

2017 Kaizen Consensus Development Process: Proposed Redesign

DRAFT REPORT

Background

The National Quality Forum's multi-step Consensus Development Process (CDP) is essential to providing a usable portfolio of measures that meets NQF's rigorous measure evaluation criteria and ensures that measures integrated into HHS' public reporting and pay-for-performance initiatives are up-to-date, reflective of the current evidence, reliable and valid, useful for accountability and quality improvement, and feasible. Since the first version of the CDP (approved in July 2000), NQF has continuously refined its process to address the needs of CMS, NQF members, and the healthcare industry more broadly. Many of these refinements have been incremental and others more substantive, requiring pilot testing and substantial operational changes. However, CMS and other stakeholders have raised concerns about the agility of the CDP – specifically, the time from measure submission to measure endorsement and the timeliness of measure evaluation/wait time for available projects (which in some cases is three or more years).

Approach

NQF hosted a process improvement, or Kaizen event on May 18-19, 2017, to explore opportunities for a more agile and efficient CDP for measure endorsement. Over the two-day event, NQF, in collaboration with the Centers for Medicare & Medicaid Services (CMS), sought to address:

- Improving coordination among CMS, developers, and NQF to better facilitate timely evaluation of measures
- Increasing opportunities for submission and timely review of measures
- Reducing cycle time of the CDP
- Improving flow of information between the CDP and Measure Applications Partnership (MAP) processes

Objectives

Specifically, through the Kaizen, NQF was committed to exploring opportunities for:

- Continuous availability of CDP for all measure types
- Improved management of the CDP measure pipeline
- Improved utilization of standing committee expertise
- Improved leveraging of NQF and external expertise
- Significant reduction in overall endorsement time to about 6 months

More than 40 invited healthcare stakeholders from the public and private sectors participated in the event—including experts from CMS and other federal agencies, NQF’s standing committees, and organizations that develop measures that represented a significant proportion of participants.

Proposed Redesign

Based on the outputs from the Kaizen event, NQF is proposing a significant CDP redesign that incorporates on-going measure submission opportunities. (Currently 63% of standing committees experience an average of 3 years of dormancy.) Offering more continuous and predictable submission pathways can increase the timeliness of endorsement decisions for measures that would drive value and fill prioritized gaps. Other recommended changes include:

- Notification by developers of their intent to submit measures
- A newly-formed methodological panel
- Expanded and continuous commenting period—with NQF members having the ability to continually express support/non-support throughout the CDP process
- Change in the content and structure of the measure evaluation technical report
- Final endorsement decision made by the Standing Committee (and not by the CSAC)¹
- Shift in the role of the CSAC and the Appeals Board in the endorsement process²
- Enhancements in stakeholder training and education
- Improvements in information exchange and access

Some of the proposed changes intended to compress the endorsement process would help to reinforce process changes that have already proven to be effective (i.e., standing committees and staff preliminary analyses). While other changes would establish new processes that reflect increased efficiencies in stakeholder participation and engagement.

NQF will not implement all changes immediately, as this will require significant design and testing to ensure that the process works as intended for all stakeholders. However, NQF would initiate a phased implementation in order to monitor these recommendations to assess outcomes and ensure a more agile and effective process.

