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Measure Feedback Loop

Options for Piloting the Measure Feedback Loop, Part 1

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Welcome and Introductions

NQF Project Staff

- Ashlie Wilbon, MS, MPH, FNP-C, Senior Director

- Jean-Luc Tilly, MPA, Senior Manager, Data Analytics

- Madison Jung, Project Manager

- Navya Kumar, MPH, Project Analyst

Federal Liaisons

CMS

- Maria Durham

- Sophia Chan

- Patrick Wynne

- Melissa Evans

Agenda

- Welcome and Roll Call

- Discuss Feedback Loop Pilot Goals

- Discuss Proposed Strategies to Address Pilot Goals

- Discuss Cost/Benefit Analysis of Pilot Strategies

- Opportunity for Public Comment

- Next Steps

Measure Feedback Loop Committee

- **Co-chair:** Rose Baez, RN, MSN, CPHQ, CPPS
- **Co-chair:** Edison Machado, MD, MBA
- Constance Anderson, BSN, MBA
- Robert Centor, MD, MACP
- Elvia Chavarria, MPH
- Dan Culica, MD, PhD
- Melody Danko Holsomback
- Anne Deutsch, RN, PhD
- Tricia Elliott, MBA, CPHQ
- Lee Fleisher, MD

- Mark E. Huang, MD
- Joseph Kunisch, PhD, RN-BC, CPHQ
- Claire Noel-Miller, MPA, PhD
- Ekta Punwani, MHA
- Koryn Rubin, MHA
- Elizabeth (Beth) Rubinstein
- Sue Sheridan, MIM, MBA, DHL
- Jill Shuemaker, RN, CPHIMS
- Heather Smith, PT, MPH
- Deborah Struth, MSN, RN, PhD(c)
- Sara Toomey, MD, MPhil, MPH, MSc

Meeting Objectives

- Reach consensus on the goals of the feedback loop pilot

- Discuss approach to recommending a feedback loop pilot option

- Identify strategies to implement in an NQF feedback loop pilot

- Identify costs and benefits against which strategies will be assessed

Approach to Identifying Feedback Loop Pilot Options

Webinar #5 (Today)

1. Establish goals of the Feedback Loop Pilot
2. Discuss goals of the pilot, problems to address, and solutions/strategies to address the goals and problems
3. Define the costs and benefits to assess pilot strategies

  - *After Webinar:*
   - » Committee to assesses costs and benefits of strategies via survey

Webinar #6 (September 3, 2-4 pm)

5. Discuss cost/benefit analyses results
6. Discuss potential pilot options

Webinar #7 (September 5, 2-4 pm)

7. Committee discusses pilot options

  - *After Webinar:*
    - » Committee votes to recommend a pilot option via survey

