Public Webinar

CMS Measure Development Education & Outreach

CMS Quality Measures: Development, Implementation, and You

Presenters:
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Kimberly Rawlings, CMS
Nicole Brennan, DrPH, Battelle
June 13, 2018
12:00-1:00pm EST

Vision and Goals: Public Webinars

CMS Measure Development Education & Outreach

- An ongoing process to engage the public in quality measure development.

- Elicit feedback that will help CMS design resources that can help all of those interested in healthcare quality improvement better understand the goals of quality measurement.

✓Education
✓Outreach
✓ Dedicated Websites
✓ Measure Development Roadmaps
✓ Listserv opportunities

CMS Quality Measurement

CMS Measure Development Education & Outreach

Agenda Webinar:

1. Measures Management System resources and how to use them throughout measure development
2. Review of the measure development process and the focus of each phase
3. Highlight the processes that are used to CMS to implement a measure
4. Describe how patients and families are included in quality measure development and implementation

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Introduction to CMS and Quality Goals: Golden Horton

- **Welcome!** Thank you for joining us for the second part of our series to engage the public in the work CMS is doing around quality measurement

- Aim to shed light on the processes and function of quality measurement in CMS programs and initiatives

- If you are new to quality measurement, stay tuned for available resources that can help navigate development and use

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Measures Management System:
Dr. Nicole Brennan

- CMS developed the Measures Management System (MMS) as a standardized system for developing and maintaining quality measures
- Aim to break down the measure development process into achievable milestones in preparation for submission to CMS
- The MMS website provides a link to:
  - The MMS Blueprint, a step-by-step guide
  - Webinars covering multiple measure development topics
  - Resources broken down by development phase

https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/MMS/Index.html
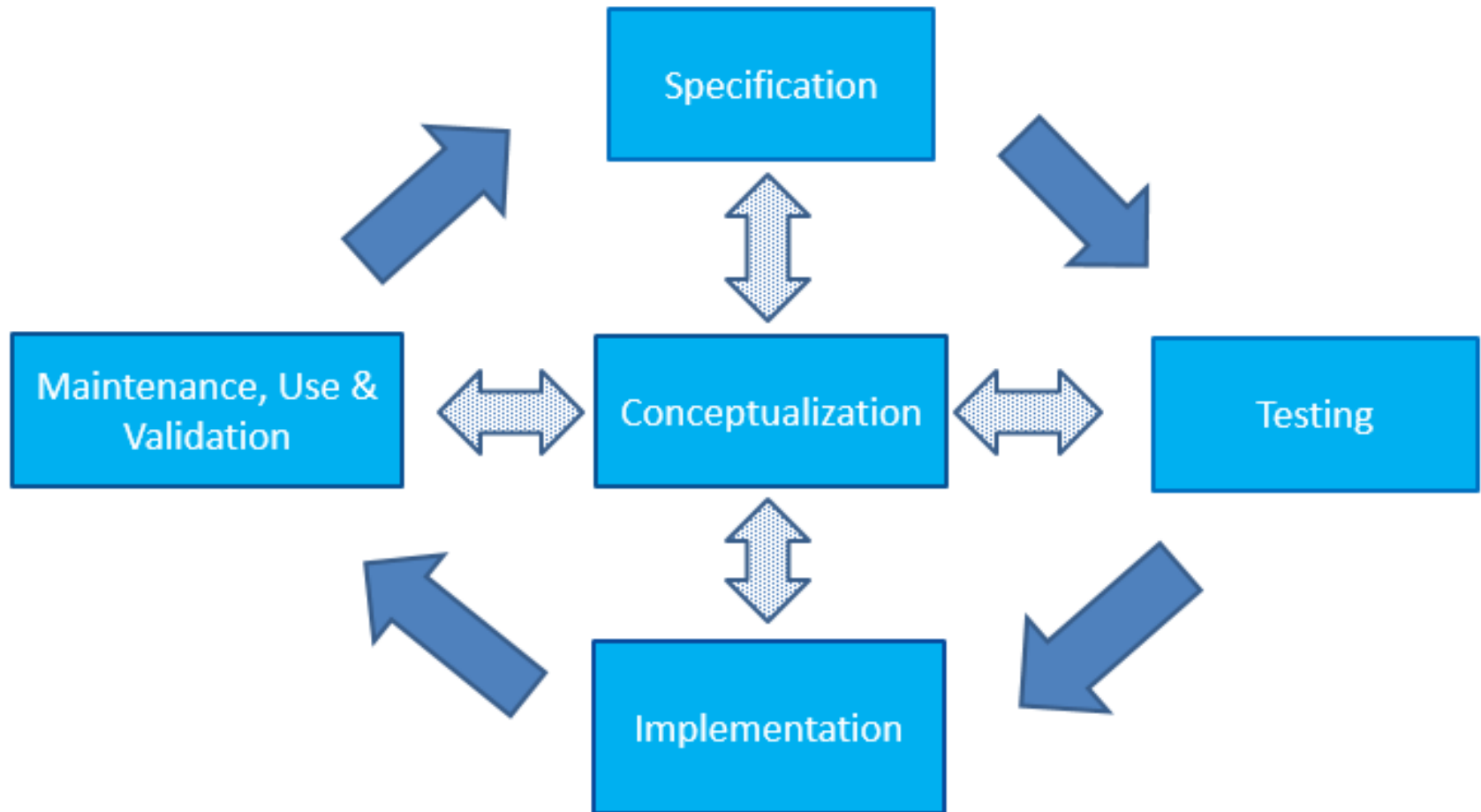
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CMS MMS Website

- Highlights best practices
- Quick reference guides and deep dive webinars
- Forms and templates

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What is the measure development process?

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Stakeholder Engagement

- Key component to each phase of development

- Valuable feedback to inform how quality of care is measured

- Important to include subject matter experts, providers, and patient perspectives

