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# Building a Roadmap From Patient-Reported Outcome Measures to Patient-Reported Outcome Performance Measures: Environmental Scan

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## Draft 2

*April 6, 2022*

*This report is funded by the Centers for Medicare & Medicaid Services under contract HHSM-500-2017-00060I – 75FCMC20F0003.*

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## Executive Summary

The National Quality Forum (NQF) and the Centers for Medicare & Medicaid Services (CMS) have a long-standing partnership to advance patient-reported outcomes (PROs) as a tool to empower patients and elevate their voices in healthcare quality measurement. This shared commitment has contributed to progress towards the development and use of patient-reported outcome measures (PROMs) and patient-reported outcome performance measures (PRO-PMs). However, PRO-PMs make up less than 7 percent of all NQF-endorsed quality measures, and only one NQF-endorsed PRO-PM is included on the CMS list of Merit-based Incentive Payment System (MIPS) quality measures for 2022.<sup>1,2</sup> These gaps demonstrate the opportunity to increase the number of PRO-PMs that measure what matters to patients in ways that are suitable for use in CMS value-based purchasing (VBP) programs or alternative payment models (APMs).

CMS has heard from measure developers and measurement experts about the lack of detailed technical guidance for developing high impact outcome measures that are based on patient-reported data. Providing this guidance is one strategy to increase the prevalence of PRO-PMs. Additionally, as part of its goal to reduce measurement burden and transform measures to fully digital by 2025, CMS is particularly interested in advancing PRO-PMs that are used in clinical care and stored in the electronic health record (EHR).<sup>3</sup> This CMS-funded initiative, [Building a Roadmap From Patient-Reported Outcome Measures to Patient-Reported Outcome Performance Measures](#) (henceforth referred to as *Building a Roadmap*), seeks to lower barriers to the development and use of “digital” PRO-PMs by providing guidance on developing PRO-PMs that utilize data from high quality PROMs, are suitable for use in CMS’ VBP programs and APMs, and can be calculated and transmitted electronically.

The Building a Roadmap initiative includes four reports:

- The Environmental Scan Report identifies and summarizes existing information relevant to the use of high quality PROMs as the basis for PRO-PMs in accountability programs. It does not directly address challenges or offer specific guidance to developers, but rather provides background for the other documents in the Building a Roadmap project.
- The Interim Report identifies and describes attributes of PROMs that are suitable data collection instruments for high quality digital PRO-PMs and provides guidance to measure developers on selecting PROMs for use in a PRO-PM.
- The Technical Guidance Report describes a series of stages and tasks that measure developers can follow when developing and testing digital PRO-PMs that are suitable for CMS VBP programs and APMs.
- The Developer Feedback Report (to be released in summer 2022) identifies recommendations from measure developers and other key audience members on improving the Technical Guidance Report.

This report is an updated version of the Environmental Scan Report that NQF first published in spring 2021. Information that NQF retained from the 2021 report includes:

- a discussion of the role of [PROMs and PRO-PMs in quality-based models](#), including CMS' strategic aim to elevate patients' voices through the increased use of interoperable digital measures<sup>4,5</sup>;
- a [description of existing resources](#) that measure developers can reference when identifying PROMs for use in high quality PRO-PMs;
- a [review of guidance](#) to assist with the development of PRO-PMs and digital PRO-PMs; and
- an identification of [gaps and challenges that measure developers commonly face](#) when developing PRO-PMs.

This updated version of the Environmental Scan Report, published in Spring 2022, includes several additions recommended by CMS and the TEP, which include:

- an expanded discussion of [modes of PROM administration and methods of data collection](#);
- an explanation of [gaps between PRO-PMs and other quality measures and domains](#);
- a more comprehensive view of the [implications of interoperability on PRO-PMs](#); and
- throughout the report, additional links to web sites that are constantly updated with new information on digital quality measurement.

Although the Environmental Scan Report focuses on digital PRO-PMs, its findings are relevant to the development of all PRO-PMs. At the recommendation of NQF, CMS, and the TEP, the Building a Roadmap initiative focuses on patient-reported outcomes (specifically health related quality of life [HRQoL], functional status, and symptoms and symptom burden) as distinct from experience of care measures.

Additional materials related to the Building a Roadmap initiative, including reports and summaries of TEP meetings, are available on the [Building a Roadmap project page](#).

## Introduction

The patient voice is essential to healthcare quality measurement, and PRO-PMs are a powerful way to elevate patients' voices. NQF and CMS have a shared commitment to measuring outcomes that are meaningful to patients using data that patients provide. Many barriers hinder the development of PRO-PMs, however, including a lack of robust guidance to assist measure developers. Additionally, an opportunity exists for measure developers to create digital PRO-PMs—in which health IT systems not only collect and share data but also calculate and submit aggregate scores for regulatory and reimbursement purposes—that are based on high quality PROMs. To facilitate measure developers' efforts to develop and test PRO-PMs, other reports in the Building a Roadmap initiative present a list of attributes of high quality PROMs for use in performance measures (the Interim Report) and a roadmap to follow when creating digital PRO-PMs for accountability purposes (the Technical Guidance Report).

The Building a Roadmap initiative supports the development of digital PRO-PMs that are based in high quality PROMs and that may be appropriate for CMS VBP programs or APMs. The purpose of this Environmental Scan Report is to document the current state of identifying high quality PROMs for use in digital PRO-PMs, including available guidance on best practices for PRO-PM development. Digital PRO-PMs collect outcome data from patients with minimal burden, maximize response rates to PROMs to

increase representativeness, and leverage health IT systems for data collection, storage, and measure calculations. Although the Environmental Scan Report focuses on digital PRO-PMs, its findings are relevant to the development of all PRO-PMs.

NQF first published the Environmental Scan Report in 2021, and published this updated edition in spring 2022 to replace the previous report. The updated edition includes several improvements that were identified by the TEP, including an expanded discussion of PROM modes and methods, an explanation of PRO domains and which are within the scope of the Building a Roadmap work, and a more comprehensive view of the current state of digital quality measurement as it pertains to PRO-PMs. The updated Environmental Scan Report includes new information on digital measurement and PRO-PMs that was not available when the original report was published, as well as links to webpages that are constantly updated with new information on digital quality measurement.

## **NQF's Work on Patient-Reported Outcomes**

This section of the Environmental Scan Report briefly describes previously published NQF reports that can inform PROM selection and/or PRO-PM development, the current Building a Roadmap initiative, and terminology that is relevant to performance measures. This section of the report helps the reader to understand how the Building a Roadmap project fits within NQF's body of work on PROs.

### **Previous Work With Patient-Reported Outcomes in Performance Measurement**

Over the past decade, NQF has actively participated in the development of numerous reports to further the use of PROs and PROMs in clinical settings as well as the use of PRO-PMs to assess the performance of healthcare organizations.

In 2012, with funding from CMS, NQF launched the PROs in Performance Measurement project. The project included two commissioned background reports. The first report, [Methodological Issues in the Selection, Administration and Use of Patient-Reported Outcomes in Performance Measurement in Health Care Settings](#) (henceforth referred to as *Methodological Issues*), focused on selecting PROMs for use in performance measurement and was updated in 2015 by David Cella and his colleagues.<sup>6,7</sup> The second report, [PRO-Based Performance Measures for Healthcare Accountable Entities](#) (henceforth referred to as *Accountable Entities*), focused on the reliability and validity of PRO-PMs.<sup>8</sup> As part of the project, NQF also convened two meetings of an Expert Panel that contributed to the development of the 2013 report titled [Patient-Reported Outcomes in Performance Measurement](#).<sup>9</sup> This work brought together diverse experts to lay the groundwork for developing, testing, endorsing, and implementing PRO-PMs.

In 2017, NQF partnered with PatientsLikeMe, and with funding from the Robert Wood Johnson Foundation, developed and published [Measuring What Matters to Patients: Innovations in Integrating the Patient Experience into Development of Meaningful Performance Measures](#).<sup>10</sup> In this report, the authors reiterated the importance of patient-centered quality measurement and demonstrated the value that online patient communities could offer to measure developers and other stakeholders involved with PROs.

Many challenges have remained unaddressed since these reports were published, such as burdensome workflows related to data collection and lack of funding for the use of PROs. In 2019, CMS funded the first of two new projects with NQF, [Patient-Reported Outcomes: Best Practices on Selection and Data Collection](#) (henceforth referred to as *PRO Best Practices*). In September 2020, NQF published the [PRO Best Practices Final Report](#) from that initiative, in which NQF identified best and promising practices to help clinicians and administrators select and implement PROs and PROMs in care settings.<sup>11</sup> This report presented solutions to common challenges, such as:

- increasing clinician support by securing physician buy-in before launching a PRO program;
- improving patient buy-in by including patients, family members, and caregivers in the process of selecting PROs and PROMs;
- engaging staff in developing feasible and effective clinical workflows; and
- collaborating with leadership to identify funding sources to offset the costs of collecting and using PRO data.

The TEP for the 2020 initiative designed a PROM Attribute Grid that guides the selection of high quality PROMs for use within a clinic or health system ([See page 12 of the PRO Best Practices Final Report](#)). While this grid is intended for clinicians who are selecting PROs and implementing PROMs, it can provide insight into the attributes of high quality PROMs for use in performance measures.

## Current Work to Build a Roadmap From PROMs to PRO-PMs

In the first year of the Building a Roadmap initiative, the TEP revisited NQF's past work to understand what has—and has not—worked well in identifying high quality PROMs as the basis for PRO-PMs that can be used for accountability. Additionally, the TEP considered new knowledge about PRO-PMs that has emerged since the previous reports, particularly regarding digital quality measures (dQMs). NQF is publishing four reports related to the Building a Roadmap initiative that provide information and guidance to advance the development of digital PRO-PMs based on high quality PROMs.

- The Environmental Scan Report identifies and summarizes existing information relevant to the use of high quality PROMs as the basis for PRO-PMs in accountability programs, and provides background for the other documents in the Building a Roadmap project; this updated edition replaces the original edition that was published in spring 2021
- The Interim Report identifies and describes attributes of PROMs that are suitable data collection instruments for high quality digital PRO-PMs and provides guidance to measure developers on selecting PROMs for use in a PRO-PM.
- The Technical Guidance Report describes a series of stages and tasks that measure developers can follow when developing and testing digital PRO-PMs that are suitable for CMS VBP programs and APMs; an updated edition will be published in autumn 2022.
- The Developer Feedback Report (to be released in summer 2022) identifies recommendations from measure developers and other key audience members on improving the Technical Guidance Report.