Defining the Consensus Development Process (CDP) Feedback Loop

Measure Users

NQF Endorsement & Maintenance

CDP Standing Committees

Measure Developers
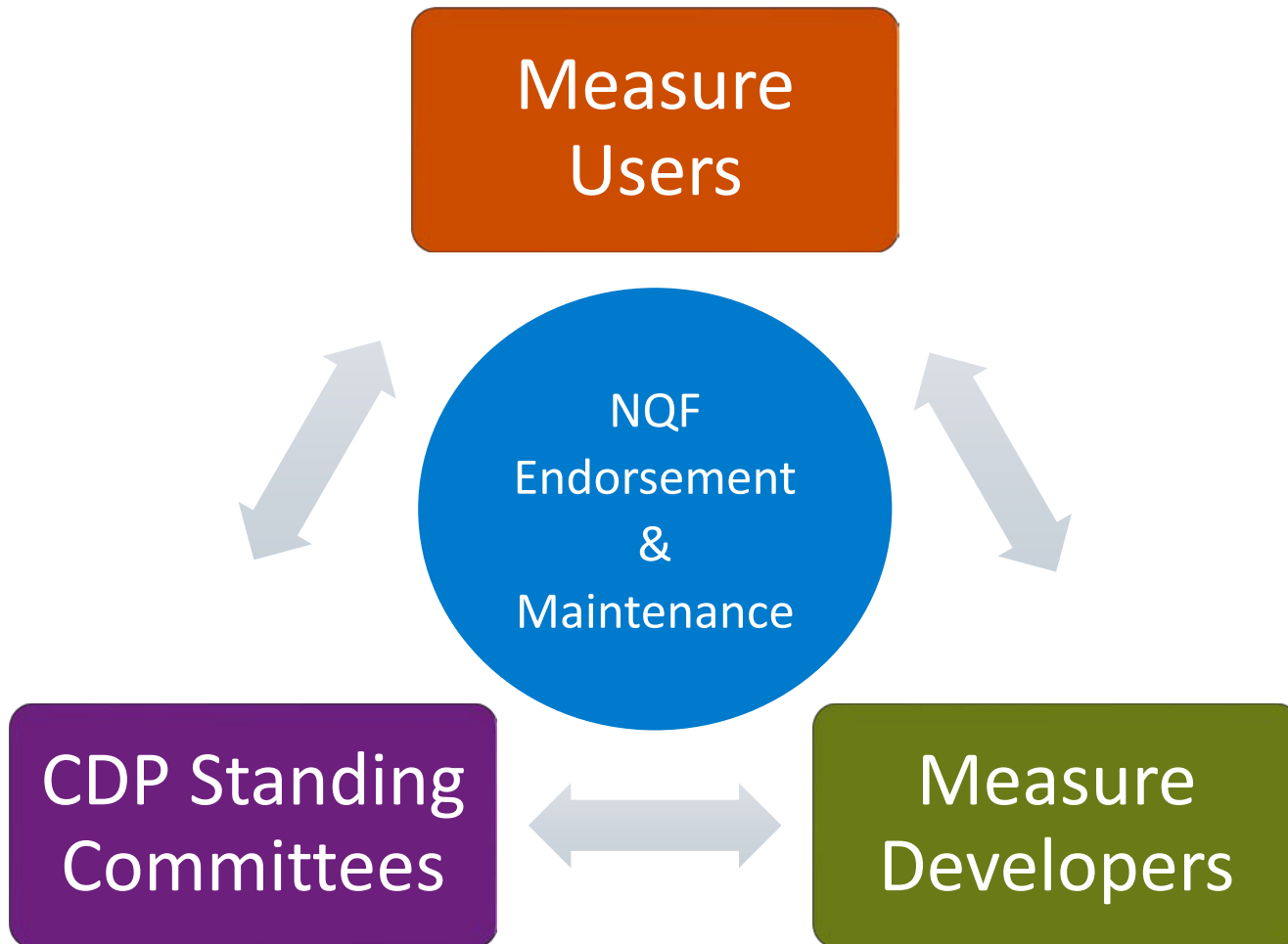
Defining the CDP Feedback Loop

NQF Role

- Steward of endorsement

- Facilitator (providing tools, channels to collect feedback)

- Serve as a central repository for feedback on endorsed measures

- Ensure that information is passed and shared among the appropriate stakeholders

- Ensure that endorsed measures adhere to the NQF evaluation criteria

Defining the CDP Feedback Loop

NQF Standing Committee Role

- Apply NQF criteria for the evaluation of measures under consideration for endorsement and maintenance of endorsement

- Provide feedback to the measure developers during measure evaluation

- Respond to comments from commenters

Defining the CDP Feedback Loop

Measure Developer Role

- Solicit and collect feedback from those using their measures

- Report feedback on their measures for endorsement consideration

- Consider feedback and take action to modify their measure if needed

- Respond to commenters who submit feedback

Defining the CDP Feedback Loop

Measure Users

- Those who use measures to make decisions (patients, consumers, caregivers)

- Those who are being measured

- Those who implement measures

- Those who use measure results for performance improvement programs, payment, or other accountability functions, internal quality improvement

- Submit feedback based on their perspective and experience with the measure

Committee Discussion

- Does the Committee agree with the conceptualization of how the NQF feedback loop should function?