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Measure Conceptualization
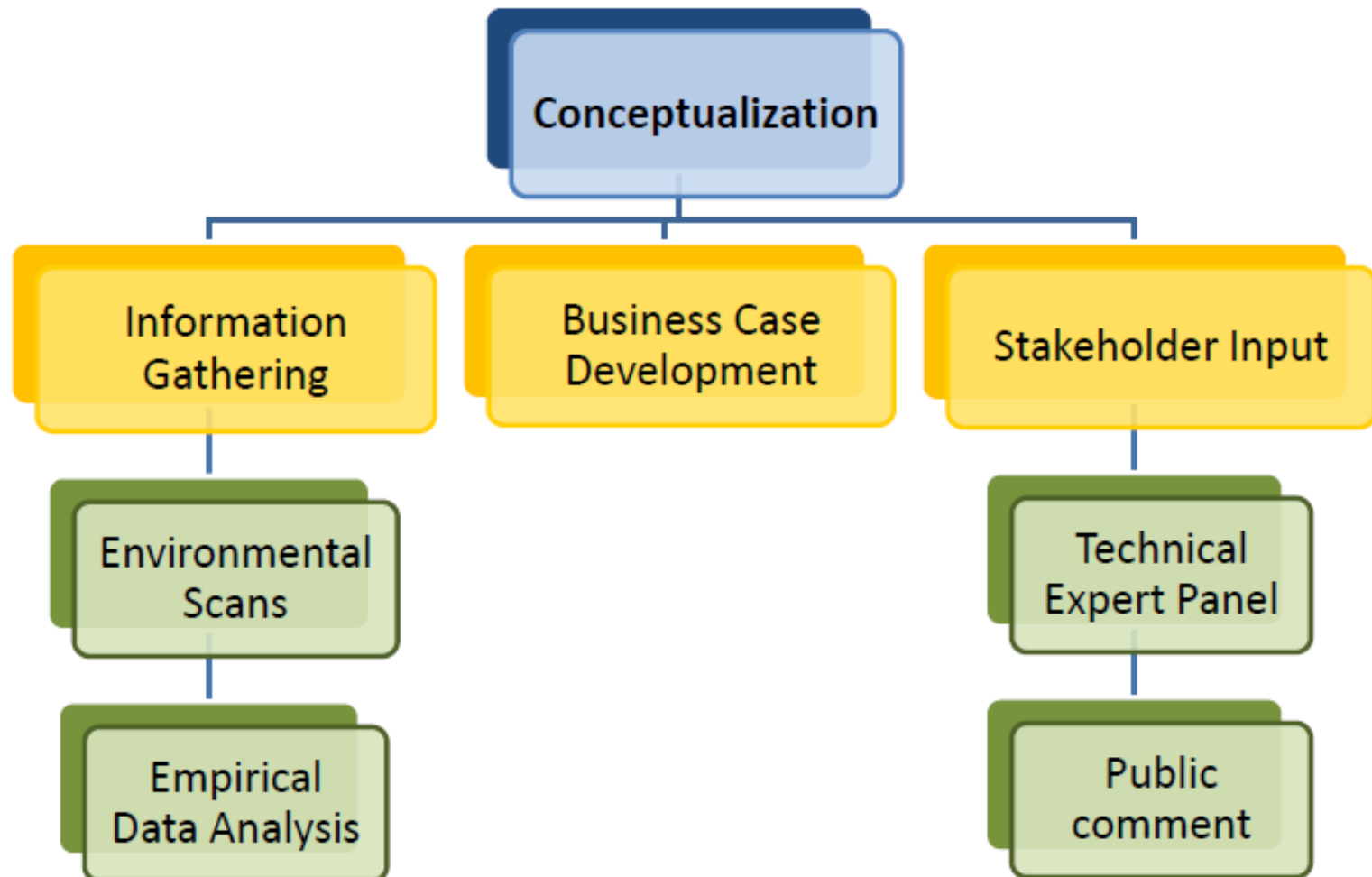
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Conceptualization: Information Gathering

- Environmental scans are analyses based on surveys and collected information regarding environmental factors that impact the definition and development of quality measures

- Example: Infant Mortality

  - Literature review on infant mortality – rates, impact, cost, clinical prevention methods and recommendations

  - Look for current measures addressing the topic

  - Interview infant mortality experts

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Conceptualization: Business Case

- The business case should qualify and quantify the pros and cons of implementing the measure.

- It should demonstrate:
  - Why the measure is needed and how it furthers the aims and objectives of CMS
  - The value of the measure, and why it is the best balance of cost, benefits, and risks
  - The viability of the measure as it relates to the healthcare sectors ability to respond
  - Realistic and affordable costs
  - Sufficient capacity within the system to implement the measure

Conceptualization: Stakeholder Input

- Convene a Technical Expert Panel (TEP)
  - A group of stakeholders who contribute direction and thoughtful input to the measure developer throughout the development process
- Engage patients and families
- Public Comments

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Measure Specification

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Measure Specification
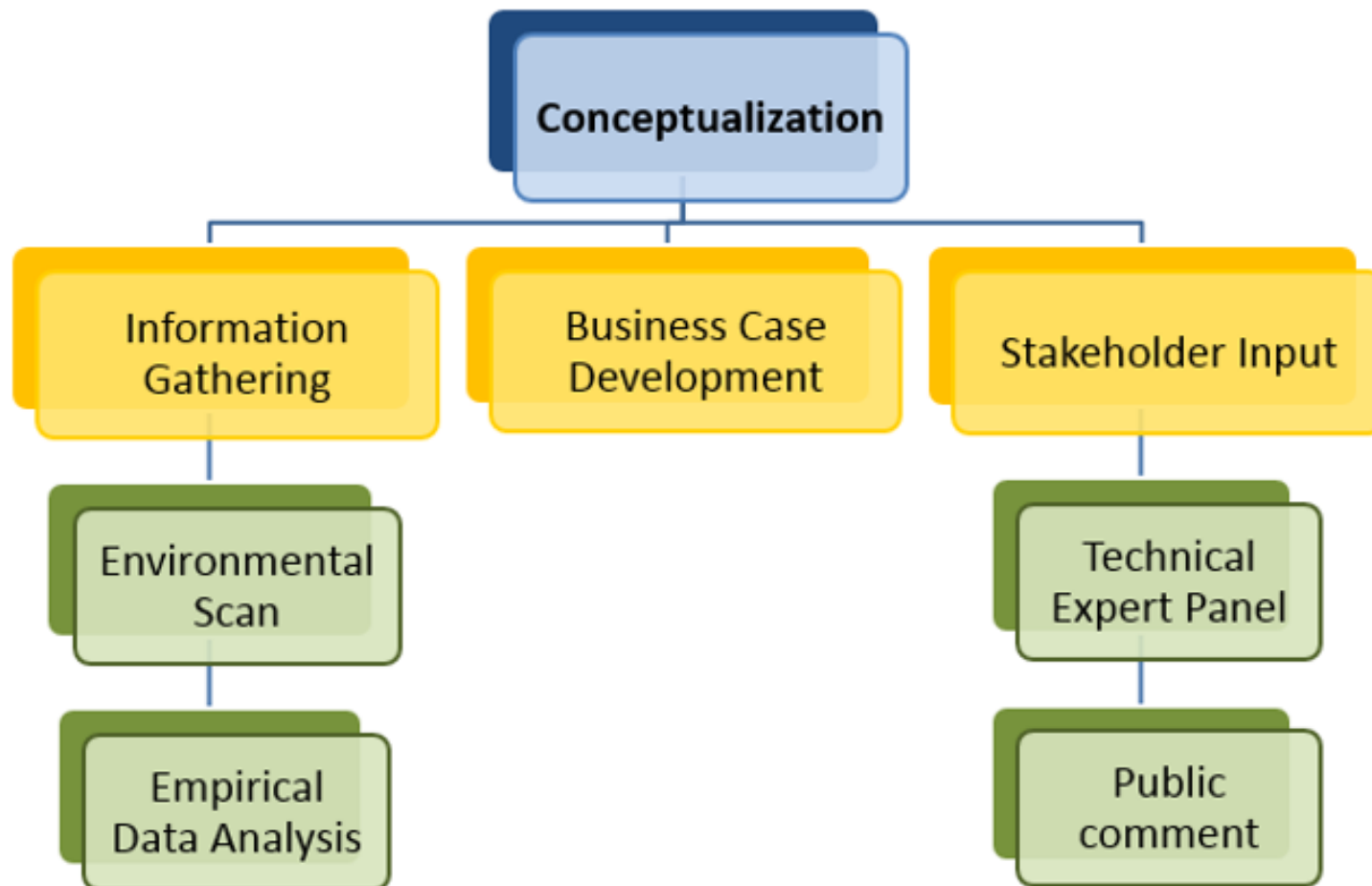
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Specification: Technical Specifications