The TEP for the Building a Roadmap initiative comprises multistakeholder experts who represent measure developers, health IT professionals, payers, researchers, clinicians, and other healthcare

perspectives. Importantly, the TEP also includes patients and patient advocates, who are critical voices for this effort. Because of the highly technical nature of this topic and the focus on PROMs and PRO-PMs that are used by federal agencies, NQF intentionally included individuals and organizations that are involved in the development of PROMs and/or the development and stewardship of PRO-PMs, including the following:

- Patient-Reported Outcomes Measurement Information System (PROMIS)
- Kansas City Cardiomyopathy Questionnaire – 12 item (KCCQ-12)
- Hip disability and Osteoarthritis Outcome Score, Joint Replacement (HOOS, JR)
- Knee injury and Osteoarthritis Outcome Score, Joint Replacement (KOOS, JR)
- PRO-PMs related to depression and orthopedic outcomes

### Terminology Used in Describing Performance Measures

In this report, NQF uses terminology from the [CMS Measures Management System \(MMS\) Blueprint](#) (henceforth referred to as *the CMS Blueprint*) to distinguish between PROs, PROMs, and PRO-PMs (Table 1). While the literature contains several different definitions for PROs, PROMs, and PRO-PMs, measure developers should be aware of the CMS Blueprint’s definitions, particularly when developing digital PRO-PMs that may be used in CMS VBP programs or APMs. Other terms, including dQMs and electronic clinical quality measures (eCQMs) are included in the glossary ([Appendix A](#)):

**Performance measures** are standards that can be used to measure and quantify healthcare processes, outcomes, patient perceptions, organizational structures, and/or systems that are associated with the ability to provide high quality care.<sup>12</sup> In healthcare, NQF has endorsed several hundred performance measures that can be used to evaluate and improve healthcare processes, outcomes, patient perceptions, and organizational structures and/or systems.<sup>12</sup> PRO-PMs are a unique type of outcome measure that can be used to evaluate and compare healthcare entities (e.g., clinicians or health plans) using patient health outcome data that are provided directly by patients. Performance measurement is not unique to healthcare. The Baldrige Performance Excellence Program, the nation’s only Presidential awards program that recognizes exceptional organizational achievement, prioritizes performance measures in its points-based scoring model is an example of the importance of performance measurement as it applies to a broad range of industries and organizations.<sup>13</sup>

**Table 1. Distinctions Among PROs, PROMs, and PRO-PMs**

Concept	Definition	Example
<b>Patient-Reported Outcome (PRO)</b>	Any report of the status of a patient's health condition or health behavior that comes directly from the patient, without interpretation of the patient's response by a clinician or anyone else <sup>14</sup>	Symptoms of depression
<b>Patient-Reported Outcome Measure (PROM)</b>	Tools used to collect patient-reported outcomes <sup>14</sup>	Patient Health Questionnaire 9 (PHQ-9) <sup>®</sup> , a standardized tool to assess depression
<b>Patient-Reported Outcome Performance Measure (PRO-PM)</b>	A way to aggregate the information from patients into a reliable, valid measure of performance at the measured entity, level, e.g., clinician <sup>14</sup>	NQF #0711: Adult patients age 18 and older with major depression or dysthymia and an initial PHQ-9 score > 9 who demonstrate remission at six months (defined as a PHQ-9 score less than 5) <sup>1</sup>

## Environmental Scan Methodology

To consolidate resources for PRO-PM developers, users, and policy makers in this report, NQF conducted an Environmental Scan using the following methodology. First, NQF conducted a literature review to assess the body of literature related to PROMs and PRO-PMs and identify those articles most relevant to this initiative (Part One). Second, NQF conducted a related scan of existing PROMs and PRO-PMs, as well as the organizational bodies that assess the quality of these measures (Part Two). Third, NQF convened a multistakeholder TEP comprised of experts in fields related to PROs and held a series of web meetings in which key topics were discussed (Part Three). Fourth, NQF conducted nine key informant interviews (KIIs) with measure developers, IT experts, and patients who are not employed by federal agencies, as well as three interviews with federal employees. Each interviewee possesses unique experience with or perspective on measure development and digital quality measurement (Part Four). Each of these approaches is outlined in more detail below.

### Part One: Literature Review

To support the goals and objectives, NQF conducted a literature review to identify current measure gaps and challenges in developing and implementing PRO-PMs. The literature review included a search for sources that detail attributes of high quality PROMs that can be used in CMS' VBP programs or APMs.

#### Methods

Databases for the literature review included PubMed/Medline and Google Scholar. NQF conducted a targeted search within these databases using various combinations of keywords that were derived terms related to guidance on developing PRO-PMs (including digital PRO-PMs) as well as general terms to capture broader work that may include relevant information ([Appendix B](#)). In order to maintain focus on current recommendations and practices, NQF confined the search to English-language work published



between 2016 and present day, unless an older source remains an important part of the body of literature (i.e., it is noted as important by the TEP, it is widely recognized or cited by experts in the field, and/or its conclusions or recommendations remain relevant and have not been significantly revised or disproven). In order to identify new literature, searches were constrained to information published on or after January 1, 2021.

NQF also included grey literature in the literature review and considered papers and websites from government, not-for-profit, and corporate organizations for the Environmental Scan Report. The project team conducted additional searches using Google, with the intent of identifying grey literature that did not appear in the database searches. NQF extensively reviewed various sections of the CMS website in order to accurately represent the current state of PROMs and PRO-PMs in VBP programs and APMs.<sup>15</sup>

NQF reviewed and listed the websites related to each PROM discussed in detail in the Environmental Scan Report ([Appendix C](#)). The project team located these websites via Google searches focused on the copyright, licensing, and/or developer information for each PROM.

## Part Two: Measure Scan of Existing PRO-PMs

NQF conducted a measure scan for NQF-endorsed PRO-PMs ([Appendix D, Table 2](#)). Because this initiative includes a roadmap that guides measure developers to the beginning of the NQF endorsement process, the Environmental Scan Report centered on PRO-PMs that are currently endorsed by NQF. NQF's scan for PRO-PMs included NQF's Quality Positioning System (QPS) and the CMS Measure Inventory Tool (CMIT) ([Appendix D, Table 3](#)).

## Part Three: Discussions With Experts

NQF selected 25 experts to serve on the TEP, 22 of whom continued to serve for the second year of the project. These experts bring diverse perspectives on developing PRO-PMs for use in VBP programs and APMs, including viewpoints of measure developers and patients. Because the literature review and measure scan did not reveal extensive information on identifying a high quality PROM as the basis of a performance measure. This report synthesizes information gained in the discussions that occurred during meetings of the TEP. Key topics addressed during these meetings included:

- Unique roles of PROMs and PRO-PMs and the intersection between them
- Implications and requirements of digital PROMs and PRO-PMs
- Modes of administration and methods of data collection for PROMs
- Domains of PROs and rationale to focus on outcomes instead of experience
- Meaning of "high quality" as it pertains to PROMs and PRO-PMs
- Attributes of a PROM that is suitable for use in a high quality digital PRO-PM
- Evaluation of public comments and related revisions to reports

These discussions were moderated by NQF staff and facilitated by the co-chairs of the TEP. Information elicited during the discussions included anecdotal experiences that were common to multiple TEP members, as well as professional activities related to performance measurement that are not represented in the literature. Members of the TEP also provided resources to NQF staff, including peer reviewed articles.

## Part Four: Key Informant Interviews (KIIs)

To gather additional information, NQF conducted nine, one-hour KIIs with measure developers, IT experts, and patients who are not employed by federal agencies, as well as three interviews with federal employees. Each interviewee offered a unique perspective on measure development, digital measurement, and/or PRO-PMs. NQF led each interview using an Interview Guide to promote consistency across the interviews. (Federal employees were interviewed using a separate interview guide designed to elicit information about digital quality measurement at federal healthcare agencies.) Although the interviews followed a standard guide, each interview accommodated the interviewee's individual expertise and background. Interviewees were identified and selected based on recommendations from the TEP and CMS.

The interview guide included questions to elicit information on specific content areas, including:

- introductory questions that inquired about the interviewee's background and experience with measure development;
- exploratory questions on the structure and content of the Interim Report and the Technical Guidance Report;
- guidance questions related to digital measurement and development of PRO-PMs; and
- general questions on how the Technical Guidance Report could be more useful to its target audience of PRO-PM developers.

Information in the Environmental Scan Report that is not explicitly attributed to a specific source has been synthesized by NQF using parts 1-4 of the methodology described above.

## Environmental Scan Findings

NQF and the TEP identified key findings about the current state of selecting high quality PROMs and developing digital PRO-PMs. The majority of the Environmental Scan Report focuses on these findings:

- The role of [PROMs and PRO-PMs in quality-based models](#) in both the public and private sectors, and the importance of digital measurement in advancing this role.
- The [modes of administering PROMs, the methods of data collection](#), and the implications of each on digital measurement.
- [Gaps between PRO-PMs and other types of quality measures](#) (e.g., process and outcome measures), as well as the gap between patient-reported outcome and experience measures.
- Existing resources that measure developers can use to [identify candidate PROMs](#) as data collection tools for PRO-PMs.
- [Currently available guidance](#) to assist measure developers with the creation of PRO-PMs.
- An overview of the [implications of interoperability on PRO-PMs](#).
- Common [challenges to the development of PRO-PMs](#).

The Environmental Scan Report does not attempt to provide recommendations or novel solutions to these findings. Instead, it documents current information about each area. In cases where multiple approaches exist (such as with the challenge of determining whether a new PRO-PM should utilize data

from a single questionnaire or multiple different questionnaires), the scan presents the tradeoffs of the respective approaches. Other reports in the Building a Roadmap initiative (i.e., the Interim Report and the Technical Guidance Report) do provide recommendations that are pertinent to these findings.

## Role of PROMs and PRO-PMs in Quality-Based Models

The Environmental Scan Report confirms the importance placed on PROMs and PRO-PMs by a broad range of healthcare stakeholders, including federal agencies, payers, health systems, professional societies, patient advocacy organizations, and quality improvement organizations.

### *CMS and Industry-Wide Perspective*

An industry-wide shift away from fee-for-service reimbursement is occurring, and it includes discussions about the role of PROMs in value-based payment. The use of PRO-PMs in accountability and value-based initiatives has the potential to promote patient-centeredness, improve care, and lower cost.<sup>16,17</sup>

CMS has supported the shift toward value-based care through a variety of programs and initiatives that encourage the use of PROMs and PRO-PMs in quality measurement and improvement. In 2017, CMS launched the [Meaningful Measures Initiative](#), which identifies and prioritizes areas for quality measurement and improvement.<sup>5</sup> This initiative also helps to identify and close important measurement gaps, align measures across both the continuum of care and payers, and spur innovation in new types of measures, such as patient-reported measures and electronic measures.<sup>18</sup> CMS identified PRO-PMs in this initiative as a way of amplifying the patient voice and driving measures toward patient-centeredness.<sup>18</sup> In addition to the Meaningful Measures Initiative, CMS also sets priorities based on input from the [National Impact Assessment](#) of CMS Quality Measure Reports, further emphasizing the importance of prioritizing PROMs and measures using patient-generated data.<sup>18</sup>

Although attention to PROM and PRO-PM adoption is increasing, the scan identified few examples of payer PRO-PM implementation. One payer example of a large-scale implementation of PROMs is the effort by Blue Cross Blue Shield of Massachusetts (BCBSMA) to incorporate PROMs into clinical care.<sup>17</sup> The implementation started with a phased adoption of PHQ-9 (utilized for depression screening) and HOOS, JR / KOOS, JR (utilized for orthopedic hip and knee pain, respectively), and ultimately, to the adoption, use, and data sharing on PROMs in 6 clinical areas. The effort paid provider systems for participation not performance, though the goal was to eventually develop PRO-PMs that could be used for performance-based payment and accountability.<sup>17</sup> While the BCBSMA effort did not ultimately produce PRO-PMs, the case demonstrates potential ways in which financial incentives that reward PROM adoption can improve diagnosis and treatment, such as improved diagnosis and longitudinal tracking of depression as well as accurate prediction of outcomes from baseline functioning scores for hip and knee replacement patients.<sup>17</sup>

### *CMS Goals Related to PRO-PMs and Digital PRO-PMs*

One aim of the CMS Meaningful Measures 2.0 initiative is to promote better collection and integration of patient perspectives through the use of PROMs.<sup>3</sup> CMS has identified several strategies within this aim:

- Simplifying the use of PROMs
- Better integrating PROMs into EHR systems and their related workflows

- Developing new PROMs that are embedded into workflows, accessible to patients through digital means, and helpful in reducing reporting burden
- Expanding the use of the PROMIS tools
- Identifying “self-reported health” as a key result across CMS for patient-reported information<sup>3</sup>

Another aim of the Meaningful Measures 2.0 initiative relates to transforming 100 percent of quality measures to be fully digital by 2025. To accomplish this, dQMs need to be fully interoperable, meaning they allow data entry, storage, integration, calculation, and reporting to be conducted by health IT systems, and enable data to be used in multiple ways across systems. The ambitious goal of modernizing and digitizing quality measures and programs includes key steps, such as finalizing a digital measure strategy and advancing the electronic data infrastructure.<sup>4</sup>

The move to dQMs promotes important patient-centered goals, such as increasing support for value-based programs across payers and improving care coordination.<sup>3,4</sup> One of the ways in which CMS plans to integrate PROMs into the EHR workflow is by aligning the EHR certification process with other CMS reporting requirements.<sup>4</sup>

## Modes of PROM Administration and Methods of Data Collection

Stakeholders agree that modes of PROM administration and methods of data collection are important to consider when developing PRO-PMs. NQF’s PRO Best Practices report focused on the importance of using multiple modes to maximize patient participation and response, because directly capturing and reflecting the patient voice is a critical goal of PRO-PMs. This focus remains relevant throughout the Building a Roadmap project.