- Does the Committee agree that these are the roles of the key feedback loop stakeholders?

Proposed Goals of the Feedback Loop Pilot

1. Improve accessibility and ease of use of NQF tools designed to collect feedback; minimize burden for users to provide feedback

2. The relevant stakeholders (users/implementers/those being measured) are aware of opportunities and channels to comment and provide measure feedback to NQF

3. NQF Standing Committees receive meaningful and adequate information to apply the relevant criteria (in importance, U/U, and feasibility) and make recommendations for endorsement

4. Developers are provided with meaningful and actionable measure feedback for consideration in a timely manner

5. Those who provide feedback are provided an acknowledgement and disposition of the feedback and how it was adjudicated

Survey Results (n=15)

Goals	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	Weighted Average
Increase accessibility and ease of use of tools designed to collect feedback; minimize burden for users to provide feedback	100%	0%	0%	0%	0%	**5**
The relevant stakeholders (users/implementers/those being measured) are aware of opportunities and channels to comment and provide measure feedback to NQF	80%	20%	0%	0%	0%	**4.6**
NQF Standing Committees receive meaningful and adequate information to apply the relevant criteria (in importance, U/U, and feasibility)	47%	53%	0%	0%	0%	**3.93**
Developers are provided with meaningful and actionable feedback for consideration in a timely manner	73%	20%	7%	0%	0%	**4.47**
Those who provide feedback are provided an acknowledgement and understand how/if it will be adjudicated	53%	40%	0%	7%	0%	**4**

Survey Results – Additional Suggested Goals

- Beta testing with public end users to test literacy levels and comprehension of measure or formats where end users have to utilize measure results for decision choice. This is a group that has not been part of measurement loop feedback and should be considered when developing public end user measurements.

- Under goal 1 - I would encourage the inclusion of stakeholders in disseminating information to providers on where/how to find tools for feedback.

- Process should be transparent and understood by all stakeholders

- Developers respond to questions from stakeholders (users/implementers/those being measured) within 24 hours or at minimum 48 hours prior to the public comment deadline, in order for meaningful and actionable feedback to be provided.

- A template with prefilled fields should be available that also allows the submitter to categorize the feedback, i.e., workflow related, data capture, care delivery, etc.

Committee Discussion

- Do these goals adequately address the key areas of focus for the feedback loop pilot? How might they be modified to better delineate the goals?

- Are there additional goals that should be considered?

Lead Discussants/Discussants

Goal	Lead Discussants/Discussants
Goal 1: Improve accessibility and ease of use of tools designed to collect feedback; minimize burden for users to provide feedback	**Connie Anderson (Lead)** Mark E. Huang Etka Punwani Sue Sheridan
Goal 2: The relevant stakeholders (users/implementers/those being measured) are aware of opportunities and channels to comment and provide measure feedback to NQF	**Elizabeth Rubinstein (Lead)** Robert Centor Jill Shuemaker Koryn Rubin
Goal 3: NQF Standing Committees receive meaningful and adequate information to apply the relevant criteria (i.e., Importance, U/U, and Feasibility)	**Lee Fleisher (Lead)** Elvia Chavarria Tricia Elliott Heather Smith
Goal 4: Developers are provided with meaningful and actionable feedback for consideration in a timely manner	**Anne Deutsch (Lead)** Sara Toomey Dan Culica Deborah Struth
Goal 5: Those who provide feedback are provided an acknowledgement and understand how/if it will be adjudicated	**Joseph Kunisch (Lead)** Melody Danko Holsomback Claire Noel-Miller

Goal 1: Improve accessibility and ease of use of tools designed to collect feedback; minimize burden for users to provide feedback

Ongoing Activities:

- The CDP public commenting portal is available on each project's page during an active public commenting period

- The NQF Measure Feedback Tool can be accessed on the NQF home page or via QPS.

