**Table 8**. Frequency of Data Elements for Included Samples by Health System

|  |  |  |
| --- | --- | --- |
| **Data Elements** | **Health System 1** | **Health System 2** |
| ***Patient Characteristics* — no. (%)** |  |  |
| Birth date | 4,812 (100) | 1,423 (100) |
| Sex | 4,812 (100) | 1,422 (99.9) |
| Race | 4,395 (91.3) | 1,407 (99.9) |
| Ethnic group | 4,453 (92.5) | 1,369 (99.2) |
| Primary insurance at index positive stool test | 3,277 (68.1) | 1,417 (99.6) |
| Primary language | 4,769 (99.1) | 1,412 (99.2) |
| ***eCQM Denominator Elements* — no. (%)** |  |  |
| Index positive stool test result date | 4,812 (100) | 1,423 (100) |
| Index positive stool test order location (i.e., facility group) | 4,812 (100) | 1,423 (100) |

**Table 9**. Frequency of Data Elements for Included Samples for 6 Facility Groups at Health System 1

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Data Elements** | **FG 1** | **FG 2** | **FG 3** | **FG 4** | **FG 5** | **FG 6** |
| ***Patient Characteristics* — %** |  |  |  |  |  |  |
| Birth date | 100 | 100 | 100 | 100 | 100 | 100 |
| Sex | 100 | 100 | 100 | 100 | 100 | 100 |
| Race | 88.7 | 98.5 | 90.5 | 91.7 | 90.7 | 88.1 |
| Ethnic group | 94.5 | 92.9 | 94.8 | 92.6 | 91.0 | 84.1 |
| Primary insurance at index positive stool test | 91.4 | 61.8 | 78.2 | 73.2 | 52.9 | 47.7 |
| Primary language | 96.9 | 99.5 | 99.2 | 98.8 | 99.6 | 100 |
| ***eCQM Denominator Elements* — %** |  |  |  |  |  |  |
| Index positive stool test result date | 100 | 100 | 100 | 100 | 100 | 100 |
| Index positive stool test order location (i.e., facility group) | 100 | 100 | 100 | 100 | 100 | 100 |

FG, facility group.

**Table 10.** Health System Characteristics and Overall eCQM Rates by Health System

|  |  |  |
| --- | --- | --- |
| **Characteristics** | **Health System 1**  **(n = 4,812)** | **Health System 2**  **(n = 1,423)** |
| Stool tests completed for colorectal cancer screening — no. | 95,809 | Not reported |
| Positive stool tests — no. (%) | 5,700 (5.9) | Not reported |
| Positive index stool tests — no. (%) | 5,049 (5.3) | 1,665 |
| Positive index stool tests excluded from eCQM — no. (%) | 237 (0.2) | 242 |
| Positive index stool tests included in eCQM — no. (%) | 4,812 (5.0) | 1,423 |
| Number with timely colonoscopy (eCQM numerator) — no. | 2,708 | 599 |
| eCQM rate of timely colonoscopy — % | 56.3% | 49.1% |
| Number of hospital-affiliated facility groups — no. | 6 | 1 |
| Number of measurement years — no. (range of years) | 6 (2018-2023) | 8 (2016-2023) |

**Table 11**. Patient and Test Characteristics for Included Samples by Health System

|  |  |  |
| --- | --- | --- |
| **Characteristics** | **Health System 1**  **(n = 4,812)** | **Health System 2**  **(n = 1,423)** |
| ***Age at index positive stool test*** |  |  |
| Mean (SD) — yr | 62.8 (8.5) | 62.6 (8.1) |
| Distribution — no. (%) |  |  |
| 45 to 49 yr | 395 (8.2) | 84 (5.9) |
| 50 to 64 yr | 2,107 (43.8) | 674 (47.4) |
| 65 to 75 yr | 2,310 (48.0) | 665 (46.7) |
| ***Sex — no. (%)*** |  |  |
| Female | 2,817 (58.5) | 800 (56.2) |
| Male | 1,995 (41.5) | 622 (43.7) |
| Unknown | 0 | 1 (0.07) |
| ***Race — no. (%)*** |  |  |
| Asian | 194 (4.0) | 19 (1.3) |
| Black | 259 (5.4) | 67 (4.7) |
| White | 3,929 (81.7) | 1204 (84.6) |
| Other\* | 13 (0.3) | 116 (8.2) |
| Unknown | 417 (8.7) | 16 (1.1) |
| ***Ethnic group — no. (%)*** |  |  |
| Hispanic | 402 (8.4) | 37 (2.6) |
| Non-Hispanic | 4,051 (84.2) | 1331 (93.5) |
| Unknown | 359 (7.5) | 55 (3.9) |
| ***Primary insurance at index positive stool test — no. (%)*** |  |  |
| Private | 1,902 (39.5) | 697 (50.0) |
| Medicare | 991 (20.6) | 627 (43.0) |
| Medicaid | 367 (7.6) | 82 (5.8) |
| Other | 17 (0.4) | 12 (0.8) |
| Unknown | 1,535 (31.9) | 5 (0.4) |
| ***Primary language — no. (%)*** |  |  |
| English | 4,340 (90.2) | 1372 (96.4) |
| Spanish | 277 (5.8) | 17 (1.2) |
| Other | 152 (3.2) | 22 (1.5) |
| Unknown | 43 (0.9) | 11 (0.8) |
| ***Type of index positive stool test — no. (%)*** |  |  |
| Fecal Immunochemical Test (FIT) | 1,607 (33.4) | 70 (4.9) |
| FIT-DNA (i.e., Cologuard) | 3,120 (64.8) | 1102 (77.4) |
| Guaiac Fecal Occult Blood Test (gFOBT) | 85 (1.8) | 252 (17.7) |