Digital input directly from the patient is widely viewed as the ideal. However, it is commonplace for clinicians to collect PROM results via a paper survey or telephone interview, then transpose those data into an EHR. Some TEP members noted anecdotal examples in which administration of a PROM by a clinician appeared to result in higher scores, and the literature reflects statistically significant differences in PROM scores obtained via telephone compared to those from self-administered instruments.<sup>19</sup> Stakeholders can digitally capture PROM data with technology such as iPads, email, or patient portals to maximize the chances of collecting accurate information directly from the patient, but they should provide alternative methods for those patients who are unable to navigate these options.<sup>11</sup>

The capture of PROM data from patients presents a variety of challenges. Nine patient-level factors may impact PROM completion: platform design, print literacy, health literacy, technology literacy, language proficiency, physical functioning, vision, cognitive functioning, and time.<sup>20</sup> These factors should be carefully considered when implementing PROMs as part of a workflow, as they can contribute to poor response rates and inaccurate completion of PROMs.<sup>20</sup> These patient-level factors may disproportionately affect minority populations, thus contributing to healthcare inequities.<sup>20</sup>

## Gaps Between PRO-PMs and Other Types of Quality Measures

CMS’ commitment to elevating the patient voice through PROMs is constrained by the small number of NQF-endorsed PRO-PMs. At the time of this publication, NQF has endorsed 28 PRO-PMs that span different domains (i.e., HRQoL, functional status, symptoms and symptom burden, health behaviors, and

experience with care), conditions and diseases (e.g., joint replacement, depression, and pain), and settings (e.g., ambulatory, inpatient, long-term care, and hospice) ([Appendix D, Table 2](#)).<sup>1</sup> While the existence of 28 NQF-endorsed measures is a positive step in the relatively short lifespan of PRO-PMs, these measures compose less than 7 percent of all NQF-endorsed measures.<sup>1</sup> In prioritizing the Building a Roadmap initiative, CMS noted the gap between the number of NQF-endorsed PRO-PMs and the limited number that are currently used for accountability programs; for example, only one NQF-endorsed PRO-PM is included in the MIPS Performance Year 2022 Quality Measures List.<sup>2</sup>

NQF, CMS, and the TEP agreed that the Building a Roadmap project should focus on digital PRO-PMs that measure three domains: HRQoL, functional status, and symptoms and symptom burden. While all five domains (including experience with care and health behaviors) are important, three primary drivers influence this recommendation.

1. **Representation of each domain in currently endorsed NQF PRO-PMs:** Nearly half of currently endorsed PRO-PMs measure the patient experience domain. PRO-PMs related to quality of life and symptoms are especially underrepresented.
2. **Assessment of healthcare entity performance:** While health behaviors and experience with care are important domains, they are farther removed from direct clinical interventions than HRQoL, functional status, and symptoms.
3. **Differences in Data Collection Methodology:** Entities that collect PROM data on HRQoL, functional status, and symptoms typically have a high degree of autonomy around data collection, storage, and analysis. Experience data, however, typically rely on stringent methodologies that require external partners to collect and analyze data, in part to ensure patient responses are confidential and will not affect the delivery of care.<sup>21</sup>

NQF endorses performance measures but does not endorse instruments or scales (including PROMs).<sup>9</sup> If a PROM is explicitly identified in the specification of a PRO-PM, the NQF Scientific Methods Panel (SMP) reviews that PROM for reliability and validity as part of the endorsement process ([Appendix E](#)).<sup>22</sup> However, NQF remains agnostic to the specific instrument and reviews it only to evaluate whether it meets an acceptable scientific standard as an element of the PRO-PM. Measure developers who are interested in learning more about the PROMs that are used in NQF-endorsed PRO-PMs can review measure specifications on NQF's [Quality Positioning System](#).

## Potential Resources for Identifying Candidate PROMs for Performance Measurement

As a rule, the measure developers who work on PRO-PMs are not the same people who develop and test PROMs. While exceptions to this rule do exist, the Building a Roadmap initiative treats PROM developers and PRO-PM developers as separate roles. The measure developers who work on PRO-PMs determine which PROM (or PROMs) should be used as a data collection instrument. This section of the Environmental Scan Report presents resources that measure developers commonly use when identifying candidate PROMs that might be suitable for data collection with a high quality PRO-PM. (The Interim Report provides extensive detail on assessing each candidate PROM against a set of defined attributes and determining its suitability for use with a performance measure.)

### *PROMs in Use With CMS VBP Programs or APMs*

With the passing of the Affordable Care Act of 2010, the U.S. healthcare system has shifted towards improving and rewarding value.<sup>23</sup> CMS designed the VBP program to increase the quality of care and experience for patients.<sup>24</sup> There are several VBP programs that can apply to various provider settings, such as hospitals and outpatient centers.

The APM is one track of CMS' Quality Payment Program (QPP), and it provides incentives to eligible participants to ensure high quality and cost-efficient care is provided.<sup>25</sup> Because the patient perspective is critical to quality measurement, payers need to leverage instruments that measure and account for the patient voice. VBPs and APMs are likely to interact during the shift towards improving value, given that incentives linked to APMs and VBP programs may be similar for some providers.<sup>23</sup>

PROMs are critical tools for capturing the patient voice. The following list highlights seven candidate PROMs that may be suitable for use with high quality PRO-PMs. While this list identifies specific PROMs that CMS has selected for use in accountability programs, this is *not* an endorsement of any individual PROM. Rather, it provides examples of PROMs that may be candidates for performance measures.

- **National Cancer Institute's (NCI) Patient-Reported Outcomes version of the Common Terminology Criteria for Adverse Events (PRO-CTCAE):** This tool was designed to measure and evaluate symptoms and adverse events for participants in cancer clinical trials.<sup>26</sup> The PRO-CTCAE Measurement System should be utilized with the Common Terminology Criteria for Adverse Events (CTCAE) due to the supplemental information that the PRO-CTCAE can provide to clinicians.<sup>26</sup> The PRO-CTCAE functions to enhance the precision of adverse-event reporting in cancer clinical trials, to provide useful data for clinicians, and to ensure that the patient perspective related to experiencing an adverse event is collected. Given the favorable test-retest reliability (median ICC 0.77) in a sample of 975 patients, as well as being linguistically validated, PRO-CTCAE demonstrates strong validity, reliability, and responsiveness.<sup>27</sup>
- **National Institutes of Health (NIH)-funded Patient-Reported Outcomes Measurement Information System® (PROMIS):** This initiative was established in 2004 with the goal of standardizing measures to allow for different PRO domains to be assessed.<sup>28</sup> The set of standards for the development and validation of item banks and instruments within PROMIS provides a useful tool for developers. PROMIS offers short forms, computerized adaptive testing (CAT), and profiles (i.e., fixed collection of short forms from multiple domains), as well as appropriate use across a range of patient populations. In using PROMIS measures with CAT, measures usually only require four to six items for precise measurement of health-related constructs, thereby reducing respondent burden.<sup>28</sup>
- **Patient Health Questionnaire 9 (PHQ-9):** This instrument has been in use since 1999 after it was developed through a grant from Pfizer. As a nine-question instrument, the PHQ-9 is shorter than its 16-question predecessor (the PHQ) and assesses the presence and intensity of depression and depression symptoms. The PHQ-9 is defined in the specification for four NQF-endorsed PRO-PMs that are stewarded by MN Community Measurement and are related to depression remission and depression response at six and 12 months.<sup>1</sup> Given its use in various medical



specialty areas, the PHQ-9 and the related performance measures offer examples of how a widely adopted PROM can be used as the basis for NQF-endorsed PRO-PMs.

- **Kansas City Cardiomyopathy Questionnaire – 12 item (KCCQ-12) and Minnesota Living with Heart Failure Questionnaire:** The KCCQ-12 PROM is a sensitive and specific HRQoL measure for patients with heart failure (HF).<sup>29</sup> Similar to PHQ-9, the KCCQ-12 is a truncated version of the 23-question KCCQ, which . Although the KCCQ has been shown to be valid, reliable, and sensitive, its length (23 questions) has been a barrier to gaining insight on the patient experience. An additional instrument that has been utilized to assess quality of life among HF patients is the Minnesota Living with Heart Failure Questionnaire (MLHFQ). The MLHFQ has two domains—physical and emotional—and is a self-administered instrument.<sup>30</sup> Both the KCCQ-12 and the MLHFQ are commonly used in clinical research and have the potential to predict outcomes important to clinicians of HF patients.<sup>31</sup>
- **Hip disability and Osteoarthritis Outcome Score, Joint Replacement (HOOS, JR) and Knee injury and Osteoarthritis Outcome Score, Joint Replacement (KOOS, JR):** Within orthopedics, PROMs are utilized for several conditions, including ligament injuries and joint replacements.<sup>32</sup> Two examples of validated and commonly used PROMs for knee injury and joint replacement include the KOOS, JR and the HOOS, JR. These PROMs assess outcomes after total knee arthroplasty (TKA) and total hip arthroplasty (THA), respectively, and are short-form measures that help to reduce patient survey fatigue.<sup>33,34</sup> In separate validation studies, high internal consistency and high responsiveness were seen with a Pearson Separation Index of 0.84 for KOOS, JR and 0.86 for HOOS, JR.<sup>35,36</sup> An additional attribute of both measures is the output of a single score that relays knee and hip “health” to the clinician. The KOOS, JR and HOOS, JR have crosswalks that allow scores from these PROMs to be converted to Oxford Knee Scores and Oxford Hip Scores (other PROMs that are widely used after TKA and THA), and vice versa.<sup>34</sup> The KOOS, JR and HOOS, JR are also both included as acceptable PROMs to meet the reporting requirements for CMS’ Comprehensive Care for Joint Replacement Model.<sup>37</sup>

### *NQF Resources*

NQF offers numerous resources that can assist measure developers in identifying candidate PROMs that might be appropriate for use in PRO-PMs. The reports from 2012 and 2013, particularly the Methodological Issues white paper, describe eight characteristics of PROMs that measure developers should assess when considering PROMs as data collection instruments in PRO-PMs.<sup>6</sup> The Interim Report from the current Building a Roadmap initiative expands on this guidance and presents 12 attributes that measure developers should assess when selecting PROMs for use with high quality PRO-PMs.<sup>38</sup> Although the core audience for the PRO Best Practices report is clinicians and administrators who are choosing PROMs for use in a clinical setting, it features guidance that developers may consider when determining if a PROM is of high quality.<sup>11</sup> Measure developers can also benefit from the specifications of PRO-PMs that are listed within the NQF Quality Positioning System database.<sup>1</sup> These specifications typically list any PROMs that are identified as data collection tools for PRO-PMs, including those that are no longer or were never endorsed.

### *International Consortium for Health Outcomes Measurement (ICHOM) Resources*

ICHOM was founded in 2012 with the intent of creating “critical foundations for value-based healthcare.”<sup>39</sup> Part of the organization’s work has focused on convening clinical experts and patients to develop standard Sets of Patient-Centered Outcome Measures. As of 2022, ICHOM has published 41 Sets, each of which is a pragmatic measurement recommendation based on a working group’s comprehensive review of relevant PROMs and other measures and data sources. As an example, the Hip and Knee Osteoarthritis Set identifies a minimum data set of case-mix variables, treatment variables, and outcomes, then recommends three potential HRQoL PROMs, a pain scale, and a hip- or knee-specific physical function PROM.<sup>40</sup> Because of ICHOM’s focus on outcomes that matter most to patients and a vetting process that involves clinical experts and consumers, the Sets are a potential source of high quality PROMs. The Sets include common chronic diseases, such as diabetes; population-specific sets, such as older person primary/preventive care and hypertension in low- and middle-income countries; and behavioral health conditions, including dementia, depression, and anxiety.

