



NATIONAL QUALITY FORUM

Driving measurable health
improvements together

Memo

October 7, 2021

To: Renal Standing Committee

From: NQF staff

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

Introduction

NQF closed the public commenting period on September 9, 2021, the measures submitted for endorsement consideration to the Renal project. Since all post-evaluation comments received were in support of the Standing Committee's recommendation of both measures under review, NQF along with the Standing Committee co-chairs have decided to cancel the post-comment web meeting scheduled for October 7, 2021.

The Standing Committee's recommendations will be reviewed by the Consensus Standards Approval Committee (CSAC) on November 30, 2021. The CSAC will determine whether or not to uphold the Standing Committee's recommendation for each measure submitted for endorsement consideration. All Standing Committee members are encouraged to attend the CSAC meeting to listen to the discussion.

Background

Approximately 37 million adults in the U.S. have chronic kidney disease (CKD), which is associated with premature mortality, decreased quality of life, and increased healthcare costs. Untreated, CKD can result in end-stage renal disease (ESRD) and a host of other health complications. Patients undergoing treatment for ESRD (e.g., dialysis) frequently report pain, and opioids are commonly used to achieve analgesia. Guidelines for safe and appropriate opioid prescribing from the Centers for Disease Control and Prevention (CDC) emphasize the need for increased discussion and follow-up between patients and providers, the need for using the lowest dose/duration possible, and the consideration of non-opioid treatment modalities.

The [Renal Standing Committee](#) is the group that oversees the NQF renal measure portfolio. The Standing Committee evaluates newly submitted and previously endorsed measures against NQF's measure evaluation criteria, identifies portfolio gaps, provides feedback on gaps in measurement, and conducts ad hoc reviews. On June 23, 2021, the Renal Standing Committee evaluated two newly submitted measures against NQF's standard evaluation criteria.

For this cycle, the Standing Committee did not recommend the following measures:

- **NQF #3615** Unsafe Opioid Prescriptions at the Prescriber Group Level (Centers for Medicare & Medicaid Services (CMS)/University of Michigan Kidney Epidemiology and Cost Center (UMKECC))
- **NQF #3616** Unsafe Opioid Prescriptions at the Dialysis Practitioner Group Level (CMS/UMKECC)

Comments Received

NQF solicits comments on measures undergoing review in various ways and at various times throughout the evaluation process. First, NQF accepts 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 on the project webpage.

Pre-evaluation Comments

NQF solicits comments prior to the evaluation of the measures via an online tool on the project webpage. For this evaluation cycle, the pre-evaluation comment period was open from April 22 to June 3, 2021, for the measures under review. The majority of the comments received focused on the appropriateness of the measure as a reliable indicator of quality and the possibility of leaving patients without access to necessary therapies. All of these pre-evaluation comments were provided to the Standing Committee prior to the measure evaluation meeting.

Post-evaluation Comments

The draft report was posted on the project webpage for public and NQF member comment on August 11, 2021, for 30 calendar days. During this commenting period, NQF received five comments from four member organizations:

Member Council	# of Member Organizations Who Commented
Provider Organization	2
Health Professional	1
Quality Measurement, Research and Improvement	1

NQF staff have included all post-evaluation comments that were received in the comment narrative posted to the Standing Committee SharePoint site. This comment narrative contains the commenter's name, comment, associated measure, topic (if applicable), and—for the post-evaluation comments—responses. Since all comments received were in support of the Standing Committee's recommendations, the post-comment web meeting has been canceled.

Comments and Their Disposition

Measure-Specific Comments

3615: Unsafe Opioid Prescriptions at the Prescriber Group Level (CMS/ UMKECC)

- The Federation of American Hospitals (FAH) expressed concern regarding the insufficient evidence supporting the measure.
- The Renal Physicians Association (RPA) expressed concern about the measure not addressing patient-centric clinical issues. Moreover, there is concern about significant unintended consequences and insufficient risk adjustment.
- The Kidney Care Partners (KCP) expressed concern about the measure not addressing patient-centric clinical issues and insufficient risk adjustment.

- Fresenius Medical Care North America (FMNCA) expressed concern about the measure not addressing patient-centric clinical issues and insufficient evidence supporting the measure.

Measure Steward/Developer Response:

No response required.

Proposed Committee Response:

Thank you for your comment.

Action Item:

No action required.

3616: Unsafe Opioid Prescriptions at the Dialysis Practitioner Group Level (CMS/UMKECC)

- The Federation of American Hospitals (FAH) expressed concern regarding the insufficient evidence supporting the measure.
- The Renal Physicians Association (RPA) expressed concern about the measure not addressing patient-centric clinical issues. Moreover, there is concern about significant unintended consequences and insufficient risk adjustment.
- The Kidney Care Partners (KCP) expressed concern about the measure not addressing patient-centric clinical issues and insufficient risk adjustment.
- Fresenius Medical Care North America (FMNCA) expressed concern about the measure not addressing patient-centric clinical issues and insufficient evidence supporting the measure.

Measure Steward/Developer Response:

No response required.

Proposed Committee Response:

Thank you for your comment.

Action Item:

No action required.

NQF Member Expression of Support

Throughout the 16-week continuous public commenting period, NQF members have the opportunity to express their support ('Support' or 'Do Not Support') for each measure to inform the Standing Committee's recommendations during the commenting period. This expression of support (or not) during the commenting period replaces the member voting opportunity that was previously held subsequent to Standing Committee deliberations.

During the 16-week public commenting period, NQF did not receive any expressions of support for the measures under endorsement consideration for the current cycle.