\*Patients identified as American Indian, Alaska Native, or Native Hawaiian or Other Pacific Islander.

**Table 12**. Patient Characteristics for Included Samples for 6 Facility Groups at Health System 1

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Characteristics** | **FG 1** | **FG 2** | **FG 3** | **FG 4** | **FG 5** | **FG 6** |
| ***Age at index positive stool test*** |  |  |  |  |  |  |
| Mean (SD) — yr | 64.1 (8.4) | 62.1 (9.0) | 62.4 (8.6) | 63.6 (8.3) | 62.2 (8.5) | 62.0 (7.9) |
| Distribution — % |  |  |  |  |  |  |
| 45 to 49 yr | 8.0 | 11.0 | 9.2 | 6.4 | 8.5 | 6.3 |
| 50 to 64 yr | 36.4 | 40.7 | 44.5 | 42.2 | 46.5 | 50.6 |
| 65 to 75 yr | 55.7 | 48.3 | 46.3 | 51.4 | 45.0 | 43.2 |
| ***Sex — %*** |  |  |  |  |  |  |
| Female | 56.0 | 67.7 | 54.2 | 63.1 | 56.7 | 54.0 |
| Male | 44.0 | 32.4 | 45.8 | 36.9 | 43.3 | 46.0 |
| Unknown | 0 | 0 | 0 | 0 | 0 | 0 |
| ***Race — %*** |  |  |  |  |  |  |
| Asian | 3.1 | 5.2 | 3.4 | 3.1 | 5.6 | 2.8 |
| Black | 0.6 | 1.2 | 6.9 | 5.4 | 5.7 | 11.4 |
| White | 84.4 | 91.9 | 80.2 | 82.8 | 79.1 | 73.9 |
| Other\* | 0.6 | 0.3 | 0 | 0.4 | 0.4 | 0 |
| Unknown | 11.3 | 1.5 | 9.5 | 8.3 | 9.3 | 11.9 |
| ***Ethnic group — %*** |  |  |  |  |  |  |
| Hispanic | 4.0 | 1.2 | 15.6 | 7.1 | 15.6 | 8.5 |
| Non-Hispanic | 90.5 | 91.7 | 79.2 | 85.5 | 79.2 | 75.6 |
| Unknown | 5.5 | 7.1 | 5.2 | 7.4 | 5.2 | 15.9 |
| ***Primary insurance at index positive stool test — %*** |  |  |  |  |  |  |
| Private | 51.7 | 44.9 | 40.7 | 44.0 | 30.9 | 30.1 |
| Medicare | 32.4 | 16.7 | 20.5 | 24.1 | 16.7 | 13.1 |
| Medicaid | 7.3 | 0.3 | 16.2 | 4.8 | 5.2 | 4.6 |
| Other | 0 | 0 | 0.8 | 0.4 | 0.2 | 0 |
| Unknown | 8.6 | 38.2 | 21.8 | 26.8 | 47.1 | 52.3 |
| ***Primary language — %*** |  |  |  |  |  |  |
| English | 93.6 | 99.3 | 80.8 | 93.1 | 91.8 | 95.5 |
| Spanish | 4.2 | 0 | 13.4 | 4.2 | 3.6 | 3.4 |
| Other | 1.6 | 0.3 | 5.0 | 1.6 | 4.2 | 1.1 |
| Unknown | 1.2 | 0.5 | 0.8 | 1.2 | 0.4 | 0 |

\*Patients identified as American Indian, Alaska Native, or Native Hawaiian or Other Pacific Islander.

