This form contains the information submitted by measure developers/stewards, organized according to NQF's measure evaluation criteria and process. The evaluation criteria, evaluation guidance documents, and a blank online submission form are available on the [submitting standards web page](#).

<table>
<thead>
<tr>
<th>NQF #:</th>
<th>0553</th>
<th>NQF Project: Care Coordination Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>(for Endorsement Maintenance Review)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Original Endorsement Date:</td>
<td>Aug 05, 2009</td>
<td>Most Recent Endorsement Date: Aug 05, 2009</td>
</tr>
</tbody>
</table>

### BRIEF MEASURE INFORMATION

<table>
<thead>
<tr>
<th>De.1 Measure Title:</th>
<th>Care for Older Adults – Medication Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>Co.1.1 Measure Steward:</td>
<td>National Committee for Quality Assurance</td>
</tr>
<tr>
<td>De.2 Brief Description of Measure:</td>
<td>Percentage of adults 66 years and older who had a medication review; a review of all a member’s medications, including prescription medications, over-the-counter (OTC) medications and herbal or supplemental therapies by a prescribing practitioner or clinical pharmacist.</td>
</tr>
</tbody>
</table>

#### 2a1.1 Numerator Statement:
At least one medication review (Table COA-B) conducted by a prescribing practitioner or clinical pharmacist during the measurement year and the presence of a medication list in the medical record (Table COA-C)

Table COA-B Codes to identify medication review: Medication review (CPT 90862, 99605, 99606), (CPT-II 1160F)

Table COA-C Codes to Identify Medication List (CPT-II 1159F)

#### 2a1.4 Denominator Statement:
All patients 66 and older as of December 31 of the measurement year

#### 2a1.8 Denominator Exclusions:
N/A

<table>
<thead>
<tr>
<th>1.1 Measure Type:</th>
<th>Process</th>
</tr>
</thead>
<tbody>
<tr>
<td>2a1.25-26 Data Source:</td>
<td>Administrative claims, Electronic Clinical Data, Paper Records</td>
</tr>
</tbody>
</table>

| 1.2-1.4 Is this measure paired with another measure? | No |

| De.3 If included in a composite, please identify the composite measure (title and NQF number if endorsed): | N/A |

### STAFF NOTES (issues or questions regarding any criteria)

Comments on Conditions for Consideration:

Is the measure untested? Yes ☐ No ☐ If untested, explain how it meets criteria for consideration for time-limited endorsement:

1a. Specific national health goal/priority identified by DHHS or NPP addressed by the measure (check De.5):

5. Similar/related [endorsed](#) or submitted measures (check 5.1):

Other Criteria:

Staff Reviewer Name(s):

---

1. IMPACT, OPPORTUNITY, EVIDENCE - IMPORTANCE TO MEASURE AND REPORT

See Guidance for Definitions of Rating Scale: H=High; M=Moderate; L=Low; I=Insufficient; NA=Not Applicable
Importance to Measure and Report is a threshold criterion that must be met in order to recommend a measure for endorsement. All three subcriteria must be met to pass this criterion. See guidance on evidence.

**Measures must be judged to be important to measure and report in order to be evaluated against the remaining criteria.** (evaluation criteria)

1a. High Impact:  

<table>
<thead>
<tr>
<th>H</th>
<th>M</th>
<th>L</th>
<th>I</th>
</tr>
</thead>
</table>

(The measure directly addresses a specific national health goal/priority identified by DHHS or NPP, or some other high impact aspect of healthcare.)

De.4 Subject/Topic Areas (Check all the areas that apply):  
De.5 Cross Cutting Areas (Check all the areas that apply):  
Care Coordination

1a.1 Demonstrated High Impact Aspect of Healthcare:  
Affects large numbers

1a.2 If “Other,” please describe:

1a.3 Summary of Evidence of High Impact (Provide epidemiologic or resource use data):

It is estimated there are more than 1.5 million serious adverse drug events which occur annually, many resulting in death (IOM 2006). Adverse reactions to medicines are implicated in 5–17% of hospital admissions (Knight 2001). Noncompliance, nonadherence, lack of communication between patients and physicians and the burden of taking multiple medications can result in drug interactions, adverse drug events, drug overuse and drug underuse. Adverse drug events are one of the leading causes of morbidity and mortality in health care. Elderly patients possess several factors, including chronic conditions and increased drug utilization, which makes them particularly prone to adverse drug events resulting from multiple care settings (Marcum 2010).

Medications are a significant part of care for elderly patients. Patients 65 years and older take more than 30% of all prescription drugs (Sorensen 2004). The vast majority of older adults are taking medications to address at least three or more chronic conditions (DHSS 2010). Many of them have multiple prescribing physicians and use more than one pharmacy, necessitating regular review of medications. Managing multiple medications is difficult due to issues with noncompliance, nonadherence, misunderstanding of dosage and lack of knowledge about the actual medication (Beckman 2004). Consequences of these challenges include adverse drug events, drug overdoses and underutilization of drugs, all leading to an increase in hospitalizations from adverse drug events (Bikowski 2001). Many of these problems result from a lack of communication between physician and patient. Physicians do not know if their patients do not understand their drug regimen, nor are they aware of the number of medications their patients may be taking at one time (Bikowski 2001; Sleath 2001). Beyond physician-initiated communication, problems also stem from the fact that older patients do not ask their physicians or pharmacists about their medication (Ostrom 1985). Approximately two out of five seniors report that they are not taking medication because of the cost, side-effects, perceived lack of effectiveness or belief that they do not need the medication (Kaiser 2003).

1a.4 Citations for Evidence of High Impact cited in 1a.3:  


1b. Opportunity for Improvement: H[M][L][I] (There is a demonstrated performance gap - variability or overall less than optimal performance)

1b.1 Briefly explain the benefits (improvements in quality) envisioned by use of this measure:
Medication review can be a useful tool to reduce medication related problems (IOM 2002; 2006). The process of resolving discrepancies in a patient’s medication list reduces the risk of adverse drug interactions being overlooked and helps physicians minimize the duplication and complexity of the patient's medication regimen (Knight 2001). This in turn may increase patient adherence to the medication regimen and reduce hospital readmission rates. A study by Gillespie et al utilized a randomized pharmacist-led medication review process of hospitalized patients and demonstrated a subsequent 16% reduction in all visits to the hospital and a 47% reduction in visits to the ED (Gillespie 2009).


