



NATIONAL QUALITY FORUM

Driving measurable health
improvements together

Memo

June 16, 2020

To: NQF Prevention and Population Health Standing Committee Members

From: NQF staff

Re: Post-comment web meeting to discuss public comments received and NQF member expression of support

COVID-19 Updates

With the recent COVID-19 global pandemic, many organizations needed to focus their attention on the public health crisis. To provide greater flexibility for stakeholders and continue the important work in quality measurement, the National Quality Forum (NQF) extended commenting periods and adjusted measure endorsement timelines for the Fall 2019 cycle.

Commenting periods for all measures evaluated in the Fall 2019 cycle were extended from 30 days to 60 days. Based on the comments received during this 60-day extended commenting period, measures entered one of two tracks:

Track 1: Measures Continuing in Fall 2019 Cycle

Measures that did not receive public comments or only received comments in support of the Standing Committees' recommendations will be reviewed by the CSAC on July 28–29.

- **Exceptions**

Exceptions were granted to measures if non-supportive comments received during the extended post-comment period were similar to those received during the pre-evaluation meeting period and were already adjudicated by the respective Standing Committees during the measure evaluation Fall 2019 meetings.

Track 2: Measures Deferred to Spring 2020 Cycle

Fall 2019 measures requiring further action or discussion from a Standing Committee were deferred to the Spring 2020 cycle. This includes measures where consensus was not reached or those that require a response to Member and public comments. Measures undergoing maintenance review retain endorsement during this time. Track 2 measures will be reviewed during the CSAC's meeting in November 2020.

During the Prevention and Population Health post-comment web meeting on July 6, the Prevention and Population Health Standing Committee will review a Fall 2019 measure assigned to Track 2 3483: Adult Immunization Status. A complete list of Track 1 measures can be found in [Appendix B](#).

Purpose of the Call

The Prevention and Population Health Standing Committee will meet via conference call on July 6, 2020, from 1:00pm–3:00pm ET. The purpose of this call is to:

- Review and discuss comments received during the post-evaluation member and public comment period;

- Re-vote on the “must-pass” criterion Quality Construct of Composite, where the Committee did not reach consensus in the initial evaluation; and
- Determine whether reconsideration of any measures or other courses of action are warranted.

Standing Committee Actions

1. Review this briefing memo and [draft report](#).
2. Be prepared to re-vote on the measure where consensus was not reached on Quality Construct of Composite.
3. Review and consider the full text of all comments received

Conference Call Information

Please use the following information to access the conference call line and webinar:

Speaker dial-in #: 1-800-768-2983; Access code: 436 3370

Web Link: <https://core.callinfo.com/callme/?ap=8007682983&ac=4363370&role=p&mode=ad>

Background

Performance measures are needed to assess improvements in population health, as well as the extent to which healthcare stakeholders are using evidence-based strategies (e.g., prevention programs, screening, and community needs assessments). To support this effort, NQF endorses and maintains performance measures related to prevention and population health through a multistakeholder consensus development process. The purpose of this project was to review prevention and population health measures submitted for endorsement or undergoing endorsement maintenance during the Fall 2019 cycle.

For this project, the [Prevention and Population Health Standing Committee](#) evaluated two newly submitted measures, and one measure undergoing maintenance review against NQF’s standard evaluation criteria. The Committee recommended two measures for endorsement, and the Committee did not reach consensus on one measure. The Committee recommended the following measures for endorsement:

- NQF 0658 Appropriate Follow-Up Interval for Normal Colonoscopy in Average Risk Patients
- NQF 3484 Prenatal Immunization Status

The Committee did not reach consensus on quality construct of composite (must-pass) for the following measure:

- NQF 3483 Adult Immunization Status

Comments Received

NQF solicits comments on measures undergoing review in various ways and at various times throughout the evaluation process. First, NQF solicits comments on endorsed measures on an ongoing basis through the Quality Positioning System (QPS). Second, NQF solicits member and public comments during a 16-week comment period via an online tool located on the project webpage.

Post-evaluation Comments

The Draft Report was available for member and public comment from March 30 to May 28, 2020. During this commenting period, NQF received five comments, one comment from a member organization and four comments from members of the public. All comments pertained to 3483 and 3484

Member Council	# of Member Organizations That Commented
Consumer	0
Health Plan	0
Health Professional	1
Provider Organization	0
Public/Community Health Agency	0
Purchaser	0
QMRI	0
Supplier/Industry	0

Although all comments are subject to discussion, the intent is not to discuss each individual comment on the July 6 post-comment call. Instead, we will spend the majority of the time considering measure number 3483, for which the Committee did not reach consensus. Please note that the organization of the comments into major topic areas is not an attempt to limit Committee discussion. Additionally, please note measure developers were asked to respond where appropriate.

