

- Reduction in overall endorsement time to about 6 months¹

More than 40 invited healthcare stakeholders from the public and private sectors participated in the event—including experts from CMS and other federal agencies, NQF’s standing committees, and organizations that develop measures that represented a significant proportion of participants.

Proposed Redesign

Based on the outputs from the Kaizen event, NQF will undergo a significant CDP redesign that incorporates on-going measure submission opportunities. (Currently 63% of standing committees experience an average of three years of dormancy.) Offering more continuous and predictable submission pathways can increase the timeliness of endorsement decisions for measures that will drive value and fill prioritized gaps. Recommended changes include:

Proposed Changes	Implementation Timing
• Increase and improve stakeholder training and education	Summer 2017
• Improve CDP and MAP information exchange and access	Summer 2017-2019 (phased approach)
• Implement Intent to Submit process	Fall 2017
• Form a newly-convened NQF Scientific Methods panel	Fall 2017
• Implement continuous commenting period and NQF member support of expression	Beginning Fall 2017
• Revise the technical report— content and structure	Fall 2017
• Designate Standing Committee as the final endorsement body²	TBD
• CSAC Role change and disbandment of the Appeals Board³	TBD

Some of the changes intended to compress the endorsement process will help to reinforce process changes that have already proven to be effective (i.e., standing committees and staff preliminary analyses). While other changes will establish new processes that reflect increased efficiencies in stakeholder participation and engagement.

NQF will not implement all changes immediately, as this will require significant resources, input from several stakeholders like NQF’s Governance Committee and Board of Directors (e.g. changes to the standing committee, CSAC and Appeals Board’s roles), design and testing to ensure that the process works as intended for all stakeholders. Furthermore, NQF will initiate a phased implementation in order to monitor these recommendations to assess outcomes and ensure a more agile and effective process.

¹ Endorsement time begins from measure submission deadline through CSAC final endorsement decision

² If changes to the roles of the Standing Committee and the CSAC are approved, execution of these changes will be phased and implemented at a later date

³ If the change in the role of the Appeals Board is approved, execution of this change will be phased and implemented at a later date

Endorsement Decision

Consensus Standards Approval Committee

As of early 2017, the Consensus Standards Approval Committee (CSAC) makes the final endorsement decisions on measures under review by NQF standing committees, following public and NQF Member comment and Member voting. The CSAC, a standing committee appointed by the NQF Board of Directors, serves in an advisory capacity to NQF leadership regarding enhancements to the CDP, the measure evaluation criteria, and emerging issues in performance measurement.

Kaizen participants recommended that standing committees make the final endorsement decisions, without ratification by the CSAC, noting that the CSAC rarely overturns the measure recommendations of the committee. NQF appreciates the comments received on this proposed recommendation; however, given important strategic considerations, NQF will not be able to implement a change of this magnitude at this time. Currently, the CSAC is comprised of a simple majority of consumers and purchasers. In order to ensure those two stakeholder perspectives remain part of the endorsement process, NQF will need to make certain there is adequate representation of these groups on each standing committee. NQF is committed to implementing a plan to identify and solicit ongoing engagement and participation opportunities from these stakeholder groups. Depending on the outcome of this initiative, NQF could potentially implement this proposed change at a later time.

Adjudication of Appeals

Once the CSAC's endorsement decisions are made public via the NQF website, a 30-day appeals period begins. Any interested party may file an appeal on an endorsed measure with the Appeals Board during this period. The Appeals Board reviews all appeals submitted to NQF for consideration. All decisions made by the NQF Appeals Board are final.

Kaizen participants recommended that the CSAC should adjudicate all submitted appeals for endorsed and non-endorsed measures, instead of the Appeals Board. Implementing this recommendation would result in disbanding the Appeals Board, which was established in fall 2016. NQF appreciates the comments received on this recommendation. However, given important strategic considerations, NQF will not be able to implement a change of this magnitude at this time.

Enhancing Training and Education

NQF currently provides various educational resources for stakeholders involved in the CDP. This includes virtual meetings and written materials for committee members, developers and staff. At the beginning of each CDP, NQF virtually convenes standing committees for an orientation to the CDP and an overview of the measure evaluation criteria. Prior to all committee calls and meetings, committee co-chairs meet with NQF staff to identify potential concerns and additional information that may be useful to the committee. In addition, NQF convenes measure developers on monthly webinars to provide educational and informational updates on ongoing NQF activities. NQF also conducts bimonthly internal staff training and education sessions that focus on the CDP.

NQF Staff

Finally, NQF will work to improve consistency across projects by expanding internal educational resources offerings for staff on the process, measure evaluation criteria and meeting facilitation. NQF will implement specific staff-focused trainings on meeting facilitation conducted by internal and externally trained facilitators. All staff will receive trainings on the updates and changes to the CDP. These resources will include video trainings providing an overview/refresher course on each step of the CDP; enhanced written guidance; and ongoing small group and/or one on one training, on the specific steps within the CDP. NQF will also hold biweekly education sessions on measure methodology, which will be conducted by senior staff.