Measure specifications provide the comprehensive details that allow the measure to be collected and implemented consistently, reliably, and effectively

- Develop the candidate measure list
- Develop precise technical specifications and update the MIF
- Define the data source
- Specify the code systems
- Construct data protocol
- Document the measures

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Specification: Technical Specifications

Measure Components

- Initial population
- Denominator
- Numerator
- Exclusions and exceptions
- Calculation algorithm

Detailed Data Elements

- Measure name, description
- Data sources
- Key terms, data elements, code sets
- Unit of measurement or analysis
- Sampling
- Risk adjustment
- Time windows
- Measure results

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Specification: Harmonization

- Harmonization standardizes similar measures when their differences do not make them scientifically stronger or more valuable.
- Harmonization may include, but is not limited to:
    - Age ranges
    - Performance time period
    - Allowable values for medical conditions or procedures; code systems, descriptions
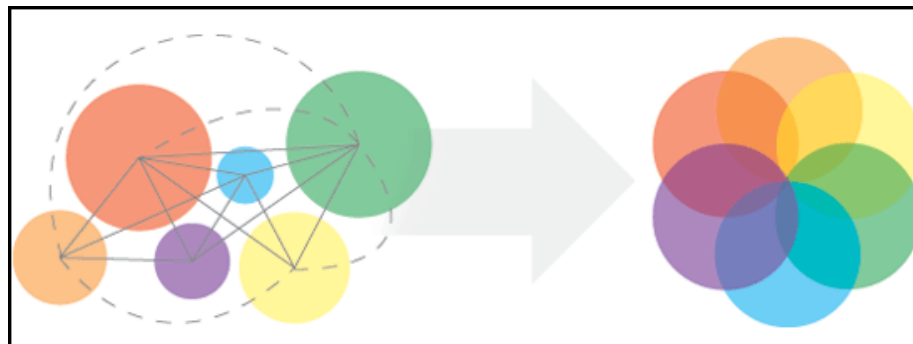
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Specification: Stakeholder Input

- A key time to get additional public comments include the measure specification drafting phase.

- Comments received during the public comment period will be reviewed and taken into consideration by the measure developer and the TEP and will often result in revisions to the measure specifications.

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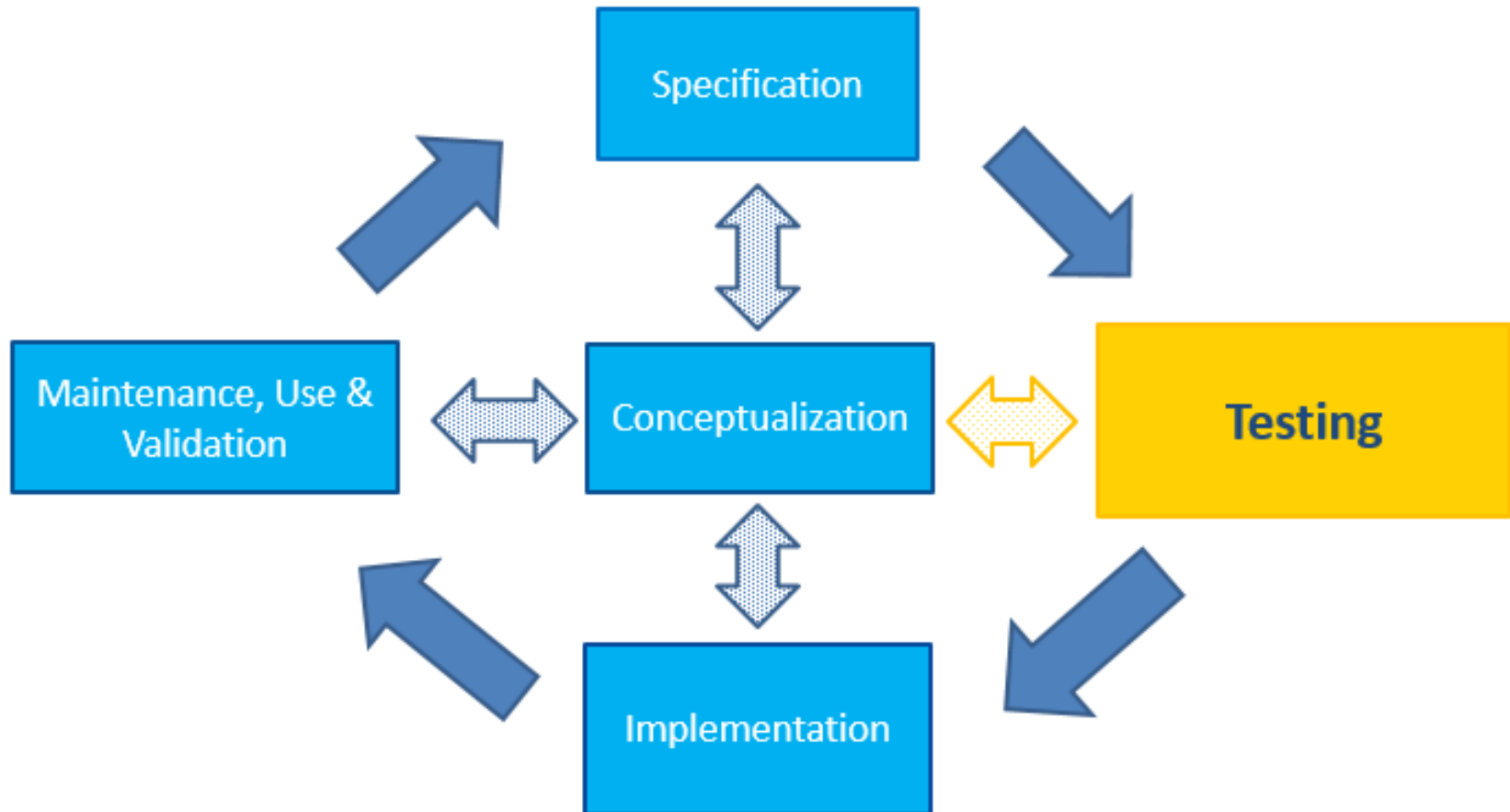
Measure Testing

