

### CDP Improvements – Fall 2019

Karen Johnson

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### **Overview of Presentation**

- Context for Improvement Activities
- Changes to Intent to Submit Process
  - Effective August 1
- Changes to the Scientific Methods Panel (SMP) Process
- Submission Reminders and Updated Guidance
- Other Improvement Activities
- Measure Developer Resources

### Context for Improvement Activities

### 2017 Redesign of the CDP

- Motivation for the redesign
  - Stakeholder concern about NQF's agility
    - » Time from measure submission to measure endorsement
    - » Timeliness of measure evaluation/wait time for available projects
- Approach
  - Kaizen event on May 18-19, 2017, using LEAN tools
- Participants
  - >40 attendees + NQF staff/consultants
  - Public and private sector stakeholders
    - » CMS and other federal agencies
    - » NQF standing committee members
    - » Measure developers

### Some Major Elements of the Redesign

- Scheduling/frequency: Two evaluation cycles per year
  - Topic area consolidation (from 22 to 15)
- Intent to Submit process
  - Meant to help facilitate planning of evaluations
  - Required for implementation of the SMP
- Scientific Methods Panel (SMP)
  - Reduce standing committee (SC) burden
  - Promote consistency in evaluation of reliability and validty
  - Encourage greater participation in SCs by consumers, patients, and purchasers

### **Internal Process Improvement Efforts**

- Specific Areas Targeted for Improvement
  - Overall efficiency of activities within the ITS period
  - Transparency of the SMP evaluation process
  - Opportunities for developers to respond to SMP comments for consideration within the same evaluation cycle
  - SMP "gatekeeper" of complex measures (failed measures not reviewed by the standing committee)
- Approach
  - Stakeholder surveys and other stakeholder feedback
  - Address problem statements
  - Process mapping
  - Eliminate waste

# Changes to the Intent to Submit Process

### Key Improvements—Measure Intake

<b>Current process</b>	Improvements				
<ul> <li>Staff identifies measures that do not meet minimum criteria for endorsement review and notifies developer</li> </ul>	No change				
<ul> <li>Staff identifies minor edits         needed by developer prior to         sending to SMP         Developers have 48 hours to         update submission     </li> </ul>	<ul> <li>Staff will no longer perform this review</li> </ul>				

### NQF Measure Intake Assessment

NQF will remove measures from the evaluation cycle for the following issues:

- Testing not performed at requisite levels (data element and/or measure score)
  - Varies based on measure type
- Administrative claims measures not specified and/or tested using ICD-10 codes
- Nonresponse to submission form items

## Changes to the SMP Process

# Key Improvements — SMP Structure and Transparency

Current process	Improvements			
<ul> <li>SMP currently includes 22 members</li> </ul>	<ul> <li>SMP membership to be expanded to ~30 individuals</li> </ul>			
<ul> <li>SMP is convened over a series of 8 conference calls divided amongst 4 subgroups</li> </ul>	<ul> <li>SMP to meet in person 2 times per year*</li> </ul>			
<ul> <li>Subgroup meeting agenda posted publicly</li> </ul>	<ul> <li>All SMP meeting materials will be posted publicly</li> </ul>			
<ul> <li>No public commenting during conference calls</li> </ul>	<ul> <li>Allow opportunity for public commenting at SMP meeting</li> </ul>			

<sup>\*</sup>Pending approval

### Key Improvements— Developer Engagement with SMP

<b>Current process</b>	Improvements
<ul> <li>Developers can only respond</li></ul>	<ul> <li>Developers will have 1 week to</li></ul>
verbally to questions/concerns	respond in writing to SMP
during the subgroup calls	preliminary analyses before final
(additional documentation after	vote; can also respond to SMP
submission is not permitted)	questions during the meeting

### Developer Engagement with the SMP

- NQF will provide developers the "raw" preliminary analyses (PAs) comments from each subgroup member assigned to evaluate the measure
- Developers will have 5 business days to review the PAs and provide written responses to any concerns or issues raised in the PAs (if desired)
- NQF will append any written responses to meeting materials (for the SMP review) prior to the in-person evaluation meeting
- Final voting on the measure will take place at the in-person meeting
- Any changes to the submission or testing form will take place during post commenting period

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### Key Improvements—SMP Gatekeeper Role

<b>Current process</b>	Improvements
<ul> <li>Measures that pass R/V or are CNR and pass are forwarded to Committee for evaluation and final recommendation</li> </ul>	No Change
<ul> <li>Measures that do not pass the SMP do not go to Committee for review, discussion, or vote</li> <li>Short summary of rationale for not passing is provided to Committee</li> </ul>	<ul> <li>Committee members will have the opportunity to pull a measure for discussion (with a rationale)</li> <li>Detailed SMP summary, specifications, and testing attachment will be provided to Committee</li> <li>Committee members can revote on eligible measures (as approved by NQF staff and Cochairs)</li> </ul>

# Committee Consideration of Measures that Do Not Pass the SMP

- Any measure pulled by a Standing Committee member will be discussed
- Some measures may be eligible for vote by the Standing Committee
  - Eligibility will be determined by NQF Staff and committee cochairs
  - Measures that failed the SMP due to the following will not be eligible for re-vote:
    - » Inappropriate methodology or testing approach applied to demonstrate reliability or validity
    - » Incorrect calculations or formulas used for testing
    - » Description of testing approach, results, or data is insufficient for SMP to apply the criteria
    - » Appropriate levels of testing not provided or otherwise did not meet NQF's minimum evaluation requirements

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# Committee Consideration of Measures that Do Not Pass the SMP

