Measure Feedback Loop: Pilot Implementation Plan

FINAL REPORT

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Contents

Executive Summary

Measure feedback is essential to the quality improvement enterprise. Measure feedback enables stakeholders to understand whether measures are being used or not, and why; the costs and burden of measurement; issues or risks in measure implementation; and the impact of measurement on improving quality of care and health outcomes. The National Quality Forum (NQF) measure feedback loop is the process of providing feedback from those who use measures to measure developers and standing committee members who may have recommended the measure receive or maintain NQF-endorsement or be selected for use in a federal quality program through the Measures Application Partnership (MAP). To close the loop, responses to the feedback should be shared back with those who submit feedback.

NQF convened the multistakeholder Measure Feedback Loop Committee to share strategic guidance to improve the ways in which NQF solicits, collects, facilitates, and shares measure feedback among stakeholders within the NQF endorsement and maintenance processes. This implementation report outlines strategies from the pilot options report that were rated as have the highest potential benefit and low- to medium-resource intensity to support the feasibility of implementing the strategies should the pilot move forward. NQF proposes testing these strategies over three steps and collaborating with healthcare stakeholders to engage in continuous quality improvement of the measure feedback loop.

The report details a proposed plan to pilot and evaluate strategies in three steps over 12-18 months to enhance and improve the NQF measure feedback loop (see Table 1). Steps one and two of the pilot run concurrently with step one taking place over the first year of the pilot, step two running for the first eight months, and step three beginning at six months into the pilot and continuing through month 18. Over the 18 months, NQF will continually evaluate and improve the pilot strategies and tactics.

Table 1. High-Level Illustrative Timeline for Proposed Pilot

High-Level Pilot Steps and Evaluation	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Step 1: Generate meaningful and actionable feedback																		
Step 2: Standardize/streamline the tool and process																		
Step 3: Support stakeholders to apply feedback																		
Continuous evaluation and process improvement																		

During each step, NQF will collect and analyze data using pre-defined metrics of success to determine whether the strategies are achieving intended targets. The vision is to broadly implement those tactics and strategies that are feasible to scale up, and successful in meeting the Committee-defined goals to: 1) minimize burden on those providing measure feedback, 2) ensure stakeholders are aware of when and how to provide feedback, 3) ensure standing committees receive meaningful and adequate information to apply the measure feedback, 4) ensure developers receive timely, meaningful, and actionable feedback, 5) provide an acknowledgement and information about how feedback is addressed to those who submit feedback, and 6) define a standard pathway for collecting measure feedback.

Step one involves generating meaningful and actionable feedback from measure users by:

- identifying priority NQF-endorsed measures where feedback would be most useful based on multistakeholder-informed standard criteria;
- collaborating with target organizations (e.g., specialty societies, measure developers, health systems, and federal agencies) to publicize measure feedback opportunities;

- communicating expectations around feedback to those submitting measure feedback, and regularize outreach with feedback opportunities;
- making the NQF Measure Feedback Tool more prominent, visible, and accessible; and
- incentivizing users to provide measure feedback (e.g., featuring submitters in a case study, dedicate time to provide feedback live).

Step two aims to standardize and streamline the NQF Measure Feedback Tool and measure feedback process by:

- integrating the NQF commenting tool and Measure Feedback Tool;
- automating acknowledgement of the feedback submission; and
- standardizing the collection of all comments and feedback to the same format that aligns with NQF criteria.

Once NQF has a better understanding of the volume and quality of the measure feedback received through the enhanced measure feedback loop from implementing the strategies and tactics from steps one and two, step three supports stakeholders to apply the measure feedback collected through prior steps by:

- improving how feedback is distributed to measure developers;
- enhancing standing committee ability to use measure feedback in their evaluation of measures in endorsement decisions; and
- closing the loop with those who submit measure feedback by exploring appropriate actions for adjudicating measure feedback.

Throughout the pilot, NQF will evaluate the strategies against the goals identified for the measure feedback loop, and assess the feasibility, cost, and NQF staff level of effort of implementing the selected strategies and tactics. NQF will monitor for any negative unintended consequences of implementing changes such as overburdening measure developers, standing committee members, and/or those who provide measure feedback to NQF. Agile methods to collect and analyze data throughout all three steps will support quickly scaling successful strategies, modifying and retesting, and/or discontinuing strategies that are not successful.

The success of the pilot will be based on NQF receiving an increase in measure feedback and higher quality measure feedback than before the pilot is implemented, improved user experiences with the NQF Measure Feedback Tool, and enhanced stakeholder engagement with measure feedback and within the measure feedback loop. If NQF is able to meet all of the goals for the measure feedback loop pilot while not experiencing an unsustainable increase in staff or stakeholder effort or resources, NQF will explore plans to implement the successful strategies and tactics across the organization.

Pilot testing the strategies and tactics detailed in the implementation plan report is an important step in ongoing efforts to continually improve NQF processes. Success of the measure feedback loop pilot and continuous efforts to improve the measure feedback loop requires the buy-in and participation of key stakeholders from the healthcare community, including CMS, measure developers, standing committee members, and individuals or organizations positioned to provide measure feedback. Engaging healthcare stakeholders in designing and implementing refinements to the measure feedback loop and

demonstrating the impact of their contributions is critical for obtaining support for these efforts. Continuing to improve the measure feedback loop is vital to the success of quality improvement enterprise.

Introduction

The National Quality Forum (NQF) measure feedback loop refers to the process of providing measure user feedback to measure developers and multistakeholder standing committee members who may have recommended the measure receive or maintain endorsement or be selected for federal program use. To close the loop, a response to the measure feedback, including potential next steps, should be shared back with those who submit measure feedback. Measure user feedback should come from those who implement measures or use measure results for decision making and quality improvement purposes. This includes individuals and organizations who select measures to be included in quality improvement or accountability applications and compare performance measure scores to choose a healthcare provider, advocate for better quality care, and/or assess and improve the quality of care they are providing.

Measure feedback is essential to the quality improvement enterprise as it meets the needs of healthcare community and performance measurement stakeholders to understand the impact of measurement, how a measure actually performs when in use, and what possible issues or risks may arise in measure implementation. Measure feedback can include:

- performance rates on the measure,
- user experience,
- the impact of collecting data/information to calculate a measure or report the measure for a quality reporting or performance-based payment program, or
- information about the negative or positive unintended consequences of implementing the measure in practice.

As a critical element in the quality improvement enterprise, quality measures must benefit the healthcare community and not be unduly burdensome to collect or report in order to achieve the goal of high quality, efficient healthcare.

Feedback on quality measures provides an important opportunity to understand the extent to which data for the measures is being captured without undue burden; how, where, and who is using the measures; what, if any, unintended consequences arise from using the measures after they receive NQF-endorsement on providers, payers, consumers, caregivers, measured populations, and others; and, ultimately, whether measures are having their intended effect on improving the quality of care and health outcomes for individuals and populations. Gathering meaningful, timely, comprehensive, and actionable feedback on measures after they are implemented also helps NQF and quality measurement stakeholders to engage in continuous quality improvement of the quality improvement enterprise.