1b.2 Summary of Data Demonstrating Performance Gap (Variation or overall less than optimal performance across providers): [For Maintenance – Descriptive statistics for performance results for this measure - distribution of scores for measured entities by quartile/decile, mean, median, SD, min, max, etc.]

Medicare
Measurement Year: 2010; 2009; 2008
N: 316; 314; 341
MEAN: 65.4; 60.6; 57.7
STDEV: 22.1; 25.3; 26.6
STDERR: 1.24; 1.43; 1.44
MIN: 0; 0; 0
MAX: 100; 100; 100
P10: 38.8; 19.9; 10.5
P25: 53; 46.5; 49.9
P50: 67.1; 67; 63.6
P75: 81.9; 78.2; 74.7
P90: 93.2; 90.5; 87.4

1b.3 Citations for Data on Performance Gap: [For Maintenance – Description of the data or sample for measure results reported in 1b.2 including number of measured entities; number of patients; dates of data; if a sample, characteristics of the entities included]
Section 1b.2 references data from the most recent three years of measurement for this measure. The data in section 1b.2 includes percentiles, mean, min, max, standard deviations and standard errors.

1b.4 Summary of Data on Disparities by Population Group: [For Maintenance – Descriptive statistics for performance results
This measure is not stratified to detect disparities. NCQA has participated with IOM and others in attempting to include information on disparities in measure data collection. However, at the present time, this data, at all levels (claims data, paper chart review, and electronic records), is not coded in a standard manner, and is incompletely captured. There are no consistent standards for what entity (physician, group, plan, employer) should capture and report this data. While “requiring” reporting of the data could push the field forward, it has been our position that doing so would create substantial burden with inability to use the data because of its inconsistency. At the present time, we agree with the IOM report that disparities are best considered by the use of zip code analysis which has limited applicability in most reporting situations. At the health plan level, for HEDIS health plan data collection, NCQA does have extensive data related to our use of stratification by insurance status (Medicare, Medicaid and private-commercial) and would strongly recommend this process where the data base supporting the measurement includes this information. However, we believe that the measure specifications should NOT require this since the measure is still useful where the data needed to determine disparities cannot be ascertained from the data available.

1b.5 Citations for Data on Disparities Cited in 1b.4: [For Maintenance – Description of the data or sample for measure results reported in 1b.4 including number of measured entities; number of patients; dates of data; if a sample, characteristics of the entities included]

N/A

1c. Evidence (Measure focus is a health outcome OR meets the criteria for quantity, quality, consistency of the body of evidence.)

Is the measure focus a health outcome? Yes No If not a health outcome, rate the body of evidence.

<table>
<thead>
<tr>
<th>Quantity</th>
<th>Quality</th>
<th>Consistency</th>
<th>Does the measure pass subcriterion1c?</th>
</tr>
</thead>
<tbody>
<tr>
<td>M-H</td>
<td>M-H</td>
<td>M-H</td>
<td>Yes[ ] IF additional research unlikely to change conclusion that benefits to patients outweigh harms: otherwise No[ ]</td>
</tr>
<tr>
<td>L</td>
<td>M-H</td>
<td>M</td>
<td>Yes[ ] IF potential benefits to patients clearly outweigh potential harms: otherwise No[ ]</td>
</tr>
<tr>
<td>L-M-H</td>
<td>L-M-H</td>
<td>L</td>
<td>No[ ]</td>
</tr>
</tbody>
</table>

Health outcome – rationale supports relationship to at least one healthcare structure, process, intervention, or service

Does the measure pass subcriterion1c? Yes[ ] IF rationale supports relationship

1c.1 Structure-Process-Outcome Relationship (Briefly state the measure focus, e.g., health outcome, intermediate clinical outcome, process, structure; then identify the appropriate links, e.g., structure-process-health outcome; process-health outcome; intermediate clinical outcome-health outcome):

To our knowledge there are no systematic reviews of the effect of medication review alone on health outcomes for older adults. However, individual studies have shown a decrease in medication errors when medication review among other medication education interventions are implemented (Sorensen 2004; Nassaralla 2007). Although the magnitude of the effect of medication review on patient outcomes is not well studied, there is agreement among experts that the potential benefits outweigh the harm (Pronovost 2003; IOM 2002; IOM 2006).

In a study by Gurwitz, at least 27.6% of adverse drug events in a cohort of Medicare beneficiaries were found to be preventable. The authors suggest more careful monitoring of prescribed medications could reduce the number of adverse drug events. Medication review has also been shown to increase patient adherence to medication (George 2008). Other studies looking specifically at a pharmacist-based medication review have shown a decrease in drug-related problems (Vinks 2009; Hanlon 2004; Zermansky 2009; Gillespie 2009; Krksa 2001).

Additionally, medication review is recommended by ACOVE (Assessing Care of Vulnerable Elders; Knight 2001), the task force on medicines partnership (2005), and the Joint Commission (Kienle 2008). Additionally, measurement of medication review has been cited by the National Quality Forum and the National Priorities Partnership as a measurement priority area (NQF 2010).

1c.2-3 Type of Evidence (Check all that apply):

Selected individual studies (rather than entire body of evidence)
1c.4 Directness of Evidence to the Specified Measure (State the central topic, population, and outcomes addressed in the body of evidence and identify any differences from the measure focus and measure target population):
The evidence directly relates to the topic of medication review, though it varies in the measurement population age range (adult, geriatric).

1c.5 Quantity of Studies in the Body of Evidence (Total number of studies, not articles): 8

1c.6 Quality of Body of Evidence (Summarize the certainty or confidence in the estimates of benefits and harms to patients across studies in the body of evidence resulting from study factors. Please address: a) study design/flaws; b) directness/indirectness of the evidence to this measure (e.g., interventions, comparisons, outcomes assessed, population included in the evidence); and c) imprecision/wide confidence intervals due to few patients or events): Medication review is widely regarded as good practice. Interventions which have targeted reducing adverse medication events have combined medication review with other care coordination and polypharmacy education interventions. Therefore the body of evidence directly linking medication review with patient outcomes is moderate. While all studies have shown a positive effect of medication review on reducing medication errors, very few have had the power to show an effect on morbidity and mortality. Despite this limitation, there is general expert consensus that the benefits of medication review outweigh the harms.

1c.7 Consistency of Results across Studies (Summarize the consistency of the magnitude and direction of the effect): All studies have shown a positive effect of medication review on reducing medication errors. Studies have shown mixed results when examining the effect of medication review on morbidity and mortality. No studies have shown any harm to the patient from medication review.

