



Cost and Efficiency Standing Committee—Post-Comment Web Meeting

The National Quality Forum (NQF) convened the Cost and Efficiency Standing Committee for a web meeting on October 31, 2019 to discuss comments submitted for three measures.

Welcome, Introductions, and Review of Meeting Objectives

Ashlie Wilbon, Senior Director, welcomed the Standing Committee and participants to the web meeting. NQF staff reviewed the meeting objectives: to review, discuss, and provide input on comments submitted during the post-evaluation public and member comment period.

Review of Public Comments

The Standing Committee discussed five comments submitted for two of the three measures. Four of these regarded NQF 3510 *Screening/Surveillance Colonoscopy (CMS/Acumen)*. Two comments were received from the American College of Gastroenterology; one comment was received from the American Society for Gastrointestinal Endoscopy; and one comment was received from the Gastroenterological Association. One comment from EyePoint Pharmaceuticals regarded NQF 3509 *Routine Cataract Removal with Intraocular Lens (IOL) Implantation (CMS/Acumen)*. NQF 3512 *Knee Arthroplasty (CMS/Acumen)* did not receive any comments. Measure 3510 received one member's expression of support.

For measure 3509, the Standing Committee discussed concerns regarding the measure's inclusion of drugs with pass-through status and other intraoperative drugs. The Committee had previously considered this issue and had agreed that because cost measures are meant to capture the entire episode of care, all relevant costs, such as drugs with pass-through status, should be included in the measure. The developer summarized their response to the comment and also noted that drugs included in the measure are considered on a case-by-case basis. The Committee acknowledged this point and noted that maintenance of the measure and future iterations of the measure would be reviewed with consideration of any drugs included in the measure.

For measure 3510, the Standing Committee discussed comments regarding validity testing, risk adjustment, and measure intent. Commenters expressed concerns that the measure would not be able to distinguish between high and low performing clinicians and that the risk-adjustment model had a low r-squared result and did not include social risk factors. The measure developer provided clarification on their risk-adjustment process and their validity testing. They noted that while the r-squared could be considered low, the reliability remains high, and the measure construct facilitates the inclusion of costs that are relevant to the episode, which limits the noise and variation for which the risk adjustment can control.

The Committee also had an extensive discussion regarding the concerns with the validity testing approach used to demonstrate construct validity. Commenters and the Committee noted that the SMP did not reach consensus in their review of this measure due to concerns that the comparator measure used to demonstrate construct validity was not an independent construct and shared data elements with the measure under review. The Committee acknowledged this concern, but

was unable to offer an alternative approach for administrative claims-based cost measures to demonstrate construct validity. In the absence of this guidance, the Committee agreed to accept this testing for this evaluation and to request guidance from the Scientific Methods Panel on how to consider this testing in the future. The Committee noted that this testing approach is not unique to cost measure testing and guidance would help inform future evaluations. After considering this and other issues raised in the comments for this measure and the developer's responses, the Committee concluded that a re-vote was not warranted.

Public Comment

No public or NQF member comments were provided during the post-comment web meeting.

Next Steps

The NQF staff informed the Committee that their discussion would be updated in the report and that the Committee's recommendations will be presented at the November 12, 2019 CSAC meeting. NQF acknowledged and thanked those members whose terms ended with this meeting. The Committee will reconvene with its new members on December 16, 2019 for orientation to kick off the fall 2019 cycle.