

**Multiple Chronic Conditions Measurement Framework  
NQF Member and Public Comments**

No.	Commenter	Organization	Topic	Comment	Steering Committee Final Response
1	Robert Blaser; Submitted by Amy Beckrich	Renal Physicians Association	1. Definition of Multiple Chronic Conditions	The vast majority of patients with chronic kidney disease (CKD) fall in to the category of multiple chronic conditions -either because of predisposing conditions that underlie their CKD such as diabetes and hypertension, or as the result of co-morbidities resulting from CKD, including hypertension, accelerated vascular disease, heart failure, etc. That said, there is no mention of "kidney" or "renal" anywhere in the document nor are any renal measures included in the examples. Given the impact of CKD on the broader spectrum of multiple chronic conditions, Renal Physicians Association (RPA) urges NQF to consider specifically noting CKD's relationship to multiple chronic conditions.	The Committee concurs that chronic kidney disease (CKD) falls within the rubric of multiple chronic conditions (MCCs) as defined by this framework. Additionally, we have developed a case study to further operationalize the conceptual model for MCCs and have included CKD the context of the case study.
2	Submitted by Kelly Horton	National Council on Aging	1. Definition of Multiple Chronic Conditions	<p>We urge the Committee to strengthen the Measurement Framework by reflecting the range of care people require whether within or external to the healthcare system. we recommend the following important changes to the definition underlined and highlighted in bold font below:</p> <p>"Persons with multiple chronic conditions are defined as having two or more concurrent chronic conditions that collectively have an adverse effect on health status, function, or quality of life and that require <b>pro-active self-care management</b> and complex healthcare management, decision-making, or coordination.</p> <p>Assessment of the quality of care provided to the MCCs population should consider persons with two or more concurrent chronic conditions that require ongoing clinical, behavioral, or developmental care from members of the care team (<b>including healthcare providers, care-givers, and community service providers</b>), and act together to significantly increase the complexity of management and coordination of care; including but not limited to potential interactions between conditions and treatments.</p> <p>Importantly, from an individual's perspective the presence of MCCs would: affect functional roles and health outcomes across the lifespan; compromise life expectancy; or hinder a patient <b>person's</b> ability to self-manage or a family or caregiver's capacity to assist in that individual's care."</p>	<p>Edits to be considered by the committee at web-meeting</p> <p>If accepted: We appreciate these refinements which have been incorporated within the definition.</p>
3	Elizabeth Lin; Submitted by Terry Aoki	Group Health Cooperative	1. Definition of Multiple Chronic Conditions	<p>Would recommend use of the AHRQ definition rather than HSS definition (numerical count two or more chronic conditions</p> <ul style="list-style-type: none"> <li>✧ In addition to AHRQ definition- "two or more chronic conditions that may influence the care of other conditions through limitations of life expectancy, interactions between drug therapies...."</li> <li>✧ Recommend taking into account the interplay of concurrent conditions on functional outcomes and health status</li> <li>✧ Thus capturing the ongoing interaction and complexity of concurrent conditions, and focus on those most at risk for decline in functional outcomes and poor health status.'</li> </ul>	The committee carefully considered existing definitions in the field to inform their work. The definition presented in this report built upon AHRQ's definition of a complex patient and HHS' definition drawn from their Multiple Chronic Conditions Strategic Framework.
4	Submitted by Louise Probst	St. Louis Area Business Health Coalition	1. Definition of Multiple Chronic Conditions	The St. Louis Area Business Health Coalition agrees with the definition of multiple chronic conditions as stated in the draft report on page 6. We also support the language that focuses on the effect of the role of the family caregivers in care management in developing the MCC measures. We also agree that patient-reported data needs to be included along with clinical and claims data for this population.	The committee appreciates your support of the key components of this definition.

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5	Submitted by Dena Mendelsohn	Pacific Business Group on Health	1. Definition of Multiple Chronic Conditions	The Consumer-Purchaser Disclosure Project (CPDP) supports the definition of multiple chronic conditions as written on page 6 of the draft report, and in particular want to highlight our support for the language in the last bullet on how MCCs would affect an individual's life that calls attention to the effect on the family and/or caregiver's capacity to assist in care management. In order to be a meaningful guide for MCC measure development, the definition of MCC in this framework must acknowledge the role of family caregivers, in the hopes that data on their experience will be included in measures of quality of care for patients with MCC. We are also very pleased that the definition section references the need for patient-reported data, in conjunction with clinical and claims data, to obtain comprehensive information on the needs and care of and for this population.	The committee appreciates your support of the key components of this definition and also acknowledges the critical role of family caregivers.
6	Submitted by Lauren Agoratus		1. Definition of Multiple Chronic Conditions	We strongly agree that while HHS Multiple Chronic Conditions Strategic Framework includes two or more conditions, that this is too broad due to "complexity or interaction among conditions." We agree with the expanded AHRQ (Agency for Healthcare Research and Quality) definition to include "limitations of life expectancy, interactions between drug therapies, or contraindications." We strongly agree that "MCCs may apply differently to children." Therefore we support NQF's definition of "two or more...chronic conditions...have an adverse effect on health status, function, or quality of life...require complex...coordination."	The committee appreciates your support of the key components of this definition.
7	Angel Oddo; Submitted by Stuart Yael Gordon	Amerigroup Corporation	1. Definition of Multiple Chronic Conditions	Amerigroup believes that the steering committee's draft report constitutes a strong first step in developing a framework for advancing measures that will ensure individuals with multiple chronic conditions are able to achieve positive health outcomes through quality treatment. We are supportive of the definition of "multiple chronic conditions" proposed by the steering committee in the draft report and of many elements of the proposed framework.	The committee appreciates your support of the key components of this definition.
8	Submitted by Gaye Fortner	HealthCare 21 Business Coalition	1. Definition of Multiple Chronic Conditions	HealthCare 21 Business Coalition supports the definition of multiple chronic conditions to include the need for patient-reported data, in conjunction with clinical and claims data, and also to acknowledge the role of family caregivers to obtain comprehensive information on the needs and care of and for patients with MCC.	The committee appreciates your support of the key components of this definition.
9	Rodney Peele; Submitted by Kara Webb	American Optometric Association	1. Definition of Multiple Chronic Conditions	NQF states, "The types of care individuals receive, included in the third ring of the model (i.e., screening, primary and secondary prevention, diagnosis, treatment and management, community services, management of an acute exacerbation, rehabilitation, palliation, and end-of-life care), are not necessarily linear or mutually exclusive." However, "screening" and "prevention" are not "types of care." According to the United States Preventive Services Task Force, screening is a type of "secondary prevention." USPSTF states, "In a clinical setting, primary preventive measures are those provided to individuals to prevent the onset of a targeted condition (e.g., routine immunization of healthy children), whereas secondary preventive measures identify and treat asymptomatic persons who have already developed risk factors or preclinical disease but in whom the condition has not become clinically apparent...Preventive measures that are part of the treatment and management of persons with clinical illnesses, such as cholesterol reduction in patients with coronary heart disease or insulin therapy to prevent the complications of diabetes mellitus, are usually considered tertiary prevention." Revise to reflect that primary and secondary prevention are not "care" because they are only appropriate when a treatable clinical condition has not been diagnosed."	The committee defines care more broadly than the treatment of a clinical condition; hence care encompasses primary, secondary and tertiary prevention.
10	Submitted by Jennifer Hitchon	American Occupational Therapy Association	1. Definition of Multiple Chronic Conditions	NQF notes that presence of multiple chronic conditions (MCCs), among other things, "compromises life expectancy." AOTA asks that NQF replace insert "and/or quality of life" here. Patients really want a better quality of life, not just decreasing mortality. We might also suggesting adding language about how MCCs increase a patient's risk for other conditions and problems, e.g., "Create risk for additional conditions, diseases, or functional limitations."	Edits to be considered by the committee at web-meeting

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11	Submitted by Sharon Sprenger	The Joint Commission	1. Definition of Multiple Chronic Conditions	The definition of MCC developed by the steering committee is well written and easily understood. The process taken by the steering committee demonstrates much research and thought over differencing definitions used to describe MCC. The definition allows for the differentiating of concurrent conditions that are dependent on each other, rather than the concurrent conditions that exist together. Standardization of this definition would assist not only in development of performance measures, but widespread adoption of a standardized definition.	The committee appreciates your support of this definition and the process undertaken to develop it. We are hopeful having a shared definition will facilitate the upstream development of measures and promote a shared understanding amongst stakeholder groups.
12	Submitted by Debra Ness	National Partnership for Women & Families	1. Definition of Multiple Chronic Conditions	NPWF is supported of the MCC definition as written on page 6 of the draft report, but would like to call out the need for the definition of MCC in this framework to acknowledge the role of family caregivers, in the hopes that data on their experience will be included in measures of quality of care for patients with MCC. To this end, we believe that measures such as whether family caregivers felt like they were provided with adequate support through the care process are critical to providing meaningful information to all stakeholders. We also want to highlight, and applaud, the references in the definition to the need for patient-reported data, in conjunction with clinical and claims data, in order to obtain comprehensive information on the needs and care of and for this population.	The committee acknowledges and supports the essential role family and caregivers play. The definition explicitly calls out family and caregivers ".....Importantly from an individual's perspective the presence of MCC's would hinder a patient's ability to self manage or a family or caregiver's capacity to assist in that individual's care".
13	Submitted by Carmella Bocchino	America's Health Insurance Plans	1. Definition of Multiple Chronic Conditions	AHIP supports the development of a measurement framework for individuals with multiple chronic conditions and applauds the NQF for its leadership in this area. The following are our specific comments on the draft framework organized by sections in the report. Definition: While we support the definition proposed in the report the following suggestions would help operationalize and enhance the definition:  The definition should clearly identify or reference a finite list of chronic conditions that should be priorities for measurement based on high prevalence, high cost, and practice variation. Absence of such a list could lead to individual interpretation of the definition and lack of alignment and focus during implementation. While the definition describes "concurrent conditions that collectively have an adverse impact..." NQF should also clarify if the definition only applies when two or more conditions collectively adversely impacts health status, function or quality of life. The definition should be inclusive of situations where each condition on its own results in adverse effects which may then be magnified when multiple conditions are present concurrently in an individual.	Although beyond the scope of this project, under a HHS funded study -- "Measure Development and Endorsement Agenda" -- NQF convened a multi-stakeholder committee that prioritized a list of 20 high- impact Medicare conditions, as well as areas related to child health and population health. A link to the study may be found here: <a href="http://www.qualityforum.org/MeasureDevelopmentandEndorsementAgenda.aspx#t=1&amp;s=&amp;p=">http://www.qualityforum.org/MeasureDevelopmentandEndorsementAgenda.aspx#t=1&amp;s=&amp;p=</a> .
14	Submitted by Kim Kuebler	Sacred Heart University	2. Key Measurement Priorities and Concepts	Patients with multiple chronic conditions are symptomatic and it is these symptoms that promote disease exacerbations, limit physical activities and cause in-patient acute care admissions. Symptom management is palliative care and integrating palliative care into the management of chronic disease will improve not only quality of life - but maintain physical functioning and reduce acute care admissions. Hospice care or end of life care should not be the only time where palliative care is used in this patient population. Hospice care is not working in the US and most patients are enrolled in this type of care and receive palliative care in the last month of their lives. Rehabilitation is a form of palliative care for example.	The committee acknowledges the importance of palliative and end of life care, particularly receiving palliation more upstream. As such, palliation is incorporated in the "Conceptual Model for Measuring Care Provided to Individuals with MCCs" (see page 8 of the framework) as a type of care.
15	Robert Blaser; Submitted by Amy Beckrich	Renal Physicians Association	2. Key Measurement Priorities and Concepts	Renal Physicians Association (RPA) recommends that due to the high prevalence of chronic kidney disease (CKD) and the impact of multiple chronic conditions in this population, CKD patients should be a population of special focus for this framework. The USRDS Annual Data Report cited in the framework includes the statistic that costs for CKD patients who have not progressed to ESRD comprise 23% of Medicare expenditures - driven primarily by their multiple chronic conditions.	The Committee concurs that chronic kidney disease (CKD) falls within the rubric of multiple chronic conditions (MCCs) as defined by this framework. Additionally, we have developed a case study to further operationalize the conceptual model for MCCs and have included CKD the context of the case study.