1c.8 Net Benefit (Provide estimates of effect for benefit/outcome; identify harms addressed and estimates of effect; and net benefit - benefit over harms): The studies show that performing a medication review reduces the probability of medication-related health complications.

1c.9 Grading of Strength/Quality of the Body of Evidence. Has the body of evidence been graded? No

1c.10 If body of evidence graded, identify the entity that graded the evidence including balance of representation and any disclosures regarding bias: N/A

1c.11 System Used for Grading the Body of Evidence: Other

1c.12 If other, identify and describe the grading scale with definitions: The evidence has not been graded.

1c.13 Grade Assigned to the Body of Evidence: N/A

1c.14 Summary of Controversy/Contradictory Evidence: N/A

1c.15 Citations for Evidence other than Guidelines (Guidelines addressed below):


Institute of Medicine (IOM): Committee on Quality Health Care in America. To err is human: building a safer health system.


1c.23 Grade Assigned to the Recommendation: N/A

1c.24 Rationale for Using this Guideline Over Others: N/A

Based on the NQF descriptions for rating the evidence, what was the developer's assessment of the quantity, quality, and consistency of the body of evidence?

1c.25 Quantity: Low  1c.26 Quality: Low  1c.27 Consistency: Moderate

Was the threshold criterion, Importance to Measure and Report, met? (1a & 1b must be rated moderate or high and 1c yes)  Yes ☐ No ☐

Provide rationale based on specific subcriteria:

For a new measure if the Committee votes NO, then STOP.
For a measure undergoing endorsement maintenance, if the Committee votes NO because of 1b. (no opportunity for improvement), it may be considered for continued endorsement and all criteria need to be evaluated.

2. RELIABILITY & VALIDITY - SCIENTIFIC ACCEPTABILITY OF MEASURE PROPERTIES

Extent to which the measure, as specified, produces consistent (reliable) and credible (valid) results about the quality of care when implemented. (evaluation criteria)

Measure testing must demonstrate adequate reliability and validity in order to be recommended for endorsement. Testing may be conducted for data elements and/or the computed measure score. Testing information and results should be entered in the appropriate field. Supplemental materials may be referenced or attached in item 2.1. See guidance on measure testing.

S.1 Measure Web Page (In the future, NQF will require measure stewards to provide a URL link to a web page where current detailed specifications can be obtained). Do you have a web page where current detailed specifications for this measure can be obtained?  No

S.2 If yes, provide web page URL:

2a. RELIABILITY. Precise Specifications and Reliability Testing:  H ☐ M ☐ L ☐ I ☐

2a1. Precise Measure Specifications. (The measure specifications precise and unambiguous.)

2a1.1 Numerator Statement (Brief, narrative description of the measure focus or what is being measured about the target population, e.g., cases from the target population with the target process, condition, event, or outcome):

At least one medication review (Table COA-B) conducted by a prescribing practitioner or clinical pharmacist during the measurement year and the presence of a medication list in the medical record (Table COA-C)

Table COA-B Codes to identify medication review: Medication review (CPT 90862, 99605, 99606), (CPT-II 1160F)

Table COA-C Codes to Identify Medication List (CPT-II 1159F)

2a1.2 Numerator Time Window (The time period in which the target process, condition, event, or outcome is eligible for inclusion): The measurement year

2a1.3 Numerator Details (All information required to identify and calculate the cases from the target population with the target process, condition, event, or outcome such as definitions, codes with descriptors, and/or specific data collection items/responses:

1) Administrative Specification (if available):

At least one medication review conducted by a prescribing practitioner or clinical pharmacist during the measurement year and the presence of a medication list in the medical record, as documented through administrative data.

The claim/encounter for a member's medication review and medication list must be on the same date of service.

Codes to identify medication review: Medication review (CPT 90862, 99605, 99606), (CPT-II 1160F)

Codes to Identify Medication List (CPT-II 1159F)
2) Medical Record Specification (if necessary):
Documentation must come from the same medical record and must include the following.
• A medication list in the medical record, and evidence of a medication review by a prescribing practitioner or clinical pharmacist and the date when it was performed
• Notation that the member is not taking any medication and the date when it was noted

A review of side effects for a single medication at the time of prescription alone is not sufficient.

An outpatient visit is not required to meet criteria.

Prescribing practitioner is defined as a practitioner with prescribing privileges, including nurse practitioners, physician assistants and other non-MDs who have the authority to prescribe medications.

| 2a1.4 Denominator Statement (Brief, narrative description of the target population being measured): |
| All patients 66 and older as of December 31 of the measurement year |

| 2a1.5 Target Population Category (Check all the populations for which the measure is specified and tested if any): |
| Adult/Elderly Care |

| 2a1.6 Denominator Time Window (The time period in which cases are eligible for inclusion): |
| The measurement year |

| 2a1.7 Denominator Details (All information required to identify and calculate the target population/denominator such as definitions, codes with descriptors, and/or specific data collection items/responses): |
| Use administrative data and medical records for of members 66 years and older as of December 31 of the measurement year. |

| 2a1.8 Denominator Exclusions (Brief narrative description of exclusions from the target population): |
| N/A |

| 2a1.9 Denominator Exclusion Details (All information required to identify and calculate exclusions from the denominator such as definitions, codes with descriptors, and/or specific data collection items/responses): |
| N/A |

| 2a1.10 Stratification Details/Variables (All information required to stratify the measure results including the stratification variables, codes with descriptors, definitions, and/or specific data collection items/responses): |
| N/A |

| 2a1.11 Risk Adjustment Type (Select type. Provide specifications for risk stratification in 2a1.10 and for statistical model in 2a1.13): |
| No risk adjustment or risk stratification |

| 2a1.12 If "Other," please describe: |

| 2a1.13 Statistical Risk Model and Variables (Name the statistical method - e.g., logistic regression and list all the risk factor variables. Note - risk model development should be addressed in 2b4.): |
| N/A |

| 2a1.14-16 Detailed Risk Model Available at Web page URL (or attachment). Include coefficients, equations, codes with descriptors, definitions, and/or specific data collection items/responses. Attach documents only if they are not available on a webpage and keep attached file to 5 MB or less. NQF strongly prefers you make documents available at a Web page URL. Please supply login/password if needed: |

| 2a1.17-18. Type of Score: |
| Rate/proportion |
### 2a1.19 Interpretation of Score

(Classifies interpretation of score according to whether better quality is associated with a higher score, a lower score, a score falling within a defined interval, or a passing score): **Better quality = Higher score**

### 2a1.20 Calculation Algorithm/Measure Logic

(Describe the calculation of the measure score as an ordered sequence of steps including identifying the target population; exclusions; cases meeting the target process, condition, event, or outcome; aggregating data; risk adjustment; etc.):

1. **Step 1.** Determine the eligible population. The eligible population is all members who satisfy all specified criteria, including any age, continuous enrollment, benefit, event, or anchor date enrollment requirement.

