



NQF Measure Incubator® Conflict of Interest (COI) Principles July 19, 2018

The Measure Incubator Advisory Council is charged with protecting the mission and brand of NQF through oversight of selected Measure Incubator activities. The Council is charged specifically with developing conflict of interest (COI) policies that will guide project priorities and collaboration. This document presents principles related to funding, project priorities, and the relation to endorsement.

CONFLICT OF INTEREST (COI) PRINCIPLES:

The COI policies for the Incubator focus on three key elements:

1. Funding
2. Project priorities
3. Relation to measure endorsement

1. Funding:

- NQF will accept funds to support the Measure Incubator® generally or for a specific project (e.g., project to facilitate measure development and testing) or activity (e.g., Measure Incubator design session)
- A funder cannot specify the outcome of a project or activity that it funds or influence discussions and activities directly related to the outcome.
 - **Example:** Doe Corporation has funded the creation of a measure regarding asthma. Independent experts have developed the measure, including specifications, based on their expertise and experience. Doe Corporation does not like the specifications and wants the independent experts to re-specify the measure at its direction.
→ Doe Corporation cannot require re-specification of the measure.
→ Doe Corporation can request an explanation of how the measure was specified.
 - **Example:** HealthCo has funded the creation of a measure regarding high-risk pregnancies. HealthCo wants to select several members of the multi-stakeholder group that will specify the measure as well as sit on the group itself.
→ HealthCo cannot select any member of the multi-stakeholder group and cannot sit on the group itself or observe the group's discussion(s).
→ HealthCo can review the summary of the multi-stakeholder group discussion and request from Measure Incubator staff clarification regarding the multi-stakeholder group's recommendations.

- NQF will prioritize funded work that fills an nationally identified measure gap
- NQF will not accept funds from a funder who has an exclusive interest in a product or activity that will be directly affected by the funded work
 - **Example:** The ABC Company wishes to fund measure development that would support a drug made by the ABC Company. The ABC Company is the only maker of a drug in this class. NQF would not accept funds from the ABC Company to support this work.
- NQF will not accept funds to support the development of a measure that names a specific product

2. Project Priorities

- The Measure Incubator will give preference to, or prioritize the following:
 - Emerging measurement areas (e.g., patient-reported outcomes, eMeasures)
 - Measurement projects that fill identified national gaps
 - Measures that can be broadly applicable across patient groups, diseases, and settings
 - Measure Incubator projects conducted with organizational members of NQF
- Measure Incubator projects should solicit input from the target population (e.g., patients) to ensure that the incubated measure would be meaningful.

3. Relation to Endorsement

Given NQF's role as a neutral evaluator and endorser of performance measures, the following policies focus on guarding against potential conflicts between Measure Incubator projects and endorsement:

- The Measure Incubator will serve as a facilitator of measure development, including access to financial support, measure developers, and data for development and testing.
- NQF will not develop performance measures and will not serve as a measure developer or measure steward.
- NQF staff may provide high-level subject matter expertise to Measure Incubator activities, but will not engage in measure development.
 - **Example:** NQF staff provide methodologic support and/or referral to experts related to emerging measurement issues (e.g., risk adjustment, transition to eMeasures, PRO-based performance measures). NQF staff do not engage in measure development or specification.
- Incubated measures are conferred no advantage in the endorsement process in terms of endorsement or fast track review.
- Per NQF's existing COI policy for committee member review of measures, standing committee members who have participated in a Measure Incubator project are recused from evaluation, discussion, and voting on the measure before the committee. This recusal also applies to competing measures.
- NQF's COI policy will be extended to NQF staff who have participated in a Measure Incubator project. Staff will be prohibited from the evaluation of the measure before the committee. This recusal also applies to competing measures.