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16	Submitted by Kelly Horton	National Council on Aging	2. Key Measurement Priorities and Concepts	<p>We appreciate that the proposed key measurement concepts including the Measurement Framework include "self-management of chronic conditions, especially multiple conditions" under the priority of "person- and family-centered care." However, we recommend broadening the measurement concept to include "healthcare provider referral to evidence-based self-care management education and training." In addition, regarding the conceptual model (Figure 2) in the Measurement Framework, we recommend making a small, albeit significant, change to the "Types of Care" circle from "community services" to "community-based services."</p> <p>Community-based service organizations play a vital role in care coordination and the delivery of evidence-based self-care management programs which have been proven to achieve the triple aim. Effective referral from traditional healthcare service providers to evidence-based self-care management programs is a vital element for achieving better health outcomes for people living with multiple chronic conditions.</p>	<p>The committee acknowledges and supports the vital role community-based services play in the care of people with MCCs. The refinement to the "types of care" has been incorporated.</p> <p>"Healthcare provider referrals to self-care management education and training" could be sub-classified under the broader measure concept of self management as the committee did not wish to limit this to referrals.</p>
17	Elizabeth Lin; Submitted by Terry Aoki	Group Health Cooperative	2. Key Measurement Priorities and Concepts	<p>The High Priority MCC Measure concepts in Box 1, and Figure 2, are fine conceptual models but seem over-archingly comprehensive, and multi-dimensional and difficult to operationalize. E.g. Appendix E - Priority Measure Concept Alignment- .....was complex and unclear.</p>	<p>The committee attempted to prioritize a finite list of measure concepts to signal strongly the areas of greatest need for gap filling, either by adapting existing measures or through de novo measure development. Appendix C provides illustrative examples of existing measures as a starting place but there are still critical gaps to be filled.</p>
18	Submitted by Louise Probst	St. Louis Area Business Health Coalition	2. Key Measurement Priorities and Concepts	<p>The list of measure concepts and priorities should also include the use of health information technology, EHRs and PHRs by providers and patients. We would like to see a limit to the inclusion of condition- or disease-specific measures being categorized as MCC measures and keep the focus on outcomes, care coordination, shared decision-making and other priorities listed on page 7.</p>	<p>Further consideration by the Committee: incorporation of HIT (infrastructure support) as a measure concept area. The committee supports the focus on cross-cutting measures including a preference for outcome measures as available and process measures most distal to outcomes.</p>
19	Tracey Moorhead; Submitted by Victoria Ingenito	Care Continuum Alliance	2. Key Measurement Priorities and Concepts	<p>Care Continuum Alliance (CCA) members' research has found that actively engaged patients have greater interest in improving self-care management and their health outcomes. This motivation is particularly important for patients with multiple chronic conditions because they generally have increased health care utilization and higher health costs, as dually noted in the NQF framework. CCA has developed Leading Practices in Consumer Engagement that would further inform and enhance this quality measures framework. We also encourage NQF to give additional consideration to the importance of medication adherence in improving health outcomes and reducing costs. Our Outcomes Guidelines Report Vol. 5 clearly evidences how medication adherence is a critical element of chronic care management programs. CCA has developed a Medication Adherence Best Practices Framework that would complement NQF's work on this Multiple Chronic Conditions Framework. CCA and our members would be glad to field questions, provide additional information and assist NQF in the future.</p>	<p>NQF welcomes additional opportunities to engage CCA in our ongoing efforts. The work of the National Priorities Partnership in particular around reducing readmissions presents a clear opportunity for collaboration.</p>
20	Submitted by Dena Mendelsohn	Pacific Business Group on Health	2. Key Measurement Priorities and Concepts	<p>The Consumer-Purchaser Disclosure Project (CPDP) agrees with the list of measure concepts and priorities, but would also strongly suggest adding to this list a bullet that reflects the use of health information technology, EHRs, and PHRs by providers and patients to transfer information across settings, labs, pharmaceuticals, etc. At the same time, we would seek to limit the inclusion of condition- or disease-specific measures being categorized as MCC measures. While there are some conditions, such as renal disease, which lead to additional chronic conditions, we would appreciate the focus remaining on outcomes, care coordination, shared decision-making, and the other priorities listed in Box 1 on page 7.</p>	<p>Further consideration by the Committee: incorporation of HIT (infrastructure support) as a measure concept area. The committee supports the focus on cross-cutting measures including a preference for outcome measures as available and process measures most distal to outcomes.</p>
21	Submitted by Lauren Agoratus		2. Key Measurement Priorities and Concepts	<p>We strongly agree with NQF's high priorities of "optimizing...maintaining...or preventing...decline; seamless transitions; usual source of care; shared accountability; outcomes; transparency of cost...and shared decision making." We looked to Appendix C for examples but would like more information on "avoiding inappropriate, non-beneficial end-of-life care" particularly due to the misperception of "death panels" used as scare tactics under healthcare reform.</p>	<p>There is a strong evidence base in regards to resource use at the last 6 months of life. It is important to frame this however through the lens of patients receiving appropriate care aligned with their preferences. A link to the paper may be found here: <a href="http://tdi.dartmouth.edu/documents/publications/2004March13_BMJ_Wnberg.pdf">http://tdi.dartmouth.edu/documents/publications/2004March13_BMJ_Wnberg.pdf</a>.</p>

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22	Submitted by Dale Lupu	American Academy of Hospice and Palliative Medicine	2. Key Measurement Priorities and Concepts	AAHPM recommends moving "shared decision making" to the top of the list of high priority MCC measure concepts. Placing it as the FIRST concept conveys the pre-eminent importance of patient-centered care. Once patient and family goals have been established, the other domains flow from it. We also recommend expanding the title to "shared decision-making based on patient and family goals" to emphasize the pre-eminent role that patient and family values and goals need to play in guiding care. AAHPM also recommends adding Quality of Life as an additional domain. While we recognize that quality of life can be addressed in part within some of the other domains, we suggest that it is important to highlight it with its own domain, as has been done in the MAP frameworks. Particularly for patients with serious illness nearing the end of life, maintaining function may not be possible. The framework needs to clearly provide a "home" for measures of perceived quality of life and reduction of symptom burden. We are concerned that these concepts may get lost within the current framework. Finally, AAHPM recommends changing "Avoiding inappropriate, non-beneficial end of life care" to simply avoiding inappropriate, non-beneficial care. While this is a big concern ESPECIALLY in the end-of-life period, it is actually appropriate to consider avoidance of non-beneficial care at all times, not just at end of life.	Further consideration by the committee- expanding non-beneficial end of life care to appropriateness of care at all stages.  The committee attempted to prioritize a finite list of measure concepts to signal strongly the areas of greatest need for gap filling, either by adapting existing measures or through de novo measure development. This was not a ranking exercise per se, but an attempt to focus heightened attention on areas most salient for people w MCCs.
23	Angel Oddo; Submitted by Stuart Yael Gordon	Amerigroup Corporation	2. Key Measurement Priorities and Concepts	<u>Shared Decision-Making</u> Appendix C of the report proposes that the high priority MCC measure concept of "shared decision-making" would be measured by whether "healthcare providers always involve patients in decisions about their healthcare as much as they want." This measure appears to set a perhaps unreasonable standard. Amerigroup suggests that the measure language phrase "always involve" be replaced with "consistently involve." We also urge that the report be revised to explicitly state that existing well-established, industry-recognized measures of patient involvement in health care decision-making, such as those available under CAHPS, should be preferred over some newly developed standard that may not be as widely recognized.  <u>Avoid Inappropriate, Non-Beneficial End-of-Life Care</u> Amerigroup feels strongly that the high priority MCC measure concept of "avoid inappropriate, non-beneficial end-of-life care" is inappropriate for inclusion in the proposed framework. Except where there is fraud and abuse, questions of what care and services may or may not be appropriate at end-of-life are issues best left to the treating provider in shared decision-making with the patient and/or the patient's caregivers, and are not generally appropriate for measurement. Amerigroup strongly recommends that the end-of-life care measure concept be eliminated from the proposed measure framework.	Further consideration by the committee- expanding non-beneficial end of life care to appropriateness of care at all stages.  The committee strongly supports shared decision-making as a key measure concept area essential to assessing the quality care for people with MCCs. It was beyond the scope of this project to recommend specific measures or tools but rather to offer illustrative examples of existing measures in the field as found in Appendix C.
24	Submitted by Gaye Fortner	HealthCare 21 Business Coalition	2. Key Measurement Priorities and Concepts	HealthCare 21 Business Coalition suggests that the focus should be on outcomes, care coordination, shared decision-making and other priorities listed, with the addition of the use of health information technology, EHRs and PHRs to transfer health information.	Further consideration by the Committee: incorporation of HIT (infrastructure support) as a measure concept area.

