



TO: Variation Expert Panel
FR: NQF Staff
RE: Post-Comment Call to Discuss Public and Member Comments
DA: October 20, 2016

Purpose of the Call

The Variation Expert Panel will meet via conference call on Thursday, October 20, 2016 from 3:00-5:00pm ET. The purpose of this call is to:

- Review public comments submitted on draft report
- Discuss next steps

Due to time constraints, during this call we will review comments by exception, in the case the Committee disagrees with the proposed responses.

Standing Committee Actions

- Review this briefing memo and consider the comments received and the proposed responses to the comments (see Comment Table).
- Be prepared to provide feedback and input on proposed comment responses
- Provide feedback on draft report.

Conference Call Information

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

Speaker dial-in #: 1. 844.224.9476 (*NO CONFERENCE CODE REQUIRED*)

Streaming Audio Online

- Direct your web browser to: <http://nqf.commpartners.com>.
- Under “Enter a Meeting” type in the meeting number: 865743
- In the “Display Name” field, type in your first and last names and click “Enter Meeting.”

Background

Many view a lack of consistency across measurement programs as unnecessary variation, contributing to a number of challenges facing providers, patients, health plans, regulators, and others who use measures to assess relative performance. For clinicians, hospitals, and other healthcare providers, variation may lead to an increase in data collection and reporting requirements without attendant increases in value, as the measures address the same area of focus. For those seeking to use measure results to inform decisions about healthcare, variation may diminish the value of measurement data. Specifically, if measures have been changed in a way that compromises the comparability of measurement results, users may not be able to draw accurate conclusions about the differential performance of those being measured.

Through this project, NQF will identify how, where, and why variation in measure specification is occurring; create a framework for understanding and interpreting the different types of variation and the implications of this variation; and develop a common understanding around key terms, concepts, and measure components to help standardize measurement efforts and minimize unnecessary variation. Through the use of an environmental scan, an expert panel, and key informant interviews, the project will explore the many facets of variation and develop practical guidance and recommendations to help stakeholders in identifying, understanding, and addressing variation in measure specifications.

Comments Received

The Draft Report went out for Public and Member comment from September 6-October 5. During this commenting period, NQF received 28 comments from three organizations. In order to facilitate discussion, the majority of the comments have been categorized into major topic areas or themes. Although all comments are subject to discussion, we will not necessarily discuss each comment and response on the post-comment call. Instead, we will spend the majority of the time considering the major topics that arose from the comments. Note that the organization of the comments into major topic areas is not an attempt to limit Committee discussion.

We have included all of the comments that we received in the Comment Table. This comment table contains the commenter's name and organization, the comment and proposed response. Please refer to this comment table to view and consider the individual comments received and the proposed responses to each.

Comments and their Disposition

The use of the term "Harmonization"

Our federal partner expressed the following concerns regarding the word and concept of "Harmonization:"

- "Harmonization" is not intuitive and is open to various interpretations.
- Due to the laxity in definition, one might believe that a measure could be "harmonized" while still deviating from a referent standard. Provides opportunity for multiple interpretations.
- Standardizing measures' specifications needs to be further defined. Does standardize mean to make identical, uniform, compatible, etc.? What do those terms mean?

Panel Action Item: Discuss comment and determine if the term harmonization and/or its definition needs to be altered.

Addition of Auditing as a Strategy for Addressing Variation

Our federal partner suggests including audits of measurements as a mitigation strategy, using HEDIS measures as an example of healthcare performance measures whose results must be audited and certified by a compliance auditor.

Panel Action Item: Discuss comment and determine if auditing of a measure should be added as a strategy for addressing variation.

Adding Coding as a Reason for Variation

Commenter stated “As we move from volume to value based payment models and purchasing, awareness of the impact of complete and accurate coding will increase and given most measures and methodologies (e.g. risk adjustment) rely on coding, this likely contributes to variation not due to performance.”

Panel Action Item: Discuss comment and determine if coding should be added as a reason for variation.

Next Steps

The final project report will include a section on ‘Next Steps’, or guidance on future work to reduce the incidence and impact of variation in measure specifications. To implement recommendations of the Expert Panel, the following key steps must be undertaken by authorities in healthcare performance measurement:

- Pilot test and facilitate operationalizing the decision logic to address variation, so that users can easily adopt and follow the decision logic at the point of measure implementation.
- Develop best practice recommendations and worked examples of transparent measure specification descriptions, and level of depth and accuracy of implementation guidance, and disclosure of changes when the measure is a variant.
- Develop considerations for the formation of an eventual measure repository that would include measures under development and measure variants, and techniques to address related and competing measures through harmonization or standardization of measure specifications.
- NQF should consider adapting the Measure Evaluation Criteria to be responsive to the causes and consequences of measure variants, and develop additional guidance for the consideration of related and competing measures as part of the NQF Consensus Development Process.