicited comments prior to the evaluation of the measures via an online tool on the project webpage. For this evaluation cycle, the pre-evaluation comment period was open November 2, 2020 through January 15, 2021 for the measures under review. During the pre-evaluation commenting period, NQF did not receive any comments.

Post-evaluation Comments

The draft report was posted on the project webpage for public and NQF member comment on March 30, 2021 for 30 calendar days. During this commenting period, NQF received four comments from two member organizations:

Member Council	# of Member Organizations Who Commented
Health Professional	3

Member Council	# of Member Organizations Who Commented
Public/Community Health Agency	1

We have included all comments that we received (both pre- and post-evaluation) in the comment table (excel spreadsheet) posted to the Standing Committee SharePoint site. This comment table contains the commenter's name, comment, associated measure, topic (if applicable), and—for the post-evaluation comments—responses for the Standing Committee's consideration. Since the majority of the comments received (see attached comment table) were in support of the Standing Committee's recommendations, the Standing Committee will use the post-comment web meeting to discuss and evaluate the measure where consensus was not reached. The Standing Committee's recommendations will be reviewed by the Consensus Standards Approval Committee (CSAC) on June 29 and June 30, 2021. The CSAC will determine whether to uphold the Standing Committee's recommendation for each measure submitted for endorsement consideration. All Standing Committee members are encouraged to attend the CSAC meeting to listen to the discussion.

Consensus Not Reached

3205 Medication Continuation Following Inpatient Psychiatric Discharge (Mathematica)

The Standing Committee noted that the measure involves both hospitals and outpatient providers, with the accountability falling on the facility that may not have full control over this aspect of care. This was expressed to be especially challenging for mental health patients. The Standing Committee noted that the healthcare system is increasingly moving toward shared accountability for issues such as this. Two commenters stated that ensuring medication adherence is maintained during transitions of care is an important process to measure but agreed with the Standing Committee's concerns over the threats to the measure's validity and supported not continuing endorsement at this time.

Committee Action: Revote on overall suitability for endorsement.

NQF Member Expression of Support

Throughout the 16-week continuous public commenting period, NQF members had the opportunity to express their support ("support" or "do not support") for each measure submitted for endorsement consideration to inform the Committee's recommendations. NQF members did not provide any expressions of support or non-support for the measures.