Goal 1: Improve accessibility and ease of use of tools designed to collect feedback; minimize burden for users to provide feedback

- Problems/challenges to address with pilot based on current state:
  1. *Log-in requirement is discouraging*
  2. *Difficult to find feedback/commenting tools on the website*

- Are there other problems to address to meet this goal?

Goal 1: Improve accessibility and ease of use of tools designed to collect feedback; minimize burden for users to provide feedback

Problem 1: Log-in requirement is discouraging

- Strategy 1: Remove log-in requirement to provide comments
  - *Commenters must identify themselves or organization, but can opt to leave email address if they would like a follow-up response.*

Goal 1: Improve accessibility and ease of use of NQF tools designed to collect feedback; minimize burden for users to provide feedback

Problem 2: Difficult to find feedback/commenting tools on the website

- <u>Strategy 2</u>: Make access point for feedback tool more prominent/visible on website
  - Visible home page icon that is easily accessed
  - Increase visibility and accessibility in Quality Positioning System (QPS)
- <u>Strategy 3</u>: Enable simple, accessible viewing of all comments submitted on any endorsed measures
  - Users would be able to easily access all comments submitted for a measure throughout its endorsement lifecycle in one accessible location (i.e., MAP comments, comments submitted via Feedback Tool [outside of endorsement review], and comments submitted during endorsement consideration)

Goal 2: The relevant stakeholders (users/implementers/those being measured) are aware of opportunities and channels to comment and provide measure feedback to NQF

Ongoing Activities:

- Solicit comments for measures that are actively under review via blast emails to members and individuals who have opted in to receive project notices

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Goal 2: The relevant stakeholders (users/implementers/those being measured) are aware of opportunities and channels to comment and provide measure feedback to NQF

- Problems/challenges to address with pilot based on current state:

    1. *Solicitation of comments/feedback from NQF is passive; Measure users are unaware that there are opportunities to provide feedback*

    2. *Those who are using measures and implement measures do not know how to provide feedback to NQF*

    3. *Feedback is being generated in different unstandardized ways*

- Are there other problems to address to meet this goal?

Goal 2: The relevant stakeholders (users/implementers/those being measured) are aware of opportunities and channels to comment and provide measure feedback to NQF

Problem 1: Solicitation of comments/feedback from NQF is passive. Measure users are unaware that there are opportunities to provide feedback

- <u>Strategy 1</u>: Expand marketing and communication strategy to promote use of NQF commenting and feedback tools by measure users
  - Identify target list of key stakeholders for each topic area and perspective (e.g., patient focused organizations, specialty societies)
  - Develop education materials or guidance tailored toward the needs of the specific stakeholder group
  - Establish partnerships to enable communication of NQF feedback opportunities through target organizations (i.e., through their website, communication channels to their constituency)
  - Establish practices for using social media outlets to publicize commenting periods (i.e., Twitter, Linked In)

Goal 2: The relevant stakeholders (users/implementers/those being measured) are aware of opportunities and channels to comment and provide measure feedback to NQF

Problem 2: Those who are using measures and implement measures do not know how to provide feedback to NQF

- Strategy 2: Develop educational resources and opportunities to inform individuals of where they can provide feedback

- Strategy 3: Align submission of feedback with workflow and data entry for measure data collection. Explore opportunities to partner with EHR vendors, and other more commonly utilized tools by measure implementers (e.g. QCDRs, registries), to incorporate links to NQFs measure feedback tool into the user interface

- Strategy 4: Encourage measure stewards with NQF-endorsed measures to share the link to the NQF measure feedback tool with known users of their measures

- Strategy 5: Provide guidance to submitters on "how to" submit a comment
  - *Develop and post a tutorial document/video on the instructions to submitting a comment to the NQF website*

Goal 2: The relevant stakeholders (users/implementers/those being measured) are aware of opportunities and channels to comment and provide measure feedback to NQF

Problem 3: Feedback is being generated in different unstandardized ways

- <u>Strategy 6:</u> Standardize collection of all comments and feedback collected by NQF to the same format and tool/interface
  - *Provide structure for those submitting feedback that aligns with NQF criteria; text boxes associated with the following categories of information:*
    - » Improvement data/Impact of measurement on performance scores
    - » Feasibility of implementation (e.g., challenges with specifications, data collection strategy)
    - » Unintended consequences/benefits
    - » How measure is being used (program, location, purpose, etc.)