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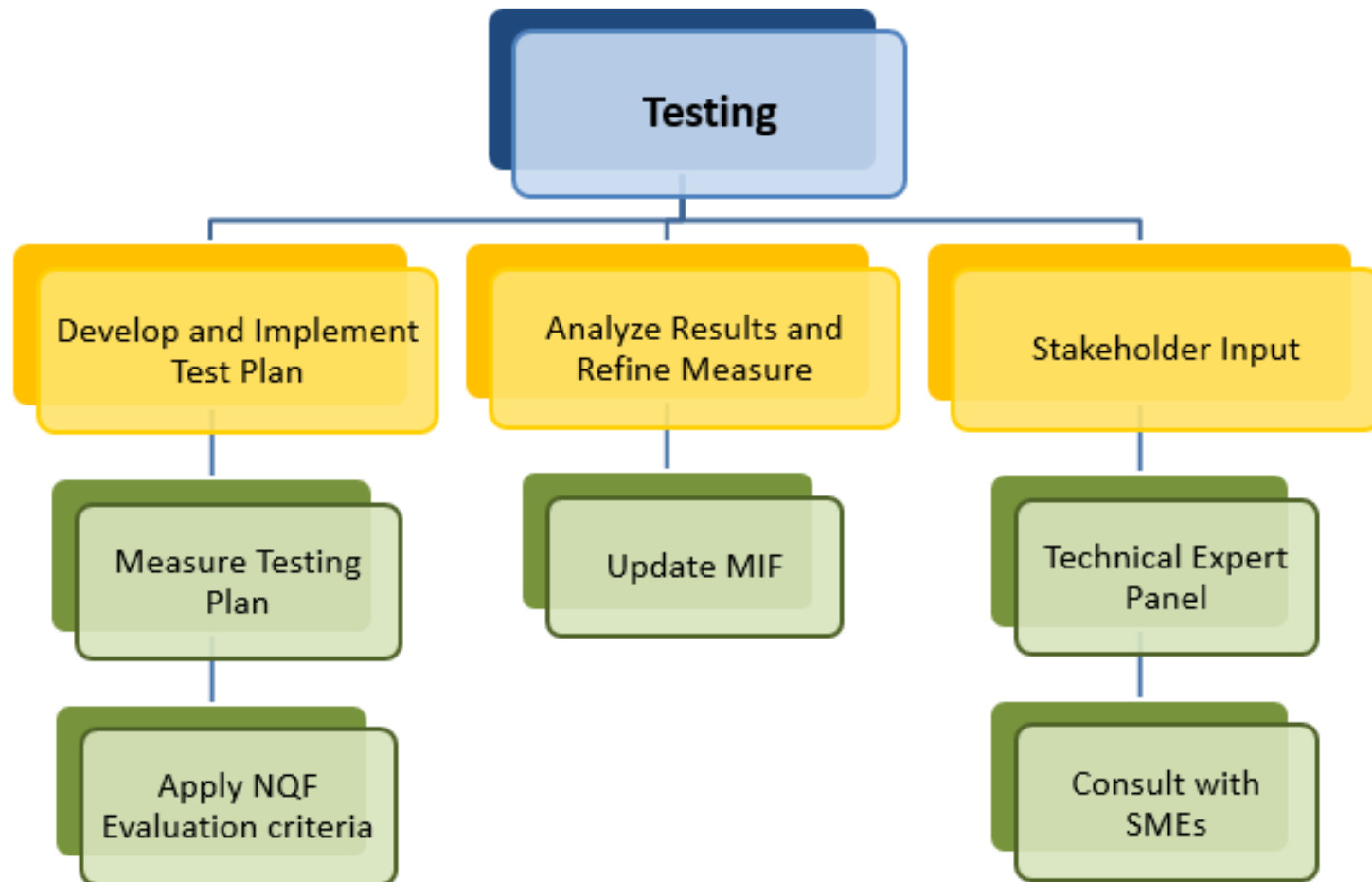
Measure Testing

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Testing: Developing and Implementing Testing Plan

Measure Testing means testing quality measures, including the components of the quality measure such as the data elements, the scales (and items in the scales if applicable), and the performance score.

- **Alpha Testing**
  - Prior to completing technical specifications
  - Convenience sampling
  - Helps identify early issues with specifications
- **Beta Testing**
  - Conducted after detailed and precise specifications are developed
  - Strives for representative sample sizes (meaning multiple sites/settings)
  - Helpful to assess or revise complex calculations for a measure

Testing: Analyzing the Results
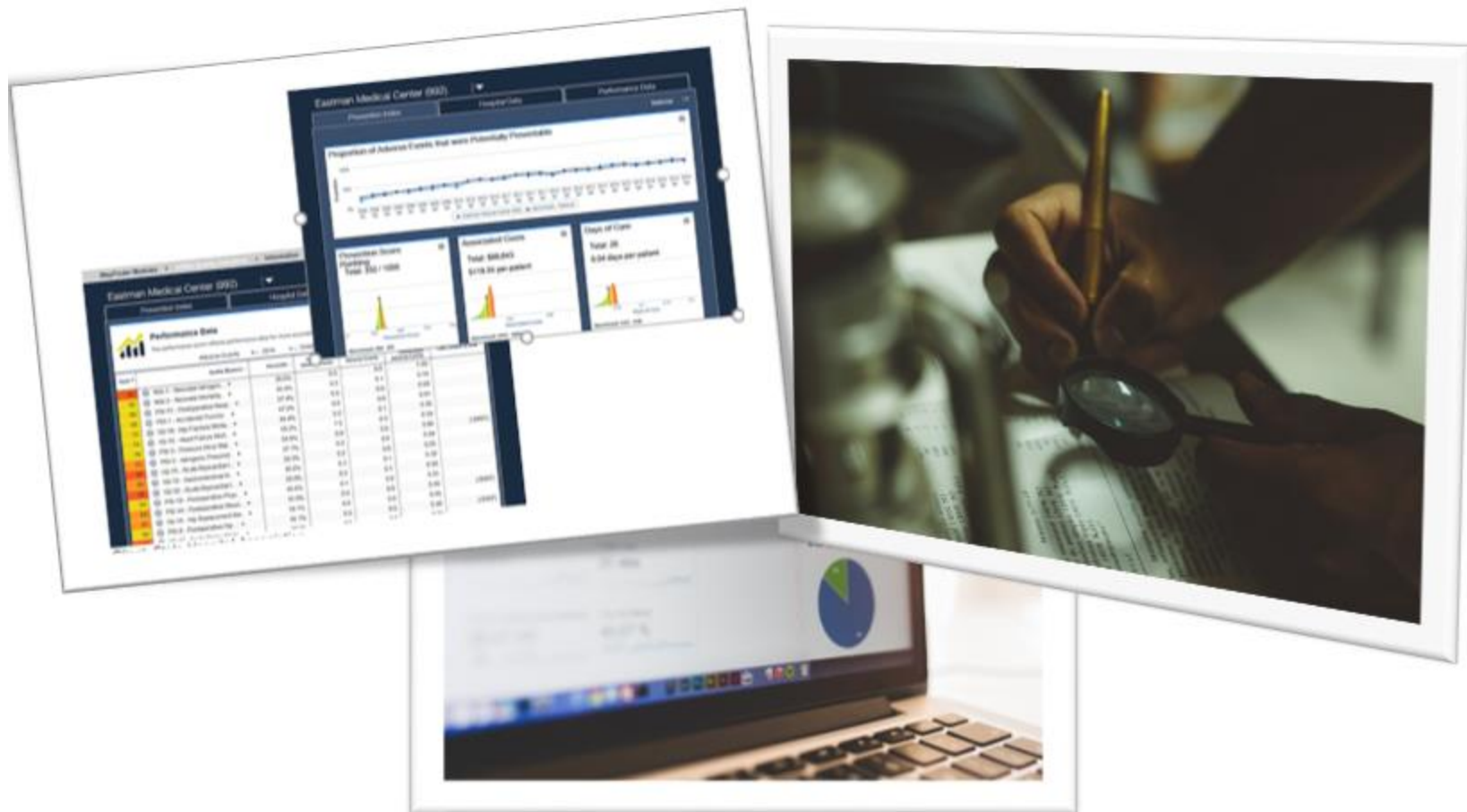
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Testing: Stakeholder Input