2. **Step 2.** Search administrative systems to identify numerator events for all members in the eligible population.

3. **Step 3.** If applicable, for members for whom administrative data do not show a positive numerator event, search administrative data for an exclusion to the service/procedure being measured. Note: This step applies only to measures for which optional exclusions are specified and for which the organization has chosen to search for exclusions. The organization is not required to search for optional exclusions.

4. **Step 4.** Exclude from the eligible population members from step 3 for whom administrative system data identified an exclusion to the service/procedure being measured.

5. **Step 5.** Calculate the rate.

### 2a1.21-23 Calculation Algorithm/Measure Logic Diagram URL or attachment:

### 2a1.24 Sampling (Survey) Methodology

If measure is based on a sample (or survey), provide instructions for obtaining the sample, conducting the survey and guidance on minimum sample size (response rate):

N/A

### 2a1.25 Data Source

(Check all the sources for which the measure is specified and tested). If other, please describe:

- Administrative claims
- Electronic Clinical Data
- Paper Records

### 2a1.26 Data Source/Data Collection Instrument

(Identify the specific data source/data collection instrument, e.g. name of database, clinical registry, collection instrument, etc.): NCQA collects HEDIS data directly from Health Management Organizations and Preferred Provider Organizations via a data submission portal - the Interactive Data Submission System (IDSS).

### 2a1.27-29 Data Source/data Collection Instrument Reference Web Page URL or Attachment:

URL

http://www.ncqa.org/tabid/370/default.aspx

### 2a1.30-32 Data Dictionary/Code Table Web Page URL or Attachment:

### 2a1.33 Level of Analysis

(Check the levels of analysis for which the measure is specified and tested): **Clinician : Group/Practice, Clinician : Individual, Health Plan, Integrated Delivery System, Population : National, Population : Regional, Population : State**

### 2a1.34-35 Care Setting

(Check all the settings for which the measure is specified and tested): **Ambulatory Care : Clinician Office, Post Acute/Long Term Care Facility : Nursing Home/Skilled Nursing Facility**

### 2a2. Reliability Testing

(Reliability testing was conducted with appropriate method, scope, and adequate demonstration of reliability.)
2a2.1 Data/Sample (Description of the data or sample including number of measured entities; number of patients; dates of data; if a sample, characteristics of the entities included):
The data sample is taken from the HEDIS Health performance data for the 2010 measurement year. Reliability testing was performed at the health plan level for all Medicare special needs plan enrollees. A total of 313 health plans were included in this analysis. The average number of members per health plan was 334 (range 30-4961 members).

2a2.2 Analytic Method (Describe method of reliability testing & rationale):
Reliability was estimated by using the beta-binomial model. Beta-binomial is a better fit when estimating the reliability of simple pass/fail rate measures as is the case with most HEDIS® health plan measures. The beta-binomial model assumes the plan score is a binomial random variable conditional on the plan’s true value that comes from the beta distribution. The beta distribution is usually defined by two parameters, alpha and beta. Alpha and beta can be thought of as intermediate calculations to get to the needed variance estimates. The beta distribution can be symmetric, skewed or even U-shaped.

Reliability used here is the ratio of signal to noise. The signal in this case is the proportion of the variability in measured performance that can be explained by real differences in performance. A reliability of zero implies that all the variability in a measure is attributable to measurement error. A reliability of one implies that all the variability is attributable to real differences in performance. The higher the reliability score, the greater is the confidence with which one can distinguish the performance of one plan from another. A reliability score greater than or equal to 0.7 is considered very good.

2a2.3 Testing Results (Reliability statistics, assessment of adequacy in the context of norms for the test conducted):
The average reliability across all 313 health plans was 0.98727 for the 2010 measurement year. The minimum reliability at the health plan level was 0.87688. There was an average of 334 plan members per health plan included in this analysis. The plans had a minimum requirement of 30 patients in the denominator to report on this measure. This reliability score can range from 0 to 1. The higher the reliability score, the greater is the confidence with which one can distinguish the performance of one health plan from another. A reliability score greater than or equal to 0.7 is considered very good.

This measure is specified and reported by NCQA at the health plan level. However, some health plans use the data from this measure to identify individual clinician performance. This measure is not tested to distinguish individual clinician performance.

2b. VALIDITY. Validity, Testing, including all Threats to Validity: H□ M□ L□ I□

2b2.1 Describe how the measure specifications (measure focus, target population, and exclusions) are consistent with the evidence cited in support of the measure focus (criterion 1c) and identify any differences from the evidence:
The evidence is consistent with the focus and scope of this measure.

2b2.2 Analytic Method (Describe method of validity testing and rationale; if face validity, describe systematic assessment):
NCQA identified and refined measure management into a standardized process called the HEDIS measure life cycle. *Step 1: Topic selection is the process of identifying measures that meet criteria consistent with the overall model for performance measurement. There is a huge universe of potential performance measures for future versions of HEDIS. The first step is identifying...
measures that meet formal criteria for further development.

NCQA staff identifies areas of interest or gaps in care. Clinical expert panels (MAPs—whose members are authorities on clinical priorities for measurement) participate in this process. Once topics are identified, a literature review is conducted to find supporting documentation on their importance, scientific soundness and feasibility. This information is gathered into a work-up format. Refer to What Makes a Measure “Desirable”? The work-up is vetted by NCQA’s MAPs, the TAG, the HEDIS Policy Panel and various other panels.

*Step 2: Development ensures that measures are fully defined and tested before the organization collects them. MAPs participate in this process by helping identify the best measures for assessing health care performance in clinical areas identified in the topic selection phase.

Development includes the following tasks.
1. Ensure funding throughout measure testing
2. Prepare a detailed conceptual and operational work-up that includes a testing proposal
3. Collaborate with health plans to conduct field-tests that assess the feasibility and validity of potential measures

The CPM uses testing results and proposed final specifications to determine if the measure will move forward to Public Comment.