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25	Submitted by Jennifer Hitchon	American Occupational Therapy Association	2. Key Measurement Priorities and Concepts	The MCCs Steering Committee has identified a number of key measurement priorities and measure concepts for individuals with MCCs: communication, care coordination and integration, process of care, important structures, patient- and family-level outcomes, safety, and cost and resource use. (Box 1). AOTA recommends that a patient's "safe functioning in their environment" (e.g., home and community) be added to this list to ensure that that "safety" is considered beyond medication safety and hospital stays. In addition, the measurement concept to "optimize function, maintain function, or prevent decline in function" describes issues with community reintegration and resumption of life roles; however, the illustrative measures do not highlight these areas sufficiently and need expansion. The measures discuss pain, mobility, functional capacity, etc., which highlight changes in the person but not in desired or required activities and participation. The "patient clinical outcomes" measurement concept mentions patient-reported outcomes such as quality of life and functional status, which we support. The illustrative measures are focused on mortality and morbidity only, and AOTA would like to see this expanded to include functional and quality of life measures.	The committee supports that safety is across the continuum of care and is beyond the walls of the hospital and will note this accordingly. The committee's emphasis on functional status and HRQoL is prevalent throughout the framework.
26	Submitted by Sharon Sprenger	The Joint Commission	2. Key Measurement Priorities and Concepts	In addition to areas already identified as measure concepts, we offer for consideration: <ul style="list-style-type: none"> <li>✧ Place more of an emphasis on community support.</li> <li>✧ Under making care safer, medication protocol and adherence is mentioned as an MCC measure concept. Will there be more specific concepts introduced as measure development begins?</li> <li>✧ Under effective communication and care coordination, access to usual source of care is mentioned. Can this concept be further clarified?</li> </ul>	The illustrative measure concepts in the framework report are intended to guide end users to areas of measurement important for this population. In addition, some existing measures may address these areas while other areas require measure development.
27	Submitted by Debra Ness	National Partnership for Women & Families	2. Key Measurement Priorities and Concepts	The list of measure concepts and priorities looks appropriate, with one glaring exception, which is the use of Health IT, including EHRs and PHRs by providers and patients to transfer information across settings, labs, pharmaceuticals, etc. Our other comments in this section echo those submitted by the Consumer-Purchaser Disclosure Project.	Further consideration by the Committee: incorporation of HIT (infrastructure support) as a measure concept area.
28	Submitted by Maureen Dailey	American Nurses Association	2. Key Measurement Priorities and Concepts	<p>Patient-centered care (goal setting should be rank ordered as first). Patient engagement and patient experience of care should also be priority concepts. Complexity of care required by patients with MCCs involves increased risk and symptom management over time required difficult patient/caregiver decision making and successful engagement. Patients have a choice in their goals and which areas of risk are most important to mitigated related to safety, loss of function, quality of life etc. Successful engagement with complex care, often with difficult symptom managed requires skill and expertise for successful patient engagement.</p> <p>High priority measure concepts do include patient clinical outcomes of morbidity and mortality. However, no mention is made elsewhere in the body of the document related to specific safety outcomes (e.g., healthcare acquired conditions). This is important given the broad scope of this document. In Appendix D, there is specific mention of safety measures. However, safety measures should be discussed in the body of the document given their importance.</p>	The committee fully supports the primacy of patient-centered care. They attempted to prioritize a finite list of measure concepts to signal strongly the areas of greatest need for gap filling, either by adapting existing measures or through de novo measure development. This was not a ranking exercise per se, but an attempt to focus heightened attention on areas most salient for people w MCCs.
29	Submitted by Maureen Dailey	American Nurses Association	2. Key Measurement Priorities and Concepts	More specificity is needed related to public and private harmonization to facilitate performance improvement. The guiding principles section does not mention or discuss the importance of working with both public and private measures of the framework, and the importance of harmonizing the reporting of these measures. Also, harmonization is not mentioned on page 12 under infrastructure needed for data collection. Nor is it mentioned on page 13 under standardized data collection, measurement, and reporting.	Further consideration by committee- addressing accountability and measure harmonization in the path forward.

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30	Submitted by Carmella Bocchino	America's Health Insurance Plans	2. Key Measurement Priorities and Concepts	<p>We support the list of high priority measure concepts identified for multiple chronic conditions and recommend the following additions:</p> <p>Patient experience of care;</p> <p>Appropriateness of care - In addition to avoiding inappropriate, non-beneficial end-of-life care, appropriateness of care that is provided to individuals with chronic conditions and <b>not at end-of-life</b> stage needs to be included; and</p> <p>Coordination of care - While the framework discusses care transitions among multiple providers, an important dimension of care coordination is how well treatment across the concurrent conditions is coordinated. For example, an individual with asthma and diabetes who receives steroids for asthma may experience an exacerbation of his/her diabetes. This aspect of care coordination needs to be measured.</p>	<p>Further consideration by the committee- expanding non-beneficial end of life care to appropriateness of care at all stages.</p> <p>The committee supports patient experience of care and has included it as a subcomponent under the broader measure concept area of person and family center care. Care coordination is framed under the concept of effective communication and coordination of care and includes transitions as well as access to usual care, care plans etc. Please see Appendix B for further details.</p>
31	Submitted by Louise Probst	St. Louis Area Business Health Coalition	3. Conceptual Model for Measuring Care Provided to Individuals with MCCs	<p>We share concerns with others that evaluating structure is not a meaningful way to measure care from a patient-centric viewpoint. However, there is still the need for measures of demonstrated use of electronic capture of data from laboratories, e-prescribing and other data sources. We do support including palliative care in the measurement framework to emphasize the role of palliative care for patients with MCC and to change the mindset that palliative care is only for patients at the end of life. In addition to using the conceptual model as a measurement framework to evaluate and improve care, language should be added to reflect the fact that measures from this framework should be implemented for purposes of transparency and consumer and purchaser decision-making/accountability.</p>	<p>Further consideration by the Committee: incorporation of HIT (infrastructure support) as a measure concept area.</p> <p>Further consideration by committee: inclusion of structure as a domain of measurement.</p>
32	Submitted by Dena Mendelsohn	Pacific Business Group on Health	3. Conceptual Model for Measuring Care Provided to Individuals with MCCs	<p>The Consumer-Purchaser Disclosure Project (CPDP) supports the theory behind the Conceptual Model. We are, however, dissatisfied by certain of the components included in the model as presented. In particular, we strongly disagree with inclusion of Structure as a domain of measurement. Evaluating structure is not a meaningful way to measure care from a patient-centric viewpoint. Rather than reviewing whether a certain structural design is in place, what is important is the outcome of that structure; i.e. not whether there are x nurses on a floor, but rather the experience of patients on that floor and their health outcomes. One exception to the inclusion of structural measures is the need for measures of demonstrated use of electronic capture of data from laboratories, e-prescribing, and other data sources. In the "types of care" ring, we greatly appreciate seeing "palliation" listed, and would suggest emphasizing the role of palliative care for patients with MCC, in order to drive away from the prevailing perspective that palliative care is only for patients at the end of life. There are many benefits to patients with MCC seeking palliative care as part of their ongoing care plan and we support including this type of care in the measurement framework.'</p>	<p>Further consideration by the Committee: incorporation of HIT (infrastructure support) as a measure concept area.</p> <p>Further consideration by committee: inclusion of structure as a domain of measurement.</p>
33	Submitted by Dena Mendelsohn	Pacific Business Group on Health	3. Conceptual Model for Measuring Care Provided to Individuals with MCCs	<p>The Consumer-Purchaser Disclosure Project (CPDP) notes that the report states that "the conceptual model as a measurement framework can be used to evaluate and improve care for individuals with MCCs." CPDP strongly urges adding that language be added here to reflect the fact that measures stemming from this framework should also be implemented for purposes of transparency and consumer and purchaser decision-making/accountability. Obviously, evaluating and improving care is a significant goal, but as important is making these measures useful for accountability and transparency, so that consumers with MCC, as well as purchasers who are paying private sector costs of care, are engaged in the discussion around how best to provide appropriate, high-quality care, to this population.</p>	<p>Further consideration by committee: further addressing accountability and transparency in the path forward.</p>
34	Submitted by Lauren Agoratus		3. Conceptual Model for Measuring Care Provided to Individuals with MCCs	<p><u>Performance Measurement with the MCC Conceptual Model</u></p> <p>We appreciated the representation under Figure 2 which included patient/family goals as the center of care, then different types of providers (including home, community, and schools), expanding to the types of care (especially including screening and prevention, and for pediatrics highly recommend Bright Futures <a href="http://brightfutures.aap.org">http://brightfutures.aap.org</a>), and finally to the domains of measurement which not only included cost but safety, processes, and outcomes.</p>	<p>The committee appreciates your support of the components of the Conceptual Model.</p>

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35	Submitted by Gaye Fortner	HealthCare 21 Business Coalition	3. Conceptual Model for Measuring Care Provided to Individuals with MCCs	HealthCare 21 Business Coalition supports a Conceptual Model based on outcomes such as the health outcomes and experiences of the patients on the floor rather than number of nurses on the floor. We would strongly urge adding that language be added here to reflect the fact that measures stemming from this framework should also be implemented for purposes of transparency and consumer and purchaser decision-making/accountability. Obviously, evaluating and improving care is a significant goal, but as important is making these measures useful for accountability and transparency, so that consumers with MCC, as well as purchasers, who are paying private sector costs of care, are engaged in the discussion around how best to provide appropriate, high-quality care, to this population.	Further consideration by committee: further addressing accountability and transparency in the path forward.
36	Rodney Peele; Submitted by Kara Webb	American Optometric Association	3. Conceptual Model for Measuring Care Provided to Individuals with MCCs	NQF states, "basing standards for performance on existing Clinical Practice Guidelines (CPGs) could lead to prioritizing low-value, burdensome measures. Additionally, existing measures based on CPGs can lead to overtreatment by encouraging more care; however, few measures assess inappropriate care. For example, strict glycemic or blood pressure control is not always appropriate for all individuals with MCCs based on their functional goals and preferences." While clinical practice guidelines might not provide sufficient direction to develop quality measures, taking strong consideration of the research on MCCs can inform the measure development process and help to identify key areas of concern. For example, a 2006 Centers for Disease Control and Prevention (CDC) study found that "Of the 5.7 million people who are estimated to have vision loss, 3.2 million report risk of mild-to-moderate depression, 350,000 report risk of severe depression, 1.2 million have vision loss and diabetes, and 3 million report both vision and hearing loss." As MCCs are so significant and widespread among those with vision loss, in figure 2, under "Sites and Providers," "Optometry" should be specifically listed. Moving forward, NQF MCC measure development should focus on key correlations that have been identified across various conditions such as vision loss and other chronic conditions.	The committee agrees that current research, particularly in regards to co morbidities, should inform the development of performance measures for people with MCCs. The model's components strive to be as inclusive as possible; however it will need to be adapted accordingly to include specific sites and providers as related to patient needs.
37	Submitted by Debra Ness	National Partnership for Women & Families	3. Conceptual Model for Measuring Care Provided to Individuals with MCCs	We support the theory behind the Conceptual Model but have some suggestions for improvement. In particular, we strongly disagree with inclusion of Structure as a domain of measurement. Evaluating structure is not a meaningful way to measure care from a patient-centric viewpoint. I refer you to the comments submitted by the Consumer-Purchaser Disclosure Project for more detail. In the "types of care" ring, we greatly appreciate seeing "palliation" listed, and are pleased to see the language around this issue included in the framework. Finally, we strongly urge language be added to reflect the fact that measures stemming from this framework should also be implemented for purposes of transparency and consumer and purchaser decision-making/accountability.	Further consideration by committee: structure as a domain of measurement  Further consideration by committee: addressing accountability and measure harmonization in the path forward.
38	Submitted by Carmella Bocchino	America's Health Insurance Plans	3. Conceptual Model for Measuring Care Provided to Individuals with MCCs	We support the conceptual model presented in the report and emphasize that Figure 2 needs to explicitly show interaction across conditions and how care is coordinated across conditions.	The committee appreciates your support of the conceptual model. A case study has also been drafted to demonstrate interaction and coordination across conditions as suggested.