### *PROMs Identified by Professional Societies*

Professional societies can be a valuable resource for identifying PROMs that may provide strong foundations for future PRO-PMs. Many professional societies have convened working groups to evaluate PROMs and recommend those that meet certain criteria, such as patient-centeredness, cost, modality of administration, methods of data collection, completion time, clinical meaningfulness, and widespread clinical adoption. Approaches and recommendations from three societies are listed below, but there are numerous associations and societies that have published comparable recommendations on their websites, in white papers, journals, and other media.

- American Academy of Orthopaedic Surgeons (AAOS):** This academy established the Quality Outcomes Data (QOD) Work Group in 2015. The workgroup evaluated instruments for PROs in orthopedics against the criteria of free use, inclusion of only patient-reported data, multiple modalities, number of questions, responsiveness, one generic quality of the PROM, no more than three joint or disease-specific PROMs, and availability of CAT.<sup>13</sup> As a result of this work, AAOS developed a set of recommended PROMs for upper extremities (e.g., shoulder and shoulder instability, along with elbow, wrist, and hand), lower extremities (e.g., foot and ankle, knee, and hip), spine, and disease-agnostic quality of life.<sup>41–44</sup>
- Society of Gynecologic Oncology (SGO):** This society convened a daylong meeting of its Policy, Quality, and Outcomes Taskforce in 2018 that resulted in disease-specific recommendations for PRO data collection using the Functional Assessment of Cancer Therapy (FACT)-G7 as a general HRQoL questionnaire; disease-specific PROMs for ovarian, uterine, cervical, vulvar, and vaginal cancers; and instruments that specifically address sexual health in women with cancer.<sup>45,46</sup>
- American Academy of Neurology (AAN):** Some societies opt to list PROMs that are common in their field. While these lists may not be as rigorously vetted as those from societies that assign dedicated working groups to recommend PROMs, they can still be useful in identifying PROMs that may provide meaningful data collection for PRO-PMs. AAN provides a brief list of PROMs



used in neurology, including cross-cutting instruments, such as PROMIS and PHQ-9, as well as condition-specific scales and tools for dementia, headache, epilepsy, and multiple sclerosis.<sup>47</sup>

Regardless of how societies assemble a list of preferred PROMs, their research and recommendations can be useful for identifying PROMs that may be suitable for high quality digital PRO-PMs.

## Currently Available Guidance for Developing PRO-PMs

The literature review identified limited guidance on the development of PRO-PMs, a finding that aligns with CMS' decision to fund the Building a Roadmap initiative based on a lack of detailed technical guidance for developing high impact PRO-PMs. While the NQF and CMS documents discussed earlier in this Environmental Scan Report are valuable resources for PRO-PM developers, only one other substantive guidance resource emerged from the literature review.

The two NQF-commissioned white papers from 2012, as well as the 2013 report that is based on the work of the Expert Panel, are widely recognized as foundational resources for the development and use of PRO-PMs, and all three remain relevant. The 2012 Methodologic Issues white paper, along with its 2015 update, focuses on the selection, implementation, and use of PROs in clinical settings, as well as best practices in using PROs in performance measurement.<sup>6,7</sup> The 2012 Accountable Entities white paper focuses on the validity and reliability of PRO-PMs, as well as considerations of measure construction, interpretation, score calculation, and risk adjustment.<sup>8</sup> The 2013 report, *Patient-Reported Outcomes (PROs) in Performance Measurement*, reflects the Expert Panel's work to identify key characteristics of PROMs that are appropriate for use in PRO-PMs, define considerations for evaluating PRO-PMs, and establish pathways to move from PROs to PRO-PMs. While overlap exists between these reports and the Building a Roadmap initiative, the latter builds upon these foundations and expand their value and usefulness by providing step-by-step guidance designed for a diverse audience of measure developers.

In addition to the above reports that are specific to PRO-PMs, NQF has published extensive information and guidance on the Consensus Development Process (CDP) it uses to evaluate and endorse measures. Information about the CDP is available on the [NQF website](#), and relevant resources include:

- The [CDP homepage](#)
- [Overview of the CDP Process](#) (PDF, 12/2020)
- [Measure Developer Guidebook for Submitting Measures to NQF](#) (PDF, 8/2021)
- [Measure Evaluation Criteria and Guidance for Evaluating Measures for Endorsement](#) (PDF, 9/2021)

The CMS Blueprint, along with its related and supplemental documents, are indispensable resources for measure developers. At the time of this Environmental Scan Report, the CMS Blueprint was on its 17<sup>th</sup> version, which is available through the [CMS Measure Management System Blueprint section](#) of the [CMS website](#). Previous versions of the CMS Blueprint offered in-depth guidance for measure developers, but beginning with version 16, CMS began optimizing the report for a broad variety of audiences.<sup>18</sup> In conjunction with this change, CMS started publishing a new document, *The Blueprint for the CMS Measures Management System: Contractual Edition*, that offers detailed information for measure developers; the Contractual Edition is only available to Measure and Instrument Development and

Support (MIDS) contractors, their government leads, and CMS.<sup>18</sup> As with the foundational NQF reports mentioned in the previous paragraph, the CMS Blueprint and its related materials provide essential guidance to measure developers. However, these materials are not specifically focused on PRO-PMs, and the Contractual Edition is not available to an expansive audience of measure developers. As such, the Building a Roadmap initiative fills an important gap in PRO-PM guidance: The Interim Report assists measure developers with the identification of high quality PROMs, while the Technical Guidance Report outlines a series of stages and tasks that guides the development of PRO-PMs.

One PRO-specific resource that is related to the CMS Blueprint is the [CMS Blueprint Supplement on Patient Reported Outcome Measures](#), which offers guidance to measure developers on the development and evaluation of PRO-PMs. However, the *CMS Blueprint Supplement on Patient Reported Outcome Measures* exists at a high level and does not present detailed information to measure developers. For example, the section on choosing and defining a PRO addresses only three key tasks: the importance of identifying quality issues that are meaningful to a targeted population, determining relevance, and ensuring usability by the measured entities.<sup>14</sup> While these tasks are important, the document does not provide additional detail to help measure developers, particularly novices, understand how to accomplish these tasks. The document does link to key resources (e.g., the [CMS Blueprint Supplement on Risk Adjustment in Quality Measurement](#) and NQF's *Patient-Reported Outcomes in Performance Measurement* report), but it lacks the level of detail to be useful to measure developers who are navigating the early steps of PRO-PM development: It does not provide information on how to choose and define a PRO that is meaningful to the population being served, what stakeholders (including patients) should be involved in choosing the PRO, or how to ensure the measure will be usable by the necessary entities.

The literature review identified one additional guidance document: a 2015 peer-reviewed article published in *Value in Health*.<sup>16</sup> A TEP assembled by the American Medical Association (AMA) prepared a document that provides detailed recommendations on PRO-PM development. The article, written by Basch et al., identified nine best practices for developing PRO-PMs ([Appendix D, Table 4](#)).<sup>16</sup> Several of the best practices correspond to NQF's measure evaluation criteria on reliability, validity, usability, and feasibility.<sup>16</sup> The best practices were developed with the goal of supporting future development of robust approaches to better understand the impact of care on the patient experience.<sup>16</sup> While these best practices remain valuable and relevant, the guidance documents from which they were drawn were all published between 2000 and 2011 and generally addressed the development and use of PROMs rather than PRO-PMs.<sup>16</sup> The Basch et al. paper does not specifically address the development of digital PRO-PMs, which further emphasizes the need for the Building a Roadmap guidance.

Because limited guidance is available regarding PRO-PM development, there is a need to create more detailed instructions for guiding measure developers, regardless of experience, through the PRO-PM development process.

## Implications of Pending Advances in Interoperability for PRO-PMs

Developers and users should understand pending advances in interoperability as they plan an approach to PRO-PM design and implementation. These changes, which are being phased in over the next few

years, should facilitate PRO-PM adoption. The Environmental Scan Report summarizes likely pending advances in interoperability that are relevant to digital PRO-PMs.

While the glossary ([Appendix A](#)) includes an extensive list of definitions, readers of this section will benefit from understanding current definitions for dQMs and eQMs:

- **Digital quality measures (dQMs):** The definition of dQMs is evolving. In May 2021, CMS shared the approach of defining dQMs in a published Request for Information that was open for feedback, and in August 2021, CMS published a Final Rule that included feedback on the proposed approach.<sup>48,49</sup> The definition describes dQMs as, “Software that processes digital data to produce a measure score or measure scores. Data sources for dQMs may include administrative systems, electronically submitted clinical assessment data, case management systems, EHRs, instruments (for example, medical devices and wearable devices), patient portals or applications (for example, for collection of patient-generated health data), health information exchanges (HIEs) or registries, and other sources.”<sup>49</sup>
- **Electronic clinical quality measures (eQMs):** eQMs are expressed and formatted to use data from EHRs and/or health IT systems to measure healthcare quality, ideally data captured in structured form during the process of patient care.<sup>18</sup> They are the most common type of digital quality measures and are specified for use in the Medicare and Medicaid EHR Incentive Programs. Eligible professionals, eligible hospitals, and critical access hospitals are required to submit eQM data from certified EHR technology to help measure and track the quality of healthcare services provided within the healthcare system.<sup>50</sup>

As noted previously, CMS has stated the goal of fully transitioning to only using dQMs (including eQMs, which typically rely on data stored within a single EHR) in its quality and VBP programs by 2025.<sup>3</sup> CMS’ overarching vision for digital measurement aims to “improve the patient experience including quality of care, improve the health of populations, and/or reduce costs.”<sup>49</sup> Using interoperable digital data for measurement reduces measurement burden on providers by eliminating time-consuming tasks such as chart abstraction and manual data entry. Interoperable data can also be aggregated for the purposes of calculating quality measure scores across different EHR systems at different organizations, as well as across other health IT systems such as registries or claims databases.<sup>4,51</sup>

Near-term advances in interoperability could remove data collection and measure score calculation barriers that currently impede PRO-PM use. For example, calculating risk-adjusted PRO-PMs requires centralizing PROM data collected by providers with disparate EHRs to build, test, and run risk-adjusted measure score calculations. Advances in interoperability will ease data sharing and create the infrastructure and specificity of shared data formats needed to aggregate data across measured providers and use shared data in centralized measure score calculations.

The U.S. is advancing data interoperability through several mechanisms that will lower the burden associated with collecting and sharing data used for quality measurement. Many significant advances in interoperability have occurred in recent years, including the development and widespread support for using Fast Healthcare Interoperability Resources (FHIR) as the standard for interoperable data. FHIR is a Health Level Seven International (HL7) standard that defines how healthcare information can be

exchanged between different computer systems regardless of how it is stored in those systems.<sup>52</sup> FHIR can be leveraged to define common specific data formats that allow for data sharing across diverse systems without sacrificing information integrity.<sup>53</sup>

CMS and the Office of the National Coordinator for Health Information Technology (ONC) finalized regulations in 2020 that will accelerate providers' use and low burden sharing of FHIR data.<sup>54</sup> The ONC 21<sup>st</sup> Century Cures Act Final Rule requires providers using certified EHR technology (CEHRT) systems to map a specified scope of EHR data to FHIR resources and make those data accessible in the FHIR standard through FHIR application programming interfaces (APIs).<sup>54-56</sup> This requirement will expand the scope of EHR data, including data used for quality measurement, that can be accessed without burden.

Not all of the data needed for PROMs and PRO-PMs, however, will be interoperable when the ONC requirement takes effect December 31, 2022. Rather, the interoperability of relevant data will likely expand over time. The initial scope of data required to be interoperable is defined in the United States Core Data for Interoperability (USCDI) Version 1, and the detailed FHIR formats required in the US Core Implementation Guide.<sup>55</sup> USCDI Version 1 does not require that PROM data be interoperable. The ONC's data requirements grow as health information technology (IT) matures, meaning the USCDI is an evolving standard: The second version of the standard was published in July 2021 and added data elements related to social determinants of health (SDOH), sexual orientation, and gender identity (SOGI), while the [draft third version](#) proposes the addition and/or reclassification of data elements related to health insurance, health status, demographics, and other areas.<sup>56,57</sup> While Version 2 and Version 3 of the USCDI are not yet required for CEHRT, the inclusion of health status as assessed by standardized tools as a data class in the draft Version 3 lends momentum to the widespread uptake of the specific FHIR standards needed for PROMs and PRO-PMs.