*Step 3: Public Comment is a 30-day period of review that allows interested parties to offer feedback to the CPM about new measures or about changes to existing measures. NCQA MAPs and technical panels consider all comments and advise NCQA staff on appropriate recommendations brought to the CPM. The CPM reviews all comments before making a final decision about Public Comment measures. New measures and changes to existing measures approved by the CPM will be included in the next HEDIS year and reported as first-year measures.

*Step 4: First-year data collection requires organizations to collect, be audited on and report these measures, but results are not publicly reported in the first year and are not included in NCQA’s Quality Compass or in accreditation scoring.

The first-year distinction guarantees that a measure can be efficiently collected, reported and audited before it is used for public accountability or accreditation. This is not testing—the measure was already tested as part of its development—rather, it ensures that there are no unforeseen problems when the measure is implemented in the real world. NCQA’s experience is that the first year of large-scale data collection often reveals unanticipated issues.

After collection, reporting and auditing on a one-year introductory basis, NCQA conducts a detailed evaluation of first-year data. The CPM uses evaluation results to decide whether the measure should become publicly reportable or whether it needs further modifications.

*Step 5: Public reporting is based on the first-year measure evaluation results. If the measure is approved, it will be reported in Quality Compass and may be used for scoring in accreditation.

Step 6: Evaluation is the ongoing review of a measure’s performance and recommendations for its modification or retirement. Every measure is reevaluated at least every three years. NCQA staff continually monitors the performance of publicly reported measures. Statistical analysis, audit result review and user comments contribute to measure evaluation. Information derived from analyzing the performance of existing measures is used to improve development of the next generation of measures.

Each year, a third of the measurement set is researched for changes in clinical guidelines or health care delivery systems, and the results from previous years are analyzed. Measure work-ups are updated with new information gathered from the literature review, and the appropriate MAPs review the work-ups and the previous year’s data. If necessary, the measure specification may be updated or the measure may be recommended for retirement. The CPM reviews recommendations from the evaluation process and approves or rejects the recommendation. If approved, the change is included in the next year’s HEDIS Volume 2.

What makes a measure “Desirable”? Whether considering the value of a new measure or the continuing worth of an existing one, we must define what makes a measure
useful. HEDIS measures encourage improvement. The defining question for all performance measurement—“Where can measurement make a difference?”—can be answered only after considering many factors. NCQA has established three areas of desirable characteristics for HEDIS measures, discussed below.

1. Relevance: Measures should address features that apply to purchasers or consumers, or which will stimulate internal efforts toward quality improvement. More specifically, relevance includes the following attributes.

   Meaningful: What is the significance of the measure to the different groups concerned with health care? Is the measure easily interpreted? Are the results meaningful to target audiences?
   Measures should be meaningful to at least one HEDIS audience (e.g., individual consumers, purchasers or health care systems). Decision makers should be able to understand a measure’s clinical and economic significance.

   Important to health: What is the prevalence and overall impact of the condition in the U.S. population? What significant health care aspects will the measure address?
   We should consider the type of measure (e.g., outcome or process), the prevalence of medical condition addressed by the measure and the seriousness of affected health outcomes.

   Financially important: What financial implications result from actions evaluated by the measure? Does the measure relate to activities with high financial impact?
   Measures should relate to activities that have high financial impact.

   Cost effective: What is the cost benefit of implementing the change in the health care system? Does the measure encourage the use of cost-effective activities or discourage the use of activities that have low cost-effectiveness?
   Measures should encourage the use of cost-effective activities or discourage the use of activities that have low cost-effectiveness.

   Strategically important: What are the policy implications? Does the measure encourage activities that use resources efficiently?
   Measures should encourage activities that use resources most efficiently to maximize member health.

   Controllable: What impact can the organization have on the condition or disease? What impact can the organization have on the measure? Health care systems should be able to improve their performance. For outcome measures, at least one process should be controlled and have an important effect on outcome. For process measures, there should be a strong link between the process and desired outcome.

   Variation across systems: Will there be variation across systems? There should be the potential for wide variation across systems.

   Potential for improvement: Will organizations be able to improve performance? There should be substantial room for performance improvement.

2. Scientific soundness: Perhaps in no other industry is scientific soundness as important as in health care. Scientific soundness must be a core value of our health care system—a system that has extended and improved the lives of countless individuals.

   Clinical evidence: Is there strong evidence to support the measure? Are there published guidelines for the condition? Do the guidelines discuss aspects of the measure? Does evidence document a link between clinical processes and outcomes addressed by the measure? There should be evidence documenting a link between clinical processes and outcomes.

   Reproducible: Are results consistent? Measures should produce the same results when repeated in the same population and setting.

   Valid: Does the measure make sense? Measures should make sense logically and clinically, and should correlate well with other measures of the same aspects of care.

   Accurate: How well does the measure evaluate what is happening? Measures should precisely evaluate what is actually happening.

   Risk adjustment: Is it appropriate to stratify the measure by age or another variable? Measure variables should not differ
appreciably beyond the health care system’s control, or variables should be known and measurable. Risk stratification or a validated model for calculating an adjusted result can be used for measures with confounding variables.

Comparability of data sources: How do different systems affect accuracy, reproducibility and validity? Accuracy, reproducibility and validity should not be affected if different systems use different data sources for a measure.

3. Feasibility:
The goal is not only to include feasible measures, but also to catalyze a process whereby relevant measures can be made feasible.

Precise specifications: Are there clear specifications for data sources and methods for data collection and reporting? Measures should have clear specifications for data sources and methods for data collection and reporting.

Reasonable cost: Does the measure impose a burden on health care systems? Measures should not impose an inappropriate burden on health care systems.

Confidentiality: Does data collection meet accepted standards of member confidentiality?
Data collection should not violate accepted standards of member confidentiality. Logistical feasibility
Are the required data available?

Auditability: Is the measure susceptible to exploitation or “gaming” that would be undetectable in an audit? Measures should not be susceptible to manipulation that would be undetectable in an audit.

2b2.3 Testing Results (Statistical results, assessment of adequacy in the context of norms for the test conducted; if face validity, describe results of systematic assessment):
Step 1: The Medication Review measure was developed in response to a growing concern about medication errors and adverse medication events. NCQA’s Performance Measurement Department and the Geriatric MAP worked together to assess the most appropriate tools for monitoring medication review.