Improvements in Information Exchange and Access

NQF currently conducts two separate measure review processes: measurement endorsement through the CDP and input on measure use and selection through the Measure Applications Partnership (MAP). While each process has a different purpose and goal, there is significant overlap in the information submitted and produced. For MAP, brief measure specifications are provided by CMS in the form of the Measures under Consideration (MUC) list, and the MAP's final recommendations for each review year are stored in Excel files and reports on NQF's public website. For the CDP, developers provide measure specifications through NQF's online measure submission form (MSF), and the endorsement decisions and summaries of committee discussions are stored in reports on various project-specific webpages on NQF's public website. Summary information for endorsed or previously endorsed measures is included on NQF's public measure repository, the Quality Positioning System (QPS).

Kaizen participants recommended a centralized information system that would allow for a comprehensive and longitudinal view of a measure. This system would allow staff, developers, and the public to access information, including both MAP and CDP data, as the information is updated in real-time. Participants emphasized attributes such as version control, consistency between NQF projects, and the ability to easily pull and edit information as key to an ideal-state measure information repository. Kaizen participants also recommended creating a more consistent, transparent, and user-friendly tool for submitting, reviewing, and analyzing measures and comments. Lastly, participants recommended that NQF should purposefully incorporate methods to ensure the tool provides an intuitive user-friendly experience.

Ongoing Improvements: Short and Long Term Solutions

NQF will adopt a two-fold approach to addressing recommendations from Kaizen participants. Some aspects of the recommendations are resolvable through short-term solutions and adaptations of existing platforms. Other recommendations will be addressed through a long-term product development approach.

NQF will advance a short-term initiative to aggregate information by grouping MAP measure recommendations and rationale issued each year into one comprehensive and filterable document, accessible from the existing MAP homepage on the NQF website. Similarly, NQF will work to consolidate existing information from CDP reports to make it easier for users to access measure information.

Appendix A: Comments Received

Robert Dent, Midland Memorial Hospital

Having a scheduled submission/review process is seen as an advantage. It should be easier for organizations to plan accordingly. Thank you

NQF Response:

Thank you for your comment. We appreciate your feedback on the proposed recommendations for the CDP Redesign.

Joseph Kunisch, Memorial Hermann Health Care System

Thank you for the opportunity to comment on this important proposal. I agree with all of the proposed changes and would like to comment on one in particular. Regarding the improvements in information exchange and access, I recommend the NQF reconsider the prioritization of the proposed changes. From the perspective of end user of the quality measures, having a coordinated, centralized system for a comprehensive longitudinal view of the measure would be extremely helpful. The current process requires a significant amount of time and work effort on the end user side to pull this information together and review in a manner that is understandable and provides the ability to communicate the changes to other stakeholders. As a person that uses this process to obtain feedback from clinical staff for commenting, I believe creating a centralized system as proposed by the Kaizen participants would not only be helpful for me but would also further the engagement of outside stakeholders by making the review process less labor intense.

I would also like to recommend that the NQF adopt a commenting process similar to the one used for commenting on the NQF's Common Formats for Patient Safety Data Document. This allows stakeholders to submit a single comment regarding a specific section of the document. I found this system to be very user friendly and significantly enhance the commenting process.

NQF Response:

Thank you for your comment. NQF has identified short-term solutions to ensure our current IT infrastructure is more user friendly that progresses towards developing a more centralized system. NQF will advance a short-term initiative to aggregate information by grouping MAP measure recommendations and rationale issued each year into one comprehensive and filterable document, accessible from the existing MAP homepage on the NQF website. Similarly, NQF will work to consolidate existing information from CDP reports to make it easier for users to access measure information

NQF will also strive to improve business rules around publishing timelines and meeting materials, to ensure developers, committee members, and members of the public are more aware of opportunities to participate in NQF's processes. Commenting opportunities will also be enhanced by increasing the character limit to 10,000 characters, real-time updates on comments forwarded to developers, and better regulated public comment periods during evaluation meetings.

Rikki Mangrum, American Institutes for Research

Thank you for the opportunity to comment on NQF's planned and deferred changes. I applaud the proposed changes, particularly the addition of a methodological panel and the expansion to continuous commenting. It may be helpful for NQF to consider in future the value of providing feedback to measure stewards/developers at the Intent to Submit phase. If NQF could identify, at the intent stage, that a measure is unlikely to meet with a warm reception, it would be helpful to share this with measure developers.

I am in favor of improving the measure technical reports, as these are often long and arcane. However, I urge NQF to consider test alternative formats for these reports, and not to rely solely on expert guidance on how to revise and restructure them. Much as we test measures to make sure they function as intended, it is equally important to test the efficacy of different ways of communicating measure-related information. Otherwise, we may still struggle to expand the "voices at the table" to those important stakeholders who don't wish to make a hobby of learning how to read measure reports. This need is also related to the barriers NQF notes for making a change to the endorsement decision process. Finding sufficient stakeholder perspectives for the standing committees may be more challenging without attention to their needs.

Regarding the information exchange and access recommendations, I am reminded that Henry Wei of Google sat on the stage at the NQF annual conference back in April and told us all that combining data from disparate sources is now “a trivial matter.” His co-panelists agreed wholeheartedly that this was true. I read about companies like Palantir that can rapidly bring together wildly different databases, including those that are entirely unstructured, into dashboards that allow users to access and combine data for new purposes. This makes me wonder whether a new system is truly beyond reach. Perhaps NQF has received input from the wrong experts. The problem may be the suggestion to build a big new centralized system. The answer may be in a smaller, more flexible infrastructure that allows transparent interaction with decentralized systems.