- Obtain stakeholder input at several points throughout the testing process
  - Should be related to measure specifications, testing plans, and also to burden in implementing the plan
- Options include:
  - Formal TEP
  - Consulting with SMEs
  - Outreach to professional associations or patient-advocacy groups
  - Public comments

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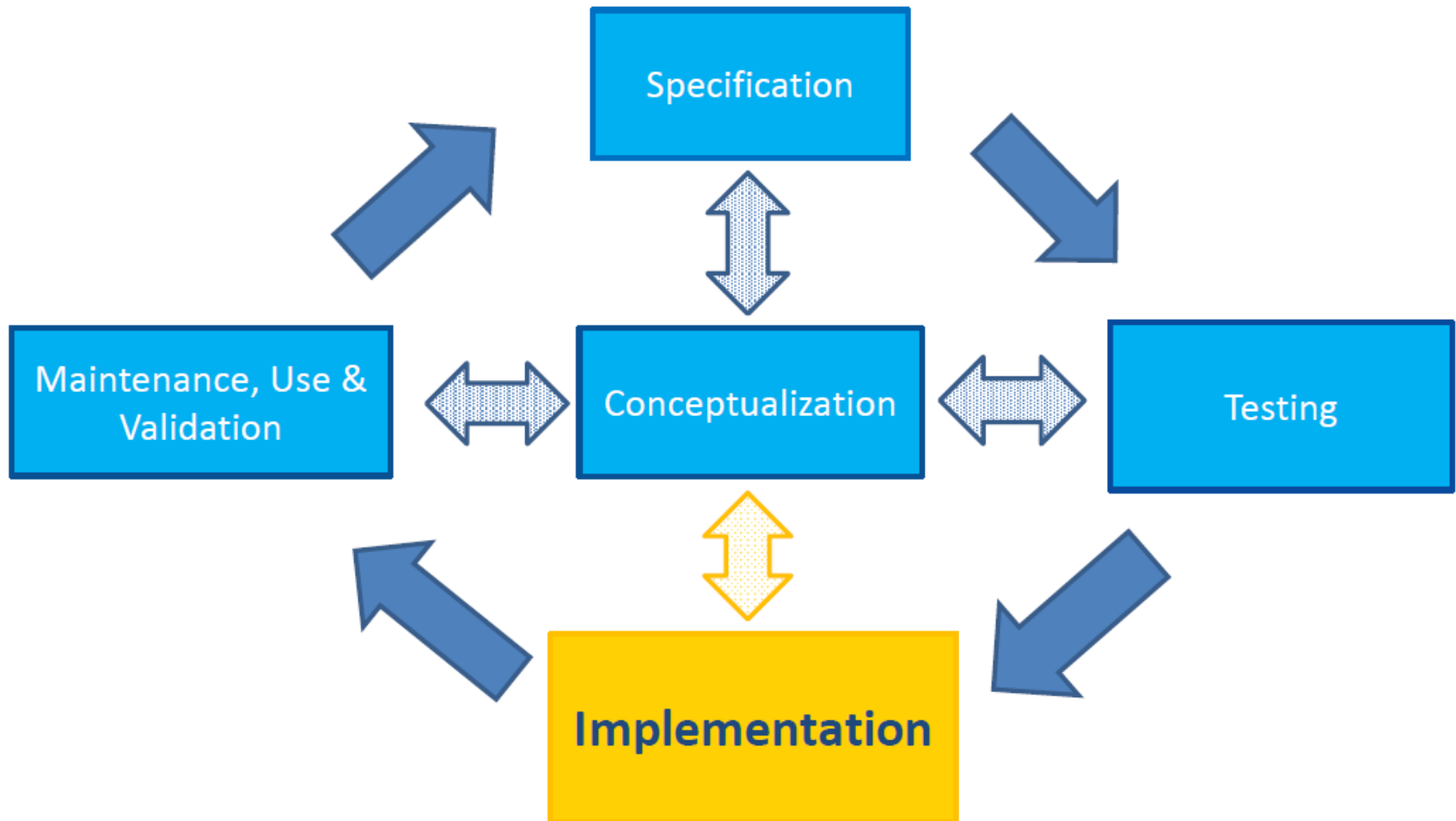
Measure Implementation