Increased Opportunities for Measure Submission

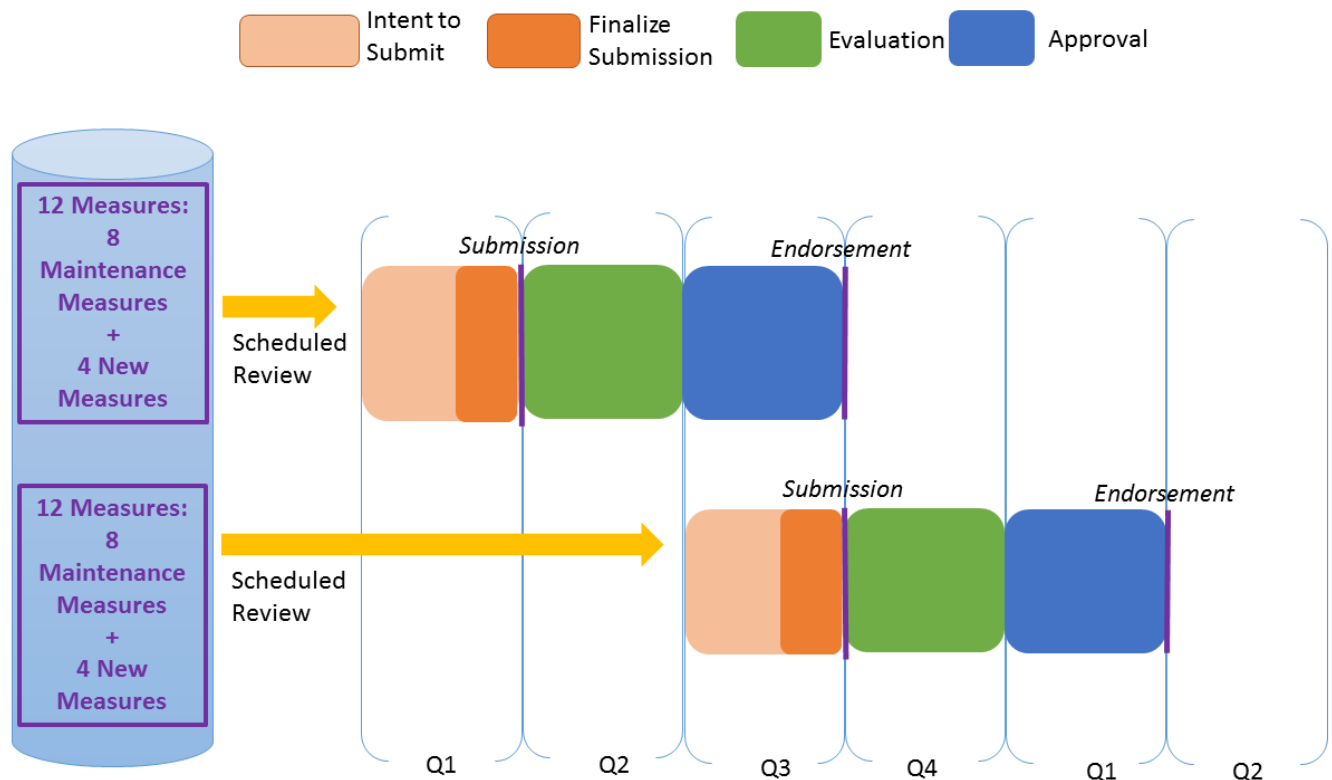
Scheduling/Frequency

As shown in the following diagram, NQF would offer two measure submission opportunities for each topic area each year, instead of one opportunity for a select few topic areas each year per the current CDP schedule. However, because there would be more opportunities for submission, NQF would limit the

¹ If changes to the roles of the Standing Committee and the CSAC are approved, execution of these changes will be phased and implemented at a later date

² If the change in the role of the Appeals Board is approved, execution of this change will be phased and implemented at a later date

number of measures evaluated by the standing committees in each cycle to a maximum of 12 (up to eight measures undergoing maintenance review and up to four new measures). NQF would schedule maintenance measures in advance to adequately plan for new submissions. Due to the anticipated increase frequency of submissions, NQF has consolidated the 22 measure review topical areas to 16 topical areas. To allow more frequent measure submission, committees would convene more often. NQF is proposing a combination of in-person meetings and virtual web meetings to evaluate submitted measures. As there would be two review cycles each year, the committee would convene via in-person meeting for one cycle and convene via virtual web meeting for the other cycle.



Intent to Submit

This would require that all measure stewards/developers notify NQF of their plan to submit measures for endorsement consideration. The *Intent to Submit* form would require the following information:

- **Submission Type:** maintenance measure (currently NQF-endorsed) or new measure (has never received NQF endorsement). Maintenance measures must indicate if new testing data will be available.
- **Measure type** – measure categorization (e.g., structure, process, outcome, cost, etc.)
- **Measure title** – concise description to convey who and what is being measured
- **Level of analysis** – levels for which the measure is assessed—specified and tested
- **Data source** – source(s) from which data are obtained for measurement

- **Measure description** – brief narrative of the measure that includes the type of score, measure focus, target population, or time frame
- **Numerator statement** – brief description of the measure focus or what is being measured
- **Denominator statement** – brief description of the target population being measured
- **Planned submission date** – cycle and year when all testing is completed and final submission is anticipated

Measure stewards/developers would need to notify NQF at least two months prior to the measure submission deadline to prepare for the committee’s review in the upcoming cycle. This would allow NQF to adequately plan for measures in the pipeline and measures ready for evaluation in the various topic areas. NQF staff will assess whether the measures will require a methodologic review based on a set of criteria.

Technical Review: Methods Panel

Current Process

After NQF staff completes its initial review, which includes developing a preliminary analysis and rating of the submission, the relevant standing committee conducts a detailed review and evaluation of all submitted measures, with the help of a technical advisory panel or members of other convened standing committees, as needed. The duration of a committee’s review for a given project can vary depending on the scope of the project, the number of measures under review, and the complexity of the measures.

During this review process, the Committee may meet several times, via webinars or conference calls to discuss and evaluate the submitted measures in accordance with NQF criteria and guidance.