NQF Response:

Thank you for your comment.

NQF currently offers technical assistance to measure stewards and developers at any time. Stewards and developers do not have to wait until there is an active project to receive technical assistance. NQF welcomes measure stewards and developers to request technical assistance at the Intent to Submit phase. NQF has clarified the opportunity to receive technical assistance in the final report.

NQF will continue to identify ways to improve the structure and format of the technical reports to capture the needs of all stakeholder perspectives.

NQF has also identified short-term solutions to ensure our current IT infrastructure is more user friendly that progresses towards developing a more centralized system. NQF will advance a short-term initiative to aggregate information by grouping MAP measure recommendations and rationale issued each year into one comprehensive and filterable document, accessible from the existing MAP homepage on the NQF website. Similarly, NQF will work to consolidate existing information from CDP reports to make it easier for users to access measure information. Additionally, NQF will strive to improve business rules around publishing timelines and meeting materials, to ensure developers, committee members, and members of the public are more aware of opportunities to participate in NQF’s processes. Commenting opportunities will also be enhanced by increasing the character limit to 10,000 characters, real-time updates on comments forwarded to developers, and better regulated public comment periods during evaluation meetings.

David Longnecker, Coalition to Transform Advanced Care (C-TAC)

We at C-TAC support the spirit and intent of the Kaizen recommendations, which are intended to facilitate efficiency and inclusive participation in the CDP. We also respect NQF's responses regarding the logistical implications for their staff and systems, and their response that some of these cannot be implemented immediately. Further, we emphasize the need for careful deliberation that leads to thoughtful implementation of key "driver measures" that encourage performance improvement but do not stifle innovation regarding how to accomplish the desired outcome. In short, the goal is to drive for the end-product of performance improvement, not dictate every step in the improvement process.

NQF Response:

Thank you for your comment. NQF appreciates your feedback on the proposed recommendations for the CDP Redesign.

Sandra Pogones, American Academy of Family Physicians

The American Academy of Family Physicians (AAFP) is in general support of the proposed changes and offers the following comments and suggestions:

- 1) Increased opportunity for measures submission: We agree with the changes. We would like a better understanding of which topic areas will be consolidated, with assurance that family medicine will continue to be represented in areas that impact primary care.
- 2) Technical Review: Methods Panel: We agree this aspect of measure evaluation is best addressed by statistical experts. We hope the change will free-up time to devote to measure alignment, duplication and identification of best-in-class measures, an important task that frequently gets less attention than it deserves in the current process.
- 3) Measure Evaluation Technical Report: We agree with the proposed changes.
- 4) Public Commenting Period with NQF Member Expression of Support: We support the changes.

5) CSAC Role in Endorsement Decisions and Appeals: The AAFP agrees that standing committees are in the best position to make the final endorsement decisions. However, it is not clear if this change would require that workgroup seats previously filled by clinicians would instead be filled with consumers and purchasers. We would support adding one or two seats to workgroups for consumers and purchasers, but would oppose heavy weighting of workgroups with public members. Clinicians' professional work, payments, patient care and safety are significantly impacted by measures, and the endorsement process must remain scientific. It is also critical that enough seats be available for professional members to ensure cross-specialty evaluation, endorsement, and acceptance by the medical community. We support having CSAC function as the Appeals Board and agree with disbanding the separate appeals board. We also suggest that CSAC be more involved in identifying potential gaps in measures, an area where consumer input would be very valuable.

6) Enhancing Training and Education: We support increased training and education for those involved in CDP and for all stakeholders. We also encourage NQF to offer training opportunities to inexperienced professionals to help groom such professionals for measures evaluation work. We've found opportunities for this type of training are limited, and suggest that each workgroup offer a limited number of "observational" seats (1-2) to be filled by inexperienced members that wish to gain experience in the process.

7) Improvement in Information Exchange and Access: We support eliminating duplicative information sources and centralizing information in one location, accessible via a user-friendly tool.

NQF Response:

Thank you for your comment.

Increased opportunity for measure submissions: NQF has consolidated the 22 measure review topical areas into 15 topical areas. (The list of the topical areas is included in the final report). Topic areas were consolidated with the goal of reassessing and balancing NQF's library of measures, while distributing measures to committees with the needed expertise to conduct an evaluation. As a result, many of the smaller portfolios have been consolidated into cross-cutting topics with a broader range of experience. In addition, some clinical groupings of committees were made to reflect more cross-cutting clinical areas, such as primary care and chronic illness care, pediatrics and geriatrics and palliative care.

CSAC Role in Endorsement Decisions and Appeals: NQF appreciates your suggestion on the composition of the standing committees. Given current resources and other important strategic considerations, NQF will not be able to implement a change of this magnitude at this time. If or when this change occurs, NQF will consider your feedback on the approach.

Enhancing Training and Education: Thank you for the suggestion. As we develop our training and education plan, we will consider your recommendation.