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39	Elliot Roth; Submitted by Pamela Gonzalez	American Academy of Physical Medicine and Rehabilitation	4. Guiding Principles for Measuring Care Provided to Individuals with MCCs	<p>The AAPM&amp;R support the MCC Measurement Framework but some issues that remain unclear from the draft report include:</p> <ul style="list-style-type: none"> <li>✦ <i>Accountability.</i> What is the structure or process for ensuring that the specifics of the measurement framework will occur?</li> <li>✦ <i>Primary vs. specialty care.</i> How exactly does an ideal model work? Is the internist/primary care physician or hospitalist responsible for the care of all these patients and for the coordination of all care? Is there a role for other providers?</li> <li>✦ <i>Physiatrists' or other specialists' roles.</i> What is the role of the specialist in regard to certain populations that are not typical internal medicine populations? Is there a role for a specialist-coordinated model or a co-management model?</li> <li>✦ <i>Function.</i> We are advocates of performance measures that include participation, as defined by the World Health Organization, such as describing the percentage of patients returning to the community and participating in social roles, as opposed to using a change in function based solely on impairments or activity (such as mobility and activities of daily living) although these are also certainly important as well.</li> </ul>	Accountability will need to be shared across providers and settings to fully realize the potential of this framework and the conceptual model within. Current accountability structures will need to evolve, including payment programs and new delivery systems models (e.g. ACOs) that support a more integrated approach to care. The role of primary care and a patient-centered medical home will be critical as well as specialty care including behavioral health. The committee also supports a broader definition of function to include the social and environmental context in which an individual lives. These will be important measure concepts to incorporate into an overall assessment of health and well being. The committee appreciates these thoughtful questions which will need to be further fleshed out as this model is implemented.
40	Submitted by Louise Probst	St. Louis Area Business Health Coalition	4. Guiding Principles for Measuring Care Provided to Individuals with MCCs	As per our previous comment in the conceptual model, the word "structural" should be removed from principle #2. We would also like to see a deeper discussion on risk adjustment (principle #8) due to the divisions among multi-stakeholders over how to address it. Overall, we do agree with the guiding principles.	The committee favors patient reported outcomes when available and process measures most distal to outcomes. Although it is outside the scope of the framework to resolve the complex issues around risk adjustment, the guiding principles attempt to offer some direction, particularly in regards to addressing unintended consequences such as disparities in care.
41	Submitted by David Bodycombe	JHU Bloomberg School of PH	4. Guiding Principles for Measuring Care Provided to Individuals with MCCs	<p>Episodes of care represent an artificial construct that often focus on acute exacerbations or flare-ups and which do little to support the ongoing coordinated and longitudinal management of care. Even those episodes grounded in procedures emphasize an interventional view that could provide perverse incentives to drive up utilization and not encourage preventive measures. Episodes tend to perpetuate a disease-based rather than a patient-oriented form of care. Making episodes the paradigm for treating persons with multiple chronic diseases expands a disease-focused view of care. Instead of focusing on someone with diabetes, the physician will now focus on someone with diabetes, hypertension, and hypercholesterolemia. They are still not focusing on patients, each of whom offers a fairly unique presentation of their co-morbidity and personal life status[i]. For persons with chronic disease, the best "episode" is a period of calendar time during which their care is being managed by a primary care clinician or other person who is responsible for the overall care of that complex patient.</p> <p>[i] Starfield, B. (2010) Chronic illness and primary care. In: Nasmith, L, Ballem, P, Baxter, R, et al. Transforming Care for Canadians with Chronic Health Conditions: Put People First, Expect the Best, Manage for Results - Appendices. Ottawa, Ontario, Canada: Canadian Academy of Health Sciences.</p>	The committee agrees and supports a more person-centered versus a disease centered approach to performance measurement. Hence their emphasis on crosscutting measures and patient reported outcomes such as functional status. The model puts patient and family preferences at the center, as measured over time.
42	Submitted by David Bodycombe	JHU Bloomberg School of PH	4. Guiding Principles for Measuring Care Provided to Individuals with MCCs	Clear distinctions need to be drawn between responsibility for care and "shared accountability" for care. "Shared accountability" in the absence of someone who, individually or organizationally, is responsible for the patient's overall care (e.g., a gateway) is problematic. "Accountable care" is generally used in the context where some entity, such as an Accountable Care Organization, assumes accountability for the care of their patient-members. "Shared accountability" is tantamount to management by committee and runs counter to the notion of effective primary care. Rather than shared accountability, the focus of measurement should be on appropriate levels of care coordination with evidence that responsibility is not broadly diffused among a number of providers. The ideal goal of such care is to avoid acute exacerbations or flare-ups. Measurement around the period of ongoing management should focus on the appropriate and timely provision of prevention and management services.	The committee agrees that shared accountability is needed to provide coordinated care; but this can not be in the absence of an accountable entity, whether a patient centered medical home or other delivery system model, to ensure appropriate care is achieved across providers and settings.

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43	Submitted by Dena Mendelsohn	Pacific Business Group on Health	4. Guiding Principles for Measuring Care Provided to Individuals with MCCs	The Consumer-Purchaser Disclosure Project (CPDP) agrees with the guiding principles, but would urge that principle #2 remove "structural" from the list of items assessed, as per our earlier comment on the conceptual model. We would also suggest that principle #8 on risk adjustment be discussed in more detail. There have been recent discussions in the context of hospital readmissions, of whether risk adjustment models should include socio-economic status to reflect the reality that having lack of post-hospitalization support has a significant link to readmissions and other poor outcomes. However, as written on page 11, it does not improve quality of care to obscure gaps and/or disparities in care and outcomes when the true paradigm change will require understanding the needs of a given demographic/community and addressing those needs. We would appreciate, therefore, a deeper discussion of this issue, given the divisions among multi-stakeholders over how to address it.	The committee favors patient reported outcomes when available and process measures most distal to outcomes. Although it is outside the scope of the framework to resolve the complex issues around risk adjustment, the guiding principles attempt to offer some direction, particularly in regards to addressing unintended consequences such as disparities in care.
44	Submitted by Lauren Agoratus		4. Guiding Principles for Measuring Care Provided to Individuals with MCCs	We concur with assessing quality of care and "evidence of links to optimum outcomes." We agree with the use of shared decision making. We were concerned about certain "exclusions...are appropriate" and our comments appear below. We agree with tracking disparities. We are unsure that "risk adjustment should be applied only to outcomes measures and not process measures" as we are concerned with skewing the outcomes data. We agree that measures must include multiple providers and all healthcare settings. We support a "comprehensive picture of the quality of care...include...patient-and family outcomes, communication, care coordination, safety, processes of care, essential structures, integration, and costs and resource use." In this section, some of our concerns about exclusions were addressed such as "too frail for certain interventions." We agree that consideration must be given to "patient-specific factors...severity...life expectancy." We agree that information can include "claims, paper medical records, registries, and electronic medical records" and concur that "integration of multiple types of data is needed." We agree that caution must be made to "avoid over-adjustment, such that performance may appear better" and that "stratifying...may better highlight how providers are...meeting needs...of patients."	The committee appreciates your overall support of the guiding principles in theory. Issues around risk adjustment are complex and although it was beyond the scope of this project to resolve all these complex methodological issues, the committee did wish to offer some direction particular in regards to the importance of unintended consequences and illumination of disparities in care.
45	Mark Nyman; Submitted by Jeannie Boness		4. Guiding Principles for Measuring Care Provided to Individuals with MCCs	<p>We congratulate the effort to create a framework to better assess patients with multiple chronic conditions. The framework is well laid out with two small suggestions:</p> <p>It is unclear on #2 (page 10) how a measure can be cross-cutting and yet still be disease specific.</p> <p>Suggest deleting the second sentence in #8 (page 10).</p> <p>Some of the measure concepts in Appendix B that are not highlighted deserve more attention. Role function is important over and above presenteeism or productivity. Medication management and reconciliation may be as important as end-of-life care. Treatment burden should be added to making quality care more affordable. Given the following vignette - "Say you have a patient with diabetes, hypertension, hyperlipidemia, CAD and CHF. If they had only one episode of CHF, were in their 50's and otherwise doing well you might want to be aggressive on goals across the board. However if they were in their 60's, had multiple episodes of CHF and a short expected survival, you might relax many of the goals - and just focus on optimizing the heart failure." This is the kind of "cross-cutting" assessment that the framework calls for, but is absent from the measures noted in the final appendix.</p>	The intent guiding principle #2 on p 10 was to indicate that depending on the patient and point in time the various types of measures listed (crosscutting, condition specific, etc.) could be used to assess the overall quality of care. The committee supports risk adjustment only for outcome measures and hence the inclusion of this in guiding principle #8.

