



## Measure Feedback Loop Committee Web Meeting 5

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The National Quality Forum (NQF) convened public web meetings for the Measure Feedback Loop Committee on July 24, 2019.

### Welcome, Introductions, and Review of Web Meeting Objectives

Ashlie Wilbon, Senior Director, welcomed participants to the web meeting and reviewed the meeting agenda and objectives. The purpose of the meeting was to discuss the goals of the measure feedback loop pilot, proposed strategies for achieving these goals, and how the costs and benefits of these strategies should be assessed. Ms. Wilbon also provided an overview of the approach to developing pilot options for a measure feedback loop.

### Discussion of Feedback Loop Pilot Goals

Madison Jung, Project Manager, reviewed the preliminary definitions and roles of the CDP feedback loop. The Committee agreed with the roles of the stakeholders in the feedback loop and offered recommendations for clarifying the developers' role for seeking feedback which may not directly involve NQF. They also emphasized the challenge of engaging those who implement measures, as this group is the most difficult group to reach and may not know their role. Ms. Jung also reviewed the draft goals of the measure feedback loop. The Committee reviewed the five proposed goals via survey prior to the webinar and generally agreed that the pilot should focus on accomplishing these goals, with the addition of one that was not already listed: Feedback is collected via standardized pathways and tools.

Ms. Wilbon and Jean-Luc Tilly, Senior Manager, Data Analytics, reviewed the ongoing activities, problems/challenges, and strategies associated with each goal. Committee members were assigned to each goal as a lead discussant or discussant to discuss in depth. The discussions are summarized below.

#### Goal 1: Increase 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.

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

- Strategy 2: Make access point for feedback tool more prominent/visible on website
  - Visible homepage icon that is easily accessed
  - Increase visibility and accessibility in Quality Positioning System (QPS)
- Strategy 3: 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 the feedback tool (outside of endorsement review), and comments submitted during endorsement consideration)

### *Committee Discussion*

The Committee supported the proposed strategies and the approach of removing the log-in requirement for the commenting tool in an effort to improve access. A full log-in process is not necessary and could be replaced by having users register their email address. The Committee reiterated that while the NQF website provides a breadth of information, it is challenging to navigate and difficult for individuals to see which measures are under evaluation and open for commenting across multiple projects. In addition to the strategies proposed, the Committee recommended these strategies be added for further consideration:

- Education should be provided to measure users on how to access feedback tools and navigate the website to find relevant information for providing feedback.
  - Include instructions on the webpage (e.g., imbedded links, rollovers with instructions on how to submit feedback)
- Include links to a standardized NQF feedback tool on other organizations' webpages for easy access to users who may not frequent NQF's website.
- Incorporate the capability in the commenting tool to search, aggregate, and sort similar comments/feedback, and the ability for others to co-sign on existing comments.

### **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

- Strategy 1: 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 educational materials or guidance tailored to 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)

**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: Explore opportunities to partner with EHR vendors and makers of other tools that measure implementers commonly use (e.g., QCDRs, registries) to incorporate links to NQF's 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 measure
- Strategy 5: Provide guidance to submitters on “how to” submit a comment
  - Develop and post a tutorial document/video on the instructions for submitting a comment to the NQF website

**Problem 3:** Feedback is being generated in different unstandardized ways

- Strategy 6: Align submission of feedback with workflow and data entry for measure data collection
  - 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 the measure is being used (program, location, purpose, etc.)

### *Committee Discussion*

The Committee recognized that the process for the collection of measure feedback should be designed with the end user in mind. Measurement and medical language is interpreted differently by lay people versus medical providers or measure developers, and therefore language crafted for outreach to measure users should limit jargon and technical language, particularly when aimed at consumers, patients, and caregivers. The Committee recommended that NQF look to other patient-focused organizations who solicit input from large audiences (e.g., National Kidney Foundation and National Cancer Foundation) for models in how to do outreach and collect input. For example, posing questions with yes/no responses with the option to provide qualitative feedback has generated meaningful information in similar contexts.