Sandra Pogones, American Academy of Family Physicians

The American Academy of Family Physicians wishes to append our prior comments on the proposed Methods Review process, considering recent and important feedback we have received from our members.

While we see the value of having statistical expertise available for review of reliability and validity of measures, we are concerned that non-clinicians may not be able to identify certain issues that are apparent to clinicians in their daily practice. For example, different registries or EHRs may not equally measure certain specifications due to clinical or technical features and logic, which will impact reliability. A statistician may not have identified such differences because they are not actually using the EHR and may make assumptions about commonality that do not exist. We are concerned that once a measure "passes" the hurdles for scientific acceptability and a recommendation is made to the committee, the process will become a rubber stamp approval, and due consideration of reliability and validity will not be performed by the committee.

We believe there are committee members that are skilled enough to handle scientific acceptability review, although not all members may feel comfortable with this. We would not oppose having statistical experts review the measures and participate in discussion of scientific reliability with the committee, but prefer they withhold making prior recommendations. We feel it is important for all committee members to hear and participate in the full discussion of scientific acceptability, as such discussion spurs questions, enhances member understanding of the measures, and improves overall effectiveness of members in reviewing all measure criteria.

NQF Response:

Thank you for your additional comment. Although NQF staff or the Scientific Methods Panel will review and rate the reliability and validity of the measure, standing committees may raise concerns with the specifications of the

- c) The external methods panel members are subject to review for conflict of interests. As a result of this review, qualifying panel members will be free from conflicts of interest.
- d) NQF will vet the external methods panel nominations for sufficient competencies in the areas evaluated in the Scientific Acceptability criterion.
- e) Draw on the recent National Academy of Medicine (NAM) report titled “Vital Directions for Health and Health Care” as it relates to the concept of creating a health care performance measurement parallel to the Financial Accounting Standards Board (FASB). Related to the FASB concept, we suggest to charge the external methods panel with responsibilities aimed at improving the standardization of measure review for Scientific Acceptability. For example, the panel’s scope could state they are charged with standardizing across all measures being evaluated:
 - How measures are reviewed for Scientific Acceptability;
 - The acceptable minimum threshold a measure must pass for Scientific Acceptability

Concluding comments

As it currently stands, 16 NQF SCs are reviewing measures as to Scientific Acceptability. Needless to say, such a large number of bodies evaluating measures against this criterion increases the likelihood of inconsistent standards applied to measures being reviewed. This risk for inconsistency is exacerbated by the following existing NQF attributes, which are noted in the NAM’s “Vital Directions” report:

- NQF criteria are not evaluated in a strict quantitative sense;
- The NQF does not define specific validity tests for different types of measures;
- NQF does not require a minimum bar for reporting a measure’s validity and reliability;
- NQF does not define specific thresholds for validity and reliability for endorsement

The “Vital Directions” report goes on to provide recommendations that relate to this particular proposal in the draft NQF report, and suggests the potential for NQF to be part of the solution. Specifically, “Vital Directions” notes:

“Policy-makers could create an independent body to write standards for healthcare performance measures.... One option would be to build on NQF... The entity charged with this work ideally would be a private, nongovernment self-regulating organization...”

Through this recommendation for one external methods panel on Scientific Acceptability, NQF can move a step closer to the NAM’s vision for NQF.

Endorsement Decision

The NQF draft report indicates the Kaizen process recommended that: *“...standing committees should make the final endorsement decisions, without ratification by the CSAC.”*

Consumer Reports generally supports the above stated proposal; however we strongly agree that final endorsement decisions should not move to the SCs until the membership of each SC is reconstituted to have a simple majority of consumers/purchasers.

NQF staff ensuring procedures are adhered to during SC process

A current role of the CSAC is to ensure the proper protocols were adhered to in the review and voting on the measures by the SC. Such review of appropriate adherence to procedures should occur concurrently during each step of the endorsement process. Thus, NQF staff should fulfill this role during the SC’s work as well as the work of the external methods panel.

Rationale: Putting the procedural review on the back end of the endorsement process is illogical. Identifying if there were procedural issues after the fact is inefficient and runs counter to a stated Kaizen process. Specifically, the NQF draft reports notes one of the aims of changes to the endorsement process is: *“reducing cycle time of the CDP”*.

Improvement in Information Exchange and Access

We strongly agree with the recommendations of the Kaizen participants to create *“a centralized information system that would allow for a comprehensive and longitudinal view of a measure. This system would allow staff, developers, and the public to access information, including both MAP and CDP data, as the information is updated in real-time.”* We encourage NQF to move toward such improvements in the future.

NQF Response:

Thank you for your comment.

Technical Review: Scientific Methods Panel:

Maintenance measures can be complex measures. Because updated reliability and validity testing is not required for maintenance measures, NQF staff will review previous testing results for complex maintenance measures and attest to the adequacy of prior testing. If prior testing is inadequate, updated testing is provided, or NQF staff deems an external review necessary, the measure will be submitted to the external Scientific Methods Panel to evaluate the reliability and validity of the measure.

Due to volume and capacity concerns, all submitted measures cannot be reviewed by the Scientific Methods Panel. NQF staff has the appropriate expertise to review the non-complex measures. NQF will train and provide resources to the Scientific Methods Panel to ensure consistency in applying the testing information submitted to the measure evaluation criteria.