Through the NQF endorsement process, NQF convenes standing committees in topical areas to evaluate quality measures against five criteria:

1. Importance to measure and report: The measure is based on evidence and there is a demonstrated opportunity for improvement.
2. Scientific acceptability of the measure priorities: The measure is clearly specified and scientifically tested.
3. Feasibility: The measure is feasible, and data can be readily collected for the calculation of the measure.

4. Usability and Use: Performance results from the measure are being used or could be used for both accountability and performance improvement.
5. Requirements for Related and Competing Measures: There are no competing measures and the measure has been harmonized with all related measures.[1]

In previous work, standing committee members have expressed the need for information on how measures perform after they are endorsed, whether or not they are in use and why. This is especially true for measures that may be contentious or have the potential to impact certain stakeholders negatively. Measure feedback enables standing committees to consider a broader set of information to inform their review and recommendations to endorse or maintain endorsement of the measures under consideration.

Project Background and Overview

In January 2019, under a contract with the Department of Health and Human Services (HHS), NQF convened a multistakeholder committee (Appendix A) to understand NQF standing committee needs for measure feedback; and elicit ideas for innovative, efficient, and effective approaches to integrate measure feedback into the measure endorsement process and maintenance of endorsed measures. This multistep effort was aimed at improving NQF's measure feedback loop by identifying a set of strategies that can be piloted to improve the ways in which NQF solicits, collects, facilitates, and shares measure feedback among stakeholders within the NQF endorsement and maintenance processes.

NQF convened the Measure Feedback Loop Committee over a series of webinars in which they provided guidance on key challenges and strategic issues related to improvement of the measure feedback loop. In prior steps of this work NQF performed an environmental scan to chart current feedback mechanisms within the quality measurement enterprise, including NQF's current activities used to solicit and collect feedback. NQF also conducted an assessment of NQF's criteria and current feedback loop activities to identify opportunities for clarifying the measure evaluation criteria and better aligning developer needs with the structure of the measure feedback loop. These efforts all served to identify challenges and opportunities for enhancing measure feedback activities within the NQF endorsement and maintenance processes, which culminated in a set of proposed strategies and their potential benefits and costs as detailed in the pilot options report.

Purpose

This final report details the proposed implementation plan to pilot strategies to enhance and improve the NQF measure feedback loop. The report outlines strategies from the pilot options report that have the highest potential benefit and low- to medium-resource intensity to test over a 12- to 18-month period. This implementation plan report describes a three-step pilot to:

1) generate meaningful and actionable feedback from measure users,
2) standardize and streamline the NQF Measure Feedback Tool and measure feedback process, and
3) support stakeholders to apply the measure feedback collected through prior steps.

Strategies from the pilot options report and associated tactics are detailed along with plans to gauge their effectiveness and determine the feasibility of implementing successful strategies more broadly across NQF throughout each step of the pilot and at its conclusion. The report culminates with an illustrative timeline for implementing the proposed pilot and a path forward for continuing to improve the measure feedback loop and, by extension, the quality improvement enterprise.

Implementation Plan Approach

A focused and stepwise approach is essential to ensure efficient use of resources, optimal performance, and long-term feasibility prior to scaling up and implementing the successful strategies across NQF more broadly. Using human-centered design,[2] continuous quality improvement principles, and a pilot test approach will enable NQF to efficiently test and implement successful strategies for improving the measure feedback loop, gain a better understanding of the resources required to support these efforts, and engage stakeholders throughout the process to design solutions that truly meet their needs.

Implementing all of the strategies from the pilot options report across all program areas at NQF would involve resource-intensive solutions and capital investments in information technology (IT) infrastructure on strategies designed but not yet proven to achieve the Committee's goals for the measure feedback loop. Instead, NQF will select and test a small set of high-impact strategies from the pilot options report that were rated as having a high potential benefit to the field. Benefit was assessed according to the strategy's ability to address more than one pilot goal, increase the volume of measure feedback, enhance the quality of measure feedback, and meet the needs of those providing and using measure feedback.

NQF will use the Committee's goals for the measure feedback loop pilot to evaluate the success of the strategies being tested. The Committee's goals to guide the measure feedback loop pilot are to:

1) minimize burden for users to provide feedback by improving accessibility and ease of use of NQF tools designed to collect feedback;
2) ensure relevant stakeholders (users/implementers/those being measured) are aware of opportunities and channels to comment and provide measure feedback to NQF;
3) ensure NQF standing committees receive meaningful and adequate information to apply the feedback to the Importance, Use and Usability, and Feasibility criteria for measure evaluation, and make informed recommendations for endorsement;
4) ensure developers receive meaningful and actionable measure feedback for consideration in a timely manner;
5) ensure that those who provide feedback receive an acknowledgement and are informed about the disposition of the feedback and how it was adjudicated; and
6) define a standard pathway for generating and collecting measure feedback.

The proposed pilot implementation plan will also be guided by human-centered design principles, meaning that NQF will iterate, test, and integrate stakeholder and end-user feedback into its process to ensure that strategies implemented are grounded in user needs and adopted and embraced by relevant stakeholders. User research focuses on understanding how the design of products and systems will impact end users.[3] Whenever possible, NQF will conduct user research—building on insights gathered
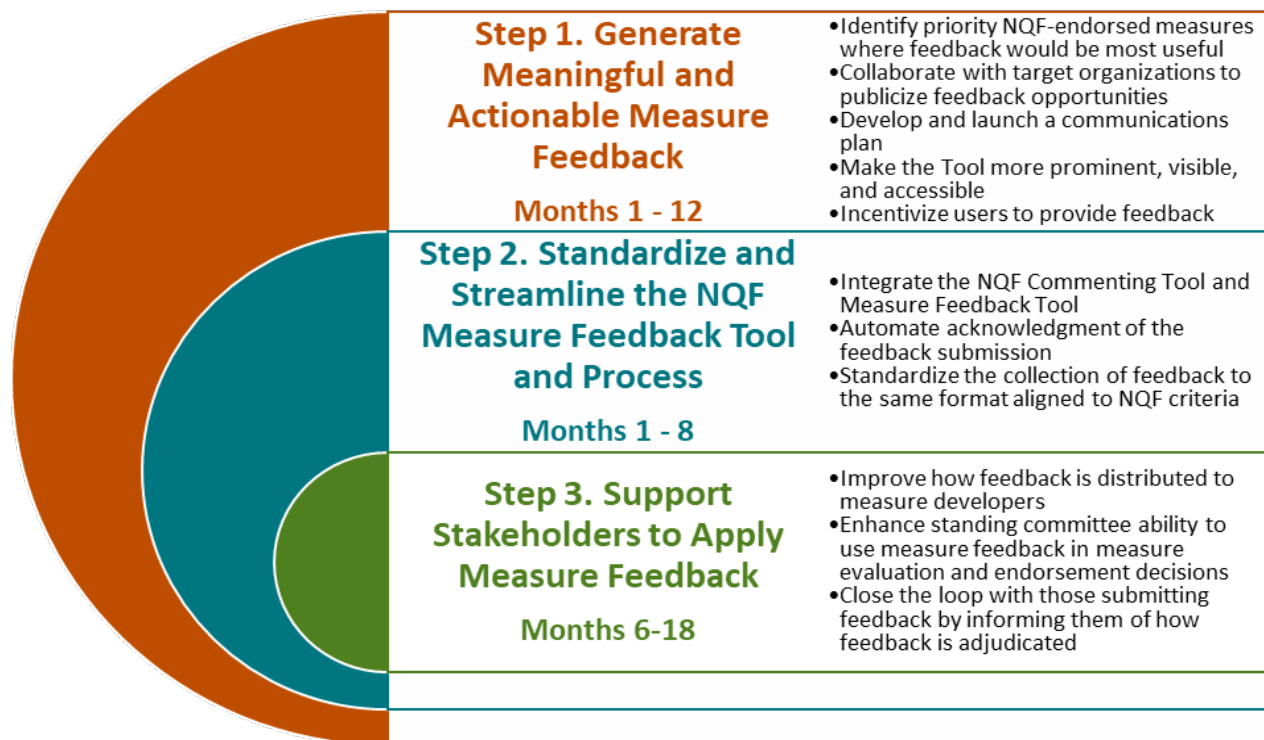
throughout this project to inform the planning and execution of the three pilot steps, and determine if strategies are on target or missing the mark.