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46	Angel Oddo; Submitted by Stuart Yael Gordon	Amerigroup Corporation	4. Guiding Principles for Measuring Care Provided to Individuals with MCCs	<p><u>Limiting Risk Adjustment as a Guiding Principle</u> Guiding principle #8 would require that risk adjustment be used "for comparability with caution" because the risk adjustment process could result in the unintended consequence of obscuring serious gaps in care for the targeted population. The principle goes on to state that risk adjustment should be applied only to outcomes measures and not process measures.</p> <p>We are in agreement that risk adjustment should be applied to outcomes measures and not to process measures, but we are unclear on the context in which NQF would limit the application of risk adjustment. Amerigroup could be generally supportive of the principle stated, but the principle requires further clarification, with a clear definition of "risk adjustment use for comparability." This is particularly important given that the draft report emphasizes the need to align quality reporting incentives and reimbursement mechanisms. As a managed care organization, risk adjustment is an integral and essential element of how we are reimbursed under Medicaid and Medicare. Before we could support principle # 8, we would need a clearer picture on how and in what context any limitation on risk adjustment in applying quality measures would work.</p>	The committee was sensitive to ensuring disparities in care would not be masked and hence be monitored. Although it is beyond the scope of this project to resolve the many complex issues around risk adjustment, this unintended consequence was of concern.
47	Submitted by Jennifer Hitchon	American Occupational Therapy Association	4. Guiding Principles for Measuring Care Provided to Individuals with MCCs	<p>Of the 9 guiding principles for these MCC measures, one is to "Assess ... changes in care over time (i.e., delta measures of improvement rather than attainment)." (#5, p. 10). Not all patients can show improvement, however, so AOTA would like to see language added, such as: "OR maintaining function, preventing decline in progressive conditions, and preventing new or exacerbating conditions."</p> <p>Additionally, while AOTA agrees that measures should assess how care is managed as conditions change over time, we question that there are enough sensitive standardized measures in existence. Research needs to be done on measuring the process of care through health indicators so we are not forced to rely solely on the patient report.</p> <p>We also like the Framework's goal of requiring care coordination and communication, thus "requiring multiple providers to share accountability," but we wonder if it might be beneficial to have guidelines in place that ensure someone takes the lead on care coordination, otherwise the consequences of not being accountable are unclear, and possibly nonexistent.</p>	The committee agrees that maintaining function or preventing decline are important outcomes for many individuals and will incorporate language accordingly. We support your other comments in regards to measure gap areas and the need for an accountable entity to ensure a patient's care is coordinated across providers and settings.
48	Rodney Peele; Submitted by Kara Webb	American Optometric Association	4. Guiding Principles for Measuring Care Provided to Individuals with MCCs	<p>AOA supports the principle to "Promote collaborative care among providers and across settings." Prevalence of vision loss coupled with other chronic conditions necessitates that doctors of optometry are members of the MCC care teams and measures should reflect this need. NQF states, "Accountable care organizations and medical homes should be explored as promising delivery systems for providing coordinated, integrated care to individuals with MCCs." While promising in theory, these models do not always include a broad range of providers. Measures must ensure broad provider expertise. Of additional concern is that NQF measures for use in the medical home are extremely limited. The "Pre-School Vision Screening in the Medical Home" measure is the only eye care measure and it has questionable effectiveness. Evidence on the efficacy of preschool vision screening for improving visual acuity does not adequately address whether screening is more effective than no screening. For adults with MCCs, high quality eye care measures beyond screenings are needed. A 2012 study found that a dilated eye examination is more cost effective than visual acuity screening and would increase quality-adjusted life-years for older individuals.[3] The need for high quality eye care measures for MCCs will become even more critical in coming years as we expect the number of patients with MCCs to increase with each generation.</p>	The committee acknowledges the importance of vision care to overall health and well being and supports the inclusion of multiple provider types in the conceptual model as it is customized to a patient's needs.

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49	Submitted by Sharon Sprenger	The Joint Commission	4. Guiding Principles for Measuring Care Provided to Individuals with MCCs	The guideline principles are well written. The idea of stratification is important especially with issues concerning disparities among the population. A recommendation to add initial and ongoing care planning under #4 would help further clarify that care planning process. The longitudinal approach to measurement to demonstrate improvement is important in this population, with the many variables that can affect measurement. Culture change is a topic that should be noted within organizations as far as how to approach patients with MCC. In proceeding with further development, culture change should be kept in the forefront.	The committee agrees that care planning is not static and will add this refinement. Culture change from a provider centric model to a patient centric model of measurement will be needed and further emphasized.
50	Submitted by Debra Ness	National Partnership for Women & Families	4. Guiding Principles for Measuring Care Provided to Individuals with MCCs	NPWF supports the guiding principles, with the exception of "structural" measures in principle #2. In addition, Principle #8 on risk adjustment, needs further clarification, particularly since this is going to be a report/tool for measure developers. The issue of whether risk adjustment models should included SES has been the subject of recent discussions around hospital readmissions measures. We do not support this approach, since, as written on page 11, it does not improve quality of care to obscure gaps and/or disparities in care and outcomes when the true paradigm change will require understanding the needs of a given demographic/community and addressing those needs. We would appreciate, therefore, a deeper discussion of this issue, given the divisions among multi-stakeholders over how to address it.	The committee favors patient reported outcomes when available and process measures most distal to outcomes. Although it is outside the scope of the framework to resolve the complex issues around risk adjustment, the guiding principles attempt to offer some direction, particularly in regards to addressing unintended consequences such as disparities in care.
51	Louise Probst	St. Louis Area Business Health Coalition	5. Path Forward	We appreciate that a high priority is given to "identifying and filling measure gaps" and support the strategic opportunities described in this section.	The committee appreciates your comment.
52	Submitted by Dena Mendelsohn	Pacific Business Group on Health	5. Path Forward	The Consumer-Purchaser Disclosure Project (CPDP) support the strategic opportunities described in this section, and appreciate that "identifying and filling measure gaps" is given high priority, particularly given the intensive discussions around gaps in measurement identified by the Measure Applications Partnership.	The committee appreciates your comment.
53	Submitted by Dale Lupu	American Academy of Hospice and Palliative Medicine	5. Path Forward	The American Academy of Hospice and Palliative Medicine strongly concurs with the need for cross-cutting measures. We have emphasized this in many prior comments on measures related to hospice and palliative care. The NQF process itself has been a barrier to cross-cutting measures. The harmonization process does not allow measures to be expanded beyond the denominator population in which they have already been tested, making it a very slow process to pull together separate measures into an appropriate cross-cutting measure.	We appreciate your support of the direction of the committee in support of crosscutting measures. NQF is also committed to ensuring perceived barriers to endorsement of these types of measures are addressed.
54	Submitted by Lauren Agoratus		5. Path Forward	<p><u>Identifying and Filling Measure Gaps</u> We agree that there needs to be "cross-cutting, longitudinal measures." Although "measures for children with MCCs are virtually non-existent and represent a prominent gap" we would highly recommend using data from the National Survey of Children with Special Health Care Needs (<a href="http://www.childhealthdata.org/learn/NS-CSHCN">www.childhealthdata.org/learn/NS-CSHCN</a>) but agree more research is needed.</p> <p><u>Standardizing Data Collection, Measurement, and Reporting</u> We also agree that "using standardized data elements could increase the utility of electronic data sources and decrease provider data collection burden" particularly in light of health information technology under healthcare reform.</p> <p><u>Payment and Delivery System Reform</u> Although we agree with disease specific measures, there are different levels of severity even within the same diagnosis. We think that care management must be care coordination but not misused as a cost cutting measure. We strongly agree with using models of ACOs (accountable care organizations" and medical homes (<a href="http://www.medicalhomeinfo.org">www.medicalhomeinfo.org</a>) as best practices.</p>	The committee appreciates this feedback and your overall support. We welcome further guidance as the framework is implemented as to how best apply this model to children with special health care needs.

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55	Submitted by Jennifer Hitchon	American Occupational Therapy Association	5. Path Forward	We applaud the authors of the framework for recognizing that measures for children with MCCs are virtually non-existent and represent a prominent gap. We recommend that, going forward, NQF specify that the development of measures in this area related to function (activity performance and participation) is particularly important. One resource to consider -- relied upon by researchers in the field of occupational therapy -- is the Children's Assessment of Participation and Enjoyment (CAPE).	Although the committee was desirous for the framework to be applicable across populations, we welcome further guidance on how to best apply the model to children and adolescents. NQF is committed to enriching its measure portfolio for this population.
56	Rodney Peele; Submitted by Kara Webb	American Optometric Association	5. Path Forward	In MCC measure development, the American Optometric Association recommends that NQF remain aware of the potential for behavioral impacts for patients with multiple chronic conditions. A 2009 study found that "Adults with visual impairment and severe depressive symptoms were more likely than adults with neither condition to smoke, be obese, be physically inactive, have fair-poor health and have difficulties with self-care and social participation." [4] Individuals with MCCs often have complex circumstances and quality measures developed pertaining to this patient base must recognize this. The AOA fully supports considering complexity and interaction among MCCs. In fact, many MCCs have unique ties to vision and eye health that often go unchecked, and these can be particularly important toward improving the health function and quality of life of individual's with MCCs.	The committee acknowledges the importance of vision care to overall health and well being and supports the inclusion of multiple provider types in the conceptual model as it is customized to a patient's needs.
57	Submitted by Fiatagata Memea	Memea Family	6. Please provide comments on the report as a whole.	I am a recipient of Medicare and Ohana Health, an entity of Wellcare. I have been with MCC since 1990, when my last child was born, and that is when I contracted diabetes. All of my health issues is related to the diabetes. I am finally beginning to get a tighter control of my diabetes with the assistance of my physician and the diabetes educator. I believe that once I can manage this disease, all of my other health issues will resolve itself. Because for most of my young life and adolescence, I can count on my 2 hands, the times I had to visit the doctor's office. In college, I was as healthy as any young adult. But not until I contracted gestational diabetes, did my health issues begin to deteriorate. And even at it's onset, was there ever any real dedication from the medical community to help me manage my diabetes, like I would go into the doctor's office, and he/she would ask me what medication's I was taking, to include my insulin and it's doses. There was never any collaboration between any agencies on reviewing or assessing the multiple chronic diseases in Medicare and Medicaid recipients. I am glad for this effort by the HHS. Not until I moved here to Hawaii, did I get the attention that was so sorely missing in managing my diabetes.	The committee is grateful for your feedback. The voice of patients and their families/caregivers is critical to informing and grounding our work. Thank you for taking the time to comment.
58	Robert Blaser; Submitted by Amy Beckrich	Renal Physicians Association	6. Please provide comments on the report as a whole.	Renal Physicians Association (RPA) supports the development of the Multiple Chronic Conditions Draft Framework Report and appreciates the opportunity to comment.	The committee appreciates your support.
59	Elliot Roth; Submitted by Pamela Gonzalez	American Academy of Physical Medicine and Rehabilitation	6. Please provide comments on the report as a whole.	The American Academy of Physical Medicine and Rehabilitation (AAPM&R) appreciates this opportunity to comment on the proposed NQF Multiple Chronic Conditions (MCC) Draft Measurement Framework Report. AAPM&R is a national association representing more than 8,000 physical medicine and rehabilitation (PM&R) physicians (physiatrists) and many of the patients we care for fit the NQF definition of multiple chronic conditions. PM&R specialists routinely diagnose and treat inpatients and outpatients with musculoskeletal, neurological, neuromuscular, cardiopulmonary, and other disabling conditions, emphasizing the improvement of function and quality of life. We support the MCC Measurement Framework and its focus on functional assessments, integration of the disability community, and patient centric care. Thanks for ensuring that patients with multiple chronic conditions are not just treated as "exceptions" to the field of performance metrics.	The committee appreciates your support and emphasizing the importance of assessing functional status.
60	Submitted by Louise Probst	St. Louis Area Business Health Coalition	6. Please provide comments on the report as a whole.	We see this as the beginning of the development of measures to improve the care for patients with Multiple Chronic Conditions and suggest showing how a lack of MCC measures is currently effecting patients. Also, you need to show how patients and other stakeholders will use these measures, if and when they are developed and implemented.	The committee appreciates your view about this framework being a pathway to getting to measures that matter for this population. You raise important issues in regards to next steps around implementation and we welcome your further guidance.