While ONC has defined FHIR standards requirements at the data class and data element level for CEHRT through the USCDI and US Core Implementation Guide, ONC also recently launched an initiative, USCDI+, that defines and advances interoperable datasets for specific federal use cases (e.g., unique programmatic requirements for CDC surveillance programs).<sup>51,56,58</sup> The initiative could potentially be used to advance and accelerate a core set of interoperable data for quality measures, including PRO-PMs. USCDI+ allows harmonization to occur across federal programs, so a single data element can be consistently used across multiple use cases, even those with different coding structures.<sup>51</sup> While USCDI+ is focused on federal agencies, ONC understands that other organizations with unique datasets and use cases (e.g., specialty societies) can benefit from the development of use-case specific federally-defined datasets.

In summary, FHIR, USCDI, USCDI+, and other standards and technologies create the infrastructure for interoperability and, by extension, digital quality measures, including PRO-PMs. These standards are evolving, informed by stakeholder input through a structured process. These advances in interoperability can be leveraged in the coming years to reduce PRO-PM data collection and sharing costs.

## Challenges and Barriers of Developing PRO-PMs

The environmental scan identified several challenges related to developing PRO-PMs:

- Challenges with [developing and testing PRO-PMs](#)
- Difficulties [navigating the NQF endorsement process](#)
- Tradeoffs with determining whether a PRO-PM should [utilize data from one PROM or multiple PROMs](#)
- Technical challenges [related to digital PRO-PMs](#)
- Issues related to [patient burden](#), including low response rates and under-detection of poor performance when sicker patients might not be able to self-report<sup>16,59–61</sup>

### *Development and Testing Challenges*

PRO-PMs are, by definition, complex measures. As discussed in the overview of the NQF endorsement process ([Appendix E](#)), the word “complex” has a specific meaning with regard to the CDP: it requires an SMP review of the PRO-PM and its underlying PROM(s). As a general word, “complex” also applies to the PRO-PM measure development process. Developers must identify candidate PROMs, review the literature for each, analyze how well each aligns with the attributes of a high quality PROM (as identifies in the Interim Report), and select a PROM that will be used to collect data for the PRO-PM. If the measure developers consider using multiple PROMs as data collection tools, they must identify crosswalks to harmonize data across different instruments and create specifications that identify how those data are used in the PRO-PM. Testing a PRO-PM also adds complexities that do not affect most quality measures, such as identifying test sites that either are already using the required PROM as part of their standard protocols or are willing to add new PROMs not only to their clinical workflows but also to their EHR. These are only a few of the challenges that can emerge during the development and testing of a PRO-PM, and measure developers should be prepared to address these barriers.

### *Challenges With NQF Endorsement*

Unique challenges arise for PRO-PMs undergoing the NQF endorsement process ([Appendix E](#)), specific to three of the CDP criteria. Additionally, developing an endorsement-ready, PROM-based performance measure requires a PROM that has been used extensively for data collection, which can eliminate the consideration of recently developed PROMs or those that have not been widely adopted within the clinical or research communities.

### **Criterion 2: Reliability and Validity – Scientific Acceptability of Measure Properties**

According to NQF’s [Measure Evaluation Criteria and Guidance for Evaluating Measure for Endorsement](#), reliability *and* validity must be demonstrated at the data element level (i.e., the PROM) as well as the computed performance score (i.e., the PRO-PM) for complex, instrument-based measures (including PRO-PMs).<sup>22</sup> Any related threats to validity must also be addressed (i.e., exclusions, risk adjustment, performance comparability if multiple PROMs are used). Generally, for other types of measures, empirical testing at the data-element or measure score level is sufficient. This requirement for PRO-PMs adds a unique challenge to the endorsement process.

### **Criterion 3: Feasibility**

An important piece of feasibility is to ensure there is an achievable and implementable plan for collecting data or information without undue burden. Measures or PRO-PMs tend to be more feasible if they occur during the normal process of care, such as an intake survey to check functional status on an iPad in a waiting room. Electronic measures are generally preferred, as it is easier to collect large

amounts of data. Examples of considerations for undue burden include instrument length and timing when requesting feedback from a patient.

#### **Criterion 4: Usability and Use**

NQF-endorsed measures should be included in accountability programs and publicly reported to ensure they remain in use. Otherwise, measures may not be ideal for endorsement since they may not be maintained or updated over time.

#### *Importance of Relationships Between PROMs and Performance Measures*

Some PRO-PMs rely upon data from a single PROM (i.e., a 1-to-1 relationship between a PROM and a PRO-PM) while others are designed to accept data from different PROMs that address the same domain (i.e., a many-to-1 relationship). There are advantages and disadvantages to both approaches, and not understanding their respective benefits and drawbacks can present a challenge to measure developers who are considering candidate instruments as data collection tools for performance measures.

The lack of standardized structured data fields across both PROMs and EHRs underlies one argument in favor of the 1-to-1 relationship between PROMs and PRO-PMs: The developer can tailor the measure specification to the unique data structure of a single PROM. Because different instruments use different scores to measure change, a performance measure based on a single PROM only needs to consider one score; this eliminates the need to identify crosswalks that harmonize PROM scores and build different instruments into the measure specification. Measure developers and stewards can more easily maintain a PROM-based performance measure that depends on a single instrument. A 1-to-1 relationship also allows the measure developer to select the PROM that is most aligned with the attributes identified in the Interim Report.

One example of an NQF-endorsed PRO-PM that is based on a single PROM is NQF #0711 *Depression Remission at Six Months*. This measure, stewarded by MN Community Measurement, assesses improvement in depression scores on the PHQ-9 by measuring the number of adults with a diagnosis of major depression and an initial PHQ-9 score greater than nine who have achieved a six-month PHQ-9 score of less than five.<sup>1</sup> According to its measure specification, MN Community Measurement selected the PHQ-9 as the PROM for this measure because it is “(1) validated with a sensitivity of 0.080 and a specificity of 0.92 with substantial heterogeneity I2 = 82%, (2) widely accepted and utilized in Minnesota, (3) available for clinical use, (4) translated into many languages, and (5) easy for the patient to complete and the provider to score.”<sup>1</sup> This PRO-PM was initially endorsed in January 2011, making it a relevant and time-tested example of a single-PROM performance measure.<sup>1</sup>

There is also rationale for a many-to-1 relationship between PROMs and PRO-PMs, in part because it provides clinicians with the flexibility to use instruments based on appropriateness for their setting (e.g., language translations, licensing costs, and brevity of instrument) rather than requiring them to use a specific questionnaire. However, different instruments use different scoring systems and cut points (i.e., markers in PROMs that indicate the need to screen for a diagnosis or provide treatment), so measure developers must be careful when combining these different approaches into a single measure.<sup>8</sup> Crosswalks are necessary to harmonize different PROMs and ensure different data elements and scoring structures map to common elements in the PRO-PM. While crosswalks exist for some PROM pairs (e.g.,



the KOOS JR and the Oxford Knee Score, and the 12-Item Short Form Survey [SF-12] and the Veterans Rand 12-Item Health Survey [VR-12]), the number of possible PROM pairings far exceeds the number of available crosswalks.<sup>36,40</sup> An additional challenge with a many-to-1 relationship is the fact that the technical specification of the measure becomes significantly more complex with every additional PROM that is added, which results in additional time for measure development, implementation, and maintenance.

Regardless of whether the PRO-PM utilizes data from one PROM or many different PROMs, the PROM quality shapes the effectiveness of the performance measure. If a PROM suffers from poor design or inaccurate data collection, the PRO-PM will suffer as well.

### *Technical Challenges in Digital PRO-PM Development*

In 2011, CMS established the Medicare and Medicaid EHR Incentive Programs to encourage providers (including skilled nursing facilities, dialysis facilities, and hospitals) to adopt, implement, upgrade, and demonstrate meaningful use of CEHRT. These programs are now known as the Promoting Interoperability Programs, moving beyond the requirements of meaningful use to a new phase of EHR measurement with an increased focus on interoperability and improving patient access to health information.<sup>62</sup> One such opportunity is implementing universal standards for data.

One aspect of standardized data is the use of Logical Observation Identifiers Names and Codes (LOINC) to provide a separate code for each discrete unit of measure, which creates the ability to account for differences in these measures.<sup>63</sup> As an example, LOINC can enable the interpretation of clinical laboratory test result data by accurately and reliably coding the units of measure.<sup>64</sup> LOINC is critical for collecting, storing, and analyzing PROM data in EHRs and other health IT systems, and using these data in the calculation and reporting of PRO-PMs. Results of completed PROMs cannot be easily shared with EHRs and other health IT systems unless there are accepted vocabulary standards.<sup>65</sup> LOINC supports the structure and content of questionnaires by creating a model to capture the essential aspects of assessments. This model represents the hierarchical panel structure, global item attributes, panel-specific item attributes, and structured answer lists.<sup>65</sup> LOINC has embraced adapting standardized scales (e.g., the Glasgow Coma Score and the Apgar Score) and PROMs (including the PHQ-2 and PHQ-9, Confusion Assessment Method [CAM], PROMIS, and Outcome and Assessment Information Set [OASIS] assessments).<sup>65</sup> Today, LOINC supports more than 500 survey instruments.<sup>66</sup> Despite progress within standardized code sets, such as LOINC, a gap remains between coding and the storage of individualized codes required for each PROM.

The successful implementation and use of PROMs depends on integration within EHRs, whether from the vendor or built locally.<sup>11</sup> These technical challenges point to the importance of both embedding the instruments in the EHR and displaying the results in an actionable way. While interoperability is an industry-wide initiative, the burden falls on the implementor of the PROMs and PRO-PMs rather than the measure developers. Widespread use of PROMs and PRO-PMs requires improved integration with EHRs and other health IT systems, which can be achieved through a combination of interoperability standards (e.g., FHIR) and coding schemes (e.g., LOINC).<sup>67</sup>

### *Challenges Due to Patient Burden*

PROM developers, clinicians, patients, and caregivers have expressed concerns about the inherent burden associated with PROM completion and use. Commonly noted issues include limited patient understanding of the importance of PROM completion, excessive time to complete a questionnaire, questions that may be perceived as intrusive or irrelevant, selection bias, and low participation from vulnerable populations.<sup>11</sup> While these insights have led to changes, such as shortened versions of existing questionnaires, obstacles remain to capturing patient-reported data on health outcomes.

Burden on patients to complete PROMs causes downstream issues for performance measurement. Factors such as low motivation, pain or functional limitations, recall difficulties, and negative survey perception can add to response burden and affect the amount and quality of patient data collected. Additionally, issues regarding social determinants of health and health disparities, such as patients' access to digital tools and language barriers, can lead to less patient engagement with PROMs. PRO-PMs cannot exist if patients do not complete questionnaires.

Physical and cognitive impairments can also have an impact on the completion of PROMs. Patients with severe physical or cognitive impairments may require proxies (i.e., caregivers, family members, or other people who complete PROMs on a patient's behalf). While it is important to ensure all patients can complete PROMs and that caregiver voices are also captured and measured, mixing patient-reported data with proxy-reported data can create data fidelity issues that affect PRO-PMs.

Attempts to decrease patient burden and increase data collection can have unintended consequences, and alleviating one burden can create a new burden. As an example, a single patient might need to access multiple websites or applications (apps) to complete PROMs for different providers at different health systems.

### *Other Challenges and Considerations*

The implementation of PRO-PMs will have an impact on clinical workflows, data flow, patient experience and satisfaction, clinician engagement, and much more. Patients are particularly affected by workflows that require the completion of lengthy PROMs at redundant intervals, and active engagement by patients is critical to the success of PRO-PMs. All stakeholders must be engaged as active partners in addressing data collection and workflows.