NQF will design and deploy pre- and post-test assessments to evaluate results throughout the pilot to allow NQF to quickly learn what works and what does not so that the organization can adopt successful strategies, refine strategies that have the potential to achieve desired goals, and discontinue strategies where the implementation costs outweigh its benefits or that do not yield desired results.

Pilot Steps, Strategies, and Proposed Tactics

NQF will conduct the pilot test in three steps over a 12- to 18-month period. Each step of the pilot builds on the successes and lessons learned from prior steps (see Figure 1). The first two steps of the pilot will run concurrently. Step one, which aims to generate meaningful and actionable measure feedback, will occur for the first 12 months of the pilot. Step two, which aims to standardize and streamline the measure feedback tool and process, will take place between the first and eighth month of the pilot. Step three, which aims to support stakeholders to apply measure feedback, will begin at six months into the pilot and continue through the end in month 18. During each step, NQF will collect and analyze data using pre-defined metrics of success to determine whether the strategies are achieving intended targets. This evaluation will be continuous and occur over the 18 months of the pilot. The vision is to broadly implement those tactics and strategies that are successful in meeting the Committee-defined goals and to engage in continuous quality improvement of the measure feedback loop in collaboration with healthcare stakeholders.

Figure 1. Measure Feedback Loop Pilot Test Steps and Strategies

Step 1. Generate Meaningful and Actionable Measure Feedback

Months 1 - 12

- Identify priority NQF-endorsed measures where feedback would be most useful
- Collaborate with target organizations to publicize feedback opportunities
- Develop and launch a communications plan
- Make the Tool more prominent, visible, and accessible
- Incentivize users to provide feedback

Step 2. Standardize and Streamline the NQF Measure Feedback Tool and Process

Months 1 - 8

- Integrate the NQF Commenting Tool and Measure Feedback Tool
- Automate acknowledgment of the feedback submission
- Standardize the collection of feedback to the same format aligned to NQF criteria

Step 3. Support Stakeholders to Apply Measure Feedback

Months 6-18

- Improve how feedback is distributed to measure developers
- Enhance standing committee ability to use measure feedback in measure evaluation and endorsement decisions
- Close the loop with those submitting feedback by informing them of how feedback is adjudicated

Step One: Generate Meaningful and Actionable Measure Feedback

The first step toward improving the measure feedback loop is enhancing NQF's ability to generate meaningful and actionable measure feedback. This requires NQF to ensure that relevant stakeholders are aware of opportunities and challenges to comment and provide measure feedback to NQF (Committee goal two) and reducing burden on those providing feedback by improving accessibility and ease of use of NQF tools designed to collect feedback (Committee goal one). Enhancing communication, collaboration, and partnerships will help to increase the volume and improve the quality of measure feedback received and shared through the feedback loop. In step one, NQF will test strategies to:

1) identify priority NQF-endorsed measures where feedback would be most useful;
2) collaborate with target organizations to publicize feedback opportunities;
3) communicate expectations around feedback and regularize outreach with feedback opportunities;
4) make the measure feedback tool more prominent, visible, and accessible; and
5) incentivize users to provide measure feedback.

Each of these strategies are described in more detail below along with sample tactics and metrics of success. Pilot testing these strategies will enable NQF to understand how best to generate measure feedback and the types of approaches such as targeted outreach, email communication, social media, and webpage optimization that increase the volume of meaningful and actionable measure feedback. Generating more feedback from measure users and measured populations (e.g., patients, families, caregivers, community members) will deepen NQF's understanding of the type of feedback that could be obtained and inform the planning and execution of step three of the pilot to support stakeholders, including measure developers, NQF standing committees, and NQF staff, to apply measure feedback generated through the measure feedback loop.

Identifying NQF-Endorsed Measures Where Feedback Would be Most Useful

NQF will develop and apply standard criteria to identify priority measures for feedback and collaborate with CMS measure developers on targeted outreach approaches. NQF proposes a partnership with CMS to determine the top 5 – 10 measures for which feedback would be most useful. NQF will apply the criteria to its portfolio of measures and generate a preliminary list of potential measures to prioritize for feedback along with rationale for selecting these measures for feedback. NQF will share this list with CMS for final selection to ensure alignment with CMS priorities.

NQF, informed by multistakeholder input, will set criteria to support prioritization for the feedback loop pilot. Criteria will also help to inform whether certain features of measures are linked to a higher volume of feedback. Sample criteria to consider includes:

- ***Measure type*** (e.g., process, composite, outcome, patient-reported outcome performance measure): NQF will identify measures across measure types to prioritize for feedback.
- ***Volume, quality, and nature of measure feedback received to date***: NQF will select measures for which it has received anecdotal feedback that there are opportunities to make the measure more impactful or that there are potential negative unintended consequences of measure implementation to explore. NQF may also consider measures that are not being utilized in the field to understand the reasons why there has not been uptake such as the high cost of

implementation or burden of data collection and reporting. Additionally, NQF may prioritize measures that have a limited volume of formally submitted feedback.

- ***NQF portfolio in which the measure is found***: NQF will select a cross section of measures to help focus feedback efforts on a smaller number of topics while ensuring that no single portfolio is disproportionately burdened and a balance in the topics the prioritized measures address.

- ***Maintenance review schedule***: NQF will prioritize measures that will be in maintenance review within the next 12 to 18 months to increase the likelihood that the feedback generated through the measure feedback loop is meaningful and actionable.

- ***Federal program quality reporting and/or value-based payment program in which the measure is included***: NQF will prioritize measures in these programs as there are higher stakes for measures in accountability applications and broader reaching implications across the nation. Healthcare organizations and clinicians may also be more focused on measures in value-based payment programs and therefore more likely to have feedback to provide on the measures.

- ***Measure developer***: With the potential for increased resources from measure developers to participate in the measure feedback loop pilot, NQF will seek measures to include in the pilot test from a wide array of measure developers to not create undue burden.

- ***Whether the measure has been recently implemented:*** NQF will seek a balance of measures that were recently implemented within the last two years and those that have been in the field for over two years to understand the current feasibility of data collection and reporting. NQF will also consider prioritizing measures that have not been recently implemented, but have been recently updated, to explore the impact of the new specifications or updates.