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61	David McCulloch; Submitted by Terry Aoki	Group Health Cooperative	6. Please provide comments on the report as a whole.	Group Health supports NQF's work in recommending these measures. This is the clearly the "right" work to focus on in American Healthcare.	The committee appreciates your comment and support.
62	Submitted by Kelly Horton	National Council on Aging	6. Please provide comments on the report as a whole.	We are pleased that the guiding principles and national initiatives upon which the Committee has premised the Measurement Framework including shared decision-making (patient-centered care, patient engagement, and a strong foundation of shared accountability), reliable measures (including patient experience, clinical outcomes, and commitment to quality care), meaningful stakeholder involvement (including consumers), and access to care. These elements are the essential building blocks of creating a new care delivery system with the triple aim of providing better care, reducing costs, and improving health outcomes and quality of life for people living with multiple chronic conditions.	The committee appreciates your comment and support, and for emphasizing these important concept areas.
63	Michael Rapp; Submitted by Rabia Khan	Centers for Medicare and Medicaid Services	6. Please provide comments on the report as a whole.	<p>CMS submits the following comments on the Multiple Chronic Conditions Framework:</p> <p>The Multiple Chronic Conditions Framework is critically important and pertinent to measurement of quality across all care settings. However, the potential applications of this report remain unclear. Will NQF utilize the framework to analyze and identify measures during the Consensus Development Process (CDP) or Measure Applications Partnership input to HHS?</p> <p>Page 10 - Although the guiding principles and framework have face validity individually, are they in priority order?</p> <p>The framework should guide measure development and refinement towards identification and attainment of meaningful health outcomes despite ongoing presence of multi-morbid conditions. Recognizing that a "gold standard" outcome would be difficult to arrive at, would safety be a dimension that transcends all domains in the conceptual model? It seems that avoiding harm is critical in this patient population.</p>	NQF will use this framework as a guidepost for its endorsement work moving forward in this area. Many of the framework's core tenets such as crosscutting measurement is aligned with the work of the National Priorities Partnership and the Measure Applications Partnership. The guiding principles are not in rank order and are by nature mutually inclusive. The committee agrees safety is a common thread across this model and in an area ripe for exploring as this model is further fleshed out in practice.
64	Michael Rapp; Submitted by Rabia Khan	Centers for Medicare and Medicaid Services	6. Please provide comments on the report as a whole.	<p>CMS submits the following comments on the MCC Framework:</p> <p>Dual eligible and post acute care/long-term care populations encompass individuals living in the community with multiple chronic conditions. Much of the language in the framework equates "condition" to "illness." Individuals with physical, cognitive, developmental, congenital conditions do not necessarily perceive themselves as "ill," although they may be ill at various points in their lives. Thus, the term "illness" needs to be clearly defined and appropriately used throughout the report. As an example of potential clarity and changes, "trajectory of illness" (page 9) could be edited to state, "beneficiary's health trajectory over time."</p>	The committee appreciates this distinction and will revise accordingly.

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65	Michael Rapp; Submitted by Rabia Khan	Centers for Medicare and Medicaid Services	6. Please provide comments on the report as a whole.	<p>The following are CMS comments specifically related to Appendices B and D:</p> <p>Appendix B - "Enable Healthy Living: Optimize Function": CMS recommends including measure concepts for functional status, specifically related to mobility, self-care, cognitive status, social participation, occupational participation, and structural/environmental considerations (e.g., accessibility to transportation, public spaces, and housing).</p> <p>Appendix B - "Effective Communication &amp; Coordination of Care": CMS recommends including measure concepts that incorporate patient/family/care-giver participation in care planning that reflect individual's preferences.</p> <p>Appendix B - "Make Care Safer": CMS recommends including measure concepts that incorporate avoidable adverse events, such as pressure ulcers, infections, and injurious falls.</p> <p>Were the measures in Appendix B the only "successful" measures when the framework was applied to the NQF measures portfolio?</p>	Appendix B was the committee's attempt to identify high leverage measure concept areas for this population. They also mapped to the NQS in an effort to promote alignment. The additional concepts provided will be helpful in further fleshing out measure gaps in these critical areas. Thank you for this helpful feedback.
66	Michael Rapp; Submitted by Rabia Khan	Centers for Medicare and Medicaid Services	6. Please provide comments on the report as a whole.	Appendix D states, "1) Communication, care coordination and integration: measures that look at coordination and communication between physicians, specialties and sites of care and integration of an overall care plan." This statement does not include the patient, but it is clear that effective care coordination and communication needs to involve the patient when integrating an overall care plan.	Agree. The committee also emphasized shared decision-making as a critical measure concept area.
67	Elizabeth Lin; Submitted by Terry Aoki	Group Health Cooperative	6. Please provide comments on the report as a whole.	In Appendix C - the measures approved by NQF are too long to be of practical value in clinical practice, e.g. 15 items to measure domains for mobility and ADL separately, just in post- acute care patients.	Appendix C was meant to be illustrative of existing measures in the field for these measure concept areas and was not intended to be an exhaustive list. The committee agrees there would need to be a prioritization of what measures were collected based on the patient's needs over time.
68	Elizabeth Lin; Submitted by Terry Aoki	Group Health Cooperative	6. Please provide comments on the report as a whole.	There is need for very short (e.g. 3 item or less functional assessment that can be applicable across conditions, similar to the Sheehan Disability Scale that we used in research for both mental and physical chronic illnesses (Sheehan DV, Harnett-Sheehan K, Raj BA. The measurement of disability. International Clinical Psychopharmacology. 1996; 11(suppl 3):89-95.	The committee supports the need for routine assessment of functional status in clinical practice in a way that is feasible and reliable.
69	Tracey Moorhead; Submitted by Victoria Ingenito	Care Continuum Alliance	6. Please provide comments on the report as a whole.	Care Continuum Alliance (CCA) supports NQF's effort to clarify and streamline quality measures for individuals with multiple chronic conditions. The framework's emphasis on designing cross-cutting measures that assess quality in care transitions for those with multiple chronic conditions closely aligns with CCA's work on care transitions. Our Transitions in Care Workgroup compiled a case studies compendium highlighting lessons and successes in a variety of transitions in care programs. We also share NQF's goal to pair incentives for patients and providers with performance-based payment programs. This reinforces the role of incentives as an important tool within chronic care management programs and more broadly within Population Health Management strategies.	The committee appreciates your support of crosscutting measurement. The case studies you have developed will be very useful moving forward as this model is applied in real life settings. We appreciate your ongoing guidance.

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70	Submitted by Dena Mendelsohn	Pacific Business Group on Health	6. Please provide comments on the report as a whole.	<p>The Consumer-Purchaser Disclosure Project (CPDP) applauds this project and hopes that it will begin to pave the way for the development of measures to improve care for patients with Multiple Chronic Conditions. We do offer one over-arching suggestion for how to improve the framework, to ensure that it achieves its aims:</p> <p>The report notes that NQF seeks "a comprehensive picture of the quality of care provided to individuals with MCCs." As currently written, however, the framework tilts very heavily toward being an academic resource and does not provide enough of the "patient's" voice to truly provide that comprehensive picture noted in the above quote. Toward that end, we suggest citing surveys, interviews, focus groups, etc. - both in the text and in the bibliography - reflecting the ways in which the lack of MCC measures is currently effecting patients, and how patients and other stakeholders will use these measures, if and when they are developed and implemented. We believe that providing scenarios, or "use cases" of how these measures would promote the shared vision of a patient-centered system that provides high quality, high value care to the most vulnerable patients would be of tremendous value to measure developers as well as to the field as a whole.</p>	The committee agrees the patient's perspective should be amplified. To that end a case study has been drafted to play out the conceptual model through the "patient's eyes".
71	Submitted by Lauren Agoratus		6. Please provide comments on the report as a whole.	<p><u>Appendix B</u> Under "effective communication and coordination of care" we would strongly recommend the inclusion of transition from pediatric to adult systems of care. We strongly agree under "treatment of leading causes of mortality" to examine "missed prevention opportunities." Under "making care safer" we would include consistency in medications (i.e., doctors adjusting dosages and telling patients to ignore what's on the label, pharmacies replacing familiar medications with whichever generic is cheapest each month, having patients use pill splitters to adjust dosages, etc.) We would also add preventable errors (now being disallowed for reimbursement) and hospital acquired conditions in this section. Under "making quality care more affordable" there must be consumer input into what are "reasonable patient out of pocket medical costs and premiums." We also agree with examining "inefficiently delivered services" which could be something as simple as multiple blood draws in different departments of the same facility on the same day. Under "person-and family-centered care", we were pleased to see family/caregiver experiences. We agree with self management but blame must not be assigned if a condition is progressive despite compliance.</p>	Appendix B was the committee's attempt to identify high leverage measure concept areas for this population. They also mapped to the NQS in an effort to promote alignment. The additional concepts provided will be helpful in further fleshing out measure gaps in these critical areas. Thank you for this helpful feedback.
72	Submitted by Lauren Agoratus		6. Please provide comments on the report as a whole.	<p><u>Appendix C</u> Under "optimize,...maintain...prevent decline" we agree with the use of a functional definition but should include more than just LTC with pain, depression, pulmonary etc. Interventions such as speech, occupational, and physical therapies must be considered for children and adults with disabilities. Under "shared accountability", again we strongly support "children with effective care coordination and with a medical home."</p>	Appendix C provides illustrative examples of available measures that address the high-priority MCC measure concepts identified by the committee. The measure concepts noted in your comment can be addressed by some of the existing measure concept.
73	Submitted by Lauren Agoratus		6. Please provide comments on the report as a whole.	<p><u>Appendix D</u> Under "communication, care coordination and integration", we would recommend the addition of cultural competency, physical accessibility, language access including ASL, and especially health literacy as it is the single largest barrier to healthcare access. Under process of care, we would add consistency in prescribing in the previously mentioned changed dosages, generics, pill-splitting etc. Under "structure", in addition to home visits we would strongly recommend the addition of telemedicine which will increase access to underserved populations.</p>	You propose important sub domains for these concept areas which can inform the filling of measure gap areas moving forward.