Upon submission of the Intent to Submit form, NQF will assess whether the measure will be reviewed by the Scientific Methods Panel. No matter the classification of the measure (complex or non-complex), the review by NQF staff or the Scientific Methods Panel will not add additional time to the review process. All measures that are ready for committee review, will be sent to the committee with adequate time for the committee to review prior to the committee evaluation meeting.

In the final report, NQF has clarified the definition of a complex measure. The following types of measures will be considered complex and therefore may require an evaluation by the Scientific Methods Panel:

- Outcome measures, including intermediate clinical outcomes
- Instrument-based measures (e.g., PRO-PMs)
- Cost/resource use measures
- Efficiency measures (those combining concepts of resource use and quality)
- Composite measures

Additionally, NQF has also provided additional information on the composition and disclosure of interest of the Scientific Methods Panel in the final report. The new NQF Scientific Methods Panel will consist of 15 to 25 nominated statisticians, epidemiologists, psychometricians, economists, performance measure methodologists and individuals with expertise related to eMeasures and disparities. All nominees will complete an annual general disclosure of interest (DOI) form, as well as measure-specific disclosures to identify recusals from specific measures. NQF will assign measure review based on identified conflicts of interest, relevant expertise, and availability of panel members. All reviews provided by the Scientific Methods Panel will be shared not only with the committee but also with the steward/developer and the public. Furthermore, the Scientific Methods Panel's charge will include providing expertise for methods/testing-related issues for NQF and advance NQF's guidance on these issues.

Enhancing Training and Education: Improving the training and education for the standing committee members will assist in ensuring consistency across all 15 committees when applying the measure evaluation criteria.

Endorsement Decision: NQF appreciates your suggestion on the composition of the standing committees. Given current resources and other important strategic considerations, NQF will not be able to implement a change of this magnitude at this time. If or when this change occurs, we will consider your feedback on the approach.

Increased staff training and education will further ensure NQF procedures are adhered to during measure evaluation process. Furthermore, the CSAC also provides oversight on the consensus development process and performs a final review of the process prior to making an endorsement decision.

Anouk Lloren, Yale-CORE

We thank the National Quality Forum (NQF) for the opportunity to comment on the NQF Kaizen Draft Report.

First, we note that a key process change discussed at the Kaizen event is not reflected in the current draft report. To avoid steering committees wasting time on applications that are unclear or for which the NQF staff and developer views on the technical content differ, NQF staff and the developer will reach agreement on the application of NQF criteria to the measure (or articulate differences where necessary) before the measure goes to the steering committee. This would ensure that the developer does not have to separately rebut NQF staff application of NQF guidelines post-hoc in front of the committee where there are differences.

Second, we provide comments on the NQF Kaizen Draft Report in the table below.

NQF Response:

Thank you for your comment. We appreciate your feedback on the proposed recommendations for the CDP Redesign. NQF hosted the Kaizen event in collaboration with CMS to inform the CDP redesign. CMS, as the funder of this initiative, has asked NQF to solicit public comment on the proposed recommendations and provide a final report outlining the new CDP by July 1, 2017. Thus, NQF had to limit the amount of time NQF members and the public had to provide feedback. However, as NQF continues to plan for implementation of the new CDP, additional feedback is welcomed.

Overarching questions and comments: To allow more frequent measure submissions, committees will convene more often. Additionally, there will be increased opportunities for NQF membership to engage in the process. As a result, NQF emphasizes the importance of stakeholder education.

After the standing committee completes its measure review, a summary of the committee's recommendations – or "draft report" – will be posted on the NQF website for the public and NQF membership to review and comment. Because there are more review cycles, NQF will revise the content and structure of the report to highlight key elements of interest. These elements are included in the final report.

To assist in planning and minimize burden for the measure stewards/developer, committee members and NQF, submission deadlines will be staggered. A graphic that outlines the new process is included in the final report.

Scheduling/Frequency: The process includes a two-week process for measure steward or developer to respond to the ratings. In addition, the standing committees can still discuss relevant issues, such as risk adjustment. Given the opportunity for more frequent submission, measures may need to be move to the next review cycle to address methodologic concerns.

The consolidated topic areas are included in the final report. For larger topic areas that include multiple conditions or cross-cutting areas, NQF will utilize technical experts as needed.

NQF will offer two measure submission opportunities for each topic area each year, limiting the number of measures evaluated by the standing committees in each cycle to a maximum of 12 (up to eight measures undergoing maintenance review and up to four new measures). This was determined given that approximately 80% of the measures submitted for endorsement consideration are maintenance measures. The combination of maintenance and new measures may vary depending on number of measures submitted, opportunities for related and competing measure review, and measure prioritization efforts. Per NQF's maintenance of endorsement policy, measures are due for reassessment every three years.

Intent to Submit: NQF will remind measure stewards and developers of scheduled measure maintenance review several months prior to the review and notify each of their assigned review cycle.