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Measure Implementation

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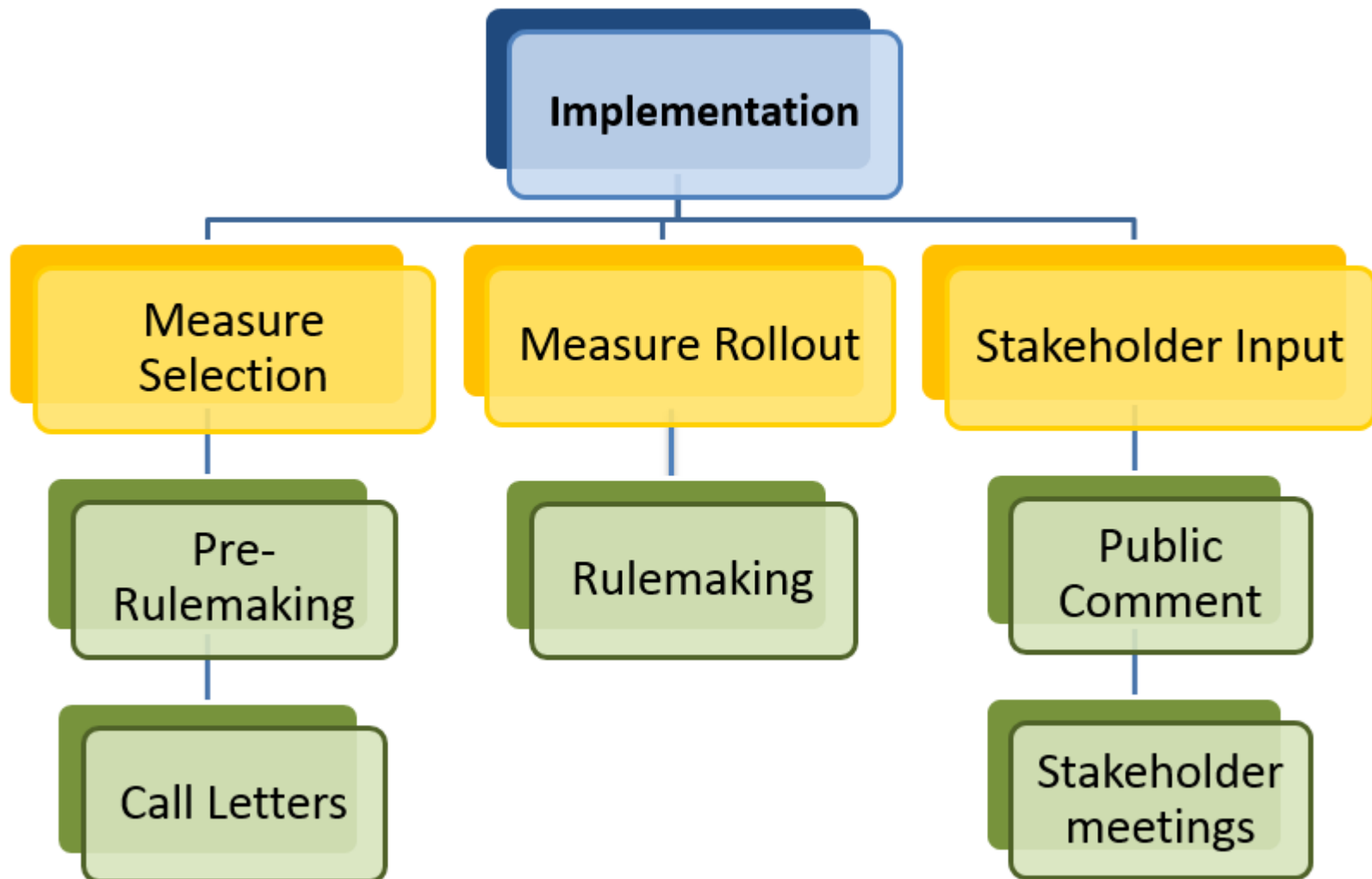
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Implementation: Measure Selection

Measure Implementation refers to the transparent process by which a measure is submitted for use in a CMS program, and is subject to stakeholder and public review before ultimately being accepted or declined for use

- There are different paths that a measure can take for implementation depending on the program
  - Pre-Rulemaking Process
  - Annual Call Letter
- The path of a measure's rollout depends on a number of factors like scope, data collection methods, and healthcare provider being measured

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Implementation: Stakeholder Input

- The implementation process for measures is meant to be transparent and open to the public for comments and questions
- Comments and feedback can be submitted through the Pre-Rulemaking or Rulemaking processes or through ad hoc comment processes
- Developers can also convene stakeholders throughout the implementation processes to resolve a