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74	Submitted by Lauren Agoratus		6. Please provide comments on the report as a whole.	<p><u>Appendix E</u> Under "work with communities" we would strongly recommend the addition of emergency preparedness (i.e. natural disasters), particularly for those with special needs. Although we appreciate the "patient family perceived challenge in managing" we would strongly recommend the addition of caregiver education and support such as respite. More people enter institutional care due to caregiver burnout rather than deterioration of the condition. Under "ensure person-and family-centered care" here again we would suggest the addition of cultural competency and health literacy as mentioned above. Under "make care safer", we would recommend the addition of preventable medical errors and hospital acquired conditions. Under "promote effective communication and care coordination" we would add transition from pediatric to adult systems of care to be included in "seamless transitions between multiple providers and sites of care."</p>	As above, the further operationalization of these measure concept areas will be critical to addressing gap areas.
75	Submitted by Joseph Drozda	American College of Cardiology	6. Please provide comments on the report as a whole.	<p>The American College of Cardiology appreciates the opportunity to review and comment on the Multiple Chronic Conditions Measurement Framework. This is an important conceptual and early implementation plan that provides a thoughtful approach to a complex problem. The definitions are well done and the principles are explained in sufficient detail. The emphasis on function is extremely important, and the variety of healthcare providers addressed in the document is laudable. Appendix E is particularly valuable, probably because of its clarity and brevity. The one important omission is the communication of MCC issues to the committees charged with disease-specific guideline delineation, such that this concept could be at least incorporated in the introduction and/or "limitation" sections of a guideline - indicating MCCs as important contributors to modifications in guideline application. This is particularly important because many performance measures are based on guideline recommendations.</p>	The committee appreciates your support and acknowledges ACC important contribution to the development of evidence-based guidelines. We agree moving forward that the core tenets of this framework will need to be incorporated more upstream into guideline development.
76	Submitted by Joseph Drozda	American College of Cardiology	6. Please provide comments on the report as a whole.	<p>Perhaps another omission, although the Committee was specifically charged with a measurement framework, is the need to educate the healthcare community about the implications of MCCs. A final recommendation is that using readmission as a performance measure deserves a more detailed discussion by the Committee. The data that would support readmission rate stand-alone measures as good proxies for care coordination are very limited. The Veterans Administration, for instance, has greatly increased its care coordination in the last 10 years yet their heart failure readmission rates have actually inched up slightly while mortality has trended down.[1] In addition, large RCT from the VA showed that improving the transition of care increased re-hospitalization though patients were more satisfied with their care.[2] In summary, although there may be some opportunities to improve the document, it is on the whole very well done and the Steering Committee is to be congratulated.</p> <p>[1]Heidenreich PA, Sahay A, Kapoor JR, Pham MX, Massie B. Divergent trends in survival and readmission following a hospitalization for heart failure in the Veterans Affairs Health Care System 2002 to 2006. J Am Coll Cardio 2010;56:362-8. [2]Weinberger M, Oddone EZ, Henderson WG. Does increased access to primary care reduce hospital readmissions? Veterans Affairs Cooperative Study Group on Primary Care and Hospital Readmission. NEJM 1996;334(22):1441-7.</p>	The committee appreciates your overall support. They agree both upstream and downstream workforce development is needed to ensure health care providers possess the core competencies needed in this area. It was beyond the scope of this project to evaluate the impact of specific performance measures in practice, but acknowledges the limitations of a single measure being used as the sole indicator of quality.

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77	Submitted by Girma Alemu	Health Resources and Services Administration	6. Please provide comments on the report as a whole.	<p>Overall, we feel the document is comprehensive. As stated in the document, basing performance measures strictly on clinical practice guidelines could lead to over treatment and burdensome measures. However, the document does not provide guidelines on how to strike a balance between the measures proposed in this document and current disease management measure sets. The DHHS HIV Treatment Guidelines, for example, provide updated guidelines to screen patients for additional chronic conditions:</p> <ul style="list-style-type: none"> <li>✦ Other infectious diseases such as Hepatitis C and Hepatitis B</li> <li>✦ Conditions such as Diabetes and Heart Disease</li> <li>✦ Behavioral conditions, such as substance use, addiction, and depression</li> </ul> <p>and deliver the care they need. From these guidelines, the HIV/AIDS Bureau (HAB) develops and maintains performance measures for care and treatment. These ensure funded providers focus on the multiple chronic conditions in this population. This is also a critical part of the National HIV/AIDS Strategy. Finally, as the NQF seeks performance measures for care coordination, it may want also to consider measures that relate to effective communication (B-1).</p>	The committee appreciates your overall support. You raise important issues in regards to implementation of the model moving forward and the need to balance crosscutting and disease specific measures. Your experience in the realm of HIV should be a useful model to inform this work.
78	Angel Oddo; Submitted by Stuart Yael Gordon	Amerigroup Corporation	6. Please provide comments on the report as a whole.	<p><u>Encounter Data vs. Claims and Charted Data</u> The measures illustrating the first of the high priority MCC measure concepts (i.e., "optimize function, maintain function, or prevent decline in function") appear to emphasize the use of record review data and claims data over the use of encounter data. Amerigroup would encourage instead that encounter data be preferred to measure patient functionality. Our preference for encounter data is based on two considerations:</p> <ol style="list-style-type: none"> <li>(1) Encounter data would provide a truer picture of the patient's changes in functionality than would conclusions drawn from claims data or from medical charts.</li> <li>(2) We understand it is a goal of the NQF to simplify the administrative burden of reporting quality measures. The use of encounter data would impose a lesser administrative burden on the reporting provider than the submission of claims data or charted data.</li> </ol> <p><u>Recognition of Cost Variations in Achieving Cost Transparency</u> The illustrative measures set out in the high priority MCC measure concept of "transparency of cost" does not appear to reflect that health care service costs frequently vary by state, program and contract area. These variations are likely to make the standardization of measures across states and programs difficult. We believe the report should acknowledge that standardization of measures of cost transparency will require consideration of these cost variables.</p>	You raise important tissues around data sources for capturing this type of patient reported outcome. It was beyond the scope of this committee's work to identify what data source should be optimally used. Your experience in this area will be valuable moving forward as the model is implemented. You also raise an important methodological issue around variation as pertained to cost. The committee wished to highlight costs of care as an important domain of measurement but a detailed analysis of these implementation challenges were out of scope for this project.
79	Submitted by Gaye Fortner	HealthCare 21 Business Coalition	6. Please provide comments on the report as a whole.	HealthCare 21 Business Coalition supports that providing scenarios, or "use cases" of how these measures would promote the shared vision of a patient-centered system that provides high quality, high value care to the most vulnerable patients would be of tremendous value to measure developers as well as to the field as a whole.	The development of "use cases" would be a useful tool as the model begins to be operationalized in in the field. Although the scope and time frame of this project did not allow for this to be done, a case study was developed as part of the response to review to make the model more "real".

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80	Submitted by Jennifer Hitchon	American Occupational Therapy Association	6. Please provide comments on the report as a whole.	The American Occupational Therapy Association (AOTA) is the national professional association representing the interests of occupational therapists, students of occupational therapy, and therapy assistants. The practice of occupational therapy is science-driven, evidence-based, and enables people of all ages to live life to its fullest by promoting health and minimizing the functional effects of illness, injury, and disability. Occupational therapy practitioners across all settings treat patients with multiple chronic conditions, and we applaud NQF for recognizing the effect of multiple chronic conditions on quality of life and function, including occupations. The Committee has done exceptional work in trying to address a very challenging initiative and we support the draft document. Overall, our primary comment is that it is imperative that NQF include the concept of "participation" in the development of new outcome measures (community participation, a return to social roles, etc.). There is certainly (and commendably) a clear focus on participation outcomes throughout the Framework -- social support, the appropriate incorporation of caregiver and family in decision making and care, optimizing function -- but the existing language is dominated by medical model terminology.	The committee appreciates your overall support of this work. Your comments are consistent with the recommendations of the NQF convened National Priorities Partnership --specifically the emphasis on social and environmental aspects of health and well being.
81	Submitted by Maureen Dailey	American Nurses Association	6. Please provide comments on the report as a whole.	The American Nurses Association applauds this important work, which builds on the Department of Health and Human Services Multiple Chronic Conditions Framework and other frameworks. Populations requiring complex, high intensity care coordination seamlessly across inter-professional teams. The importance of team-based care should be highlighted earlier in the document. Structures of care, the backbone of patient safety, were not addressed in detail. Access to the right mix of inter-professional team members in the right setting timely is key to mitigate progressive risk, manage symptoms etc. achieve the best quality and cost outcomes.	The committee supports your comments on the importance of multi-disciplinary team-based care essential for providing high quality care to this population and will highlight accordingly.
82	Submitted by Debra Ness	National Partnership for Women & Families	6. Please provide comments on the report as a whole.	As noted in the definition comment, we truly applaud the work of the steering committee on this incredibly complex, multi-faceted issue, and we are elated at the idea of truly meaningful measures of how care is delivered to patients with MCC may soon be a reality. However, to make this framework as useful as possible, it needs a much greater reflection of the patient's voice. As currently written, it leans very heavily toward being an academic resource. We suggest adding language from the consumer and patient perspective that relays just how critical it is to improve care for this population, in order to spur meaningful measure development. Our biggest concern is that the framework as written gets used by measure developers to create measures that are not conducive to promoting patient centered care, and in the end we will have wasted this journey.	Agree. In response, a case study has been drafted that captures the patient's voice, specifically in context of the model put forth in this framework.