Step 2: The Medication Review measure was written, field-tested, and presented to the CPM in 2008. The CPM recommended sending the measure to public comment with a vote of 14 in favor and none opposed.

Step 3: The Medication Review measure was released for Public Comment in spring 2008. We received and responded to over 50 comments on this measure. The CPM recommended moving this measure to first year data collection with a vote of 14 in favor and none opposed.

Step 4: The Medication Review measure was introduced in HEDIS 2010. Organizations reported the measures in the first year and the results were analyzed for public reporting in the following year. The CPM recommended moving this measure public reporting with a vote of 12 in favor and 3 opposed.

Step 6: The Medication Review measure will be reevaluated in 2013.

POTENTIAL THREATS TO VALIDITY. (All potential threats to validity were appropriately tested with adequate results.)

2b3. Measure Exclusions. (Exclusions were supported by the clinical evidence in 1c or appropriately tested with results demonstrating the need to specify them.)

2b3.1 Data/Sample for analysis of exclusions (Description of the data or sample including number of measured entities; number of patients; dates of data; if a sample, characteristics of the entities included):
There are no measure exclusions.

2b3.2 Analytic Method (Describe type of analysis and rationale for examining exclusions, including exclusion related to patient preference):
N/A

2b3.3 Results (Provide statistical results for analysis of exclusions, e.g., frequency, variability, sensitivity analyses):
### 2b4. Risk Adjustment Strategy

(For outcome measures, adjustment for differences in case mix (severity) across measured entities was appropriately tested with adequate results.)

- **2b4.1 Data/Sample** (Description of the data or sample including number of measured entities; number of patients; dates of data; if a sample, characteristics of the entities included):
  - N/A

- **2b4.2 Analytic Method** (Describe methods and rationale for development and testing of risk model or risk stratification including selection of factors/variables):
  - N/A

- **2b4.3 Testing Results** (Statistical risk model: Provide quantitative assessment of relative contribution of model risk factors; risk model performance metrics including cross-validation discrimination and calibration statistics, calibration curve and risk decile plot, and assessment of adequacy in the context of norms for risk models. Risk stratification: Provide quantitative assessment of relationship of risk factors to the outcome and differences in outcomes among the strata):
  - N/A

- **2b4.4 If outcome or resource use measure is not risk adjusted, provide rationale and analyses to justify lack of adjustment:**
  - N/A

### 2b5. Identification of Meaningful Differences in Performance

(The performance measure scores were appropriately analyzed and discriminated meaningful differences in quality.)

- **2b5.1 Data/Sample** (Describe the data or sample including number of measured entities; number of patients; dates of data; if a sample, characteristics of the entities included):
  - Data analysis demonstrates that methods for scoring and analysis of the specified measure allow for identification of statistically significant and practically/clinically meaningful differences in performance.

- **2b5.2 Analytic Method** (Describe methods and rationale to identify statistically significant and practically/meaningful differences in performance):
  - Comparison of means and percentiles; analysis of variance against established benchmarks: if sample size is >400, we would use an analysis of variance.

- **2b5.3 Results** (Provide measure performance results/scores, e.g., distribution by quartile, mean, median, SD, etc.; identification of statistically significant and meaningfully differences in performance):
  - Medicare Measurement Year: 2010; 2009; 2008
  - N: 316; 314; 341
  - MEAN: 65.4; 60.6; 57.7
  - STDEV: 22.1; 25.3; 26.6
  - STDERR: 1.24; 1.43; 1.44
  - MIN: 0; 0; 0
  - MAX; 100; 100; 100
  - P10: 38.8; 19.9; 10.5
  - P25: 53; 46.5; 49.9
  - P50: 67.1; 67; 63.6
  - P75: 81.9; 78.2; 74.7
  - P90: 93.2; 90.5; 87.4

### 2b6. Comparability of Multiple Data Sources/Methods

(If specified for more than one data source, the various approaches result in comparable scores.)

- **2b6.1 Data/Sample** (Describe the data or sample including number of measured entities; number of patients; dates of data; if a sample, characteristics of the entities included):
  - In the fall of 2007, NCQA conducted a field test, to assess the feasibility of Medication Review measure. The field test used two
samples of patient-level data from health plans to refine and calibrate the measure specifications and gather initial data on health plan performance. Three health plans volunteered to submit data for the field test. Two plans did so by providing patient-level administrative data and medical record abstracts to NCQA under the terms of a formal data-sharing agreement. The enrollment of these plans ranged from 5,521 to 15,331 members.

Administrative Data Collection
Participating health plans were asked to submit a data file containing one record per patient meeting the eligibility and event criteria with a unique patient identifier that could be used to link data from other sources to the individual. Each record contained information from administrative data sources regarding advance care planning with covariates.

Medical Record Validation Data
Medical records for a sample of 150 patients from the Medicare members identified in the administrative database were utilized for each of the measures. The sample was selected either randomly or by using the HEDIS systematic sampling methodology. Plans were instructed to review the medical record located at the provider who most frequently provides care to the member. Charts were reviewed for information concerning the years 2005-2006.

2b6.2 Analytic Method (Describe methods and rationale for testing comparability of scores produced by the different data sources specified in the measure):

The purpose of field testing is to determine:
- The validity of the administrative algorithm to identify the target population (denominator) based upon the measurement period, continuous enrollment/exclusionary criteria
- The validity of administrative data to accurately capture medical processes delivered (i.e. tests) or diagnoses by comparing administrative results with data from a sample of medical records
- The feasibility of the measure specifications to identify the quality problem and to discriminate performance between health plans for the purposes of HEDIS public reporting.
- The reliability and feasibility of the measure specifications so that all health plans can capture the required data elements and can conduct programming

Based upon the field test results, NCQA made necessary revisions to the measure specifications so that it meets the Desirable Attributes of a HEDIS measure.

2b6.3 Testing Results (Provide statistical results, e.g., correlation statistics, comparison of rankings; assessment of adequacy in the context of norms for the test conducted):

Across two plans, 67.8% of members had documentation of a medication review with a range of 61.5-74% between the two plans. Similarly, 69.1% of members had a medication list in the medical record with a range of 58.8-79.3%. Rates increased slightly when assessing if either a documentation of medication review or a medication list was present, with 75.8% of members having either one.