In addition to workflow challenges, there can be gaps between what existing PROMs measure and what is valued by patients. A theme in elevating the patient voice through PRO-PMs, or ensuring PRO-PMs are patient-directed, is to focus on what is important to patients.<sup>11</sup> Not all PROMs align with patients' priorities, though, and not all patients share the same priorities. While limitations of existing PROMs are beyond the scope of the Environmental Scan Report, it is a reminder that performance measurement must be guided by what matters most to patients.

Measure development is a time-consuming and costly endeavor, and PRO-PMs are classified by NQF as complex measures. Future work should consider whether PRO-PM development would benefit from incentives, such as increased funding for measure developers or streamlined development



requirements, that could lead to a larger range of organizations and stakeholders involved in development.

## Limitations of the Environmental Scan Report

To note, there are three main limitations of the Environmental Scan Report.

1. The Environmental Scan Report presents resources that measure developers can use to identify candidate PROMs as data collection tools for PRO-PMs, but it does not offer a list of vetted or approved PROMs. The PROMs discussed in this report were included as potential examples of high quality PROMs due to their inclusion in one or more federal programs. However, the quality of a PROM cannot be assessed by its inclusion in this report.
2. The literature search returned only a short listing of guidance for developing PRO-PMs. To supplement this gap, NQF engaged with TEP members and measure development experts to inform the reports in the Building a Roadmap initiative. This limitation does, however, speak to the need for the Building a Roadmap initiative.
3. Guidance on digital quality measurement is rapidly evolving at the time this report was written and published. NQF staff relied on the TEP and the expertise of the key informants, as well as information published by CMS and other sources, but acknowledge that this information is rapidly changing.

## Conclusion

There is a road that travels from high quality PROMs to NQF-endorsed PRO-PMs to CMS VBP programs and APMs. That road, however, is fraught with barriers and delays. Although there are many PROMs in today's healthcare environment, there is not a clear way to identify high quality PROMs that will provide a foundation for a digital PRO-PM. Development and endorsement processes can be challenging for PRO-PMs, and the number of NQF-endorsed PRO-PMs remains small. While healthcare's technical infrastructure is at an unprecedented level of sophistication, developing and implementing digital PRO-PMs remains difficult. Understanding the current state of these opportunities and barriers, as described in this Environmental Scan Report, is the first step in navigating the road from high quality PROMs to PRO-PMs. The Interim Report lists the attributes of high quality PROMs for use in performance measures and offers guidance to measure developers on selecting a data collection instrument. Finally, the Technical Guidance Report identifies stages and tasks that measure developers—from entry-level employees to veteran developers with decades of experience—can follow when creating digital PRO-PMs for CMS accountability programs.

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## Appendices

### Appendix A: Glossary of Terms

#### *Alternative Payment Models (APMs)*

A payment approach that gives added incentive payments to provide high quality and cost-efficient care. APMs can apply to a specific clinical condition, care episode, or population.<sup>68</sup>

#### *Anchors*

Anchor-based methods are one of three types of methods used to determine minimal clinically important difference (MCID). A numerical scale for an outcome is “anchored” to a subjective and independent assessment of improvement. For example, a response of “a little better” to a question about how the patient feels post-treatment can be anchored to a numeric outcome.<sup>69</sup>

#### *Attribute*

A characteristic or trait of a PROM. Past National Quality Forum (NQF) reports have used *attribute* and *characteristic* synonymously.<sup>9,11</sup> Throughout the Building a Roadmap initiative, *attributes* primarily refer to the characteristics that make a PROM suitable for use in a PRO-PM.

#### *Attribute Grid*

A table designed to provide a systematic method to perform a side-by-side comparison of PROMs on the basis of meaningful PROM attributes.<sup>11</sup>

#### *Attribution*

A process used in quality measurement that aims to assign accountability for a patient’s outcomes to a clinician, groups of clinicians, or a facility.<sup>70</sup>

#### *Burden*

Burden refers to the time, effort, or other demands placed on respondents or those administering the PROM. This can include the number and complexity of items and the literacy level needed to understand and complete the measure.<sup>8</sup>

#### *Crosswalk*

A concordance table to convert scores from one scale to the other and vice versa.<sup>71</sup> Crosswalks can allow harmonization of PROMs that measure similar outcomes (e.g., HRQoL after a knee replacement surgery), which may facilitate multicenter collaboration or allow sites to switch PROMs without loss of historic comparison data.<sup>71</sup>

#### *Cut Points*

Clinically meaningful thresholds of a score change within a PROM that is often associated with either improvement in patient outcome or indication of need for treatment.<sup>69</sup>

### *Digital Quality Measures (dQMs)*

Software that processes digital data to produce a measure score or measure scores. Data sources for dQMs may include administrative systems, electronically submitted clinical assessment data, case management systems, EHRs, instruments (for example, medical devices and wearable devices), patient portals or applications (for example, for collection of patient-generated health data), HIEs or registries, and other sources. We also note that dQMs are intended to improve the patient experience including quality of care, improve the health of populations, and/or reduce costs.<sup>49</sup>

### *Electronic Clinical Quality Measures (eQMs)*

eQMs are expressed and formatted to use data from EHRs and/or health IT systems to measure healthcare quality, ideally data captured in structured form during the process of patient care.<sup>18</sup> They are the most common type of digital quality measures and are specified for use in the Medicare and Medicaid EHR Incentive Programs. Eligible professionals, eligible hospitals, and critical access hospitals are required to submit eQM data from certified EHR technology to help measure and track the quality of healthcare services provided within the healthcare system.<sup>50</sup>

### *Fast Healthcare Interoperability Resources (FHIR)*

A Health Level Seven International (HL7) standard that defines how healthcare information can be exchanged between different computer systems regardless of how it is stored in those systems.<sup>52</sup>

### *Interpretability*

The degree to which the meaning of the scores can be easily understood by any group requiring use of the scores. A PRO measure should have documentation to support interpretation of scores, including the meaning of low and high scores and guidance on the minimally important difference in scores between groups and/or over time.<sup>9</sup>

### *Logical Observation Identifiers, Names, and Codes (LOINC)*

LOINC is a database and universal standard for identifying medical laboratory observations. It was developed in 1994 and is maintained by the Regenstrief Institute, a U.S. nonprofit medical research organization. LOINC was created in response to the demand for an electronic database for clinical care and management and is publicly available at no cost.<sup>50</sup>

### *Method*

How PROM data are collected, such as via a paper form or a patient portal.

### *Minimal Clinically Important Difference (MCID)*

MCID is the smallest improvement needed after treatment that would be considered worthwhile from the patient's perspective.<sup>69</sup> MCID can be calculated using three different methods: consensus or delphi method, which depends on consensus of an expert panel; anchors (described above); and a distribution-based method, which relies on the statistical analysis of the distribution of outcome scores.<sup>69</sup>

### *Mode*

How a PROM is administered, such as self-administration or verbal administration by a clinician.

### *Patient-Reported Outcome (PRO)*

Any report of the status of a patient's health condition or health behavior that comes directly from the patient, without interpretation of the patient's response by a clinician or anyone else.<sup>72</sup>

### *Patient-Reported Outcome Measure (PROM)*

Tools used to collect patient-reported outcomes.<sup>72</sup>

### *Patient-Reported Outcome Performance Measure (PRO-PM)*

A way to aggregate the information from patients into a reliable, valid measure of performance at the measured entity, level, e.g., clinician.<sup>72</sup>

### *Performance Measures (PMs)*

These are standards that can be used to measure and quantify healthcare processes, outcomes, patient perceptions, organizational structure, and/or systems that are associated with the ability to provide high quality care.<sup>12</sup>

### *Psychometric Soundness*

How consistently and accurately an assessment measures what it purports to measure.<sup>8</sup> Validity and reliability are key aspects to attaining psychometric soundness. Psychometrics is a scientific discipline concerned with the construction of measurement models for psychological data.<sup>73</sup>

### *United States Core Data for Interoperability (USCDI)*

A standardized set of health data classes and constituent data elements for nationwide, interoperable health information exchange.<sup>57</sup>

### *USCDI+*

An ONC initiative that supports the identification and establishment of domain or program-specific datasets that will operate as extensions to the existing USCDI. It is a service for federal agencies who have a need to establish, harmonize, and advance the use of interoperable datasets that extend beyond the core data in the USCDI in order to meet agency-specific programmatic requirements. The three pillars of USCDI+ are collaboration, harmonization, and specification.<sup>58</sup>

### *Value-Based Purchasing (VBP) Program*

Value-based programs reward healthcare providers with incentive payments or penalties for the quality of care they give to people with Medicare. These programs are part of CMS' larger quality strategy to reform how healthcare is delivered and paid for.<sup>74</sup>

## Appendix B: Search Terms

To gain a broad understanding of literature related to PRO-PMs and existing guidance for developing PRO-PMs, various search terms were included within PubMed and Google Scholar queries. An initial PubMed search that incorporated potentially relevant Medical Subject Heading (MeSH) terms yielded zero results. Given that MeSH terms are not in existence for PROMs or PRO-PMs, general search terms and phrases were utilized. Such phrases included the following:

- “PROM”
- “PRO-PM”
- “Patient-Reported Outcome-Performance Measure” and “Patient-Reported Outcome-Performance Measures”
- “Patient-Reported Outcome Measure” and “Patient-Reported Outcome Measures”
- “Attributes of patient-reported outcome measures”
- “Development of patient-reported outcome measures”
- “PRO-PM guidance”
- “Logical Observation Identifiers, Names, and Codes (LOINC)”
- “Patient assessments” and “LOINC”
- “HL7 FHIR”
- “Interoperability”
- “Digital quality measures”
- “Digital quality measurement”
- “dQMs”

Terms also included specific searches for those PROMs referenced in Appendix C.

## Appendix C: PROMs Discussed in This Report

The following PROMs were used as potential examples of high quality PROMs based on recommendations by CMS, documentation for CMS VBP programs and/or APMs, the TEP, and information identified during literature reviews. PROMs are linked to a homepage or developer site where possible.

- [Hip disability and Osteoarthritis Outcome Score, Joint Replacement](#) (HOOS, JR)
- [Kansas City Cardiomyopathy Questionnaire – 12 item](#) (KCCQ-12)
- [Knee injury and Osteoarthritis Outcome Score, Joint Replacement](#) (KOOS, JR)
- [Minnesota Living with Heart Failure Questionnaire](#) (MLHFQ)
- [Patient Health Questionnaire](#) (PHQ-9)
- [Patient-Reported Outcomes Measurement Information System](#) (PROMIS)
- [Patient Reported Outcomes version of the Common Terminology Criteria for Adverse Events](#) (PRO-CTCAE)

