NQF Endorsement and Maintenance

This document explains the measure developer’s roles and responsibilities in relation to the National Quality Forum’s (NQF’s) measure endorsement and maintenance processes. NQF currently serves as the consensus-based entity (CBE) regarding performance measurement for the U.S. Department of Health and Human Services (HHS), as required in the Medicare Improvements for Patients and Providers Act of 2008. This information supplements the content found in the Blueprint, Chapter 7.1, The Implementation Process and Chapter 8, Measure Use, Continuing Evaluation, and Maintenance.

1 NQF

NQF is a not-for-profit, non-partisan, membership-based organization that works to catalyze improvements in healthcare. NQF endorses quality measures through a transparent, consensus-based process that incorporates feedback from diverse groups of stakeholders to foster healthcare quality improvement. NQF endorses measures only if they pass five measure evaluation criteria: importance to measure and report, scientific acceptability of measure properties, feasibility, usability and use, and related and competing measures.

To the extent feasible, CMS uses NQF-endorsed measures in CMS public reporting and value-based purchasing programs. However, measure developers do not necessarily submit all measures to NQF for endorsement. CMS will consider non-endorsed measures if they meet necessary criteria.

2 Measure Submission to NQF

2.1 When to Submit Measures to NQF

NQF requires measure stewards or measure developers to submit an Intent to Submit form at least 3 months prior to the designated cycle’s measure submission deadline. Figure 1 shows the NQF measure production and monitoring timeline. Deadlines for the Intent to Submit form are generally August 1 (i.e., fall) and January 2 (i.e., spring) every year. The Intent to Submit form submission notifies NQF of the
measure steward’s or measure developer’s readiness to submit a measure for endorsement consideration and allows adequate opportunity for technical assistance before submission. Measure developers submit up-to-date testing information and full measure specifications to NQF at the same time they submit the Intent to Submit form.

2.2 Complete the NQF Measure Submission

Measure developers must submit their measures via an online Measure Submission Form on the NQF website which enables users to

- gain secure access to the Measure Submission Form from any location
- save a draft version of the Measure Submission Form and return to complete it at their convenience
- print a copy of the Measure Submission Form for reference or other uses, if desired

When initiating an online measure submission, the measure developer may contact NQF and request access for additional users to enter data in the online form. This process enables the measure developer to assign sections of the form to appropriate staff and facilitates internal review.

To the extent possible, CMS aligned its Measure Information Form (MIF) and Measure Justification Form (MJF) with the NQF Measure Submission Form. CMS designed the MIF and MJF to help the measure developer gather the information they need for a successful NQF submission. CMS organized both forms to minimize rework during the NQF measure submission process.

The measure developer is responsible for completing the NQF Measure Submission Form and ensuring that the information is sufficient to meet NQF’s requirements. The measure submission is the measure developer’s presentation of the measure to the standing committee and others to demonstrate that the measure meets the criteria for endorsement. The standing committee shapes the project’s scope and develops specific plans for a project, offers expert advice, obtains input from relevant stakeholders,
and makes recommendations to NQF membership about measures proposed for endorsement. NQF requires the measure developer to submit a form for each measure they submit for endorsement consideration. Tips for successful submissions include

- **Contacting NQF project staff** for technical assistance with the submission and evaluation process.
- Answering every part of the NQF measure submission clearly and concisely.
- Providing substantive, practical responses to each item.
- Ensuring the form is complete and understandable with enough information that it can be a standalone document.
- Including specific page numbers, table numbers, links, etc. in supplementary materials (e.g., attachments, references, and URLs).
- Submitting attachments or URLs, as needed, for long lists of codes or other data elements used in the measure, details of a risk adjustment model, and the calculation algorithm.
- Providing any pilot test data available, even if the data do not satisfy NQF’s entire testing requirements.
- Identifying all possible endorsement roadblocks in advance and addressing them in the measure submission.
- Documenting the rationale for all decisions in the specifications.
- Documenting the rationale for all denominator and numerator exclusions.
- Discussing any controversies about the science behind the measure and why the measure developer built the measure as it did.
- Double-checking the document to ensure there are no unanswered questions (i.e., no fields are blank and all questions have a response).

For technical questions about the online submission, measure developers should contact the appropriate NQF project manager/director or measuremaintenance@qualityforum.org. Measure developers should direct questions about the online Measure Submission Form content or information requirements to the NQF central project email found on the project’s Information page on the NQF website.

