Electronic Health Record (EHR) Data Quality Best Practices for Increased Scientific Acceptability Technical Expert Panel (TEP) Web Meeting 2

The National Quality Forum (NQF) convened the Electronic Health Record (EHR) Data Quality Best Practices for Increased Scientific Acceptability Technical Expert Panel (TEP) on January 14, 2020 for their second web meeting.

Welcome, Introductions, and Review of Meeting Objectives

NQF staff welcomed the TEP and participants to the web meeting. NQF staff reviewed the meeting objectives. Objectives included review and discussion of the environmental scan to date; clarification of data quality as it pertains to the project; and identification of additional sources of information on the extent of EHR data quality issues, if needed. TEP members introduced themselves.

Discussion on the Environmental Scan

NQF staff started discussion on the environmental scan by providing an outline of how the scan was set up, background and context, a summary of key legislation cited in the scan, and the environmental scan's overarching goals. Following this, NQF staff reviewed scan results and analysis to date.

Challenges with eCQMs and EHR Data

NQF staff started the discussion of the environmental scan by reviewing key points of the eCQMs and EHR data section, including the current state of eCQM standards and future FHIR-based standards. Themes from the TEP feedback include:

- This section should remain in the scan to capture challenges with standards themselves. The TEP recommended that the scan reference the Future FHIR-based standards as emerging standards, since CMS hasn't made decisions yet regarding emerging standards replacing existing standards.
- This section should include the ONC Interoperability Standards Advisory (ISA) as it links to specific versions of standards and includes information on the adoption of each standard.
- This section should include ONC CHPL and that the CHPL identifies HIT products that are capable of implementing eCQMs based on applicable CEHRT criteria.
- The environmental scan should clarify that this section focuses on inpatient and outpatient settings to better align with the PAC section of the environmental scan.
- Natural language processing (NLP) would fit better in the section of the scan on unstructured data rather than in this section.

Challenges with EHR Data in PAC Settings

NQF staff started the discussion of this section of the environmental scan by highlighting the CEHRT program's focus on eCQMs, the IMPACT Act's focus on PAC settings, and efforts to align PAC setting standardized assessments including future FHIR-based standards. Themes from the TEP feedback include:

- This section should include PAC domains, existing measures within the PAC domains, and the fact that the field has not yet seen eCQMs in these domains.
- This section should expand on the significant barriers in the PAC space including financial incentives for vendors, the cost of certification, PDMP and PDGM programs and their impact on payment in the PAC space.
- This section should reflect that at the January 2020 CMS connectathon, there were three PAC tracks; the scan should highlight existing efforts in the emerging standards to align data across settings (as opposed to developing siloed standards for each setting).

Unstructured EHR Data

NQF staff started the discussion of this section of the environmental scan by identifying the importance of unstructured data in primary care and billing, presenting a brief overview of some types of information that is typically unstructured, and reviewing some studies that highlight challenges and benefits of unstructured data. Themes from the TEP feedback include:

- This section is important to include in the final environmental scan.
- Natural language processing (NLP) discussions should be moved to this section and should better address existing processes—both automated and with human intervention—to convert unstructured data to structured data.
- Concrete use cases could be an opportunity to show the current state of NLP, with pressure injury staging suggested as an example.
- There could be value in including the pros and cons of using clinical decision support to suggest structured data opportunities during unstructured documentation.
- A recommendation to mention other approaches to unstructured data beyond NLP

Data Quality Issues and NQF Endorsement

NQF staff began this portion of the discussion by reviewing challenges with meeting the testing requirements for NQF endorsement as reported by eCQM measure developers. These included:

- The number of EHR systems available for testing scientific acceptability.
- Recruiting for testing. Not all sites have validated tools and/or standardized methods of EHR reporting for screening or interventions.
- Identifying test sites that are currently collecting all required data elements.

NQF staff also provided examples of eCQMs that were evaluated for NQF endorsement but were not endorsed. Several eCQMS did not meet the Importance to Measure and Report criterion, and several did not meet the minimum testing requirements for Scientific Acceptability. Although Feasibility is not a must-pass criterion for endorsement, a feasibility assessment must be submitted by the measure developer and is factored into the overall recommendation for endorsement.

Co-chair Cindy Cullen asked the TEP to provide feedback on this section of the draft scan. Themes from the TEP's comments include the following:

- Requirements of test sites capturing each data element is an issue because different sites capture different data elements; however, measure developers design measures to use equivalent concepts so that measure requirements can be met even if availability of data elements varies by site.
- Adding additional challenges for measure developers in testing eCQMs:
  - Lack of readily available data from EHR systems and test sites for testing to support scientific acceptability.

- o Cost burden associated with testing measures in advance of formal inclusion within a federal program.
  - o Lack of clarity around NQF endorsement criteria.
  - o Impact of local site data mapping and manipulation that can invalidate measures.
  - o Standing committee consistency in evaluating eCQMs in a manner that aligns with the current NQF criteria.
- Usefulness of including information regarding eCQMs that did not pass the NQF evidence criterion, a criterion that is "must-pass" for all data sources and not specific to eCQMs.
- Including more detail and clarity around the specific examples or "case studies" of eCQMs and their evaluation for NQF endorsement.
- Being explicit with the NQF criteria that are specific to eCQMs versus other data sources.

Additional Literature Relevant to EHR Data Quality and Quality Measurement

NQF staff started the discussion of this section of the environmental scan by briefly reviewing the literature included in this section and inviting TEP members to share relevant articles with NQF. Themes from the TEP feedback include:

- Grouping literature by theme (such as implementation) to show its relevance to the environmental scan.
- Suggest attribution of data as a theme that warrants further exploration, either in this section or in the scan.

Frameworks for Assessing EHR Data Quality

NQF staff started the discussion of this section of the environmental scan by reviewing conceptual highlights from the four frameworks analyzed in the scan, and how these frameworks might contribute to the final report for this project. Themes from the TEP feedback include:

- Narrow scope of frameworks section to the concepts that are most relevant to eCQMs.
- Consider reviewing AHRQ Action 4 IDIQ and CDC efforts at defining a national testbed to see if they are at an appropriate level of maturity for inclusion in the environmental scan.

Guidance from Standard-Setting Bodies

This was not specifically discussed due to time constraints within the meeting

Discussion on Scope and Data Quality

Following the environmental scan discussion, NQF staff presented a "true north" statement intended to clarify the scope of this project moving forward. The statement presented to the TEP is: "The purpose of this Task Order (TO) is to establish a technical expert panel (TEP) to recommend best practices for improving EHR data in ways that support healthcare performance measures at all phases including measure development, measure endorsement, and implementation." The TEP feedback was generally supportive of the "true north" statement and noted the importance of all EHR data ultimately supporting quality patient care and outcomes.

Public Comment

One public comment was received on how inaccurate EHR data affects measures, and what can be done to mitigate those risks. The commenter requested that this topic be considered for the environmental scan and/or final report.

Next Steps

The TEP will continue to provide NQF staff with their feedback on the environmental scan. NQF will post a draft of the scan online for a 30-day public commenting period that starts on February 10, 2020 and continues through March 4, 2020. Comments on the scan will be reviewed by the TEP during their third web meeting on March 31, 2020.