Goal 3: NQF Standing Committees receive meaningful and adequate information to apply the relevant criteria (i.e., Importance, U/U, and Feasibility)

Ongoing Activities:

- Developers complete the submission form with information available to them for evaluation of their measure for endorsement and maintenance

- Solicit comments for measures that are actively under review and include them in the Committee materials for evaluation of the measure

- Include comments and recommendations from the Measure Applications Partnership deliberations in Standing Committee measure evaluation materials.

Goal 3: NQF Standing Committees receive meaningful and adequate information to apply the relevant criteria (i.e., Importance, U/U, and Feasibility)

- Problems/challenges to address with pilot based on current state:

    1. *Measure submission form items for Usability and Use are often incomplete or have inadequate responses from developers.*

    2. *Developers do not always know who is using their measure and who to collect feedback from in order to adequately complete the submission form.*

    3. *NQF receives few comments/feedback for the Committee to consider during a measure's three-year endorsement period and endorsement review.*

- Are there other problems to address to meet this goal?

Goal 3: NQF Standing Committees receive meaningful and adequate information to apply the relevant criteria (i.e., Importance, U/U, and Feasibility)

Problem 1: Measure submission form items for Usability and Use are often incomplete or have inadequate responses; Committees are unable to effectively apply the criteria

- <u>Strategy 1</u>: Revise the submission form to clarify questions and modify as needed to correspond with any changes to the evaluation criteria
  - *Clarify questions regarding:*
    - » Process for obtaining feedback (during testing and implementation)
    - » Description of the feedback (by use and type of user)
    - » Developer actions taken in response to feedback
  - *Addition of questions addressing intended audience and usability specifically for patients/consumers*
  - *Move questions regarding feedback questions under usability*

Goal 3: NQF Standing Committees receive meaningful and adequate information to apply the relevant criteria (in importance, U/U, and feasibility)

Problem 1: Measure Submission form items for Usability and Use are often incomplete or have inadequate responses; Committees are unable to effectively apply the criteria

- <u>Strategy 2:</u> In preparation for endorsement-maintenance review, NQF staff will access JIRA, Impact Reports, QRS/QHP Reports, and other resources for implementation feedback and incorporate it into Committee materials.

- <u>Strategy 3:</u> NQF to identify measures with missing feedback (defined as fewer than 5 public comments in the past 5 years and no meaningful entries in the "Feedback by those being measured and others" section of the Measure Submission Form), and collaborate with developers to proactively identify a strategy to collect measure feedback.

- <u>Strategy 4:</u> Align the submission of feedback with workflow and data entry for measure data collection

Goal 3: NQF Standing Committees receive meaningful and adequate information to apply the relevant criteria (in importance, U/U, and feasibility)

Problem 1: Measure Submission form items for Usability and Use are often incomplete or have inadequate responses; Committees are unable to effectively apply the criteria

- Strategy 5: In preparation for maintenance review, NQF staff to conduct literature searches using PubMed to identify any published implementations of the measure, and impacts identified.

- Strategy 6: NQF staff to ensure that comments are carried from one maintenance review cycle to the next so that committees can track relevant comments, identify themes of feedback, and requested actions from developer

Goal 3: NQF Standing Committees receive meaningful and adequate information to apply the relevant criteria (in importance, U/U, and feasibility)

Problem 2: Developers do not always know who is using their measure and who to collect feedback from, in order to adequately complete the submission form.