## Appendix D: Reference Tables

*Table 2: Current NQF-Endorsed PRO-PMs*

Measure Title	NQF#	Measure Steward	Updated Date
Adolescent Assessment of Preparation for Transition (ADAPT) to Adult-Focused Health Care	<a href="#">2789</a>	Center of Excellence for Pediatric Quality Measurement	May 04, 2016
Bereaved Family Survey	<a href="#">1623</a>	Department of Veterans Affairs / Hospice and Palliative Care	October 11, 2017
CAHPS Clinician & Group Surveys (CG-CAHPS) Version 3.0 -Adult, Child	<a href="#">0005</a>	Agency for Healthcare Research and Quality	October 25, 2019
CAHPS® Home- and Community-Based Services Measures	<a href="#">2967</a>	Centers for Medicare & Medicaid Services	November 09, 2020
CAHPS® Home Health Care Survey (experience with care) NQF#: 0517	<a href="#">0517</a>	Centers for Medicare & Medicaid Services	November 09, 2020
CAHPS® Hospice Survey (experience with care)	<a href="#">2651</a>	Centers for Medicare & Medicaid Services	November 20, 2020
CollaboRATE Shared Decision Making Score	<a href="#">3227</a>	The Dartmouth Institute for Health Policy & Clinical Practice	October 25, 2019
Consumer Assessment of Healthcare Providers and Systems (CAHPS) In-Center Hemodialysis Survey (ICH CAHPS)	<a href="#">0258</a>	Centers for Medicare & Medicaid Services	October 25, 2019
Consumer Assessment of Healthcare Providers and Systems (CAHPS) Health Plan Survey, Version 5.0 (Medicaid and Commercial)	<a href="#">0006</a>	Agency for Healthcare Research and Quality	October 25, 2019
Consumer Assessment of Healthcare Providers and Systems (CAHPS)® Surgical Care Survey Version 2.0	<a href="#">1741</a>	American College of Surgeons	June 05, 2018
CoreQ: AL Family Satisfaction Measure	<a href="#">3422</a>	American Health Care Association	October 26, 2018
CoreQ: AL Resident Satisfaction Measure	<a href="#">3420</a>	American Health Care Association	October 26, 2018
CoreQ: Long-Stay Family Measure	<a href="#">2616</a>	American Health Care Association/National Center for Assisted Living	November 20, 2020
CoreQ: Long-Stay Resident Measure	<a href="#">2615</a>	American Health Care Association	November 20, 2020
CoreQ: Short Stay Discharge Measure	<a href="#">2614</a>	American Health Care Association/National Center for Assisted Living	November 20, 2020

Measure Title	NQF#	Measure Steward	Updated Date
Depression Remission at Six Months	<a href="#">0711</a>	MN Community Measurement	March 06, 2015
Depression Remission at Twelve Months	<a href="#">0710e</a>	MN Community Measurement	March 06, 2015
Depression Response at Six Months- Progress Towards Remission	<a href="#">1884</a>	MN Community Measurement	February 08, 2016
Depression Response at Twelve Months- Progress Towards Remission	<a href="#">1885</a>	MN Community Measurement	October 26, 2016
Functional Status Change for Patients with Low Back Impairments	<a href="#">0425</a>	Focus on Therapeutic Outcomes	July 31, 2020
Functional Status Change for Patients with Neck Impairments	<a href="#">3461</a>	Focus on Therapeutic Outcomes	October 25, 2019
Gains in Patient Activation (PAM) Scores at 12 Months	<a href="#">2483</a>	Insignia Health	April 07, 2016
Hospital-Level, Risk-Standardized Patient-Reported Outcomes Following Elective Primary Total Hip and/or Total Knee Arthroplasty (THA/TKA)	<a href="#">3559</a>	Centers for Medicare & Medicaid Services	November 20, 2020
Informed, Patient Centered (IPC) Hip and Knee Replacement Surgery	<a href="#">2958</a>	Massachusetts General Hospital	October 26, 2016
National Core Indicators for Intellectual and Developmental Disabilities (ID/DD) Home- and Community-Based Services (HCBS) Measures	<a href="#">3622</a>	Human Services Research Institute	November 30, 2021
Person-Centered Contraceptive Counseling (PCCC) measure	<a href="#">3543</a>	University of California, San Francisco	February 08, 2021
Person-Centered Primary Care Measure PRO-PM	<a href="#">3568</a>	American Board of Family Medicine	July 02, 2021
Shared Decision Making Process	<a href="#">2962</a>	Massachusetts General Hospital	September 06, 2017

*Table 3: PRO-PMs Used in CMS Programs*

The following PRO-PMs are located within CMS' Measure Inventory Tool as active in federal programs. Please note, those measures listed below are not necessarily NQF endorsed. Those that are NQF-endorsed are indicated with an asterisk (\*).

<b>CMIT Ref. No</b>	<b>Measure Title</b>	<b>Program</b>
02802-C-MQRS	Access to Care	Marketplace Quality Rating System
02803-C-MQRS	Access to Information	Marketplace Quality Rating System
05597-C-MIPS	Back Pain After Lumbar Discectomy/Laminectomy	Merit-Based Incentive Payment System Program
05598-C-MIPS	Back Pain After Lumbar Fusion	Merit-Based Incentive Payment System Program
02517-C-PC, 02517-C-MIPS	CAHPS for MIPS Clinician/Group Survey	Doctors & Clinicians Compare, Merit-Based Incentive Payment System Program
02575-C-DFC	CAHPS In-Center Hemodialysis Consumer Assessment of Healthcare Providers and Systems (ICH CAHPS) Survey Administration	Dialysis Facility Compare
05142-X-MSSP	CAHPS: Care Coordination	Medicare Shared Savings Program
05141-X-MSSP	CAHPS: Courteous and Helpful Office Staff	Medicare Shared Savings Program
02830-C-MQRS, 04007-C-PARTC	Care Coordination	Marketplace Quality Rating System, Medicare Part C Star Rating
01049-C-ASCQR, 01049-C-HC, 01049-C-MIPS	Cataracts: Improvement in Patient's Visual Function within 90 Days Following Cataract Surgery	Ambulatory Surgical Center Quality Reporting, Hospital Compare, Merit-Based Incentive Payment System Program
01052-C-MIPS	Cataracts: Patient Satisfaction within 90 Days Following Cataract Surgery	Merit-Based Incentive Payment System Program
06186-C-HEDIS	Children With Chronic Conditions (CCC)	HEDIS Quality Measure Rating System
04015-C-PARTC, 04015-C-PARTD	Complaints about the Drug Plan / Complaints about the Health Plan	Medicare Part C Star Rating, Medicare Part D Star Rating



<b>CMIT Ref. No</b>	<b>Measure Title</b>	<b>Program</b>
02840-C-HEDIS	Consumer Assessment of Healthcare Providers and Systems (CAHPS ) Health Plan Survey 5.0H Child Version Including Medicaid and Children with Chronic Conditions Supplemental Items	HEDIS Quality Measure Rating System
02841-C-HEDIS, 02841-C-MACS	Consumer Assessment of Healthcare Providers and Systems (CAHPS ) Health Plan Survey 5.0H, Adult Version (Medicaid)	HEDIS Quality Measure Rating System, Medicaid: Adult Core Set
02840-X-MCCS	Consumer Assessment of Healthcare Providers and Systems (CAHPS ) Health Plan Survey 5.1H Child Version Including Medicaid and Children with Chronic Conditions Supplemental Items (CPC-CH)	Medicaid: Child Core Set
02155-C-HPEC, 02155-C-HQR	Consumer Assessment of Healthcare Providers and Systems (CAHPS) Hospice Survey*	Hospice Care Compare, Hospice Quality Reporting
04018-C-PARTC	Customer Service	Medicare Part C Star Rating
02853-C-HEDIS, 02853-C-MQRS, 02853-C-MACS	Flu Vaccinations for Adults Ages 18 to 64	HEDIS Quality Measure Rating System, Marketplace Quality Rating System, Medicaid: Adult Core Set
06194-C-HEDIS	Flu Vaccinations for Adults Ages 65 and Older (FVO)	HEDIS Quality Measure Rating System
05878-C-MIPS	Functional Status After Lumbar Discectomy/Laminectomy	Merit-Based Incentive Payment System Program
05877-C-MIPS	Functional Status After Lumbar Fusion	Merit-Based Incentive Payment System Program
05876-C-MIPS	Functional Status After Primary Total Knee Replacement	Merit-Based Incentive Payment System Program
05828-E-PC, 05828-E-MIPS	Functional Status Assessment for Total Hip Replacement	Doctors & Clinicians Compare, Merit-Based Incentive Payment System Program

<b>CMIT Ref. No</b>	<b>Measure Title</b>	<b>Program</b>
05833-E-PC, 05833-E-MIPS	Functional Status Assessment for Total Knee Replacement	Doctors & Clinicians Compare, Merit-Based Incentive Payment System Program
05840-E-MIPS	Functional Status Assessments for Congestive Heart Failure	Merit-Based Incentive Payment System Program
01263-C-PC, 01263-C-MIPS	Functional Status Change for Patients with Elbow, Wrist or Hand Impairments	Doctors & Clinicians Compare, Merit-Based Incentive Payment System Program
01251-C-PC, 01251-C-MIPS	Functional Status Change for Patients with Hip Impairments	Doctors & Clinicians Compare, Merit-Based Incentive Payment System Program
01248-C-PC, 01248-C-MIPS	Functional Status Change for Patients with Knee Impairments	Doctors & Clinicians Compare, Merit-Based Incentive Payment System Program
01257-C-PC, 01257-C-MIPS	Functional Status Change for Patients with Low Back Impairments	Doctors & Clinicians Compare, Merit-Based Incentive Payment System Program
01254-C-MIPS	Functional Status Change for Patients with Lower Leg, Foot or Ankle Impairments	Merit-Based Incentive Payment System Program
06045-C-MIPS	Functional Status Change for Patients with Neck Impairments	Merit-Based Incentive Payment System Program
01260-C-MIPS	Functional Status Change for Patients with Shoulder Impairments	Merit-Based Incentive Payment System Program
04025-C-PARTC	Getting Appointments and Care Quickly	Medicare Part C Star Rating
04028-C-PARTC	Getting Needed Care	Medicare Part C Star Rating
04029-C-PARTD	Getting Needed Prescription Drugs	Medicare Part D Star Rating
00113-C-HC, 00113-C-HIQR	Hospital Consumer Assessment of Healthcare Providers and Systems Survey (HCAHPS)	Hospital Compare, Hospital Inpatient Quality Reporting
05599-C-MIPS	Leg Pain After Lumbar Discectomy/Laminectomy	Merit-Based Incentive Payment System Program
05875-C-MIPS	Leg Pain After Lumbar Fusion	Merit-Based Incentive Payment System Program

<b>CMIT Ref. No</b>	<b>Measure Title</b>	<b>Program</b>
06201-C-HEDIS	Medicare Health Outcomes Survey (HOS)	HEDIS Quality Measure Rating System
06151-C-MACS	National Core Indicators Survey (NCIDDS-AD)	Medicaid: Adult Core Set
00549-C-PC, 00549-C-MIPS	Nuclear Medicine: Correlation with Existing Imaging Studies for All Patients Undergoing Bone Scintigraphy	Doctors & Clinicians Compare, Merit-Based Incentive Payment System Program
02885-C-MQRS	Plan Administration	Marketplace Quality Rating System
02569-C-PC	Quality of Life Assessment For Patients With Primary Headache Disorders	Doctors & Clinicians Compare
02898-C-MQRS	Rating of All Health Care	Marketplace Quality Rating System
04089-C-PARTD	Rating of Drug Plan	Medicare Part D Star Rating
04090-C-PARTC	Rating of Health Care Quality	Medicare Part C Star Rating
02899-C-MQRS, 04091-C-PARTC	Rating of Health Plan	Marketplace Quality Rating System, Medicare Part C Star Rating
02900-C-MQRS	Rating of Personal Doctor	Marketplace Quality Rating System
02901-C-MQRS	Rating of Specialist	Marketplace Quality Rating System
05874-E-MIPS	Urinary Symptoms Score Change 6-12 Months After Diagnosis of Benign Prostatic Hyperplasia	Merit-Based Incentive Payment System Program
02554-C-MIPS	Varicose Vein Treatment with Saphenous Ablation: Outcome Survey	Merit-Based Incentive Payment System Program

*Table 4: Best Practices and Considerations*

The table below consists of methodological best practices and associated considerations for developing and evaluating proposed PRO-PMs, as identified by Basch et al.<sup>16</sup>

Best Practice	Considerations
A rationale for measuring the outcome should be described.	<p>Is a knowledge gap described and justified?</p> <p>Is there evidence that the outcome is meaningful and important to patients, caregivers, and/or other stakeholders?</p> <p>How does patient self-reporting, in particular, address the gap?</p> <p>Are patients the most appropriate source of information?</p>
The intended context of use should be described and justified.	<p>Is the intended context of use clearly described and justified?</p> <p>How is information from the measure expected to inform change in practice to improve performance in the intended context of use?</p> <p>How will the nominated measure complement other measures to improve understanding of performance in the intended context of use?</p> <p>Is there variability in the outcome at the practice or practitioner level?</p>
The measure should be adequately developed for the intended context of use (or a similar context of use), including demonstration of meaningfulness and importance to patients as well as adequate psychometric properties.	<p>Is the underlying concept to be measured clearly identified (e.g., post-chemotherapy nausea)?</p> <p>Is there prior or planned qualitative work in a patient population similar to the intended context of use that demonstrates understanding of terminology and mapping of the terminology to the underlying concept(s) of interest?</p> <p>Is there evidence of adequate psychometric properties of the measure, including construct validity and reliability, meaningfulness of score changes in a comparable population, and reasonableness of the recall period?</p>