Proposed Change

Kaizen participants noted the challenges many committee members face when reviewing and applying NQF’s evaluation criteria to the technical aspects of reliability and validity analyses and results, and therefore recommended removing this responsibility from the committee. NQF would operationalize this recommendation through a “methods review” that would be conducted by NQF staff or an external methods panel as needed given their expertise. This methods review will apply to the *Scientific Acceptability* (reliability and validity) section of the measure, a must-pass criterion. The methods panel would provide expertise for methods/testing related issues for NQF and advance NQF’s guidance on these issues.

Complex measures, including risk-adjusted outcomes, composites, and cost measures require a higher level of methodologic review. For complex measures, the external methods panel would complete the review of measure testing and provide a recommendation to the standing committees. Since requirements for *Scientific Acceptability* differ for maintenance measures, staff would review testing results for maintenance measures and attest to the adequacy of prior testing. For non-complex measures, such as process and structural measures, NQF staff would complete the methodologic review and provide testing recommendations to standing committees. Standing committees will review the ratings and comments from the methods review. It is expected that the methods review rating will be used to rate the

Scientific Acceptability of the measure. However, standing committees may raise concerns with the specifications of the measure or with potential threats to validity (e.g., selection of variables for risk adjustment model). Generally, NQF will not forward measures with a ‘low’ or ‘insufficient’ rating from the methods review to the committee for further evaluation.

The opportunity for a methods review is seen as a value add for the standing committee and developers because members of the committee do not always have the needed expertise in statistics to adequately review and rate the scientific merits of the measures. Further, removal of this more technical review will encourage greater participation by consumers, patients, and purchasers in standing committees.

Measure Evaluation Technical Report – Content and Structure

Current Process

After a project's standing committee completes its initial measure review, a draft of the committee's recommendations – or "draft report" – is posted on the NQF website for the public and NQF membership to review and comment. Currently, the technical report includes an executive summary, introduction of the topic, overview of the current NQF topical portfolio of measures, the measure evaluation details, and several appendices.

Proposed Change

Kaizen participants raised concerns about the length and density of the technical report and emphasized key elements of interest. NQF would like to reduce the amount of information provided in the technical report. The revised report would include an executive summary that indicates the endorsement decision, brief summaries of the measures, and the details of each measure's evaluation in an appendix (“Appendix A” in current reports). The remaining background information on the topic area would be included on NQF's public website. In addition, at the end of each year, an annual cross-cutting report would summarize endorsement activities and identify prioritized gaps in measurement across all of the topic areas.

Public Commenting Period with NQF Member Expression of Support

Current Process

Both NQF members and interested members of the public can submit comments on the standing committee's draft recommendations through the NQF website. This includes measures that were recommended for endorsement by the standing committee, those that were not recommended, and those where consensus regarding endorsement was not reached. As part of NQF's commitment to transparency, all submitted comments are posted on the NQF website, where any site visitor can review them.

The standing committee reviews all submitted comments, and all submitted comments receive responses from the standing committee, measure developers, and/or NQF, as appropriate. The standing committee may revise its recommendations in response to a specific comment or series of comments that are submitted during this phase of the CDP.

Once a standing committee has reviewed all of the comments submitted during the public and member comment period and any resultant revisions to endorsement decisions are made and included in a revised draft report, NQF members may vote on the measures that are recommended by the committee. All NQF member organizations are eligible to vote on any endorsement project. The member voting period is open for 15 days.

Proposed Change

In place of two separate public commenting periods (14-day pre-meeting commenting and 30-day post-meeting commenting), NQF would have one continuous public commenting period. This commenting period would span 12 weeks to allow adequate time for general public and NQF member commenting. The commenting period would open approximately 3 weeks prior to the committee evaluation meeting and would not close until 30 days after NQF staff posts the draft technical report on the NQF website. NQF would include comments and member indications of support received at least one week prior to the committee evaluation meeting into the committee materials for discussion during the measure evaluation meeting. The committee would review any comments received following the committee evaluation meeting after the close of the public commenting period.

As part of this process, NQF membership voting would no longer be a separate 15-day voting period. NQF members would have the opportunity to express their support (*'Support'* or *'Do Not Support'*) for each measure along with their public comment to inform the committee's recommendations. If desired, members could change their support decision at any time during the public commenting period. This earlier and more continuous expression of support/non-support from NQF members should have a more significant impact on the measure evaluation.

Endorsement Decision

Current Process

The Consensus Standards Approval Committee (CSAC) makes endorsement decisions on measures under review by NQF standing committees, following public and NQF Member comment and Member voting. The CSAC, a standing committee appointed by the NQF Board of Directors, serves in an advisory capacity to NQF leadership regarding enhancements to the CDP, the measure evaluation criteria, and emerging issues in performance measurement.