Measure Use, Continuing Evaluation, and Maintenance
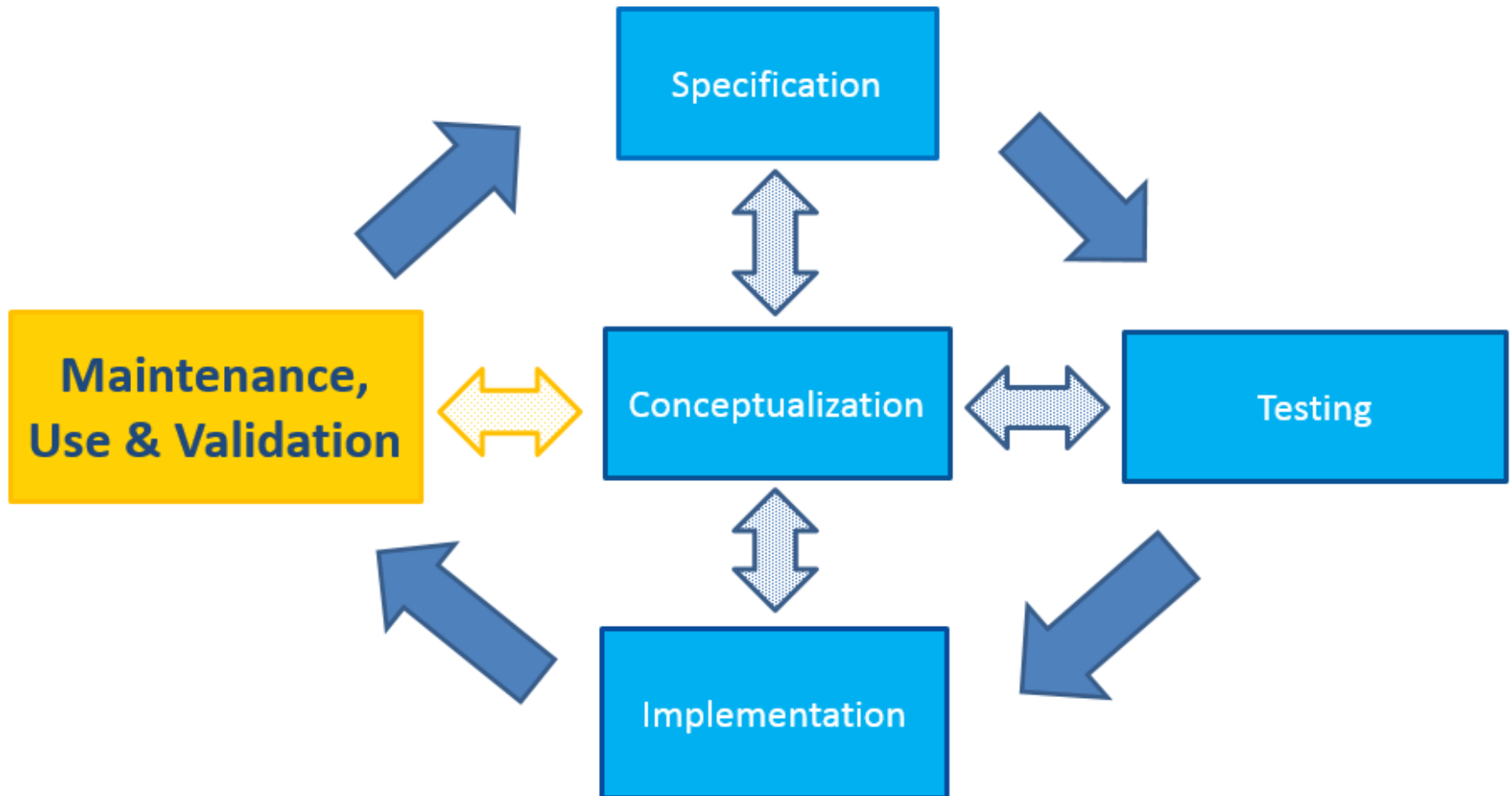
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Measure Maintenance, Use & Validation
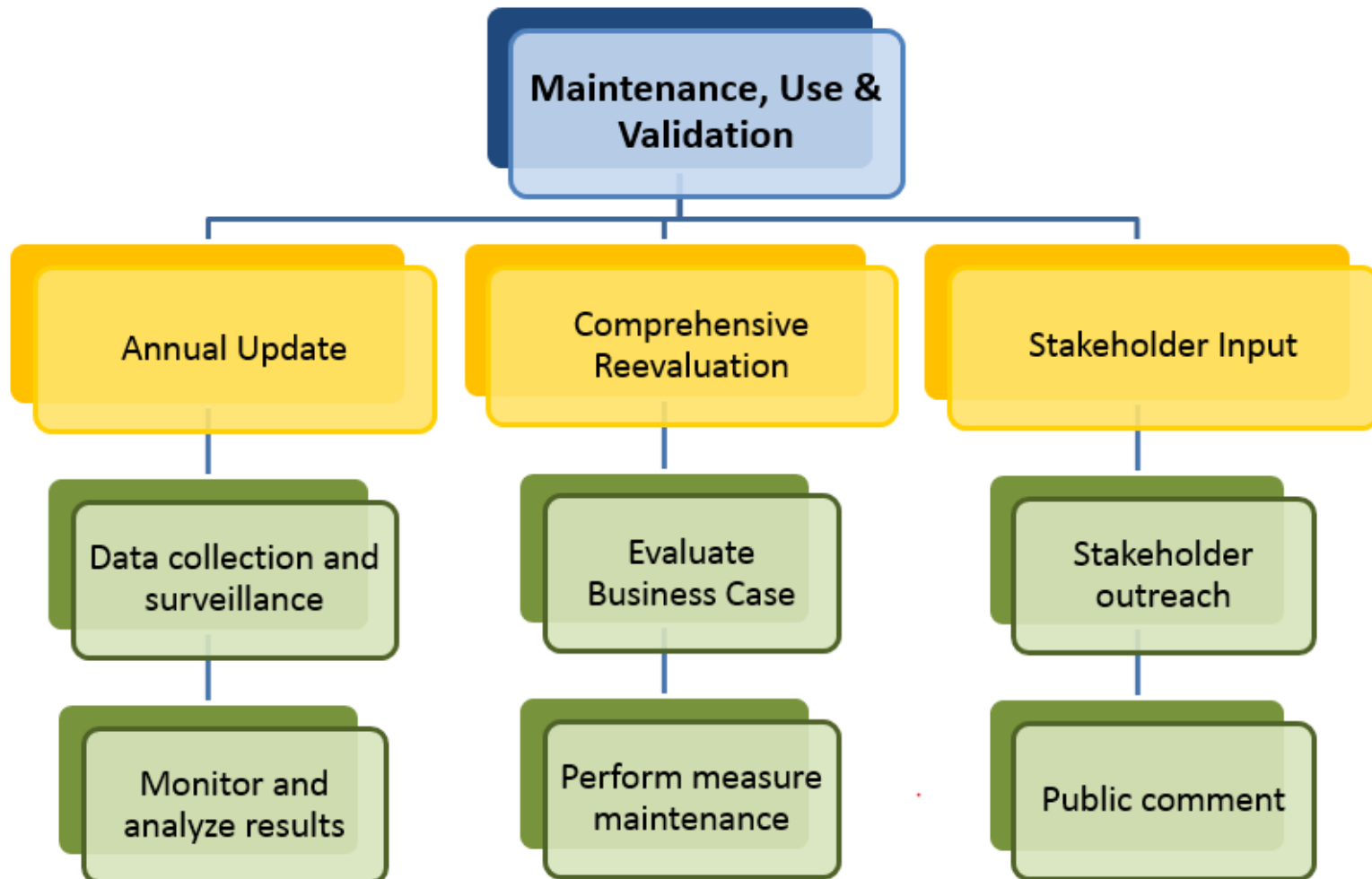
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Maintenance: Annual Update and Reevaluation

- Contributions measured *continue to be* <u>important</u>

- Results *drive significant improvements* in healthcare

- Data elements, codes, and parameters are *still the most appropriate*

- Calculation methods continue to *reflect a clear and accurate* representation of variation in a health outcome or its <u>tightly linked processes</u>

- Measure continues to be <u>unique</u> *or best in class*

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Maintenance: Annual Update and Reevaluation

Measure Update
- Limited review of precision of measure's specifications
- Completed annually or semi-annually

Comprehensive Re-evaluation
- Required every three years
- Uses a process structure similar to measure development

Ad Hoc Review
- Limited examination of measure based on new information
- Completed as quickly as possible, regardless of the timing with respect to the annual or three-year cycle

Maintenance: Stakeholder Input

- Even though the annual update, comprehensive reevaluation, and ad hoc reviews are separate activities, they can occur together and all require public solicitation for feedback

- In turn, each of these review processes are then reported back to the p
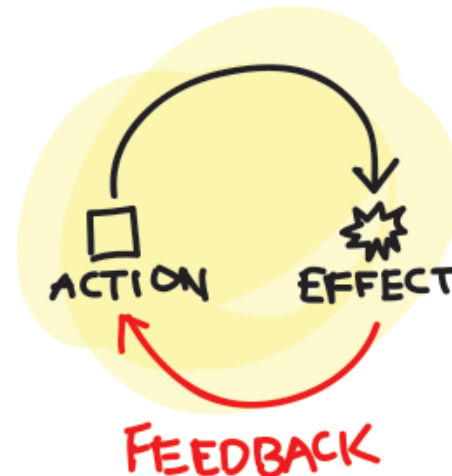
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Helpful Tools

CMS Blueprint

Measures Management System Website

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Helpful Tools

CMS Pre-Rulemaking Website

Submitting Candidate Measures

Stakeholders can submit candidate quality and efficiency measure specifications for CMS review using JIRA - an issues tracking system. CMS opens JIRA in the second quarter of the fiscal year to receive these measures.