Technical review: Methods Panel: NQF has provided additional information on the composition and disclosure of interest of the Methods Panel in the final report. The new NQF Scientific Methods Panel will consist of 15 to 25 statisticians, epidemiologists, psychometricians, economists, performance measure methodologists and individuals with expertise related to eMeasures and disparities. All nominees will complete an annual general disclosure of interest (DOI) form, as well as measure-specific disclosures to identify recusals from specific measures. NQF will assign measure review based on identified conflicts of interest, relevant expertise, and availability of panel members. All reviews provided by the Scientific Methods Panel will be shared not only with the committee but also with the steward/developer and the public. Furthermore, the Scientific Methods Panel's charge will include providing expertise for methods/testing-related issues for NQF and advance NQF's guidance on these issues.

NQF will provide standard guidance on assessing the *Scientific Acceptability* criterion for a measure, using the current decision algorithm used from the measure evaluation criteria. As part of its ongoing education efforts, NQF will provide clear guidance to standing committees regarding the circumstances wherein an overturn of the rating would be permissible.

For both complex and non-complex measures, when the preliminary analysis is complete, NQF staff will send the preliminary analysis to developers by email for review. The process includes a two-week process for measure steward or developer to respond to the ratings. In addition, the standing committees can still discuss relevant issues, such as risk adjustment. The rating from the methods review—whether generated by NQF staff or the Scientific Methods Panel—will be used to rate the *Scientific Acceptability* of the measure. However, standing committees may raise concerns with the specifications of the measure or with potential threats to validity (e.g., selection of variables for risk adjustment model) and can therefore overturn the staff or Scientific Methods Panel ratings.

Technical Review: Methods Panel: Enhancing training and education for the standing committee and scientific methods panel members, developers, NQF members and the public is a top priority for NQF. In the final report, NQF has provided additional details regarding the training and education plan for each audience.

Amir Qaseem, American College of Physicians

We applaud NQF for addressing the critical issue of improving the consensus development process. Overall, the changes seem to be a positive step in the right direction. We particularly support the addition of a dedicated methods review team that utilizes individuals with methodological expertise. This method will help standardize the endorsement process while reducing the burden of clinical reviewers. Furthermore, we support embedding key stakeholders such as consumers and purchasers from the CSAC within the standing committee. Doing so will not only improve the timeliness of committee approvals, but also involves these stakeholders in the critical work of assessing performance measures in a more direct and accountable manner.

While we agree with the proposed changes, we encourage NQF to move towards pushing endorsement decisions to the standing committee. We also encourage NQF to make improvements in information exchange and access to include transparency in the process.

NQF Response:

Thank you for your comment.

CSAC Role in Endorsement Decisions and Appeals: We appreciate your feedback on the role of the standing committee as the final endorsement body, however given current resources and other important strategic considerations, NQF will not be able to implement a change of this magnitude at this time. If or when this change occurs, we will consider your feedback on the approach.

Enhancing Training and Education: Thank you for the suggestion. As we develop our training and education plan, we will consider your recommendation.

Jeffrey Plagenhoef, American Society of Anesthesiologists

On behalf of more than 52,000 members of the American Society of Anesthesiologists® (ASA), I welcome the opportunity to offer comments on the 2017 Kaizen Consensus Development Process: Proposed Redesign issued by the National Quality Forum (NQF). ASA looks forward to these and future NQF improvements to the measure endorsement process.

ASA supports continuous improvement to the NQF Consensus Development Process.

ASA supports NQF's commitment to simplifying the measure development and endorsement process and ensuring stakeholders, including specialty societies, have ample opportunity to engage in the Consensus Development Process. We support several components of the proposed redesign, especially those aimed at simplifying the current process and providing a more transparent, streamlined process for submitting measures for endorsement to NQF and inclusion in federal payment programs.

ASA supports increased opportunities for measure submission to NQF.

ASA supports instituting two measure submission periods per year for each topic area, as it will allow for stakeholders to have standard expectations of when measures may be submitted for endorsement. Increasing measure submission opportunities throughout the year will improve continuity of measure development for stakeholders and reduce dormancy previously experienced by standing committees.

NQF should reconsider the twelve (12) measure cap for bi-annual topic opportunities.

The proposed twelve measure limit for each topic area during each measure submission period is limiting and will slow the measure development process for dense topic areas such as in surgical care. This cap would stall the measure development process for new measures, as NQF has proposed that only eight (8) new measures will be considered in each topic area each year. NQF should consider expanding the number of measures to review during each submission period or, at a minimum, allow for flexibility with this cap. Additionally, ASA recommends the close monitoring of this cap, to ensure it is appropriately meeting stakeholder demand.

ASA supports increased frequency of standing committee meetings throughout the Consensus Development Process.

With increased measure opportunities throughout the year, standing committees should meet more frequently to discuss submissions. While ASA supports more frequent convening of standing committees, NQF should closely monitor both review cycles to ensure measures reviewed in in-person meetings versus virtual web meeting are

held to the same rigorous standards. When choosing standing committee members, NQF must strike an appropriate balance between clinicians who will be assessed on a majority of endorsed measures, with other stakeholders.

NQF should remove Consensus Standards Approval Committee (CSAC) authority to overturn standing committee decisions.