- Strategy 3: NQF to identify measures with missing feedback (defined as fewer than 5 public comments in the past 5 years and no meaningful entries in the "Feedback by those being measured and others" section of the Measure Submission Form), and collaborate with developers to proactively identify a strategy to collect measure feedback.

- Strategy 7: Partner with CMS to receive an annual export of the feedback collected through JIRA and distribute to measure developers

Goal 3: NQF Standing Committees receive meaningful and adequate information to apply the relevant criteria (in importance, U/U, and feasibility)

Problem 2: Developers do not always know who is using their measure and who to collect feedback from, in order to adequately complete the submission form.

- <u>Strategy 8</u>: Partner with specialty societies and relevant organizations to identify opportunities for using NQF feedback tool as standard method for collecting feedback on NQF-endorsed measures

  - For each project/topic area identify relevant specialty societies, patient focused organizations and other interest groups that should be targeted for outreach and feedback.

  - Identify contacts and seek to establish relationship (will require education efforts to make sure they know who we are, what we want from them, why it's of value to them to participate, and how they actually do it [i.e., where on the website, link to tool, etc.])

Goal 3: NQF Standing Committees receive meaningful and adequate information to apply the relevant criteria (in importance, U/U, and feasibility)

Problem 3: NQF receives a low number of comments for the Committee consider during a measure's three-year endorsement period.

- <u>Strategy 2</u>: In preparation for endorsement-maintenance review, NQF staff to access JIRA, Impact Reports, QRS/QHP Reports, and other resources for implementation feedback and incorporate it into Committee materials.

- <u>Strategy 7</u>: Partner with CMS to receive an annual export of the feedback collected through JIRA and distribute to measure developers

Goal 4: Developers are provided with meaningful and actionable feedback for consideration in a timely manner

Ongoing Activities:

During endorsement-maintenance review:

- Comments submitted prior to Committee evaluation are shared with the developer within 1 week and discussed by the Committee during their deliberations

- Developer provides written responses to comments submitted after committee recommendations and are discussed on the post-comment call

- Comments are posted on the project page with developer and committee responses and included in report as an appendix

Goal 4: Developers are provided with meaningful and actionable feedback for consideration in a timely manner

- Problems/challenges to address with pilot based on current state:
  1. *No existing process or capability to send feedback to developers in real-time*
  2. *Expectations and timing for addressing feedback is unclear*
  3. *Feedback is being generated in unstandardized pathways*

Goal 4: Developers are provided with meaningful and actionable feedback for consideration in a timely manner

Problem 1: No existing process to send feedback to developers in real-time (measures not under review)

- Strategy 1: Modify the NQF Measure Feedback Tool so that comments submitted are automatically sent to measure steward and available for viewing on NQF's website.
  - *The measure steward would be able to respond to comments via a link in their email that is sent back to the NQF maintenance team and the commenter.*

Goal 4: Developers are provided with meaningful and actionable feedback for consideration in a timely manner

Problem 2: Expectations and timing for addressing feedback is unclear

- <u>Strategy 2</u>: Establish guidelines for developer response to feedback on NQF-endorsed measures
  - *Acknowledge receipt of feedback within 48 hours*
  - *Within 30 days of receipt, developer should respond to commenter with anticipated plan or actions that will/will not be taken in response to the feedback.*
- <u>Strategy 3</u>: NQF to work with federal partners and establish guidance for developers on submitting measures for rule-making and endorsement consideration (i.e., suggested timeline) and expectations for addressing feedback within that timeline.