- ***Whether the measure is tackling an understudied area of measurement science or addressing a gap area***: To ensure measures reflect the current evidence, NQF will consider when the measure was first developed and the evolution of science and research underlying the measure. NQF may also prioritize measures that were designed to fill critical gaps in quality measurement to obtain feedback on whether the goal of the measure is being met.

- ***Prior recommendations from the Standing Committee or other key stakeholders on the need for measure feedback*** (e.g., the need to monitor for unintended consequences): MAP and CDP Standing Committee deliberations may include recommendations that measures be monitored once they are implemented for unintended consequences, for issues such as undue measurement burden, and/or to understand the impact of measurement. NQF will review documented recommendations to inform which measures to prioritize for feedback.

Developing a Target Outreach and Communications Plan

Identifying a list of high-priority measures where feedback would be most useful would support efforts to tailor communications and outreach to measure developers, measure implementers, and relevant organizations and individuals who are best positioned to provide and use measure feedback. A narrower communication and outreach strategy will support testing what types of messages and communication channels lead to an increased awareness of opportunities to provide measure feedback and an increase in the volume of measure feedback from diverse constituencies (Committee goal 2).

As part of the communications and outreach plan, NQF will collaborate with target organizations such as specialty societies, measure developers, health systems, electronic health record vendors, patient and caregiver advocacy organizations, managed care programs, Medicaid offices, disability organizations, mental health organizations, administering agencies, accountable care organizations, and federal

agencies to publicize measure feedback opportunities at NQF, including the link to the NQF Measure Feedback Tool. These organizations may be directly affected by the priority measures identified for measure feedback (e.g., the measure developer who may need to address measure feedback, the specialty society representing clinicians who are required to report on the measure, the patient advocacy organization representing a measured population, or a health system who had previously submitted comments on the measure when under consideration).

A targeted communications campaign using existing email and social media channels will support regular outreach to relevant stakeholders with feedback opportunities and help to inform a standard approach for soliciting feedback on NQF-endorsed measures that are not currently under review. Collaborators will help to inform key messages and tactics for communicating measure feedback opportunities including optimal timeframes for soliciting measure feedback from stakeholders.

Communications will also include expectations around feedback such as who uses measure feedback, who should give it, and when and how it may be used. For example, communications to a patient advocacy organization might explicitly request feedback on how patients and families have been positively or negatively impacted by the measure, and whether patients and families find the measure meaningful. As another example, communications to electronic health record vendors might explicitly request feedback on how measures can be incorporated into systems and workflows and how to improve electronic data collection for the measures. Project participants have shared that the majority of measure feedback relates to the negative aspects of measure implementation. While important to learn about real-world challenges related to implementation, NQF will also encourage end users to submit both constructive and positive feedback on the prioritized measures in the pilot. The former type of feedback is important for ensuring that measures continue to improve and to reduce unexpected harm. The latter is important for recognizing the benefits of quality measurement, understanding unexpected positive consequences, and balancing the representativeness of feedback.

Making the Feedback Tool More Prominent, Visible, and Accessible

Simultaneous with the identification of priority measures for feedback and communications plan development, NQF will work to make NQF's Measure Feedback Tool more prominent, visible, and accessible to stakeholders. The NQF Measure Feedback Tool is currently not accessible directly from the NQF homepage. In step one of the pilot, NQF will test whether the creation of a dedicated space on the NQF homepage that includes links to the tool, guidance on how to provide measure feedback, and educational resources will generate more measure feedback compared to the current links to the Measure Feedback Tool within NQF's Quality Positioning System (QPS).

Using human-centered design principles, NQF will develop educational resources related to the Measure Feedback Tool and measure feedback more broadly to house on this dedicated space.[4] NQF will seek stakeholder input on what educational resources would help to improve accessibility and use of the Measure Feedback Tool. Resources may include examples of measure feedback, how-to-submit guidance, and answers to frequently asked questions such as: Why is measure feedback important? Who should provide measure feedback? What type of feedback is most useful? When is feedback most helpful in the quality measurement lifecycle? How is feedback used? Clear instructions on the measure feedback process including expectations for receiving feedback and a flow chart of what happens to measure feedback after it is submitted will support enhanced engagement with the Measure Feedback Tool and measure feedback loop.

Resources will also include information about the different timeframes in which feedback is reviewed and can be addressed. For instance, when do measure developers make annual updates to electronic clinical quality measures versus chart-abstracted measures versus claims-based measures? If feedback comes in after the updates are made, how long should individuals expect to wait before their feedback is reviewed and potentially addressed? The resources that NQF develops to accompany the Measure Feedback Tool will help to set clear and realistic expectations with those who submit measure feedback about the time it may take to modify a measure—if a modification is indicated based on the feedback submitted.

Testing Approaches to Incentivize Users to Provide Feedback

User research will support NQF in determining what types of incentives would encourage users to provide measure feedback through the Measure Feedback Tool. Non-financial incentives might include formal recognition in NQF meetings or materials, being featured in a case study or webinar to showcase how measure feedback led to a positive change, participation in a session where feedback can be taken in real time, or simply knowing that the standing committee members reviewed and considered their feedback as part of their measure evaluation discussions and endorsement decisions. Seeking feedback on measures that are included in a value-based payment program also serves as a built-in incentive for providing feedback as measure results have a direct impact on payment levels. Incentives outside of NQF could also be explored (e.g., creating a clinical improvement activity in the Merit-Based Incentive Payment System to credit clinicians for providing feedback on a certain number of quality measures). The incentives from NQF should acknowledge and recognize those that submit measure feedback and eliminate the possible perception that measure feedback goes into a "black box" with no action. NQF will engage those who have submitted measure feedback in the past and organizations and individuals who are well-positioned (e.g., those who collect data to report on the measures, those who are measured, or those who use the measures to inform decision-making) to submit measure feedback but have yet to do so in exploring what would motivate them to submit measure feedback to NQF. Using these insights, NQF will test those approaches that have the potential to increase the volume and quality (e.g., actionability, credibility, specificity, and timeliness) of measure feedback.

STEP ONE METRICS OF SUCCESS

NQF will collect retrospective and prospective data to conduct assessments pre- and post-implementation of the various strategies and tactics described above. Where possible, NQF will conduct A/B tests where a control group receives the status quo approach and a target group receives the test approach. For example, in testing the enhanced communication strategy, a control group will receive the current standard communication and outreach for a feedback opportunity, and a target group will receive more tailored communications. NQF will review the data to determine which group has higher engagement with the Measure Feedback Tool and supporting resources.