Removing the CSAC's authority to overturn decisions from standing committees will eliminate an unnecessary layer to the Consensus Development Process that is rarely used. Standing committees possess the subject matter expertise related to the measures in which they review, and the CSAC often defers to each standing committee for recommendations. ASA recommends NQF focus more energy on ensuring standing committees have diverse stakeholder representation and receive final endorsement authority.

ASA supports the use of methodologists and staff experts to conduct "methods review" and make recommendations on "complex" measures.

ASA supports shifting the responsibility of "methods review" from each standing committee to NQF staff experts or an external methods panel. This will ensure a standardized methodological review process for each measure under consideration and allow experts to make recommendations to standing committees in a consistent manner. Additionally, ASA supports the engagement of the external methods panel to review measures requiring complex methodological analysis, such as risk-adjusted outcome and composite measures. ASA recommends that NQF engage both physicians and non-physicians in the "methods review" as part of both expert staff or the external methods panel to ensure a well-rounded analysis from clinical and methodological perspectives.

NQF should allow stakeholders to vote on individual measures and not require voting on all measures within a measure set.

The current process requires stakeholders to declare support for an entire suite of measures, even if only one measure applies to their interests. Stakeholders should have the opportunity to indicate "Support," "Do Not Support," "Abstain" or "Not Voting" for individual measures within a report. A la carte voting will allow stakeholders to vote for or against specific measures within their area of specialty and expertise. In previous cycles, an NQF member who voted "Abstain" had their vote, for all intents and purposes, count against the measure. ASA appreciates NQF's effort to combine comment periods into one continuous public comment period throughout each measure cycle as this will reduce redundancy, compared to the current process of two comment periods.

ASA supports increased training and education for stakeholders engaged in the Consensus Development Process.

Education and training are essential to ensure continued success in measure development and endorsement processes. The ASA thanks NQF for their routine education and training webinars related to the Consensus Development Process. These activities equip measure developers with tools to efficiently and effectively develop measures suitable for NQF endorsement with the end desire of inclusion in federal payment programs.

Thank you for the opportunity to submit comments for your consideration. ASA looks forward to continued work with NQF in the future and appreciates its effort to improve the Consensus Development Process and improve opportunities for measure submission and endorsement. If you have any questions or would like to discuss any of our comments further, please contact Matthew Popovich, Ph.D., ASA Director of Quality and Regulatory Affairs at 202-591-3703 or Leslie Kociemba, M.P.H., ASA Quality Associate at 847-268-9266. They may also be reached at qra@asahq.org.

NQF Response:

Thank you for your comment. We appreciate your feedback on the proposed recommendations for the CDP Redesign.

Increased Opportunities for Measure Submission: NQF has consolidated the 22 measure review topical areas into 15 topical areas. (The list of the topical areas is included in the final report). NQF will limit the number of measures evaluated by the standing committees in each cycle to a maximum of 12 (up to eight measures undergoing maintenance review and up to four new measures). This may vary depending on number of measures submitted; opportunities for related and competing measure review, and measure prioritization.

NQF will make every effort to standardize how both in-person meetings and web meetings are conducted to ensure consistency in the Committee's measure review and evaluation process.

Consensus Standards Approval Committee: NQF appreciates the comments received on the recommendation of this endorsement body. However, given important strategic considerations, NQF will not be able to implement a

long-term solutions take time and resources but would support any short-term solutions to enhancing information exchange and access.

NQF Response:

Thank you for your comment.

Frequency/Scheduling: NQF has consolidated the 22 measure review topical areas into 15 topical areas. (The list of the topical areas is included in the final report). Topic areas were consolidated with the goal of reassessing and balancing NQF's library of measures, while distributing measures to committees with the needed expertise to conduct an evaluation. As a result, many of the smaller portfolios have been consolidated into cross-cutting topics with a broader range of experience. In addition, some clinical groupings of committees were made to reflect more cross-cutting clinical areas, such as primary care and chronic illness care, pediatrics and geriatrics and palliative care. Individual standing committees that will no longer convene for the following topical areas include:

Since 80% of the measures submitted for endorsement consideration are maintenance measures, NQF determined that eight of the 12 measures in each cycle would be maintenance measures.

NQF will limit the number of measures evaluated by the standing committees in each cycle to a maximum of 12 (up to eight measures undergoing maintenance review and up to four new measures). This may vary depending on number of measures submitted; opportunities for related and competing measure review, and measure prioritization.

Technical Review: Methods Panel: NQF will make every effort to standardize how both in-person meetings and web meetings are conducted to ensure consistency in the Committee's measure review and evaluation process.

Intent to Submit: NQF will schedule the evaluation of maintenance measures and notify measure stewards and developers in advance. Measure stewards/developers will need to notify NQF at least three months prior to the measure submission deadline to prepare for the committee's review in the upcoming cycle. An intent to submit will signal to NQF of the measure stewards/developers' plan and readiness to submit measures for endorsement consideration.

Endorsement Decision: NQF appreciates the comments received on the recommendation of this endorsement body. However, given important strategic considerations, NQF will not be able to implement a change of this magnitude at this time. Currently, the CSAC is comprised of a simple majority of consumers and purchasers. In order to ensure those two stakeholder perspectives are a key part of the endorsement process, NQF will need to make certain there is adequate representation of these groups on each standing committee. NQF is committed to implementing a plan to identify and solicit ongoing engagement and participation opportunities from these stakeholder groups. Depending on the outcome of this initiative, NQF could potentially implement this proposed change at a later time.