We have included all comments that we received in the excel spreadsheet posted to the [Committee SharePoint site](#). This comment table contains the commenter's name, comment, associated measure, topic (if applicable), and the developer or NQF response, where appropriate. Please review this table in advance of the call and consider the individual comments received and the proposed responses to each.

Although all comments and proposed responses are subject to discussion, we will not necessarily discuss each comment and response on the post-comment call. Instead, we will spend most of the time considering the comments received for measure 3483.

Comments and Their Disposition

Supportive Comments for Measures

- American Immunization Registry Association (AIRA) provided a comment strongly supporting the endorsement of both the Prenatal Immunization Status (PRS) and Adult Immunization Status (AIS) measures. They emphasized the importance of public health Immunization Information Systems (IIS) to contribute to more complete, quality vaccination data among adults to inform efforts to improve vaccine uptake, access and delivery.
- American College of Obstetricians and Gynecologists (ACOG) provided a comment in support of the Prenatal Immunization Status measure mentioning that the measure encourages the meeting of all nationally accepted immunization guidelines.

Measure Specific Comments

3483 Adult Immunization Status (National Committee for Quality Assurance)

- Two commenters supported the measure for endorsement
 - Could provide valuable data to identifying current gaps in immunization coverage with the goal of improving access and utilization of Advisory Committee for Immunization Practices (ACIP)-recommended vaccines for adults.
 - Composite measures put in place for childhood immunization status have helped to make great strides in vaccination coverage and expect a similar pattern for adults.
- One commenter did not support for endorsement
 - Although the measure is specified for the health plan level, in practice could be attributed to individual physicians, which would not capture accurate information.

Developer Response:

NCQA provided post-comment response for Adult Immunization Status measure, [memo can be found here.](#)

Action Item:

Committee will reconsider the Quality Construct of Composite criterion that it did not come to consensus on during the web evaluation meeting.

Co-Chair and NQF Staff Re-vote Request:

During the two measure evaluation webinars on February 18 and 20, 2020, the Committee discussed and agreed that the overall evidence for the measure (3483: Adult Immunization Status) is strong, as is the evidence for each component. It did note, however, that the measure is based on the 2018 Advisory Committee on Immunization Practices (ACIP), wherein only a Td booster was recommended. In January 2020, ACIP recommended that people aged 19 or older could either receive a Td or Tdap booster every 10 years. The Committee reviewed the measure based on the 2018 guidelines; the developer responded that it would update the measure at its next appropriate interval. The Committee noted that there is a significant performance gap among different health plans and payer types.

The Committee noted that the measure is neither an all-or-nothing nor a binomial distribution, since the denominator is the total number of recommended vaccines in the population, which could be between two to four based on the population's age range. For the composite rate, there was an 11- point difference between plans in the 25th percentile and plans in the 75th percentile for Medicare plans, and 7 and 8 points for commercial and Medicaid plans, respectively. The developer responded that it did consider scoring the measure as an all-or-nothing but said that stakeholders did not find the results useful. Many Committee members expressed concerns about the utility of a composite score over an individual score for each vaccine component.

Voting Results:

- **Importance to Measure and Report:** Consensus not reached
(1a. Evidence, 1b. Performance Gap, 1c. Composite – Quality Construct)
1a. **Evidence:** H-7; M-12; L-0; I-0; 1b. **Performance Gap:** H-1; M-18; L-0; I-0; 1c. **Composite – Quality Construct:** H-0; M-9; L-7; I-3

NQF Member Expression of Support

Throughout the 16-week continuous public commenting period, NQF members had the opportunity to express their support (“support” or “do not support”) for each measure submitted for endorsement consideration to inform the Committee’s recommendations. One NQF member provided its expression of nonsupport. See [Appendix A](#).

Appendix A: NQF Member Expression of Support Results

One NQF member expressed nonsupport for NQF 3483.

3483 Adult Immunization Status (National Committee for Quality Assurance)

Member Council	Support	Do Not Support	Total
Consumer	0	0	0
Health Plan	0	0	0
Health Professional	0	1	1
Provider Organization	0	0	0
Public/Community Health Agency	0	0	0
Purchaser	0	0	0
QMRI	0	0	0
Supplier/Industry	0	0	0

Appendix B: Fall 2019 Track 1 Measures

The following measures did not receive public comments or only received comments in support of the Standing Committee's recommendations and will be reviewed by the CSAC on July 28-29, 2020:

- 0658: Appropriate Follow-Up Interval for Normal Colonoscopy in Average Risk Patients (American Gastroenterological Association)
- 3484: Prenatal Immunization Status (National Committee for Quality Assurance)