- For measures eligible for vote by the Committee:
  - The full Committee must vote on whether to uphold the SMP's vote on R/V
    - » Vote to Uphold → No further discussion of the measure
    - » CNR or Vote to overturn SMP Vote → SC discusses and votes on R/V
- Maintenance Measures
  - Committee must vote to remove endorsement
    - » Regardless of whether it is pulled for discussion by an SC member

# Submission Reminders and Updated Guidance

### **Submission Reminders**

- <u>All</u> measures must be submitted <u>in full</u> by the measure submission deadline (regardless of SMP evaluation decision)
- Now enforcing ICD-10 testing requirements
  - NQF may relax this requirement on a case-by-case basis, but this must be approved prior to submission
- Testing must align with specifications
  - Not a new requirement, but NQF is more rigorously upholding this requirement, particularly for level of analysis and minimum sample sizes
- eCQMs: Demonstration of data element validity now required

### **Submission Reminders**

- Extensions for measures going to the SMP
  - <u>Cannot</u> be granted
    - » If you need an extension, contact the NQF maintenance team and arrange for submission in a subsequent cycle
- Maintenance measures that failed the SMP in fall 2017, spring 2018, fall 2018, spring 2019:
  - Had 3-cycle grace period to maintain endorsement and resubmit
  - Measures will need to be re-submitted within this grace period in order to maintain endorsement
- Complex maintenance measures are evaluated by the SMP if testing has changed since last submission
  - If no changes, NQF staff evaluate R/V

### Updated Guidance—Reliability Testing

- If reporting results from a signal-to-noise analysis
  - Typically should provide more than just one overall statistic
  - Information according to sample size preferred

#### Example

Sample size	Mean	SD	Min	10th %ile	25 <sup>th</sup> %ile	50th %ile	75th %ile	90th %ile	Max
10+									
20+									
50+									
100+									
200+									

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### Updated Guidance—Validity Testing

If presenting score-level validation, the following is now expected

- Narrative describing the hypothesized relationships
- Narrative describing why you think examining these relationships (e.g., correlating measures) would validate your measure
- Expected direction of the association
- Expected strength of the association
- Specific statistical tests used (more detail is better)
- Results
- Interpretation of those results (including how they related to hypothesis and whether they have helped to validate the measure)

## Other Improvement Activities

### **Tentative Changes**

- Reserve Status
  - Recommendation: Regularize review of reserve status measures
    - » To be reviewed on a 3-year maintenance cycle like all endorsed measures
- Ad hoc reviews
  - Recommendation: Rename to "Early Maintenance"
    - » Ad hocs now considered an early maintenance evaluation
    - » Same criteria for requesting an ad hoc
- Annual Update
  - Recommendation: Eliminate this process

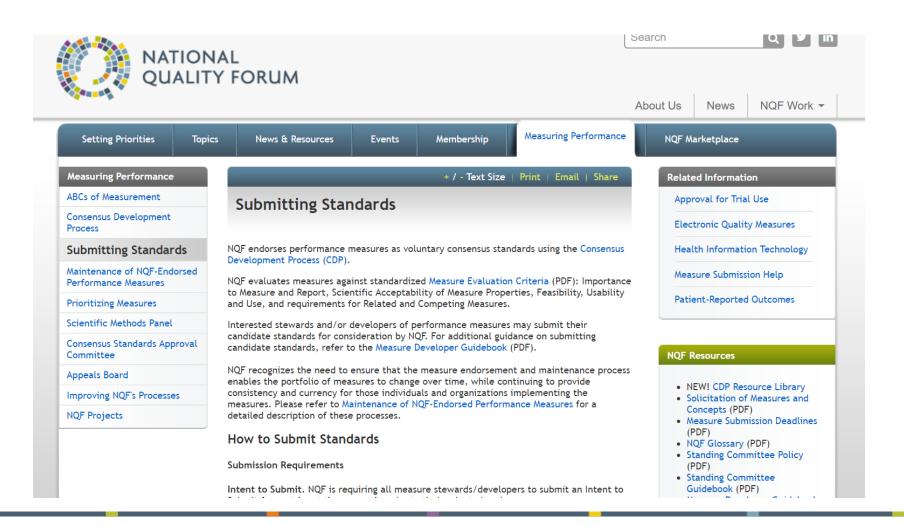
## Measure Developer Resources

### **Technical Assistance and Resources**

- NQF staff will provide technical assistance during the submission process—just ask!
  - Staff will provide feedback on a draft submission before the submission deadline
- Resources on the <u>Submitting Standards webpage</u>
  - Measure Developer Guidebook updated annually
    - » Explains the NQF process and expectations for developers
  - Evaluation algorithms for evidence, reliability and validity
    - » Found in the Criteria and Guidance document
    - » You should have a good idea what the Committee evaluation is likely to be using the algorithms for these criteria
  - What Good Looks Like examples of good submissions

### Bookmark this page!

http://www.qualityforum.org/Measuring\_Performance/Submitting\_Standards.aspx



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### Submitting Standards Webpage Resources

- Criteria and Guidance Document
- Measure Developer Guidebook updated annually
  - Explains the NQF process and expectations for developers
- Evaluation algorithms for evidence, reliability and validity
  - Lays out the logic that committees will use for rating Evidence,
     Reliability, and Validity subcriteria
- What Good Looks Like: examples of good submissions
- Blank copies of submission forms
- Resource libraries
  - Recordings of SMP and Developer Webinar meetings
  - On-demand educational recordings
  - Tips for developers

### **Important Dates**

- Intent to Submit Deadline: August 1
- SMP in-person meeting: October 28-29
- Full Measure Submission Deadline: November 1-15

- Have questions? Contact us at:
  - <u>measuremaintenance@qualityforum.org</u>

# Questions?