2c. Disparities in Care

2c.1 If measure is stratified for disparities, provide stratified results (Scores by stratified categories/cohorts): The measure is not stratified to detect disparities. NCQA has participated with IOM and others in attempting to include information on disparities in measure data collection. However, at the present time, this data, at all levels (claims data, paper chart review, and electronic records), is not coded in a standard manner, and is incompletely captured. There are no consistent standards for what entity (physician, group, plan, employer) should capture and report this data. While “requiring” reporting of the data could push the field forward, it has been our position that doing so would create substantial burden with inability to use the data because of its inconsistency. At the present time, we agree with the IOM report that disparities are best considered by the use of zip code analysis which has limited applicability in most reporting situations. At the health plan level, for HEDIS health plan data collection, NCQA does have extensive data related to our use of stratification by insurance status (Medicare, Medicaid and private-commercial) and would strongly recommend this process where the data base supporting the measurement includes this information. However, we believe that the measure specifications should NOT require this since the measure is still useful where the data needed to determine disparities cannot be ascertained from the data available.

2c.2 If disparities have been reported/identified (e.g., in 1b), but measure is not specified to detect disparities, please explain:
### 3. USABILITY

Extent to which intended audiences (e.g., consumers, purchasers, providers, policy makers) can understand the results of the measure and are likely to find them useful for decision making. (*evaluation criteria*)

#### C.1 Intended Purpose/Use

*Check all the purposes and/or uses for which the measure is intended*: Public Reporting, Quality Improvement (Internal to the specific organization), Quality Improvement with Benchmarking (external benchmarking to multiple organizations)

#### 3.1 Current Use

*Check all that apply; for any that are checked, provide the specific program information in the following questions*: Public Reporting, Quality Improvement with Benchmarking (external benchmarking to multiple organizations), Quality Improvement (Internal to the specific organization)

#### 3a. Usefulness for Public Reporting

*The measure is meaningful, understandable and useful for public reporting.*

3a.1. **Use in Public Reporting - disclosure of performance results to the public at large**

*If used in a public reporting program, provide name of program(s), locations, Web page URL(s).* **If not publicly reported in a national or community program, state the reason AND plans to achieve public reporting, potential reporting programs or commitments, and timeline, e.g., within 3 years of endorsement: [For Maintenance – If not publicly reported, describe progress made toward achieving disclosure of performance results to the public at large and expected date for public reporting; provide rationale why continued endorsement should be considered.]

*This measure is used in public reporting for plans only through Healthcare Effectiveness Data and Information Set (HEDIS) and is reported through venues such as the annual State of Healthcare Quality report, Quality Compass, America’s Best Health Plans.*

3a.2. **Provide a rationale for why the measure performance results are meaningful, understandable, and useful for public reporting.** If usefulness was demonstrated (e.g., focus group, cognitive testing), describe the data, method and results:

#### 3b. Usefulness for Quality Improvement

*The measure is meaningful, understandable and useful for quality improvement.*

3b.1. **Use in QI.**

*If used in quality improvement program, provide name of program(s), locations, Web page URL(s): [For Maintenance – If not used for QI, indicate the reasons and describe progress toward using performance results for improvement].

*This measure is a measure in the Healthcare Effectiveness Data and Information Set (HEDIS) and is used in NCQA's Health Plan Accreditation program.*

3b.2. **Provide rationale for why the measure performance results are meaningful, understandable, and useful for quality improvement.** If usefulness was demonstrated (e.g., QI initiative), describe the data, method and results:
Upon review of public comment results, the Committee on Performance Measurement approved the NCQA staff recommendation to add the measure to HEDIS. After reviewing first-year analysis results, the CPM approved the staff recommendation to publicly report the measure. The measure was deemed usable and feasible.

Overall, to what extent was the criterion, *Usability*, met?  

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Provide rationale based on specific subcriteria:

### 4. FEASIBILITY

Extent to which the required data are readily available, retrievable without undue burden, and can be implemented for performance measurement. *(evaluation criteria)*

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<tbody>
<tr>
<td>4a. Data Generated as a Byproduct of Care Processes:</td>
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#### 4a.1-2 How are the data elements needed to compute measure scores generated? *(Check all that apply).*

Data used in the measure are:
- generated by and used by healthcare personnel during the provision of care, e.g., blood pressure, lab value, medical condition,
- Coded by someone other than person obtaining original information (e.g., DRG, ICD-9 codes on claims),
- Abstracted from a record by someone other than person obtaining original information (e.g., chart abstraction for quality measure or registry)

#### 4b. Electronic Sources:  

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<tr>
<td>4b.1 Are the data elements needed for the measure as specified available electronically <em>(Elements that are needed to compute measure scores are in defined, computer-readable fields):</em></td>
<td>No data elements are in electronic sources</td>
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#### 4b.2 If ALL data elements are not from electronic sources, specify a credible, near-term path to electronic capture, OR provide a rationale for using other than electronic sources:  

NCQA is working on developing EHR specified measures to capture this information.

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<td>4c. Susceptibility to Inaccuracies, Errors, or Unintended Consequences:</td>
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#### 4c.1 Identify susceptibility to inaccuracies, errors, or unintended consequences of the measurement identified during testing and/or operational use and strategies to prevent, minimize, or detect. If audited, provide results:

NCQA recognizes that, despite the clear specifications defined for HEDIS measures, data collection and calculation methods may vary, and other errors may taint the results, diminishing the usefulness of HEDIS data for managed care organization (MCO) comparison. In order for HEDIS to reach its full potential, NCQA conducts an independent audit of all HEDIS collection and reporting processes, as well as an audit of the data which are manipulated by those processes, in order to verify that HEDIS specifications are met. NCQA has developed a precise, standardized methodology for verifying the integrity of HEDIS collection and calculation processes through a two-part program consisting of an overall information systems capabilities assessment followed by an evaluation of the MCO’s ability to comply with HEDIS specifications. NCQA-certified auditors using standard audit methodologies will help enable purchasers to make more reliable “apples-to-apples” comparisons between health plans.