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83	Submitted by Lynda A. Szczech	National Kidney Foundation, Inc.	6. Please provide comments on the report as a whole.	<p>Since chronic kidney disease (CKD) is often caused by or combined with other life-threatening chronic diseases (e.g. diabetes and cardiovascular disease) NKF appreciates the effort to develop a methodology for consideration of clinical performance measures (CPMs) in the context of multiple chronic conditions (MCCs). On the other hand, we believe that some of the conclusions in the report require additional clarification. For example, we do not agree that basing standards for performance on existing CPGs could necessarily lead to prioritizing low value, burdensome measures. Similarly, an impractically high level of complexity, cost, potential interactions, and burden should not automatically be ascribed to adherence with disease specific guideline recommended treatment in individuals with MCCs.</p> <p>Instead we contend that NQF decisions about applicability of disease specific guidelines in the development and application of performance measures for individuals with MCCs should focus on how those guidelines are developed. In the case of clinical performance guidelines developed under the Kidney Disease Improving Global Outcomes (KDIGO) program, the use of the GRADE system obviates the issue of "overtreatment" as only those recommendations that are based on strong evidence are rated as high strength and should be adopted as clinical performance measures. See Dr Uhlig's article for a summary of the GRADE process, especially table 5 that indicates that only a "strong guideline recommendation may form the basis for a clinical performance measure" (CPM). (K Uhlig, et al. Grading evidence and recommendations for clinical practice guidelines in nephrology. A position statement from Kidney Disease: Improving Global Outcomes (KDIGO). <i>Kidney International</i> (2006) 70, 2058–2065. )</p>	<p>The report draws caution to the potential unintended consequences of using a multitude of disease-specific CPGs for people with MCCs devoid of a holistic view of the patient and their goals and preferences. The NKF provides an excellent example of an evident-based approach to care which can serve to inform work in this area moving forward and the further operationalization of this model. The committee appreciates this feedback.</p>
84	Submitted by Lynda A. Szczech	National Kidney Foundation, Inc.	6. Please provide comments on the report as a whole.	<p>Also note that the KDIGO explicitly states that the guideline, INCLUDING THE STRENGTH OF THE RECOMMENDATION, must be cited verbatim . (The following quote is from the KDIGO CKD-MBD guideline, chapter 2, summary and future directions. <i>Kidney Disease: Improving Global Outcomes (KDIGO) CKD-MBD Work Group. KDIGO clinical practice guideline for the diagnosis, evaluation, prevention, and treatment of chronic kidney disease-mineral and bone disorder (CKD-MBD). Kidney International</i> 2009; 76 (Suppl. 113): S1-S130).</p> <p>"We strongly encourage users of the guidelines to ensure the integrity of the process by quoting the statements verbatim, and including the grade system after the statement when quoting/reproducing or using the statements, as well as explaining the meaning of the code that combines an Arabic number (to indicate that the recommendation is "strong" or "weak") and an uppercase letter (to indicate that the quality of the evidence is "high", "moderate", "low", or "very low")."</p> <p>The advantages of using this approach are described in the preceding section:</p> <p>"In the session of December 2008, the KDIGO Board also revised the grading system for the strength of recommendations to align it more closely with GRADE, an international body committed to the harmonization of guideline grading across different specialty areas. The full description of this grading system is found in Chapter 2, but can be summarized as follows: There are two levels for the strength of recommendation (level 1 or 2), and four levels for the quality of overall evidence supporting each recommendation (grade A, B, C, or D) (see Table 2, Chapter 2).</p>	

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85	Submitted by Lynda A. Szczech	National Kidney Foundation, Inc.	6. Please provide comments on the report as a whole.	<p>In addition to graded recommendations, ungraded statements in areas where guidance was based on common sense and/or the question was not specific enough to undertake 150 a systematic evidence review are also presented. This grading system allows the Work Group to be transparent in its appraisal of the evidence, yet provide practical guidance. The simplicity of the grading system also permits the clinician, patient, policy maker and provider to understand the statement in the context of the evidentiary base more clearly."</p> <p>Thus, for those organizations that issue disease-specific guideline statements using GRADE or a similarly rigorous approach, then only those statements that are 1A or perhaps 1B should be considered for CPMs and thus there should not be "low value" or "burdensome" CPMs based on those guidelines. In addition, the guideline statements are already prioritized based on the strength of the evidence rating.</p> <p>In addition, NQF should consider the recommendations of the IOM to determine feasibility for implementation of CPMs based upon disease-specific CPGs, especially in CKD patients, who have multiple chronic conditions. (Institute of Medicine. "Clinical Practice Guidelines We Can Trust." March 23, 2011.)</p>	
86	Submitted by Lynda A. Szczech	National Kidney Foundation, Inc.	6. Please provide comments on the report as a whole.	<p>December 1, 2005 There are virtually no data to suggest that there should be differences in CPMs based on disability, cognitive impairments, life expectancy, illness burden, dominant conditions, socioeconomic status, and race/ethnicity (at least in CKD). We maintain that it is inappropriate to consider such issues until relevant studies are undertaken and evaluated. In particular, we object to any assumption that a patient with multiple comorbidities wants "less-aggressive" care. The bottom line is that if the CPMs are rigorously developed, then it is clear which guidelines are important and should be adopted by NQF for national measures of quality.</p> <p>Nonetheless, disease-specific CPGs and CPMs may sometimes be medically contraindicated for patients with MCCs. For example, it would be dangerous to apply the American Heart Association's atrial fibrillation guidelines to people with End Stage Renal Disease and later-stage CKD.</p> <p>For this reason, a blanket statement like "Performance measures should be as inclusive as possible, as opposed to excluding individuals with MCCs from measure denominators" is not universally applicable.</p>	
87	Submitted by Andrew Goodman	Health Promotion and Disease Prevention	6. Please provide comments on the report as a whole.	<p>The Bureau of Chronic Disease Prevention &amp; Tobacco Control in the New York City Department of Health and Mental Hygiene (NYC DOHMH) welcomes the opportunity to submit comments to the National Quality Forum (NQF) on the draft report of the Multiple Chronic Conditions Measurement Framework. This draft report is an admirable first step in developing principles that will guide the evaluation and improvement of healthcare for patients with Multiple Chronic Conditions (MCCs). Within future drafts of this framework, we encourage the Steering Committee to recognize the importance of incorporating screening and treatment for tobacco use within routine care for patients with MCCs.</p>	The committee has identified health lifestyle behaviors as a priority measure concept which would include screening & treatment for tobacco use.

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88	Submitted by Andrew Goodman	Health Promotion and Disease Prevention	6. Please provide comments on the report as a whole.	<p>According to the U.S. Department of Health and Human Services' 2008 Clinical Practice Guidelines on Treating Tobacco Use and Dependence, tobacco cessation should be a high priority for patients with MCCs. Tobacco use is known to be an independent risk factor for many chronic illnesses, including heart disease, lung disease, and numerous cancers.[1] Furthermore, tobacco use interacts with many other medical conditions, affecting the heart, lungs, brain, kidneys, and other body systems, which can lead to adverse clinical outcomes in MCCs patients.[2] For example, smoking greatly increases the risk of developing both micro and macro vascular complications in diabetics,[3] and also exacerbates additional comorbid conditions, including cardiac disease, Chronic Obstructive Pulmonary Disease (COPD), and asthma.[4] Cigarette smoke also increases metabolizing of various medications that patients with MCCs may use, like insulin, which can result in higher effective dosages.[5]</p> <p>[1] Fiore MC, Jaen CR, Baker TB et al. Treating Tobacco Use and Dependence: 2008 Update. Clinical Practice Guideline. Rockville, MD: U.S. Department of Health and Human Services. Public Health Service. May 2008.  [2] U.S. Department of Health and Human Services. The Health Consequences of Smoking: A Report of the Surgeon General. Atlanta: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health, 2004.  [3] Haire-Joshu D, Glasgow RE, Tibbs TL. Smoking and diabetes (Technical Review). Diabetes Care, (1999) 22: 1887-1898. 1999  [4] Fiore MC, Jaen CR, Baker TB et al. Treating Tobacco Use and Dependence: 2008 Update. Clinical Practice Guideline. Rockville, MD: U.S. Department of Health and Human Services. Public Health Service. May 2008.  [5] Rx for Change. Drug Interactions with Smoking. Updated June 2003.  <a href="http://smokingcessationleadership.ucsf.edu/interactions.pdf">http://smokingcessationleadership.ucsf.edu/interactions.pdf</a></p>	The committee supports this comment and has identified this as a priority area for measurement for individuals with MCCs.
89	Submitted by Andrew Goodman	Health Promotion and Disease Prevention	6. Please provide comments on the report as a whole.	<p>Compounding these medical complications is the higher prevalence of current smoking among persons with a smoking-related chronic disease (36.9%) relative to those without any chronic diseases (19.3%).<sup>6</sup> When examined by disease type, current smoking prevalence was higher among those with smoking-associated cancers (except for lung cancer) (38.8%), coronary heart disease (29.3%), and stroke (30.1%) compared to those without chronic disease (19.3%). Additionally, almost half (49.1%) of adults in the U.S. with emphysema and 41.1% of individuals with chronic bronchitis smoke.<sup>7</sup></p> <p>Within the current framework, tobacco use is mentioned as a National Quality Strategy (NQS) concept that is aligned with MCC Measure Concepts relating to patient outcomes and missed prevention opportunities (pg. E-1). As the Steering Committee addresses measure gaps for people with MCCs, we recommend NQF measure 0028a (Tobacco Use Assessment) and measure set 0027 (Smoking and Tobacco Use Cessation, Medical Assistance) to support the delivery of tobacco dependence treatment. Including measures relating to screening and treatment for tobacco use will ensure key prevention practices identified by federal initiatives such as the NQS will be incorporated within care for those with MCCs. These particular measures align with other reporting systems, including Meaningful Use, thereby reducing measure burden for providers. In order to prompt more vigorous cessation efforts by healthcare providers, we also encourage the Steering Committee to consider the use of tobacco dependence treatment measures within new payment and delivery models.</p>	As above, the committee supports this comment and has identified this as a priority area for measurement for individuals with MCCs.
90	Submitted by Andrew Goodman	Health Promotion and Disease Prevention	6. Please provide comments on the report as a whole.	We thank the NQF for the opportunity to comment on this framework. Incorporating tobacco cessation will have a positive impact on MCCs patients' quality of life, functional capacity, and morbidity and mortality outcomes.	The committee supports this comment and has identified this as a priority area for measurement for individuals with MCCs.