Proposed Change

Kaizen participants recommended that standing committees should make the final endorsement decisions, without ratification by the CSAC. Participants noted that the CSAC rarely overturns the measure recommendations of the committee.

NQF appreciates comments on the proposed change of the endorsement body. However, given current resources and other important strategic considerations, NQF will not be able to implement a change of this magnitude at this time. Currently, the CSAC is comprised of a simple majority of consumers and purchasers. In order to ensure those two stakeholder perspectives are a key part of the endorsement process, NQF will need to make certain there is adequate representation of these groups on each standing

committee. Depending on the feedback received from NQF members and the public on this recommendation, NQF could potentially implement this proposed change at a later time.

Adjudication of Appeals

Current Process

Once the CSAC's endorsement decisions are made public via the NQF website, a 30-day appeals period begins. Any interested party may file an appeal with the Appeals Board during the appeals period. The Appeals Board reviews all appeals submitted to NQF for consideration. All decisions made by the NQF Appeals Board are final.

Proposed Change

Kaizen participants recommended that the CSAC should adjudicate all submitted appeals for endorsed and non-endorsed measures, instead of serving as the endorsement body. Implementing this recommendation would result in disbanding the Appeals Board, which was established in Fall 2016.

NQF appreciates comments on the proposed change. However, given current resources and other important strategic considerations, NQF will not be able to implement a change of this magnitude at this time. Depending on the feedback received from NQF members and the public on this recommendation, NQF could potentially implement this proposed change at a later time.

Enhancing Training and Education

Current Process

NQF currently provides various educational resources for stakeholders involved in the CDP. This includes virtual meetings and written materials for developers and committee members. At the beginning of a new project, NQF virtually convenes standing committees for an orientation to the CDP and an overview of the measure evaluation criteria. Prior to all committee calls and meetings, committee co-chairs meet with NQF staff to assist in anticipating questions and identifying additional information that may be useful to the committee. NQF also conducts bimonthly internal staff training and education sessions that focus on the CDP.

Proposed Change

Participants in the Kaizen expressed a need for increased training and education for all stakeholders engaged in the CDP. NQF would expand and strengthen the current range of educational resources offered for staff, committees, and developers. NQF would create additional educational resources tailored to specific audiences (e.g., consumers) and provide more opportunities for on-demand virtual references available for review at any time.

NQF currently provides technical assistance to measure developers on request through projects and through the Measure Maintenance team; staff will continue to offer this resource for one-on-one training. In addition, NQF will work to better promote available educational offerings to ensure all stakeholders are fully aware of available resources. While NQF currently offers a monthly measure developer education

series via webinar, additional efforts would focus on less experienced developers. NQF would also offer developer-focused orientation sessions that will allow developers to pose specific questions, meet the project team, and discuss technical assistance needs.

Routine meeting facilitation training would be provided to both NQF staff and standing committee co-chairs to promote consistency across evaluation meetings. Finally, NQF would work to increase consistency across projects by expanding internal educational offerings for staff.

Improvements in Information Exchange and Access

Current Process

NQF currently conducts two separate measure review processes: endorsement through the CDP and advice on selection through the Measure Applications Partnership (MAP). While each process has a different purpose and goal, there is significant overlap in the information submitted and produced. For MAP, brief measure specifications are provided by CMS in the form of the Measures under Consideration (MUC) list, and the MAP's final recommendations for each review year are stored in Excel files and reports on NQF's public website. For the CDP, developers provide measure specifications through NQF's online measure submission form (MSF), and the endorsement decisions and summaries of committee discussions are stored in reports on various project-specific webpages on NQF's public website. Summary information for endorsed or previously endorsed measures is included on NQF's public measure repository, the Quality Positioning System (QPS).

Proposed Change

Kaizen participants recommended a centralized information system that would allow for a comprehensive and longitudinal view of a measure. This system would allow staff, developers, and the public to access information, including both MAP and CDP data, as the information is updated in real-time. Participants emphasized attributes such as version control, consistency between NQF projects, and the ability to easily pull and edit information as key to an ideal-state measure information repository. Kaizen participants also recommended creating a more consistent, transparent, and user-friendly tool for submitting, reviewing, and analyzing measures and comments. Lastly, participants recommended that NQF should purposefully incorporate methods to ensure the tool provides an intuitive user-friendly experience.

NQF appreciates comments on the proposed change. However, given current resources and other important strategic considerations, NQF will not be able to implement a change of this magnitude at this time. Depending on the feedback received from NQF members and the public on this recommendation, NQF will develop short-term solutions to get closer to the ideal state and investigate technological solutions to achieve the longer-term recommendations.