The HEDIS Compliance Audit addresses the following functions:

1) information practices and control procedures  
2) sampling methods and procedures  
3) data integrity  
4) compliance with HEDIS specifications  
5) analytic file production  
6) reporting and documentation

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<td>4d. Data Collection Strategy/Implementation:</td>
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#### 4d.1 Describe what you have learned/modified as a result of testing and/or operational use of the measure regarding data collection, availability of data, missing data, timing and frequency of data collection, sampling, patient confidentiality, time and cost of data collection, other feasibility/implementation issues *(e.g., fees for use of proprietary measures):*

NCQA’s multi-stakeholder advisory panels examined an analysis of the measure after its first year of reporting. The measure was deemed appropriate for public reporting. NCQA has processes to ensure coding and specifications are clear and updated when
Overall, to what extent was the criterion, Feasibility, met? H □ M □ L □ I □
Provide rationale based on specific subcriteria:

### OVERALL SUITABILITY FOR ENDORSEMENT

<table>
<thead>
<tr>
<th>Does the measure meet all the NQF criteria for endorsement?</th>
<th>Yes □ No □</th>
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</thead>
</table>
| **Rationale:** | If the Committee votes No, STOP.  
If the Committee votes Yes, the final recommendation is contingent on comparison to related and competing measures. |

### 5. COMPARISON TO RELATED AND COMPETING MEASURES

If a measure meets the above criteria and there are endorsed or new related measures (either the same measure focus or the same target population) or competing measures (both the same measure focus and the same target population), the measures are compared to address harmonization and/or selection of the best measure before a final recommendation is made.

5.1 If there are related measures *either same measure focus or target population* or competing measures *both the same measure focus and same target population*, list the NQF # and title of all related and/or competing measures:

- 0097 : Medication Reconciliation
- 0554 : Medication Reconciliation Post-Discharge
- 0646 : Reconciled Medication List Received by Discharged Patients (Discharges from an Inpatient Facility to Home/Self Care or Any Other Site of Care)

#### 5a. Harmonization

5a.1 If this measure has EITHER the same measure focus OR the same target population as NQF-endorsed measure(s):

- Are the measure specifications completely harmonized? **No**

5a.2 If the measure specifications are not completely harmonized, identify the differences, rationale, and impact on interpretability and data collection burden:

- See answer 5b.1 for more details.

#### 5b. Competing Measure(s)

5b.1 If this measure has both the same measure focus and the same target population as NQF-endorsed measure(s):

- Describe why this measure is superior to competing measures *(e.g., a more valid or efficient way to measure quality)*; OR provide a rationale for the additive value of endorsing an additional measure. *(Provide analyses when possible)*:

  **Measure 0553** is conducted at health plan level. This measure assesses annual outpatient medication review by a prescribing practitioner and is not driven by a hospital discharge. The denominator for this measure is all patients aged 65+.

**Related Measures:**

- **Measure 0554** is conducted at the health plan level. This measure assesses medication reconciliation by a RN or prescribing practitioner within 30 days of hospital discharge. The denominator for this measure is all patients 65+ discharged from the hospital. All patients regardless of ambulatory care visit are included in the denominator.

- **Measure 0097** is conducted at the physician level. This measure assesses medication reconciliation post hospital discharge which occurs during an outpatient visit with a physician. The denominator for this measure is all patients 65+ discharged from the hospital with an ambulatory care visit within 60 days of discharge. Patients without a visit to an ambulatory care visit are not included in the denominator.

- **Measure 0646** is conducted at the facility level. This measure assesses whether the patient received a reconciled medication list at the time of discharge. The denominator for this measure is all patients, regardless of age, discharged from the hospital. This measure is not dependent on an ambulatory care provider reconciling the medication list.
Additive value of related measures:
The AMA and NCQA have worked together to assess how the three medication reconciliation measures can be harmonized and continue to address performance gaps at different levels of care. Care-coordination measures by nature must address care across levels of accountability. The three medication reconciliation measures submitted to NQF for re-endorsement address measure reconciliation at three levels of accountability and across three points of care. Together all three measures represent shared accountability for medication reconciliation across facilities, health plans and physicians.

Defining the process of medication reconciliation (this will determine the numerator)
• Patients should be educated about changes to medication list (Measure #646)
• Outpatient record should be updated as appropriate with the discharge medication list and reviewed for potential harm (Measure #0554)
• The physician responsible for patient care should review the discharge medication list for appropriateness over the long-term treatment of the patient and their multiple conditions (Measure #0097)

What is the point of care for medication reconciliation (this will determine the denominator)?
• At discharge (Measure #646)
• Within 30 days of discharge (Measure #0554)
• At outpatient follow-up visit within 60 days of discharge (Measure #0097)

Evidence of performance gap and relation to risk of adverse events
• Many medication errors occur during times of transition, when patients receive medications from different prescribers who lack access to patients' comprehensive medication list. Providing patients with a comprehensive, reconciled medication list at each care transition (eg, inpatient discharge) may improve patients' ability to manage their medication regimen properly and reduce the number of medication errors. (Measure #0646).
• Geriatric patients in particular are more likely to have multiple comorbid conditions and be receiving multiple medications, making them more at risk of having and adverse medication event. Therefore there is a need to have a higher level of reconciliation for these patients. (Measures #0554 and #0097).
<table>
<thead>
<tr>
<th>Measure Developer/Steward Updates and Ongoing Maintenance</th>
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<tbody>
<tr>
<td><strong>Ad.2</strong> If adapted, provide title of original measure, NQF # if endorsed, and measure steward. Briefly describe the reasons for adapting the original measure and any work with the original measure steward:</td>
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<tr>
<td><strong>Ad.3</strong> Year the measure was first released: 2010</td>
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<td><strong>Ad.4</strong> Month and Year of most recent revision:</td>
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<tr>
<td><strong>Ad.5</strong> What is your frequency for review/update of this measure? Approximately every 3 years, sooner if the clinical guidelines have changed significantly.</td>
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<tr>
<td><strong>Ad.6</strong> When is the next scheduled review/update for this measure?</td>
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<tr>
<td><strong>Ad.7</strong> Copyright statement: © 2012 by the National Committee for Quality Assurance</td>
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<tr>
<td>1100 13th Street, NW, Suite 1000</td>
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<td>Washington, DC 20005</td>
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<tr>
<td><strong>Ad.8</strong> Disclaimers: These performance Measures are not clinical guidelines and do not establish a standard of medical care, and have not been tested for all potential applications.</td>
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<tr>
<td>THE MEASURES AND SPECIFICATIONS ARE PROVIDED &quot;AS IS&quot; WITHOUT WARRANTY OF ANY KIND.</td>
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<tr>
<td>Ad.9 Additional Information/Comments:</td>
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<tr>
<td>Date of Submission (MM/DD/YY): 01/09/2012</td>
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See Guidance for Definitions of Rating Scale: H=High; M=Moderate; L=Low; I=Insufficient; NA=Not Applicable