Best Practice	Considerations
<p>There should be prior or planned work using the measure in the intended context of use (or a similar context of use), demonstrating that it is sensitive to change and clinically actionable.</p>	<p>Has the measure been shown to detect changes over time or differences between known patient groups, practices, and/or procedures?</p> <p>Does the measure detect change in clinical action(s)?</p> <p>Is there evidence that there is not a floor or ceiling effect of the measure in the intended context of use?</p>
<p>There should be a recommended implementation strategy for the measure in the intended context of use.</p>	<p>Is there a rationale for an administration mode (e.g., paper, electronic) and schedule (e.g., timing of follow-up evaluations)?</p> <p>Is there a plan to maximize recruitment and response rates (e.g., backup data collection plan for nonrespondents)?</p> <p>Is proxy or surrogate reporting considered allowable?</p> <p>Is there a plan to accurately identify patients in the target population and calculate the denominator (i.e., number of people who were asked to complete the measure)?</p>
<p>There should be a recommended analysis plan, including a risk adjustment strategy, missing data approach, and power calculation.</p>	<p>Is there a well-justified, <i>a priori</i> risk adjustment or stratification strategy based on evidence?</p> <p>Is there a plan to adjust analyses for case mix, recruitment bias, and response bias?</p> <p>Is there a plan for imputing missing data with sensitivity analyses?</p> <p>What sample sizes are necessary for planned analyses?</p>

Best Practice	Considerations
There should be a recommended framework for interpreting results, including unit(s) of analysis and meaningful score thresholds.	<p>What unit of analysis is recommended (e.g., hospital system, hospital, individual practice, individual practitioner, and patient-level)?</p> <p>What metrics should be used to reflect performance (e.g., proportion of patients achieving a specific score change, proportion of providers who are outliers)?</p> <p>How are the results of different PRO measures that may not agree with each other considered?</p>
There should be a recommended approach for reporting and disseminating results.	Is there a suggested approach for packaging and presenting reports to practices, providers, and/or patients?

## Appendix E: Review of NQF PRO-PM Endorsement Process

### *Themes Related to NQF Analysis*

NQF's endorsed PRO-PMs vary in scope but have similar goals of gathering and quantifying PROs. They reflect various conditions and topic areas, including experience with care (e.g., CAHPS or CoreQ [i.e., patient, resident, and family satisfaction for skilled nursing care centers and assisted living communities]), depression response or remission, shared decision making/patient activation, transitions of care, pain management, and contraception.

PRO-PMs are considered complex measures and are evaluated against more stringent requirements than most other measures. These include an evaluation of the psychometric properties (e.g., reliability and validity) of the PROM(s) that collect data for the PRO-PM. All complex measures, which include but are not limited to PRO-PMs, require an evaluation by the SMP.<sup>75</sup>

### *Scientific Methods Panel*

The SMP is composed of approximately 25 individuals with methodological expertise who provide NQF Standing Committees with evaluations of measures' scientific acceptability. Panel members use NQF's standard measure evaluation criteria to assess new and maintenance measures.<sup>76</sup> The SMP's feedback is critical for endorsement recommendations by the Standing Committees and for endorsement decisions by the Consensus Standards Approval Committee (CSAC). Although the number of PRO-PMs that come through the SMP process is relatively low compared with other types of measures, the SMP recognizes the inherent complexity of PRO-PMs.

### *Consensus Development Process and Standing Committee Reviews*

The CDP is NQF's formal, cyclical process to evaluate and endorse measures. It is designed to allow input and discussion from stakeholder groups across the industry. The CDP involves six principal steps, which are described in more detail on the [Consensus Development Process webpage](#):

1. **Intent to Submit:** The measure developer notifies NQF at least three months prior to the designated cycle's submission deadline.<sup>77</sup>
2. **Call for Nominations:** NQF seats a Standing Committee to offer expert advice, ensure input is obtained from relevant stakeholders, and make recommendations to NQF membership about standards that are proposed for endorsement.<sup>78</sup>
3. **Measure Review:** The Standing Committee evaluates the measure, and is expected to reach consensus on whether the measure continues toward possible NQF endorsement or is returned to the developer and/or steward for refinement.<sup>79,80</sup>
4. **Public Commenting with Measure Support:** All Standing Committee recommendations are included in a draft report, which is opened to the public for commenting. The Standing Committee may revise a recommendation based on public comment.<sup>81</sup>
5. **Measure Endorsement:** The CSAC, whose members are appointed by the NQF Board of Directors, makes an endorsement decision that either upholds the Standing Committee's decision or sends the measure back for further consideration.<sup>82,83</sup>
6. **Measure Appeals:** After the CSAC's decisions are made public, a 30-day appeals period begins. Eligibility for an appeal must relate to procedural errors or new information.<sup>84</sup>

The following five criteria are considered throughout the CDP for all candidate measures:

- **Criterion 1: Importance to Measure and Report:** Extent to which the specific measure focus is evidence-based, important to making significant gains in healthcare quality, and improving health outcomes for a specific high-impact aspect of healthcare in which there is variation in or overall less-than-optimal performance.
- **Criterion 2: Reliability and Validity – Scientific Acceptability of Measure Properties:** Extent to which the measure produces consistent and credible results about the quality of care when implemented.
- **Criterion 3: Feasibility:** Extent to which the specifications, including measure logic, required data that are readily available or could be captured without undue burden and can be implemented for performance measurement.
- **Criterion 4: Usability and Use:** Extent to which potential audiences (e.g., consumers, purchasers, clinicians, and policymakers) are using or could use performance results for both accountability and performance improvement to achieve the goal of high quality, efficient healthcare for individuals or populations.
- **Criterion 5: Comparison to Related or Competing Measures:** If a measure meets all criteria and there are endorsed or new related or competing measures, the measures are compared to address harmonization and/or selection of the best measure.<sup>[22](#)</sup>



## Appendix F: Technical Expert Panel Members, Federal Liaisons, and NQF Staff

### *Technical Expert Panel Members*

\* TEP members marked with an asterisk served in 2021; all others served 2021-2022

**Catherine MacLean, MD, PhD (Co-Chair)**

Chief Value Medical Officer, Rheumatologist, Hospital for Special Surgery  
New York, New York

**Sam Simon, PhD (Co-Chair)**

Director, Health Program Improvement, Mathematica  
Cambridge, Massachusetts

**David Andrews, PhD\***

Patient Advisor  
Aiken, South Carolina

**Katherine Ast, MSW, LCSW**

Director, Quality & Research, American Academy of Hospice and Palliative Medicine  
Glenview, Illinois

**Rachel Brodie, BA**

Senior Director, Measurement & Accountability, Pacific Business Group on Health  
San Francisco, California

**Zahid Butt, MD, FACG**

President and Chief Executive Officer (CEO), Medisolv, Inc.  
Columbia, Maryland

**Collette Cole, BSN, RN, CPHQ**

Clinical Measurement Developer, Minnesota Community Measurement  
Minneapolis, Minnesota

**Paula Farrell, BSN, RN, CPHQ, LSSGB\***

Associate Project Director, Clinical Quality Measurement, Department of Quality Measurement, The Joint Commission  
Oakbrook Terrace, Illinois

**Mark Friedberg, MD, MPP**

Senior Vice President, Performance Measurement & Improvement, Blue Cross Blue Shield of Massachusetts  
Boston, Massachusetts

**Debbie Gipson, MD, MS**

Professor of Pediatrics, University of Michigan  
Ann Arbor, Michigan

**Ben Hamlin, DrPH**

Senior Research Informaticist, Research & Performance Measurement, National Committee for Quality Assurance

Washington, District of Columbia

**Janel Hanmer, MD, PhD**

Medical Director of Patient Reported Outcomes, University of Pittsburgh Medical Center  
Pittsburgh, Pennsylvania

**Helen Haskell, MA**

Founder and President, Mothers Against Medical Error  
Columbia, South Carolina

**Brian Hurley, MD, MBA, DFASAM**

Director of Addiction Medicine, Los Angeles County Department of Health Services  
Los Angeles, California

**Christine Izui, MS**

Health Policy Principle, Center for Transforming Health, MITRE Corporation  
McLean, Virginia

**Laura Jantos, LFHIMSS**

Patient Advocate, Healthcare Technology/Digital Health  
Mercer Island, Washington

**Kirk Munsch**

Patient Advocate, Rare Patient Voice  
Colorado Springs, Colorado

**Deborah Paone, DrPH, MHA**

Performance Evaluation Lead and Policy Consultant, SNP Alliance  
Washington, District of Columbia

**Brenna Rabel, MPH**

Lead Health Research Scientist, Battelle Memorial Institute  
Arlington, Virginia

**Nan Rothrock, PhD, MA**

Clinical Psychologist, Feinberg School of Medicine, Northwestern University  
Chicago, Illinois

**Mike Sacca, AS**

Vice President, Healthcare Quality and Data Analytics, RELI Group  
Douglassville, Pennsylvania

**Rachel Sisodia, MD\***

Senior Medical Director for Specialty Care and Patient Reported Outcomes, Massachusetts General  
Brigham Health

Boston, Massachusetts

**John Spertus, MD, MPH, FACC, FAHA**

Clinical Director of Cardiovascular Education and Outcomes Research, Mid America Heart Institute  
Kansas City, Missouri

**Ruth Wetta, PhD, MSN, MPH, RN**

Lead Clinical Researcher, Population Health, Cerner Corporation  
Kansas City, Missouri

**Albert Wu, MD, MPH, FACP**

Professor, Department of Health Policy and Management and Medicine, Johns Hopkins Bloomberg  
School of Public Health  
Baltimore, Maryland

*Federal Liaisons*

**Joel Andress**

CMS, Center for Clinical Standards and Quality

**Janis Grady, RHIT, FAC-COR III**

CMS, Center for Clinical Standards and Quality

**Sandra Mitchell, PhD, CRNP, FAAN**

National Institutes of Health, National Cancer Institute

**Ashley Wilder Smith, PhD, MPH**

National Institutes of Health, National Cancer Institute

**Rhona Limcango, PhD**

Agency for Healthcare Research and Quality

**Meghan McHugh, PhD, MPH**

Substance Abuse and Mental Health Services Administration

**Clifford A. Smith, PhD, ABPP-Cn**

US Department of Veterans Affairs, Office of Mental Health and Suicide Prevention

**David Au, MD, MS**

US Department of Veterans Affairs, Center of Innovation for Veteran-Centered and Value-Driven Care

**Girma Alemu, MD, MPH**

Health Resources and Services Administration, Office of Planning, Analysis, and Evaluation

*NQF Staff*

**Kathleen Giblin, RN**

Senior Vice President

**Elizabeth Drye, MD, SM**  
Chief Scientific Officer

**Maha Taylor, MHA, PMP**  
Managing Director

**Chuck Amos, MBA**  
Senior Director

**Teresa Brown, MHA, MA**  
Director

**Deidra Smith, MBA, PMP**  
Senior Project Manager

**Evelyn Thomas, MPH, CHES**  
Senior Analyst

**Zoe Waller, BA**  
Coordinator

*CMS Staff*

**LaWanda Burwell, ScD**  
Task Order COR

**Gequincia Polk**  
IDIQ COR

**Helen Dollar-Maples**  
Director, DPMS/QMVIG/CCSQ

**Marsha Smith, MD, MPH, FAAP**  
Medical Officer, DPMS/QMVIG/CCSQ

## Appendix G: Public Comments

Comments received during the public commenting period will be posted here, along with responses from the TEP.