



TO: NQF Members
FR: NQF Staff
RE: Voting Draft Report: *Care Coordination Measures: 2016-2017*
DA: May 30, 2017

Background

On February 22, 2017, the 20-member [Care Coordination Standing Committee](#) met during a one-day in-person meeting to evaluate seven measures against NQF's standard evaluation criteria. The Committee evaluated two newly-submitted measures and five measures undergoing maintenance review. The Committee recommended one maintenance measure for endorsement. The Committee did not recommend the remaining six measures for endorsement.

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 prior to the evaluation of the measures via an online tool located on the project webpage. Third, NQF opens a 30-day comment period to both members and the public after measures have been evaluated by the full committee and once a report of the proceedings has been drafted.

Pre-evaluation comments

The pre-evaluation comment period was open from January 9, 2017 to January 23, 2017 for all seven measures under review. No pre-evaluation comments were received.

Post-evaluation comments

The Draft Report was posted for Public and Member comment on the NQF website from April 3, 2017 to May 2, 2017. During this commenting period, NQF received 20 comments from six member organizations:

Consumers – 0	Professional – 2
Purchasers – 0	Health Plans – 1
Providers – 1	QMRI – 2
Supplier and Industry – 0	Public & Community Health – 0

A complete table of comments submitted post-evaluation, along with the responses to each comment is posted to the [Care Coordination](#) project page on the NQF website, along with the measure submission forms.

The Committee reviewed and responded to all comments received. Revisions to the draft report and the accompanying measure specifications are identified as red-lined changes. (Note: Typographical errors and grammatical changes have not been red-lined, to assist in reading.)

Three themes were identified in the post-evaluation comments:

1. Support for the measure
2. Transition of care measures
3. Submission of additional data

Theme 1 - Support for the measure

Measure **#0326** *Advance Care Plan* received two comments supporting the Committee's recommendation to endorse the measure. However, one commenter noted that claims data do not reliably capture the care plan and the physician does not always bill for this service. Another commenter suggested being mindful of implementation challenges and any unintended consequences. During the in-person meeting, the Committee did not express any concerns with the validity of the measure or any unintended consequences or potential harms to patients because of this measure.

Developer Response: We appreciate your support of endorsement for #0326: Advance Care Plan as a clinician/group practice level measure. We understand the challenges of retrieving this information through claims data and have expanded the list of codes that count toward the numerator for this measure. This list includes the CPT II codes: 1123F, 1124F and the CPT codes 99497, or 99497 and 99498. Medicare began allowing reimbursement for advance care planning discussions through codes 99497 and 99498 effective January 1, 2016. We expect this will encourage more physicians to record these codes when providing this service.

Action Item: None.

Theme 2 – Transition of Care Measures

Two commenters expressed their disappointment with the Committee's decision not to recommend four transition of care measures for continued endorsement: **#0646** *Reconciled Medication List Received by Discharged Patients*, **#0647** *Transition Record with Specified Elements Received by Discharged Patients*, **#0648** *Timely Transmission of Transition Record* and **#0649** *Transition Record with Specified Elements Received by Discharged Patients*.

Committee Response: Thank you for your comment. The Committee recognizes the importance of transitions of care measures and encourages the developer to monitor the performance of these measures. The Committee did not recommend the four transition of care measures for continued endorsement because the developer did not provide updated performance data and sufficient reliability testing data for each measure as required per NQF's current measure evaluation criteria. The Committee recognizes the importance of these transition of care measures in the coordination of care. The Committee notes that the performance gap requirements include demonstrating quality problems and opportunity for improvement. As part of NQF's endorsement maintenance process, there is an increased emphasis on data for current performance, gaps in care, and variation. The Committee encourages the developer to continue collecting data to demonstrate that the measures meet NQF criteria for performance gap, which is a must-pass subcriterion. The Committee looks forward to the possibility of re-evaluating these important transitions of care measures in the future.

NQF Response: Performance scores on the measure as specified are required for maintenance of endorsement per NQF criteria. In addition, the developer did not submit disparities data as required by NQF. Please note that NQF does not require additional

testing for maintenance measures if prior testing is adequate; however, prior testing must meet current NQF evaluation criteria.

Action Item: None.

Theme 3 - Submission of additional data

Measure **#3170** *Proportion of Children with ED Visits for Asthma with Evidence of Primary Care Connection before the ED Visit* and **#3171** *Percentage of Asthma ED Visits Followed by Evidence of Care Connection* received two comments expressing their concern with the developer's intent to present reliability testing results to the Committee at the post-comment call. The developer did not provide measure score reliability testing data as required for composite measures. The commenters state that presenting new information at the end of the public and member commenting period that could lead to a change in the Committee's recommendations would comply with NQF's Consensus Development Process (CDP). The commenters recommend a second public and member commenting period if new data are presented.

Committee Response: Thank you for your comment. During the comment period, the developer did not submit new data as stated at the in-person meeting. Due to the lack of new data, the measures will not undergo further review. Because measure level testing was unavailable, the measures as currently specified do not meet NQF's measure evaluation criteria and are not recommended for endorsement. The Committee looks forward to re-evaluating these measures in the future.

Action Item: None.

NQF Member Voting

Information for electronic voting has been sent to NQF Member organization primary contacts. Accompanying comments must be submitted via the online voting tool.

Please note that voting concludes on June 13, 2017 at 6:00 pm ET – no exceptions.