The measure developer should search for related and competing measures early during the information gathering phase of development and again just prior to submission to NQF. Before NQF will even consider a measure submission, the measure developer must attest that they considered and addressed harmonization with related measures and issues with competing measures, as appropriate. Measure Evaluation Criterion 5, Comparison to Related or Competing Measures, found in NQF’s Measure Evaluation Criteria and Guidance for Evaluating Measures for Endorsement, is the standard NQF uses to evaluate harmonization.

A measure developer may not discover that measures exist for the same condition, process of care, outcome, or care setting until after the submission of measures to NQF. If that happens, the NQF standing committee reviewing the measures could select a superior measure or request that both responsible measure developers create a harmonization plan that addresses the possibility and challenges of harmonizing their respective measures. The standing committee would consider the harmonization plan and decide whether to recommend the measure for endorsement.
3 NQF ENDORSEMENT PROCESS

NQF follows a Consensus Development Process and notional timeline, depicted in Figure 2. Measure developers will want to monitor the NQF Submitting Standards website for new information, as NQF periodically changes their processes and timelines. Measure developers may now begin their measure submission at any time. There are two evaluation cycles per year. Measure developers should refer to the NQF web page, Submitting Standards, for more information on submitting new measures, and refer to the Maintenance of NQF-Endorsed Performance Measures web page for information about measure maintenance reviews.

Figure 2. NQF Consensus Development Process and Notional Timeline

4 MEASURE DEVELOPER’S ROLE DURING NQF EVALUATION

During its evaluation, NQF may have questions about the submitted measure. These questions may come from NQF staff, the project standing committee, or the Scientific Methods Panel. To facilitate response to questions, NQF encourages active involvement by the measure developer in the NQF process while the measure is under consideration. When there is discussion by the project standing committee and Consensus Standards Approval Committee (CSAC) meetings about a measure, a member of the measure developer’s team should attend the meeting prepared to explain and defend the measure. By attending the meetings, the measure developer will gain better understanding of NQF’s approach to the overall project as well as the specific measures under consideration. This level of active involvement better positions the measure developer to answer NQF’s questions. During discussions, the measure developer should be prepared to defend the importance of the clinical topic, the scientific basis for the measure, the construction of the measure, and measure testing results.

For electronic clinical quality measures (eCQMs), the measure developer, with support from a health quality measures format (HQMF) or eCQM standards subject matter expert, communicates and collaborates with NQF during the evaluation.
Questions may also arise during the NQF public comment period and may also need review by the technical expert panel (TEP) involved with measure development or reevaluation.

During its evaluation, NQF may suggest changes to the measure to make it more acceptable, to harmonize with other measures, or both. If this occurs, the measure developer may then consult with the TEP involved with measure development or reevaluation.

5 **TRIAL USE APPROVED MEASURES**

In some cases, NQF may grant an eCQM Approval for Trial Use status. Measures with Trial Use approval will lose that status after 3 years. The measure developer can submit the measure for endorsement prior to or after the end of the 3-year trial use period. The NQF Trial Use Approval Policy can be found on the NQF website along with the Measure Testing Form for Trial Use Approval.

6 **MEASURE MAINTENANCE FOR NQF**

Once NQF has endorsed a measure, the measure developer supports ongoing maintenance of the measure endorsement if it is part of the scope of work for that measure developer. The measure developer is responsible for being familiar with NQF’s current measure endorsement maintenance processes as described on NQF’s website. The review cycles are the same, as the standing committee for each project reviews both the measures undergoing maintenance and new measures. The design of NQF’s endorsement maintenance process ensures NQF continues to endorse only measures that meet the current NQF evaluation criteria.

7 **KEY POINTS**

NQF is the consensus-based entity that currently oversees measure endorsement. Using a transparent, consensus-based process, NQF reviews measures against well-established evaluation criteria. CMS considers NQF-endorsed measures to be of high quality and suitable for use in CMS programs. Therefore, CMS highly encourages measure developers to seek NQF endorsement for measures.

To submit measures for endorsement, measure developers must complete NQF forms. CMS has aligned the MIF and MJF with the NQF Measure Submission Form. The measure developer should pursue opportunities to harmonize with related or competing measures prior to submitting a measure for endorsement. Once the measure developer submits a measure for endorsement the expectation is that they will respond to questions from NQF committees to facilitate measure review.

If NQF endorses a measure, the measure developer is responsible for helping to maintain that measure’s endorsement status. Measure developers should review NQF’s website for current maintenance requirements.
REFERENCES


