

# Public Comment Opportunity



## **ENDORSEMENT AND MAINTENANCE: COMMITTEE ENGAGEMENT ENHANCEMENTS FOR THE SPRING 2024 CYCLE**

### *Committee Roles, Voting, and Meeting Structure Changes*

As the Centers for Medicare & Medicaid Services (CMS) certified Consensus-Based Entity (CBE), Battelle is committed to ensuring that the quality measurement review process is reliable, transparent, attainable, equitable, and most of all, meaningful. To facilitate its consensus-based process, Battelle formed the Partnership for Quality Measurement (PQM)<sup>™</sup>, involving a variety of experts - clinicians, patients, measure experts, and health information technology specialists - to ensure informed and thoughtful endorsement reviews of qualified measures.

Beginning with the Fall 2023 endorsement and maintenance (E&M) cycle, measure developers and stewards submitted measures to Battelle for PQM endorsement review. Battelle appreciates the participation and engagement of all interested parties during the Fall 2023 cycle, including E&M committee members, developers, stewards, and members of the public.

In response to recent feedback received from E&M committee members and measure developers/stewards regarding the Fall 2023 cycle, Battelle seeks to implement several changes to the E&M committee roles, voting, and meeting structure. Taking effect in the Spring 2024 cycle, the proposed changes discussed below are intended to:

- Enhance the engagement and participation of Advisory Group members, patient partners, and members of the public;
- Reduce burden for E&M committee members (both Advisory and Recommendations Groups); and
- Mitigate confusion of roles for E&M committee members by aligning processes across both E&M and the Pre-Rulemaking Measure Review (PRMR).



Overall, the proposed changes are designed to enhance consensus-building, capturing measure review input in a less burdensome way, while maintaining diversity of voices.

*Proposed Changes to Be Implemented for the Spring 2024 Cycle and Beyond:*

1. **Advisory Group Meetings:** To improve the ability of the Advisory Group members to raise questions and share perspectives verbally regarding the measures under endorsement review, Battelle will convene the Advisory Group members for each committee 2-3 months prior to the endorsement meetings. There is no voting during these meetings, as Advisory Group members will be asked to review the measures assigned to their respective committee and attend a virtual meeting to ask questions and comment on strengths and limitations of the measures. Recommendations Group members and measure developers/stewards are invited and encouraged to attend these Advisory Group meetings to listen to the discussion. A frequently asked questions (FAQ) document will be shared with developers/stewards after the meetings, in which developers/stewards will be provided the opportunity to respond to the comments and questions. The FAQ along with developer/steward responses will be shared with the respective Recommendations Group for consideration in advance of the E&M endorsement meetings.
2. **Voting:** Due to implementing separate Advisory Group meetings noted above, the Recommendations Group will be the only group voting during the endorsement meetings. This further aligns with the PRMR process and mitigates potential burden associated with attendance and lack of quorum, which results in having to collect votes offline.
3. **Recommendations Group Size:** To accommodate the changes in voting, the Recommendations Group will increase its size to 20-25 individuals. Battelle will recruit members from the respective Advisory Group to serve on Recommendations Group for Spring 2024 cycle, while maintaining the diversity of voices and perspectives as outlined in [Table 4](#) of the E&M Guidebook.
4. **Public Comment Listening Sessions:** To further improve endorsement meeting efficiency, Battelle will host a series of Public Comment Listening Sessions prior to the close of the measure public comment period for that E&M cycle. These Listening Sessions are in addition to the written public comment opportunity and will be used to further capture additional public comment for E&M committee consideration. To facilitate these sessions, any interested party will have the opportunity to register for the session through the PQM website using an online form to give a brief verbal statement on one or more measures of their interest. Comments received during the public comment period and the Listening



Sessions are compiled and made publicly available on the PQM website prior to the E&M endorsement meetings. E&M committee members and measure developers/stewards are invited and encouraged to attend to listen to the comments. After the listening sessions, Battelle will draft a summary document, which is shared with the E&M committee, developers/stewards, and members of the public.

5. **Committee Independent Review Ratings:** To align with the changes noted above and to improve efficiency and reduce burden associated with measure reviews, E&M committees will no longer submit ratings of measures prior to the endorsement meetings (i.e., assigning a rating of “Met,” “Not Met, but Addressable,” “Not Met”). Rather, committees will continue to use the [PQM Measure Evaluation Rubric](#) to evaluate measures, review staff preliminary assessments, and consider Advisory Group and public comments prior to voting.

Battelle will accept public comments on the proposed changes from March 1 – March 22, 2024 (11:59 EST). Please submit your comments through the PQM website: <https://p4qm.org/media/2366>.

If you're having any difficulties or have any questions, please contact [PQMsupport@battelle.org](mailto:PQMsupport@battelle.org).