Technical Review: Methods Panel: The new NQF Scientific Methods Panel will consist of 15 to 25 statisticians, epidemiologists, psychometricians, economists, performance measure methodologists, and individuals with expertise related to eMeasures and disparities. NQF will solicit and identify nominees through NQF's standard nominations process. Much like guidance for standing committees, NQF will provide standard guidance on assessing the *Scientific Acceptability* criterion for a measure, using the current decision algorithm from NQF's Measure Evaluation Criteria. To ensure impartiality, three panel members will independently evaluate each measure undergoing an external panel review. The majority recommendation will serve as the overall assessment of reliability and validity. NQF will share all evaluations with the measure steward/developer.

JohnMarc Alban, The Joint Commission

The Joint Commission appreciates the opportunity to comment on the 2017 Kaizen Consensus Development Process: Proposed Redesign.

Increased Opportunities for Measures Submission: The Joint Commission supports these changes. We would like a better understanding of the consolidated topic categories. We would also like clarification around maintenance measures and whether the bi-annual consideration includes both annual review as well as the 3 year re-endorsement.

Technical Review: Methods Panel: The Joint Commission agrees that the Scientific Acceptability section of the measure submission should be reviewed by statistical experts with the knowledge and expertise to base a determination on the reliability and validity of the measure. We would suggest that the Methods Panel should be a standing committee across topic areas to promote consistency of interpretation, as well as, the feedback provided to measure developers. Furthermore, we are recommending that the measure submission process

thought-out feedback to comments as is possible; Lewin suggests delivering comments to measure stewards in near-real time (or as rapidly as is feasible) to maximize our response time.

Enhancing Training and Education: Lewin agrees that NQF should provide as many public-facing education resources as possible, including increased promotion of technical assistance support for measure developers, on-demand and real-time webinars for those new to the measure development/NQF submission processes, and creation of orientation sessions for those less experienced in submitting measures to NQF. Lewin also supports standardization of NQF staff competencies through trainings on meeting facilitation and other shared operational skills that can apply across Committees.

NQF Response:

Thank you for comment.

Increased opportunities for measure submission: NQF will make every effort to standardize how both in-person meetings and web meetings are conducted to ensure consistency in the Committee's measure review and evaluation process.

Intent to Submit: NQF will provide a schedule for all maintenance measures in advance to allow developers adequate time to prepare accordingly. All maintenance measures are due every three years from its last endorsement review. Developers are required to maintain their measure in accordance with the Measure Steward Agreement. Failure to do so may result in removal of endorsement; however, NQF will continue to identify potential options with the developer prior to removing endorsement.

Technical Report Content and Structure: Thank you for your comment.

Methods Panel for Technical Review: The complexity of a measure, complex vs. non-complex, will be based on information provided in the *Intent to Submit* form. Measures that are considered complex may require an evaluation by the Scientific Methods Panel. For both complex and non-complex measures, NQF staff will send the preliminary analysis to developers for review prior to finalizing and sending to the standing committee. A flowchart illustrating this process is included in the final report.

Standing committees may raise concerns with the specifications of the measure or with potential threats to validity (e.g., selection of variables for risk adjustment model) and can therefore overturn the staff or Scientific Methods Panel rating. NQF will provide the Scientific Methods Panel and standing committees education and training on changes to the process and expectations on their roles and updated written guidance documents. As part of its ongoing education efforts, NQF will provide standing committees clear guidance regarding the circumstances wherein an overturn of the rating would be permissible.

Public Comment Period: NQF will make every effort to provide developers with public comments in real-time to the extent possible.

Enhancing Training and Education: Thank you for your comment.

Kyle N. Campbell, Health Services Advisory Group, Inc.

Information Exchange and Access: It would be helpful if this section were separated into short term and long term actions rather than listing everything in this section collectively as not feasible. The revision to the submission form should be called out as a key recommendation.

Overall this is a very concise summary of the key themes of the meeting. However, I would suggest adding a summary section that would detail how the proposed short-term changes would impact the overall endorsement timeline. A key theme/goal of the meeting was reducing the length of the process. It would be helpful to highlight if a reduction in length was achieved given the changes NQF is committed to implementing short term. Further, I believe separating into short term and long term actions throughout versus the statements concerning current feasibility would be more strategic.

NQF Response:

Thank you for your comment. We appreciate your feedback on the proposed recommendations for the CDP Redesign.

Information Exchange and Access: NQF will adopt a two-fold approach to addressing recommendations from Kaizen participants. Some aspects of the recommendations are resolvable through short-term solutions and adaptations of existing platforms. Other recommendations will be addressed through a long-term product development approach. This is outlined in the final report.

This revised process is designed to allow more opportunities for public input and measure discussion and to ensure best practices in building consensus for performance measurement and standards-setting are put into place. While the final report provides descriptions of proposed processes to the extent possible, there are many details that may change as implementation continues. NQF will continue to keep all stakeholders informed and will solicit ongoing feedback throughout this process.