Note: User credentials are required to access the JIRA system. If you need access to JIRA, refer to the 2018 CMS Measures under Consideration User Guide and Quick Start Guide for JIRA for assistance.

Measure submitters are encouraged to use the JIRA MUC Template Blank to gather required information in advance of entering the measure specifications into JIRA.

Candidate measures for the Merit-based Incentive Payment System (MIPS) are required to have a completed peer-reviewed journal article template and attached to the measure record in JIRA. Examples of completed templates are also provided below for your reference.

CMS Measures Inventory Tool (CMIT)

CMS Measure Processes for Implementation of a Measure

Pre-Rulemaking Process

List of Measures under Consideration for December 1, 2017

Rulemaking Process

FEDERAL REGISTER
The Daily Journal of the United States Government

Wednesday, January 24th

Current Issue
101 documents from 36 agencies (139 Pages)
86 Notices 3 Proposed Rules 12 Rules

Public Inspection

Special Filing
updated on 04:15 PM, on Wednesday, January 24, 2018
17 documents from 10 agencies
8 Notices   6 Presidential Documents
1 Proposed Rule   2 Rules

Regular Filing
updated on 08:45 AM, on Wednesday, January 24, 2018
31 documents from 15 agencies
17 Notices   8 Proposed Rules   6 Rules

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Measure Requirements for Use in CMS Quality Programs

- Respond to specific program goals and statutory requirements.

- Address an important topic with a performance gap and be evidence-based

- Focus on one of the CMS Quality Priorities and Meaningful Measure areas

- Identify opportunities for improvement.

- Avoid duplication with other measures currently implemented in programs

- Include a title, numerator, denominator, exclusions, measure steward, data collection mechanism

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CMS Pre-Rulemaking Process

- Measure developers submit quality measures for consideration by 18 quality reporting and payment programs

- The Measures under Consideration (MUC) list is reviewed by CMS Program Leads
  - Final list published by Dec. 1 each year

- Measures are then submitted to the Measure Application Partnership (MAP) workgroups to undergo expert review and recommendations

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Measures Application Partnership (MAP)

- MAP is a multi-stakeholder partnership that provides recommendations on quality measures for CMS programs
  - MAP workgroups are convened and facilitated by NQF
  - Separate from NQF endorsement
- Goal is to maintain transparency and encourage public engagement

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CMS Rulemaking Process

- Method by which CMS includes measures for use in their programs and initiatives
  - All CMS programs that go through Pre-Rulemaking participate in Rulemaking
- Each program that participates publishes one Proposed Rule and one Final Rule annually
  - Public can provide feedback on the Proposed Rule via public comment

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Measure Implementation: Non-Pre-Rulemaking

- Not all measures go through pre-rulemaking
  - Example: Marketplace Quality Initiatives
  - Specific measures may not be listed in the Final Rule
- Process
  - CMS issues a call letter to solicit measures
  - Submitted measures go through the DHHS clearance process
  - Measures *may* go to MAP for review and decision
  - Measures undergo public comment
  - CMS issues a final letter (rather than a Final Rule)

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CMS vs. NQF Submission

NQF Submission= Endorsement	CMS Submission= Implementation into a Program
- NQF endorsement process assesses whether a measure meets key requirements - Evaluation criteria: - Importance - Scientific Acceptability - Feasibility - Usability/Use - Harmonization - Separate from MAP review/implementation	- CMS implementation process(es) include all activities associated with taking a measure from development to active and used in a program. - Includes measure selection processes and measure rollout - Uses same evaluation criteria as NQF - NQF endorsement is not a requirement for implementation, but it is valued

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How Can You Participate?

- Technical Expert Panels
  - CMS requires TEPs for business cases, reviews of testing results, and determining which measures should be submitted
  - Should include persons/family members, providers, and recognized experts in the field
- Public Comment
  - Provides an opportunity for a wide array of interested parties to provide input on measures
- Encouraging patients and families to engage in the measure development process
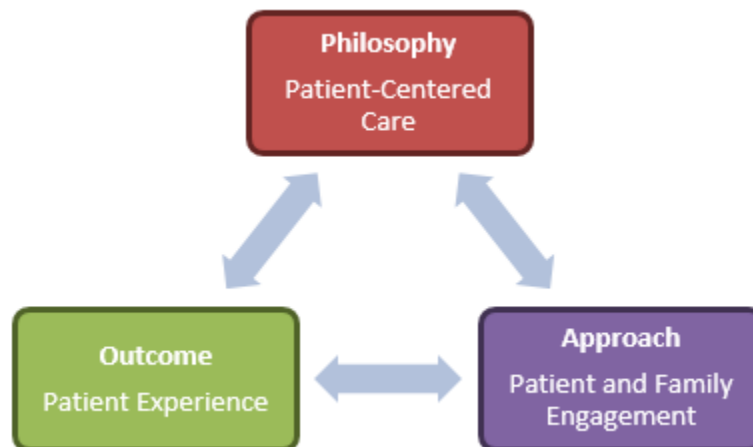
Patient and Family-Centered Approaches

- Person and family engagement is the process of involving persons and family representatives in a meaningful way at each stage of the measure development process.

  Person: Non-healthcare professional representing those who receive healthcare.

  Family representatives: Other non-healthcare professionals representing those who receive healthcare such as caregivers.

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Patient and Family-Centered Approaches

Benefits Healthcare Consumers

- Works to identify issues that are important and meaningful
- Identifies information that consumers need to make informed healthcare decisions

Benefits Measure Developers & CMS

- Helps develop measures that are relevant and useful to consumers
- Supports the creation better measures
- Increases the understanding of measures by consumers
- Helps craft messaging that will resonate with consumers

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Patient and Family-Centered Approaches

- Person or family-representative only TEPs

- Working groups

- Focus Groups

- Text-based virtual community

- One-on-one interviews

- Testing (concept, cognitive, plain language)

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Patient and Family-Centered Approaches

- Network with providers or clinicians currently active on TEPs

- Reach out to consumer advocacy organizations

- Contact condition-specific advocacy organizations

- Contact organizations that have patient engagement representatives who are experienced mentors (e.g. PCORI Patient Engagement Advisory Panel)

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- MMS Website
  - https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/MMS/Index.html
- CMS MMS Blueprint
  - https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/MMS/Downloads/Blueprint-130.pdf
- CMS Pre-rulemaking
  - https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html
- Federal Register
  - https://www.federalregister.gov

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Discussion Questions

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CMS Public Engagement Webinars

Planned Upcoming Webinars:

- Today's session will be held again next week for those that were not able to join today.

  – Session #2: June 14, from 4:00-5:00pm EST

- Email: MMSsupport@battelle.org

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CMS Measure Development Education & Outreach

Contact information:

Measures Management System Contract Holder: Battelle

Contact: MMSsupport@Battelle.org