Goal 4: Developers are provided with meaningful and actionable feedback for consideration in a timely manner

Problem 4: Feedback is being generated in unstandardized pathways

- <u>Strategy 4:</u> Standardize collection of all comments and feedback collected by NQF to the same format and the same tool/interface
  - *Provide structure for those submitting feedback that aligns with NQF criteria; text boxes associated with the following categories of information:*
    - » Improvement data/Impact of measurement on performance scores
    - » Feasibility of implementation (e.g., challenges with specifications, data collection strategy)
    - » Unintended consequences/benefits
    - » How measure is being used (program, location, purpose, etc.
- <u>Strategy 5:</u> Provide guidance to submitters on "how to" submit a comment
  - *Develop and post a tutorial document/video on the instructions to submitting a comment to the NQF website*

Goal 5: Those who provide feedback are provided an acknowledgement and understand how/if it will be adjudicated

Ongoing Activities:

During endorsement maintenance review:

- Commenters receive written responses from developers, Committee members, and NQF staff and may attend the Committee's post-comment call to hear discussion of comments

- Comment responses are posted on the project page and included in report as an appendix

Goal 5: Those who provide feedback are provided an acknowledgement and understand how/if it will be adjudicated

- Problems/challenges to address with pilot based on current state:
    1. *Some commenters do not receive confirmation of receipt of their feedback, information on who received their comment, how it was considered, or whether some action was taken based on their comments*

- Are there other problems to address to meet this goal?

Goal 5: Those who provide feedback are provided an acknowledgement and understand how/if it will be adjudicated

Problem 1: Commenters do not receive confirmation of receipt of their feedback; to whom their comment is going to and how it is considered; whether some action was taken based on their comments

- Strategy 1: Communicate expectations for commenters and those who provide feedback on how their feedback may or may not be acted upon during the current phase of the measure development/maintenance lifecycle before they enter a comment (disclaimer on the commenting interface)
  - *NQF to require developers to respond to commenters within 48 hours*
- Strategy 2: Automate responses to commenters from the NQF Measure feedback tool

Cost/Benefit Assessment of Strategies and Solutions

1. Identify a set of costs and benefits against which each strategy can be assessed
   - *Assessment of High, Moderate, Low*
2. Committee members will be surveyed for their cost/benefit assessment of the strategies/solutions that have been identified to date; NQF staff will also assess
3. Results will be used to select and aggregate strategies into various pilot options
4. Select strategies/solutions for each goal that are:
   - *Feasible (low cost)*
   - *High impact (high benefit)*
   - *Address problems and pilot goals, and*
   - *Meet contractual requirements (IT, Specialty Society Outreach)*

Proposed Cost/Benefit Analysis

- Assessment of Costs (Feasibility)
  - *Increase in NQF Workload/Resources*
  - *Investment in Technology*
  - *Increase in Developer Workload/Resources*

- Assessment of Benefits (Impact)
  - *Increase in Feedback Volume*
  - *Increase in Feedback Quality*
  - *Addresses at least one pilot goal*
  - *Meets stakeholder needs (split out by stakeholder? –dev, committee, NQF, user/commenter)*

- Other costs and benefits to be added to assess feasibility and impact?

Opportunity for Public Comment

Next Steps

- Web Meeting 6 – Options for Piloting the Measure Feedback Loop, Part 2
  - *September 3, 2019, 2-4 pm ET*

- Web Meeting 7 – Options for Piloting the Measure Feedback Loop, Part 3
  - *September 5, 2019, 2-4 pm ET*

- NQF Pilot Options Draft Report
  - *Post for 14-day public and NQF member comment period from October 7, 2019 to October 21, 2019*

- NQF Pilot Options Final Report
  - *Due to CMS on November 11, 2019*

Overview of Meeting Timeline

Meeting	Date
Web Meeting 6 and 7: Options for Piloting the Measure Feedback Loop, Parts 2 and 3 [2 hours each]	September 3, 2019, 2-4 pm ET September 5, 2019, 2-4 pm ET
Web Meeting 8: Implementation Plan [2 hours]	November 19, 2019, 2-4 pm ET
Web Meeting 9: Project Wrap-Up [2 hours]	January 16, 2020, 1-3 pm ET

Project Contact Information

- Email: measurefeedback@qualityforum.org

- NQF phone: 202-783-1300

- Project page: https://www.qualityforum.org/Measure_Feedback_Loop.aspx

- SharePoint: http://share.qualityforum.org/Projects/MeasureFeedbackLoop/SitePages/Home.aspx