Quantitative data to collect and analyze include:

- Pre- and post- number of feedback submissions through the NQF Measure Feedback Tool
- Pre- and post- click-through rates of outreach emails
- Pre- and post- unique and return visitors to the NQF Measure Feedback Tool webpage space
- Pre- and post- click-through rates of the NQF Measure Feedback Tool access points
- Forecasted and actual NQF staff level of effort

Qualitative data to collect and analyze include:

- Responses from potential target organizations and individuals to requests to participate in the pilot test
- Stakeholder survey responses on awareness and understanding of the Measure Feedback Tool and opportunities to submit measure feedback
- User responses following measure feedback submission indicating the source of where users learned about the opportunity to submit measure feedback
- User responses to surveys, key informant interviews, and/or focus group questions on motivators driving measure feedback submissions

As NQF prepares to implement the pilot, it will evaluate the need to comply with the Paperwork Reduction Act on any surveys or questionnaires sent to more than nine individuals. If the strategies and tactics that NQF implements in step one are successful, NQF expects to see an increase in the post-implementation number of feedback submissions, and a higher rate of click-throughs on outreach emails and the Measure Feedback Tool access points on the post-implementation quantitative metrics (Committee goal 1). NQF will monitor for the unintended consequence of generating an increase in the number of complaints about measures by using an increase in the volume of feedback as a metric of success. In step 2, NQF will assess the quality of feedback as a balancing measure to ensure that the quality of feedback increases alongside the volume of feedback. In this step, NQF also expects an increase in stakeholder-reported awareness and understanding of the Measure Feedback Tool and opportunities to submit measure feedback (Committee goal 2). Forecasted and actual staff level of effort will enable NQF to understand the resources requirements to support scaling up and rolling out strategies that are evaluated as successful during the pilot.

From a qualitative perspective, NQF will develop and administer a survey and/or conduct key informant interviews and/or focus groups with individuals and organizations at the beginning, during, and end of the proposed pilot. The purpose of this assessment is to understand awareness of the opportunities to provide measure feedback and the NQF Measure Feedback Tool, understanding of how and when measure feedback can be used, and motivators for submitting measure feedback to NQF. The target sample of participants for these surveys will be those who have never submitted measure feedback, those who have seldom submitted measure feedback, and those who frequently submit measure feedback to NQF. Early qualitative data from external stakeholders indicating positive acceptance of the pilot and enthusiasm to participate will help to inform whether NQF needs to conduct more in-depth stakeholder engagement prior to testing further strategies and tactics. Qualitative data on the source where users learned about the opportunity to submit feedback and motivators for feedback will help to inform refinements of strategies that may not be achieving desired results during step one, and the broader roll out of successful strategies during steps two and three.

Step Two: Standardize and Streamline the Measure Feedback Tool and Process

As NQF works to identify the set of measures for which feedback is a priority and gains stakeholder buy-in with external partners on participating in the pilot, NQF will concurrently begin to test approaches to standardize and streamline the Measure Feedback Tool and the process for collecting measure feedback. In this step of the pilot, NQF will test how to make it easier to structure and process measure feedback that stakeholders submit to NQF. During this step, NQF will explore automation within the measure feedback loop process and integration of the various mechanisms at NQF to provide feedback

on measures. Automation will help to ensure that those who provide feedback receive a timely acknowledgment of their feedback that includes information about how feedback will be addressed and adjudicated (Committee goal 5). Integration will support a standard pathway for generating and collecting measure feedback (Committee goal 6). Standardizing and streamlining the tool and process will help to improve the quality and utility of measure feedback received and shared through the feedback loop, and improve user experience with the measure feedback loop.

During step two, NQF will test strategies to:

1) explore integration of the commenting tool and Measure Feedback Tool;
2) automate acknowledgement of the feedback submission; and
3) standardize the collection of all comments and feedback to the same format that aligns with NQF criteria.

Testing these strategies will enable NQF to make the process of submitting measure feedback as seamless as possible, improve the user experience, and position itself to enter step three to support stakeholders to apply the measure feedback generated through the measure feedback loop.

Integrating the NQF Commenting Tool and Measure Feedback Tool

There are currently myriad ways to provide measure feedback to NQF: using the NQF Measure Feedback Tool, by email, and through public comment periods using the commenting tool, to name a few. NQF also regularly collects general feedback from stakeholders and general website visitors. While these various tools serve as multiple channels for healthcare stakeholders to provide NQF with feedback, they may also be inadvertently creating confusion as to the best pathway to provide measure feedback that will enter the measure feedback loop. To address this, NQF will explore how to most efficiently integrate the NQF Commenting Tool and Measure Feedback Tool to ensure consistency in how stakeholders provide measure feedback to NQF and understanding of what happens to measure feedback submitted to NQF.

Integrating the NQF Commenting Tool and Measure Feedback Tool might involve changes to the tool infrastructure, redirecting links to a single tool, or adding in language to clarify the similarities and differences between the two tools and pathways. Within this strategy, NQF will work to bring the multiple feedback pathways across NQF together into a single standard pathway. This will involve taking an inventory of all of the pathways external stakeholders can take to provide NQF with measure feedback, mapping these pathways to understand where measure feedback can be submitted, and redirecting these pathways into a standard pathway. Work to standardize the pathways will begin early on in step 2 to mitigate risks of delays should IT changes prove more challenging than anticipated.

Automating the Acknowledgement of a Measure Feedback Submission

Stakeholders have previously shared that they are often unsure of what happens to feedback after it is submitted to NQF. They perceive measure feedback to go into a "black box" rather than a measure feedback loop where measure feedback is used to help inform standing committee deliberations and endorsement decisions. When feedback is not acknowledged and how feedback is used is not communicated back to those who submit measure feedback, those who submit feedback are disincentivized to provide future feedback or continue to engage in the measure feedback loop. To begin to close the loop with those who submit feedback, NQF will pilot test approaches to automatically

acknowledge a measure feedback submission (Committee goal 5). NQF will engage end users to inform the content and format of the acknowledgement. NQF will test an automated message pop-up and/or an automated email message that is sent to the individual who submitted measure feedback immediately following the successful submission of measure feedback. End users will inform the key messages contained in this acknowledgement, which will likely include high-level information about next steps such as who is responsible for responding to feedback, when the measure will next be reviewed by a standing committee, deadlines for feedback to be included in measure review, how responses will be communicated and in what timeframe, and the point of contact for follow-up. Over time, as standard approaches to address measure feedback are developed, the automated acknowledgment will evolve to include more detailed information about next steps and expectations such as what kind of feedback goes to different stakeholders and what types of feedback can and cannot be acted up under certain conditions, and why.

To accomplish an automated acknowledgement, NQF will continue to require users to log-in to submit a comment. Although the login requirements can act as a barrier to submitting feedback, without validated contact information for those who have submitted the feedback, NQF would not be able to close the loop. Specifically, removing the login requirements would prevent NQF from meeting the goal of ensuring that those who provide feedback receive an acknowledgment and are informed about the disposition of the feedback and how it was adjudicated. Single-sign-on to the NQF website and associated databases, however, can help to minimize the burden of logging in to provide measure feedback. IT stewardship practices, including enhancing user ability to easily reset their passwords, communicating with organizations to ensure that NQF's internet protocol (IP) address is whitelisted, and automatically overriding system lockouts after three incorrect password attempts, are additional mechanisms by which NQF can minimize burden on those submitting feedback through the Measure Feedback Tool.

