



# NATIONAL QUALITY FORUM

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## Memo

**June 4, 2021**

**To:** Geriatrics and Palliative Care Standing Committee

**From:** NQF staff

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

### Introduction

NQF closed the public commenting period on the measures submitted for endorsement review to the fall 2020 measure review cycle on April 30, 2021.

### Purpose of the Call

The Geriatrics and Palliative Care Standing Committee will meet via web meeting on June 4, 2021, from 3:00 PM to 5:00 PM ET. The purpose of this call is to:

- Review and discuss comments received during the post-evaluation public and member comment period;
- Provide input on proposed responses to the post-evaluation comments;
- Review and discuss NQF members' expression of support of the measures under review; and
- Determine whether reconsideration of any measures or other courses of action are warranted.

### Standing Committee Actions

1. Review this briefing memo and [draft report](#).
2. Review and consider the full text of all comments received and the 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 input on proposed post-evaluation comment responses.

### Conference Call Information

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

**Meeting link:** <https://nqf.webex.com/nqf/j.php?MTID=m1e1dc9315d908c6c3d5568f3b607d3a7>

**Meeting number:** 173 455 0109

**Password:** QMEvent

**Join by phone:** 1-844-621-3956 United States Toll Free

**Access code:** 173 455 0109

### Background

Factors including the aging United States (U.S.) population; the projected increases in the number of Americans with chronic illnesses, disabilities, and functional limitations; and increases in ethnic and cultural diversity have intensified the importance of improving the quality of palliative care, end-of-life care, and geriatric care, with an emphasis on the need for individualized, person-centered care. To date, the National Quality Forum (NQF) has endorsed more than 30 measures that address geriatric care, palliative care, and end-of-life care. These measures address physical, spiritual, and legal aspects of care, as well as the care of patients nearing the end of life.

On February 17 and 18, 2021, NQF convened the 25-person NQF Geriatrics and Palliative Care Standing Committee to evaluate four maintenance measures against NQF's standard evaluation criteria. The Standing Committee recommended three measures for endorsement but did not recommend the remaining measure for endorsement. Please review the [draft report](#) for details about the measure evaluations.

## Comments Received

NQF seeks comments on measures undergoing review in various ways and at various times throughout the evaluation process. First, NQF accepts 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.

### Post-evaluation Comments

The draft report was posted on the project webpage for public and NQF member comment on April 1, 2021 for 30 calendar days. During this commenting period, NQF received five comments from two member organization and one member of the public:

Member Council	# of Member Organizations Who Commented
Health Professional	1
Provider Organization	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, and—for the post-evaluation comments—draft responses (including measure steward/developer responses) for the Standing Committee's consideration. Please review this table in advance of the meeting and consider the individual comments received and the proposed responses to each.

## Comments and Their Disposition

### Measure-Specific Comments

#### NQF #0326 Advance Care Plan (National Committee for Quality Assurance (NCQA))

One commenter raised concerns about whether the "surrogate" has the legal authority to make decisions about the person's care. The commenter suggested that the developer clarify that the health care proxy, surrogate, legal representative, or agent (whichever term, or using examples of terms) has the authority to be a decisionmaker.

Another commenter raised a concern that this measure may encourage "check-box" advance care planning. The commenter suggested that ideally, the measure would want to encourage a deeper,

longitudinal elicitation of values/surrogates. The commenter also encouraged stratifying by race/ethnicity, since research suggests there are disparities in ACP completion.

**Measure Steward/Developer Response:**

Regarding the “surrogate” comment, “NCQA appreciates this request for clarification of the language used in the measure description referring to surrogate decisionmaker. This language is a reflection of the code’s descriptions used to identify numerator compliance. We do not envision a formal process that would be outlined in the measure description to designate legal authority.”

Regarding the race/ethnicity stratification comment, “we are constrained by the reporting requirements of the CMS QPP/MIPs reporting program in the matter of stratification of results by race and ethnicity. NCQA looks forward to working with CMS and its vendors to support reporting all measure results (where appropriate) by race and ethnicity and relevant social factors.”

**Proposed Committee Response:**

Thank you for your comments. The Standing Committee will review the comments during its deliberations on the Post-Comment Call scheduled on June 4, 2021.

The Standing Committee notes the concerns raised. However, the comment does not provide additional concerns or information that would require a revote on the evaluation criteria.

**Action Item:**

The Standing Committee should review the comments and the developer’s response and be prepared to discuss any recommendations for the developer to consider.

**NQF #0209 Comfortable Dying: Pain Brought to a Comfortable Level Within 48 Hours of Initial Assessment (National Hospice and Palliative Care Organization (NHPCO))**

For NQF maintenance of endorsement, measure stewards/developers are expected to provide current performance data. NQF informed the Standing Committee that the developers would have an opportunity to submit current performance data during the upcoming public commenting period. In response, the developer submitted a comment acknowledging there is a lack of data tracking and analysis available during this evaluation period to inform NQF #0209 and noted several registries that promote the use of this measure (Merit-based Incentive Payment System (MIPS) #342) through MIPS registries.

The developer also stated that “throughout treatment, patient reported outcome measures (PROMs) can assist with evaluation of effectiveness of treatment and lead to revisions to the plan of care. PROMs also are an indicator of patient satisfaction with the experience of care” and provided references to support the importance of PROM for acute and chronic pain. Additionally, the developer has attempted to secure a co-steward or transition the NQF #0209 measure to a new steward and stated that if NQF would consider approving the measure without the data reporting and analysis for this evaluation period, they will commit to finding a co-steward to assist in the process moving forward.

**Proposed Committee Response:**

Thank you for your comments. The Standing Committee will review the comments during its deliberations on the Post-Comment Call scheduled on June 4, 2021.

The Standing Committee agrees with the importance of a patient reported outcome to capture and reflect patient goals for pain management. However, current performance data are

required to demonstrate a gap in performance at the time of maintenance of endorsement. The Standing Committee encourages the measure developer to continue working with potential co-stewards to acquire the needed data and potentially resubmit the measure for endorsement consideration in the future.

**Action Item:**

The Standing Committee should review the comment and be prepared to discuss whether information was provided that would require a revote on the evaluation criteria.

## **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 Standing Committee’s recommendations. No NQF members provided their expressions of support or non-support.