The Committee also recommended that the pilot incorporate ways to provide early feedback to measure developers. Feedback is most impactful during the alpha and beta testing phases of measure development, and changes to measures based on feedback should not be expected during the endorsement process after measures have been fully specified.

### *Goal 3: NQF Standing Committees receive meaningful and adequate information to apply the relevant criteria (i.e., Importance, Usability/Use, 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 1: Revise the submission form to clarify questions and modify as needed to correspond with any changes to the evaluation criteria

- Strategy 2: In preparation for maintenance of endorsement review, NQF staff to access JIRA, Impact Reports, QRS/QHP Reports, and other resources for implementation feedback and incorporate it into Committee materials
- Strategy 3: NQF to identify measures with missing feedback (defined as fewer than five public comments in the past five 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 identify a strategy to collect measure feedback
- Strategy 4: Align the submission of feedback with workflow and data entry for measure data collection
- Strategy 5: Conduct literature searches using PubMed to identify any published implementations of the measure and impacts identified.
- Strategy 6: 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 actions requested from the developer

**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 five public comments in the past five 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 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
- Strategy 8: Partner with specialty societies and relevant organizations to identify opportunities for using the 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.]

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

- Strategy 2: In preparation for maintenance of endorsement review, NQF staff to access JIRA, Impact Reports, QRS/QHP Reports, and other resources for implementation feedback and incorporate it into Committee materials
- Strategy 7: Partner with CMS to receive an annual export of the feedback collected through JIRA and distribute to measure developers

### *Committee Discussion*

The Committee emphasized a preference of receiving a few high-quality comments versus voluminous feedback that is not actionable. As such, they suggested that determining the

threshold at which NQF should engage with developers for having few comments (currently recommended as fewer than five) should be considered based on the quality of those comments received. Further, if every effort has been made by developers and NQF to solicit comments from the appropriate audiences and they still do not receive any feedback, there should be consideration of when enough effort has been made to engage measure users. In addition to those strategies proposed to the Committee, members of the Committee recommended consideration of these additional strategies:

- Provide standing committee trainings on eQCMs and other evolving measure constructs
- Consider incorporating a landing page for measure developers on the NQF website where developers can easily access and view all of the comments submitted on their measures in real time. However, they did also express concern that adding yet another place for developers to go to in order to collect feedback (in addition to JIRA and developer-hosted wiki's) could become burdensome for measure developers.
- Identify ways in which measure users can be incentivized to provide feedback.
- Incorporate strategies that address strengthening communication channels to those who are using measures.
- Measure developers should collaborate with NQF in identifying key external stakeholders that should be targeted for outreach to solicit feedback.

#### 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

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

**Problem 2:** Timelines for the various quality measurement vetting activities do not align; expectations and timing for addressing feedback are unclear

- Strategy 2: Feedback responses on endorsed measures in use in a federal program will be incorporated into MAP's annual program review.
- Strategy 3: NQF to work with CMS partners and establish guidance for developers on submitting measures for rulemaking consideration and endorsement (i.e., suggested timeline) and expectations for addressing feedback

**Problem 3:** Feedback is being generated in unstandardized pathways

- Strategy 4: 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 the measure is being used (program, location, purpose, etc).
- Strategy 5: Provide guidance to submitters on how to submit a comment
  - Develop and post a tutorial document/video on the instructions for submitting a comment to the NQF website

### *Committee Discussion*

While the Committee did not complete their discussion of goal 4 and the associated problems and strategies, they generally agreed with the proposed strategies in response to the brief overview.

### **NQF Member and Public Comment**

Ms. Kumar opened the web meeting to allow for public comment. No public comments were offered.

### **Next Steps**

The Committee was unable to complete their discussion of the problems and strategies for goals 4 and 5 and will provide their feedback via email. The Committee will also provide feedback on the elements to assess costs and benefits via email. The Committee's recommendations and feedback will inform web meetings 6 and 7 on September 3 and 5, 2019, when the Committee will discuss the costs and benefits of the strategies and grouping the strategies into pilot options.