Standardize the Format of Feedback and Align with NQF Endorsement Criteria

Currently, the NQF Measure Feedback Tool contains one open-text field for a summary of feedback specific to a particular measure. NQF will convene one or more end-user focus groups to inform ongoing testing of refinements to the Measure Feedback Tool such as standard fields that align with NQF's measure endorsement criteria and other feedback fields that would be most meaningful and actionable to measure users (e.g., burden of data collection, impact on provider workflows, positive or negative unintended consequences, impacts on measured populations, equitability of measures, implementation challenges and solutions, and best practices for meeting the measures). Focus groups participants could include measure developers, measured populations, patients and caregivers, clinicians, specialty society representatives, and health system representatives. Commenting fields will be preceded by language describing the type of feedback being solicited. For example, impacts on provider workflows might include text asking users whether they had to change any workflows in order to implement the measure, or whether they were unable to implement the measure because of workflow challenges. Impacts on measured populations might include text asking whether patients can understand the measure and use measure results to make decisions.[5]

Collecting feedback in the same format through standardized and structured fields will support step three efforts to enable relevant stakeholders to apply measure feedback. The more structured the fields (e.g., through the use of drop downs, standard questions to guide stakeholders to provide measure feedback, and a formalized template), the easier it may be for users to provide feedback and for NQF

staff and other stakeholders to process and analyze the feedback (Committee goal 6). Improvements to the fields can also help to stratify and/or prioritize feedback and determine whether feedback requires more immediate attention or can wait until the next review cycle or update period. Over time, feedback through structured fields could also help with categorizing feedback to help measure developers and/or standing committees to focus their recommendations, and to help NQF and others better understand and trend the data from feedback. For example, are there process issues, definitional issues, unintended consequences, potential patient harm?

Prior to making any enhancements to the Measure Feedback Tool interface, NQF will conduct user research to test potential format changes to make clear what components of measure feedback are most meaningful and actionable to measure developers, standing committees, NQF, CMS, and other relevant healthcare stakeholders. Some of this research will be completed in step one through the work to identify criteria for determining which measures should be prioritized for receiving measure feedback and will likely include questions specific to implementation challenges, data collection burden on patients and providers, and unintended consequences of using the measure in the field. Test questions will explore how structured the fields should be and whether the language describing the commenting fields is clear to a variety of audiences who may wish to submit measure feedback.

STEP TWO METRICS OF SUCCESS

In step two, NQF will also conduct pre- and post-assessments to determine whether the strategies and tactics are achieving desired results, and what refinements or modifications may be required to improve implementation. Unlike in step one, the work in step two does not lend itself well to A/B tests to understand the effect of the strategies and tactics. Creating a standard pathway for measure feedback by exploring integration or ways to connect the Measure Feedback Tool and Commenting Tool, and implementing standardization into the Measure Feedback Tool will require iterative testing with users prior to making IT changes within the tools. As such, NQF will increase engagement with end users during this step to ensure the changes that are implemented will achieve the goals for the measure feedback loop pilot and allow NQF to move into step three.

Quantitative data to collect and analyze in step two include:

- Pre- and post- number of feedback submissions through the NQF Measure Feedback Tool
- Pre- and post- number of feedback submission-related issue emails to project teams

Qualitative data to collect and analyze in step two include:

- Pre- and post-feedback survey results rating how easy or hard it was to use the tool to submit measure feedback
- Pre- and post- rating of the quality of measure feedback (e.g., actionability, credibility, specificity, and timeliness) by survey respondents including NQF staff, measure developers, standing committees, and other measure users

Success in step two would be demonstrated through an increase or maintenance of the number of feedback submissions through the NQF Measure Feedback Tool. A decrease in the volume of feedback might indicate that the changes to the tool have created undue burden or barriers to engaging in the measure feedback loop. NQF would also want to see a reduction in the number of feedback submission-

related issue emails sent to project teams resulting from implementing refinements and modifications to the Measure Feedback Tool.

From a qualitative perspective, NQF will develop and administer a survey on ease of use of the Measure Feedback Loop tool and assess whether the tool is consistently rated as easy to use by stakeholders. NQF will also survey stakeholders with whom measure feedback has been shared in the past before and after the tool fields are standardized and better aligned with NQF's endorsement criteria to assess whether the quality of the feedback has improved (Committee goal 6). Improvements to the quality of the feedback as rated by measure developers and standing committees in particular will indicate readiness to proceed to step three.

Step Three: Support Stakeholders to Apply Measure Feedback

Once NQF has a better understanding of the volume and quality of the measure feedback received through the enhanced measure feedback loop from implementing the strategies and tactics from steps one and two, NQF will proceed to step three. NQF will test how best to support stakeholders to apply feedback on the measures that were identified as priorities for feedback in step one. Strategies in step three will help to ensure that standing committees receive meaningful and adequate information to apply the relevant criteria and make informed recommendations for endorsement (Committee goal 3) and ensure measure developers receive meaningful, actionable, and timely measure feedback (Committee goal 4).

In this step, NQF will test three strategies to:

1) improve how feedback is distributed to measure developers;
2) enhance standing committee ability to use measure feedback in their evaluation of measures in endorsement decisions; and
3) close the loop with those who submit measure feedback by exploring appropriate actions for adjudicating measure feedback.

Implementing of these strategies as part of the pilot will be informed by insights and lessons learned from earlier stages to ensure the approach builds on what strategies and tactics have been assessed as successful to date. Lessons learned from step three will help NQF continue to refine its communication and outreach materials, educational resources, the Measure Feedback Tool, and the measure feedback loop itself.

Distributing Measure Feedback to Measure Developers

A critical step in the measure feedback loop is sharing measure feedback received with measure developers so that they can review and address it appropriately. Before measure developers are able to address feedback, they first need to receive it in a timely fashion. NQF will engage measure developers early on in the pilot to determine optimal mechanisms for receiving feedback on measures, how to ensure NQF and measure developer efforts to solicit feedback are not duplicative, and how to ensure processes are not unnecessarily delayed due to the measure feedback loop. In this step of the pilot, NQF will use results from these early engagements to develop a standard approach for distributing measure feedback to measure developers. NQF and measure developers will have two-way communications to explore questions including:

- How frequently should measure developers receive the measure feedback that NQF receives through the Measure Feedback Tool (e.g., in real-time as it is received by NQF, weekly, monthly, or some other frequency)?
- Does the frequency of sharing measure feedback with measure developers change based on the nature of the measure feedback submitted, whether the feedback is considered high priority, or where the measure is in the maintenance review cycle?
- What format for the measure feedback would be most useful to measure developers?
- How does the timing of measure developers' responses to feedback change based on the complexity of the feedback received to help set expectations for responses with those who submit measure feedback?
- Are there any duplicative processes for collecting measure feedback between NQF and measure developers? And how can NQF and measure developers better align efforts to strengthen the measure feedback loop?

NQF anticipates adding questions to this list based on lessons learned and insights from user research in previous steps, and the measure developer discussions throughout the pilot. Responses from measure developers to the above questions will inform implementation of additional tactics to distribute timely feedback to measure developers (Committee goal 4).

Incorporating Measure Feedback into Standing Committee Materials

As a first step to closing the feedback loop, measure feedback needs to be relayed back to standing committees who have recommended that the measure be NQF-endorsed or maintain its endorsement. For standing committees, measure feedback allows them to review considerations from others involved in the quality improvement enterprise and provides committees with important information to support them to appropriately apply NQF's measure evaluation criteria. Within this step, NQF will examine whether providing standing committees with more high-quality measure feedback (generated through step one) that is structured in a way that aligns with NQF's endorsement criteria (addressed through step two) facilitates and enhances their ability to evaluate measures.

