National Quality Forum Measure Endorsement Review Process

The National Quality Forum (NQF) is a private non-profit organization that reviews measures for endorsement. This measure review process, which NQF refers to as the <u>Consensus Development Process</u> (CDP), builds consensus-based input from a wide array of stakeholders to determine a measure's endorsement status. Endorsement is about ensuring that the measures in CMS programs are of the highest caliber possible and improve health outcomes for patients. While CMS is not statutorily required to base decisions related to program use of measures on NQF-endorsement status, an endorsed measure tends to be one that is generally regarded as a high-quality measure.

NQF's criteria for measure endorsement align with those outlined in CMS's Measures Management System <u>Blueprint</u>:

- Importance
 - o Evaluates the strength of the measure's evidence base
 - Evaluates whether the measure will address an important performance gap (Is it important to make significant gains in performance? Is there variation in the less-thanoptimal performance among healthcare providers?)
- Scientific acceptability of measure properties
 - o Includes sub-criteria of validity and reliability
 - A must-pass criterion for new measures and measures seeking re-endorsement
- Feasibility
 - For eCQMs, requires completion of the <u>feasibility scorecard</u>
- Usability and use
 - A must-pass criterion for measures seeking re-endorsement
- Related and competing measures (harmonization)

Who Oversees the CDP?

NQF oversees the CDP by convening various committees to contribute to each step of measure evaluation. NQF is responsible for organizing measures by topic area; these topics areas are called NQF Projects. Some examples of topic-specific NQF Projects include Behavioral Health and Substance Abuse, Cancer, and Cardiovascular. However, some NQF Projects are specific to a certain measure type or crosscutting issue, such as Cost and Resource Use Measures. Each NQF project is overseen by a multistakeholder standing committee that oversees the portfolio of measures for that topic. Each standing committee is comprised of 20 to 25 technical experts and stakeholders (including clinicians, epidemiologists, statisticians, representatives of health plans, payers, professional medical societies, consumer and advocacy groups, etc.). Standing committee members are nominated via a transparent process, which usually includes a 30-day call for nominations period and a 14-day public comment period during which interested parties can review and comment on the candidates. Standing committee members are typically appointed for two- to three-year terms.

These standing committees make measure endorsement recommendations that are reviewed and decided upon by the Consensus Standards Approval Committee (CSAC). The CSAC is an advisory panel

appointed by the NQF Board of Directors following a transparent nomination process. The panel is charged with endorsing or declining to endorse proposed measures based on standing committee recommendations and public comments.

How Do Measures Get Reviewed?

Initial Analysis by NQF Staff: When measure developers submit a measure for endorsement, NQF staff will do an initial analysis of each measure and assign a preliminary rating for each of the evaluation criteria before passing the measures to the appropriate standing committee for review. For new, complex measures and complex measures with updated testing information that are undergoing maintenance evaluation (see call-out box for examples), NQF will pass the measures to a Scientific Methods Panel concurrent with standing committee review.

Scientific Methods Panel (for complex measures): The Scientific Methods Panel was created in 2017 as part of the CDP re-design to provide targeted review for measures that are more technically complex. The panel consists of 24 individuals with methodological expertise who are charged with evaluating a complex measure's reliability and validity and making recommendations on whether the measure meets the reliability and validity sub-criteria. Recommendations from the Scientific Methods Panel are compiled and shared with the relevant standing committee for further review.

Review by Standing Committee: Standing committee review can occur either in-person or via teleconference, and measure developers and/or measure stewards are encouraged to attend. Each measure developer is given several minutes to introduce their measure before turning the discussion back to the standing committee, which determines the extent to which the measure meets the evaluation criteria. The standing committee will then vote on the measure. There are three possible outcomes of the standing committee vote: recommended, not recommended, and consensus not reached. To be recommended for endorsement, at least 60 percent of members must vote in favor of endorsement (both in terms of overall suitability and for each must-pass criterion).

Public Comments & Questions: NQF staff will then compile and summarize committee discussions and recommendations in a draft technical report, which is later posted to the NQF website for a comment period. The standing committee reviews the submitted comments—along with any additional information provided by the developer—in a post-comment web meeting. Measure developers are expected to attend this meeting, during which they may be asked to respond to questions about the measure. The standing committee may reconsider their recommendations for or against endorsement at this time. The committee is also required to re-vote on any measures for which consensus was not

reached. Following the post-comment web meeting, a revised draft report will be compiled and re-circulated for comment, if necessary (e.g., if the content of the report has changed substantially).

Endorsement Decision by Consensus Standards Approval Committee (CSAC): The measures are then passed along to the CSAC, which makes the final measure endorsement decision. The CSAC convenes monthly. NQF staff will notify

Examples of complex measures:

- Outcome measures
- Instrument-based measures (e.g., patient-reported outcomes)
- Cost/resource use measures
- Composite measures

developers of the date that the CSAC will review their measure(s) so they may attend and respond to questions. CSAC members vote on each measure. To grant endorsement status, the measure must achieve greater than 60 percent approval votes. The CSAC votes to endorse or not endorse; it does not have the "consensus not reached" threshold used by the standing committee. Information about each CSAC meeting is posted to the NQF website.

How Do Developers Submit Requests for Reconsideration and Appeals?

Reconsideration: There are two reasons that may justify a request to reconsider a measure that was not recommended for endorsement. The first includes instances in which the measure developer believes the evaluation criteria were not followed appropriately. The second involves instances in which the measure developer believes the CDP may not have been followed appropriately. In either case, the measure developer may send a written request for reconsideration. If citing the first reason, the developer should submit the letter directly to the committee during the public comment timeframe. If citing the second reason, the written request should be sent to the CSAC co-chairs at least two weeks prior to their assigned CSAC endorsement meeting.

Appeals: After a measure has been formally endorsed by the CSAC, there is a 30-day period during which any interested party may appeal endorsement decisions. The NQF Appeals Board, which is made up of NQF board members and former members of CSAC and standing committees, is charged with reviewing and deciding upon appeals to measure endorsement decisions without a review by the CSAC. The decision of the Appeals Board is final.

When and How Do Developers Submit Measures for NQF Endorsement?

NQF holds two CDP cycles each year (see figure). Measure developers/stewards must notify NQF at least three months prior to the measure submission deadline of their intent to submit measures for endorsement consideration. The Intent to Submit form, along with other submission materials, is available on the NQF website. The main NQF submission form must be submitted electronically using NQF's online submission form, while the testing and evidence forms should be completed in Word and attached to the online submission.

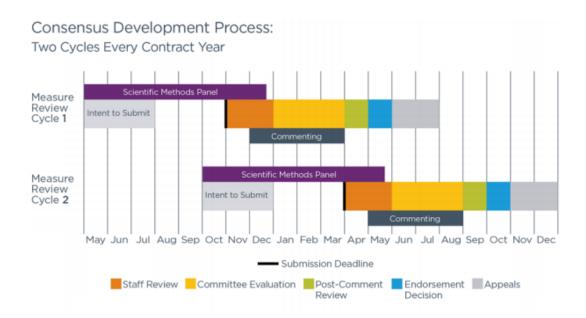


Figure 1. Consensus Development Process from the <u>Measure Developer Guidebook for Submitting</u> <u>Measures to NQF.</u>

Additional Resources

For additional information about the CDP, resources for developers, and detailed submission instructions, visit the NQF <u>Submitting Standards webpage</u>.