

Oral Health Report: NQF Public and Member Comments

No.	Commentor	Organization	Topic	Comment	Expert Panel Final Response
1	Krishna Aravamudhan	Dental Quality Alliance	Gap Analysis and Measure Topic Prioritization	<p>The Dental Quality Alliance (DQA) appreciates the opportunity to comment on the NQF framework report. The American Academy of Oral and Maxillofacial Pathology, member of the DQA, recommends that prevention and detection of Oral and Oropharyngeal Cancer be more explicitly and unambiguously cited in the panel's recommendations.</p> <p>Page 16: "Measures of oral soft tissue lesions" Change to: "Measures of oral soft tissue lesions, including oral and oropharyngeal cancer". Also EXPAND: "Screening" to "Screening for mucosal and submucosal lesions, including oral and oropharyngeal cancer." (Note: this supports HP 2020: OH-14.2) and ADD: "Measure of proportion of oral and oropharyngeal cancers detected at stage I." (Note: this supports HP 2020: OH-6)</p> <p>Page 18: "Oral examination/assessment" Change to: "Oral mucosal examination, including oral and oropharyngeal cancer screening/assessment" (Note: this supports Healthy People 2020 14.2)</p> <p>Page 18: "Can include measures of visits to office, screenings or other nonoffice-based services" Change to: "Can include measures of visits to office, screenings, including oral and oropharyngeal cancer screening, or other non-office based services"</p> <p>Page 20: "Measures of habits" Change to: "Measure of Risk Oral and Oropharyngeal Cancer" and ADD: HPV positivity</p>	The Expert Panel reviewed this comment and per the recommendations on page 16 and page 20, the panel expanded the definitions to include the terminology suggested. The panel did not incorporate the two recommendations suggested on page 18, emphasizing that amending the text to specifically mention oropharyngeal cancers would create a statement that is too narrow. The existing verbiage allows for the inclusion of numerous conditions.
2	Ralph Fucillo	DentaQuest Institute	General Comments	<p>DentaQuest commends the National Quality Forum on its comprehensive draft report "Oral Health Performance Measurement: Environmental Scan, Gap Analysis and Measure Topic Prioritization." As an enterprise dedicated to the mission, "to improve the oral health of all," DentaQuest appreciates the increasing burden of oral disease, the connections between oral health and overall health, and the need to define, measure, and report on quality in oral health care as a national priority. We appreciate the opportunity to participate in the public comment phase of the Report development.</p> <p>Thank you for the opportunity to attend the March 30th session and to experience the dialogue among national leaders that served as the basis for the draft report.</p>	Thank you for your comment.
3	Ralph Fucillo	DentaQuest Institute	Background and Context	<p>In addition to the input below, DentaQuest would offer its support, including through its DentaQuest Institute and the DentaQuest Foundation, as the work to advance oral health quality measures moves forward. Through our overall enterprise, there might be opportunities to create partnership activities such as, evaluating methodologies for collecting information and testing draft performance measures within DentaQuest's active data processing systems. There are also current plans through the DentaQuest Institute and Foundation to continue to convene national leaders to promote consensus on the long-term development and implementation of a quality measurement system in oral health.</p>	Thank you for your comment.
4	Ralph Fucillo	DentaQuest Institute	Gap Analysis and Measure Topic Prioritization	<p>Please accept the following feedback as input to the public comment on several key points raised in your report:</p> <p>Diagnostic Codes: The lack of a standard set of diagnostic codes for oral health is a major barrier to implementing a quality measurement system. A critical component of moving this work forward is consensus on a single, comprehensive, and easily-implementable system of diagnostic codes.</p> <p>Refinement of Measures: Given that the number and scope of measures catalogued in your report is vast, there is a clear need to narrow the list to a set of measures that are feasible and highly impactful in monitoring quality and outcomes of care over time.</p> <p>Focus on Health Outcomes: We need to move toward greater measurement of health outcomes and population health rather than process and procedures. A system focused on quality must identify and implement measures that track higher-level outcomes, including changes in disease risk status, levels of disease, and patient/provider satisfaction.</p> <p>We look forward to working with you over the months to come. Please contact Brian Souza, Managing Director, to discuss next steps.</p>	Thank you for your comment.
5	Janet Leiker	American Academy of Family Physicians	General Comments	<p>Although the document does address both population measures and provider specific measures, it will be important to strike a balance in the final measure set between public health approaches/population measures and provider level performance measures. Proper oral health care for the population must be a community responsibility, taking into account awareness, access and affordability of dental services in the community.</p>	Thank you for your comment.
6	Girma Alemu	Health Resources and Services Administration	Gap Analysis and Measure Topic Prioritization	<p>With the prioritized measure topics, HRSA recommends that the expert panel select a set of existing measures from its environmental scan data, which are ripe for testing to further support oral health measures development.</p> <p>Under one of the high level category areas "Measures of Factors that Influence Risk for Oral Disease or Disease Treatment", topics for measures of habits, such as use of tobacco (tobacco use assessment, tobacco cessation counseling), and use of alcohol were listed. We recommend to add 'other substance use/abuse' under the topic of 'Measures of habits' on page 20 to measure the impact of non-alcohol and non-tobacco substances on oral health diseases. "Meth Mouth", is an example of the consequence of substance use and want to draw attention to the population affected by it. Substance use/abuse can fit also under the topic area of "measures of other tooth conditions" that lists "Broken Teeth", etc.</p>	NQF staff reviewed this comment and per this recommendation and earlier discussions with HHS, the Expert Panel partook in an exercise to select measures which they believe are ripe for testing. The panel cited numerous challenges and limitations associated with this exercise, including the lack of standardized definitions. Despite these challenges, NQF staff has formulated a table of Panel recommended measures for HHS use.
7	Girma Alemu	Health Resources and Services Administration	General Comments	<p>The NQF draft report, ORAL HEALTH PERFORMANCE MEASUREMENT- Environmental Scan, Gap Analysis & Measure Topics Prioritization, analyzes the current state of oral health performance measurement and clearly identifies priorities and goals for oral health performance measurement and improvement through its summary findings and recommendations. This report will help measure developers and users to identify the topics of oral health measures of a high priority and guide them for further measure development and testing.</p>	Thank you for your comment.
8	Trish Roels, DDS	Cherry Street Health Services	General Comments	<p>I am the Chief Oral Health Officer for Cherry Street Health Services, an FQHC in Grand Rapids, Michigan. As I read the oral health report and realized how much this report would affect my organization two thoughts came to mind 1) we need oral health measures and reporting and 2) funding needs to be provided for implementation and reporting. I have been a dentist for 25 years. I started in private practice but have been at Cherry Street for 21 years. I am pleased that oral health is recognized as a vital component for over all health and proud to be an oral health care provider. However as the demand for oral health care increases and therefore the services of oral health care providers increases the issue of funding must also be addressed. I am confident my profession will continue to evolve and improve to meet population demands as I am confident funding sources can be found to help pay for the demanded services.</p>	Thank you for your comment.