NQF will also engage standing committee members to explore what additional tools and resources would support them to apply the measure feedback in their discussions, and the best way to provide measure feedback to standing committees in committee materials over time as measures go through the maintenance review cycle. NQF will test ways to carry over measure feedback from one review cycle to the next so that standing committees are able to track relevant feedback, identify themes, and monitor progress on actions requested from measure developers. This can include sharing feedback each year for measures within NQF topic area portfolios along with initial responses from measure developers to the feedback submitted, even when feedback is received outside of a measure's review cycle. If feedback is considered high priority (e.g., there are negative unintended clinical consequences) but outside of the measure's review cycle, Committee co-chairs could review this feedback and determine whether additional actions are required from the full standing committee. With an increased volume of feedback and more structured and standardized fields for feedback, NQF may also be able to categorize the feedback

In this step, these tests will apply to those measures that were identified as high priorities for feedback in step one. Because of this, NQF will be able to compare differences in a standing committee's ability to apply the measure feedback for measures within the pilot and measures that were not prioritized for

feedback in step one, and where measure feedback may or may not be shared through the measure feedback loop (Committee goal 3).

Exploring Appropriate Actions to Adjudicate Feedback

In order to close the loop with those who provide measure feedback, NQF will explore appropriate actions to adjudicate the measure feedback. NQF will work with measure developers and standing committees to understand what are the types of feedback that are actionable and what makes the feedback actionable. For example, if NQF receives feedback that one of the validated data collection tools included in the measure's specifications has been modified or that there is a new International Classification of Diseases (ICD) code related to the measure, what is the best timing for developers and committees to receive this feedback so that they can act on it? More broadly, at what point in time is receiving various kinds of feedback ideal? Similarly, how much evidence of unintended consequences would be required in order to spur action from a measure developer and/or standing committee? And what would the action or actions be in this case? NQF will also seek to understand the types of feedback where no action should or could be taken by either the measure developer, the Standing Committee, or both. NQF will use this information to help align expectations between those who submit measure feedback, measure developers, and standing committees for adjudicating measure feedback (Committee goal 5).

To support these efforts, NQF may engage standing committees and measure developers to develop case vignettes based on the identified measures from step one. These vignettes could then inform a broader rollout of successful strategies from this step and the continued improvement of strategies in previous steps. For instance, learning more about the kinds of action that measure developers and standing committees can take based on measure feedback, and the best timeframe for receiving such feedback for action to occur, would enable NQF to refine language in the automated acknowledgement email to those who submit measure feedback in order to clarify expectations. This test would support implementation of the recommended strategy for measure developers to respond to those providing feedback with acknowledgment and next steps in real time during standing committee review or in monthly or quarterly batched responses.

STEP THREE METRICS OF SUCCESS

In step three, NQF will conduct pre- and post-assessments with measure developers, standing committee members, and those who submit feedback to determine the success of strategies and tactics to support stakeholders to apply measure feedback. NQF will develop a survey or conduct key informant interviews or focus groups to understand whether the utility of the measure feedback generated and shared through the measure feedback loop pilot is higher quality, more useful, more meaningful, and more actionable than feedback on measures received prior to the pilot implementation and when compared to measures that are not prioritized for feedback in step one. Data collection will include demographic information to determine if measure developer and/or standing committee member expertise, committee tenure, or other factors influence results. NQF will analyze qualitative data to evaluate whether to continue to test and refine the strategies and tactics from the pilot, or how best to continue to improve the measure feedback loop.

Quantitative data to collect and analyze in step three include:

- Forecasted and actual NQF staff level of effort

Qualitative data to collect and analyze in step three include:

- Standing committee member-reported improvement in the quality of measure feedback shared in standing committee materials
- Standing committee member-reported ability to use measure feedback to apply the relevant criteria and make informed recommendations for endorsement or re-endorsement
- Measure developer-reported improvement in the quality of measure feedback shared
- Measure developer-reported rating of meaningfulness and actionability of feedback from the measure feedback loop
- Measure feedback submitter-reported experience in hearing about how their feedback was considered and/or addressed

NQF will evaluate step three success based on positive changes in standing committee member- and measure developer-reported quality of measure feedback, improvement in standing committee member ability to use feedback to apply the relevant criteria and make recommendations for endorsement, and improvement in measure developer-reported meaningfulness and actionability of measure feedback (Committee goals 3 and 4). As in prior steps of the pilot, NQF will use forecasted and actual staff level of effort to understand resources requirements of these additional activities and support the plan to scale successful strategies.

Continuous Quality Improvement and Pilot Evaluation Plan

Throughout the proposed pilot, NQF will evaluate the strategies against the goals identified for the measure feedback loop and assess the feasibility, cost, and NQF staff level of effort of implementing the strategies and tactics described above. Additionally, NQF will monitor for any potential negative unintended consequences of implementing changes to the current measure feedback loop process and the Measure Feedback Loop tool such as overburdening measure developers, standing committee members, and/or those who provide measure feedback to NQF.

Rather than waiting until the completion of step three to determine success of each strategy and tactic, NQF will employ agile methods to collect and analyze data throughout all three steps to support quickly scaling successful strategies, modifying and retesting, and/or discontinuing strategies that are not successful. NQF will employ a mixed-methods approach to evaluating the measure feedback loop pilot, collecting data from existing sources, surveys, and user research focus groups. Collecting and assessing data that NQF naturally collects as part of its regular processes or early on in the pilot process will help to accelerate learning about what is working and what is not in the measure feedback loop implementation.

In the lead up to each step of the pilot, NQF will design and test the data collection tools it will employ to assess the success of the strategies and tactics. This includes designing and validating the survey tools, key informant interview questions, and focus group discussion guides for the pre- and post-assessments. In implementing the pilot, NQF will make clear to internal and external stakeholders the need for data to support the evaluation of the pilot and will regularly monitor data entry to ensure data quality and accuracy. NQF will collect quantitative data throughout the pilot on an ongoing basis and determine the optimal frequency of analysis based on the type of strategy and tactic being tested and the volume of data received. For example, NQF will want to assess within the first two weeks of testing new communications and outreach approaches whether these are generating any increase in the

volume of measure feedback and whether there are any unexpected issues arising from the changes implemented. This method supports NQF to address any issues, mitigate risks, and adjust its implementation approach based on close to real-time data.

Evaluating Success

At the end of the pilot period, NQF will evaluate the success of the pilot, documenting results, lessons learned, and recommended next steps in a summary report detailing whether NQF was able to:

1) generate more meaningful and actionable measure feedback,
2) standardize and streamline the NQF Measure Feedback Tool and measure feedback process, and
3) support stakeholders to apply measure feedback.

NQF will report on the full set of metrics of success based on pre- and post-implementation of the pilot. Unless indicated below, a higher number or proportion of the metric is better. NQF will set targets for these metrics prior to pilot implementation. The pilot will be judged successful if NQF sees more and higher quality measure feedback than before the pilot is implemented, improved user experiences with the NQF Measure Feedback Tool, and enhanced stakeholder engagement with measure feedback and in the measure feedback loop as measured by:

- Number of feedback submissions through the NQF Measure Feedback Tool
- Click-through rates of outreach emails
- Unique and return visitors to the NQF Measure Feedback Tool webpage space
- Click-through rates of the NQF Measure Feedback Tool access points
- NQF staff level of effort (equal to or not significantly higher than pre-implementation or forecasted levels)
- Lower number of feedback submission-related issue emails to project teams
- Stakeholder awareness and understanding of the Measure Feedback Tool and opportunities to submit measure feedback
- Number of users indicating they learned about the opportunity to submit measure feedback through pilot strategies compared to status-quo approaches
- Number of measures adjusted based on feedback received through the feedback loop
- Proportion of stakeholders rating the Measure Feedback Tool as easy to use
- Proportion of stakeholder rating the quality of measure feedback as high along dimensions of actionability, credibility (e.g., use of evidence), specificity, and timeliness

If NQF is able to meet all of the goals for the measure feedback loop pilot while not experiencing an unsustainable increase in NQF staff level of effort or financial resource expenditure, or performance measurement stakeholder effort and resource expenditure, NQF will explore plans to implement all of the successful strategies and tactics to define a standard process for eliciting and sharing feedback with healthcare community stakeholders on using and reporting NQF-endorsed performance measures across the organization. If the pilot is successful, follow-on activities would involve examining modifications to existing processes and forms such as the measure submission form or standing committee guidance for applying the measure evaluation criteria. These activities would build on recommendations from the Measure Feedback Loop Committee in prior steps of the work.

Proposed Pilot Implementation Timeline

The pilot implementation plan is intended to be complete within 18 months, including the final pilot evaluation. As detailed above, NQF will assess the level of effort and resource requirements associated with successful strategies and scale those whose additional costs are marginal compared to the benefits they are achieving. For successful strategies where costs are either higher than anticipated or at forecasted levels but unsustainable across a broad area, NQF will explore process improvement opportunities to determine whether it is possible to reduce the resource requirements for scaling up.

An illustrative timeline (Figure 2) displays a high-level overview of how and when NQF would execute the pilot implementation. Activities in orange indicate those that fall into step one. Activities color-coded in teal indicate those that are in step two. As described above, step one and step two include some activities that run concurrently. NQF anticipates that communications and outreach efforts will extend beyond efforts to standardize and streamline the NQF Measure Feedback Tool and process in step two. Step three activities are indicated in green. While these activities require NQF to have generated measure feedback from relevant stakeholders, NQF will conduct outreach to and collaborate with measure developers and standing committee members to prepare for step three activities to apply measure feedback during steps one and two. Assessment and evaluation activities are coded in purple. These set of activities are related to pre- and post-testing, evaluation, and the continuous quality improvement approach to adjust and reassess strategies that are not meeting targets, and to adopt and explore roll-out of strategies that are successful in meeting targets.

The first 6 – 7 months of the pilot will build on insights and recommendations from prior steps of this project and prepare for collecting and applying measure feedback in the enhanced measure feedback loop. The first few months are focused on refining the plan based on early data collected in the pilot, developing resources and pilot materials such as the dedicated space for the Measure Feedback Tool and accompanying resources, drafting communication and outreach materials, identifying and securing collaborators to participate in the pilot, and prioritizing measures for inclusion in the pilot. In these early months, NQF's IT team, informed by a focused user group, will work on the potential reformatting of the Measure Feedback Tool, along with integration of the various measure feedback pathways, and automation of responses to those who submit measure feedback. In these first few months, NQF also plans to deploy the pre-test tools to establish a baseline for assessing the success of strategies and tactics in the pilot.

Figure 2. Illustrative Timeline for the Proposed Pilot (numbered columns indicate months)

Activities	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Identify priority measures	■	■	■															
Secure collaborators		■	■	■														
Develop and launch communications plan		■	■	■	■	■	■	■	■	■	■	■						
Make the feedback tool more accessible	■	■	■	■														
Test approaches to incentivize feedback				■	■	■	■	■	■									
Integrate comment and feedback tools	■	■	■	■	■	■												
Automate acknowledgment of submission	■	■	■	■	■													
Standardize format of the tool	■	■	■	■	■	■	■											
Collect measure feedback						■	■	■	■	■	■	■	■	■	■	■	■	■
Distribute feedback to measure developers							■	■	■	■	■	■	■	■	■	■	■	■
Incorporate feedback into committee materials							■	■	■	■	■	■	■	■	■	■	■	■
Explore actions to adjudicate feedback										■	■	■	■	■	■	■	■	■

Activities	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Create evaluation tools	■	■	■															
Collect and analyze pre-test data				■	■													
Collect and analyze post-test data						■	■	■	■	■	■	■	■	■	■	■	■	■
Assess successes and failures							■	■	■	■	■	■	■	■	■	■	■	■
Adjust approaches and reassess								■	■	■	■	■	■	■	■	■	■	■
Determine feasibility of scaling up										■	■	■	■	■	■	■	■	■
Roll out successful strategies											■	■	■	■	■	■	■	■

A Path Forward

This report represents a comprehensive and multistakeholder-driven approach to enhancing the process by which NQF solicits, collects, facilitates, and shares measure feedback among stakeholders within the NQF endorsement and maintenance processes. Pilot testing the strategies and tactics detailed in the implementation plan report is an important step in ongoing efforts to continually improve NQF processes. As NQF learns what does and does not work in improving the measure feedback loop, it can remain open to new and innovative approaches to collect and share feedback through the measure feedback loop. These may include strategies recommended by the Measure Feedback Loop Committee that have high potential benefit, but whose current implementation costs prevent their deployment in a pilot test approach. Data collection and achieving success through each step of the pilot positions NQF to implement additional strategies in the future across multiple standing committees with greater success.

The success of the measure feedback loop pilot and continuous efforts to improve the measure feedback loop requires the buy-in and participation of key stakeholders from the healthcare community, including CMS, measure developers, standing committee members, and individuals or organizations positioned to provide measure feedback. NQF will engage these key stakeholders to explore implementing the proposed pilot plan described in this report. Continuing to improve the measure feedback loop is vital to the success of quality improvement enterprise.

Appendices

Appendix A: Measure Feedback Loop Committee Roster

Rose Baez, RN, MSN, MBA, CPHQ, CPPS (Co-chair)
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Appendix B: NQF Project Staff for the Pilot Implementation Plan

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Appendix C: Bibliography

1 NQF: Submitting Standards.
   http://www.qualityforum.org/Measuring_Performance/Submitting_Standards.aspx. Last accessed
   February 2020.

2 Altman M. Design Thinking in Health Care. *Prev Chronic Dis*. 2018;15.
   https://www.cdc.gov/pcd/issues/2018/18_0128.htm. Last accessed February 2020.

3 User Research Basics. https://www.usability.gov/what-and-why/user-research.html. Published
   October 8, 2013. Last accessed February 2020.

4 IDEO.org. *What Is Human-Centered Design?*; 2014. https://vimeo.com/106505300. Last accessed
   February 2020.

5 *The Patient Engagement in Quality Measurement Rubric.*; 2019.
   https://www.pqaalliance.org/assets/PQA-Patient-Engagement-Rubric.pdf.