**Table 13**. Patient and Test Characteristics for Excluded Samples by Health System

|  |  |  |
| --- | --- | --- |
| **Characteristics** | **Health System 1**  **(n = 237)** | **Health System 2**  **(n = 242)** |
| ***Age at index positive stool test*** |  |  |
| Mean (SD) — yr | 65.6 (7.3) | 65.0 (8.0) |
| Distribution — no. (%) |  |  |
| 45 to 49 yr | 9 (3.6) | 14 (5.8) |
| 50 to 64 yr | 86 (34.5) | 75 (31.0) |
| 65 to 75 yr | 154 (61.8) | 153 (63.2) |
| ***Sex — no. (%)*** |  |  |
| Female | 130 (54.9) | 134 (55.4) |
| Male | 107 (45.1) | 108 (44.6) |
| ***Race — no. (%)*** |  |  |
| Asian | 5 (2.1) | 3 (1.2) |
| Black | 21 (8.9) | 10 (4.1) |
| White | 192 (81.0) | 204 (84.3) |
| Other\* | 0 (0.0) | 20 (8.3) |
| Unknown | 19 (8.0) | 2 (0.8) |
| ***Ethnic group — no. (%)*** |  |  |
| Hispanic | 21 (8.9) | 8 (3.3) |
| Non-Hispanic | 204 (86.1) | 228 (64.2) |
| Unknown | 12 (5.1) | 6 (2.5) |
| ***Primary insurance at index positive stool test — no. (%)*** |  |  |
| Private | 93 (39.2) | 72 (29.8) |
| Medicare | 91 (38.4) | 151 (62.4) |
| Medicaid | 11 (4.6) | 15 (6.2) |
| Other | 0 (0.0) | 5 (2.1) |
| Unknown | 42 (17.7) | 2 (0.8) |
| ***Primary language — no. (%)*** |  |  |
| English | 217 (91.6) | 236 (97.5) |
| Spanish | 15 (6.3) | 3 (1.2) |
| Other | 5 (2.1) | 2 (0.8) |
| Unknown | 0 (0.0) | 2 (0.8) |
| ***Type of index positive stool test — no. (%)*** |  |  |
| Fecal Immunochemical Test (FIT) | 136 (57.4) | 6 (2.5) |
| FIT-DNA (i.e., Cologuard) | 56 (23.6) | 118 (48.8) |
| Guaiac Fecal Occult Blood Test (gFOBT) | 45 (19.0) | 122 (54.6) |

\*Patients identified as American Indian, Alaska Native, or Native Hawaiian or Other Pacific Islander.

**Table 14**. Patient Characteristics for Excluded Samples for 6 Facility Groups at Health System 1

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Characteristics** | **FG 1** | **FG 2** | **FG 3** | **FG 4** | **FG 5** | **FG 6** |
| ***Age at index positive stool test*** |  |  |  |  |  |  |
| Mean (SD) — yr | 65.8 (7.7) | 66.6 (7.5) | 65.3 (6.8) | 66.0 (6.3) | 65.1 (7.7) | 64.1 (7.9) |
| Distribution — no. (%) |  |  |  |  |  |  |
| 45 to 49 yr | 5.1 | 0 | 2.3 | 2.8 | 3.0 | 0 |
| 50 to 64 yr | 30.5 | 34.8 | 36.4 | 33.3 | 35.8 | 50.0 |
| 65 to 75 yr | 64.4 | 65.2 | 61.4 | 63.9 | 61.2 | 50.0 |
| ***Sex — no. (%)*** |  |  |  |  |  |  |
| Female | 61.0 | 47.8 | 43.2 | 69.4 | 49.3 | 75.0 |
| Male | 39.0 | 52.2 | 56.8 | 30.6 | 50.8 | 25.0 |
| Unknown | 0 | 0 | 0 | 0 | 0 | 0 |
| ***Race — no. (%)*** |  |  |  |  |  |  |
| Asian | 0 | 8.7 | 0 | 2.8 | 3.0 | 0 |
| Black | 5.1 | 8.7 | 13.6 | 5.6 | 6.0 | 50.0 |
| White | 89.8 | 82.6 | 77.3 | 69.4 | 85.1 | 50.0 |
| Other\* | 0 | 0 | 0 | 0 | 0 | 0 |
| Unknown | 5.1 | 0 | 9.1 | 22.2 | 6.0 | 0 |
| ***Ethnic group — no. (%)*** |  |  |  |  |  |  |
| Hispanic | 0 | 0 | 13.6 | 27.8 | 6.0 | 12.5 |
| Non-Hispanic | 91.5 | 100 | 81.8 | 66.7 | 89.6 | 87.5 |
| Unknown | 8.5 | 0 | 4.6 | 5.6 | 4.5 | 0 |
| ***Primary insurance at index positive stool test — no. (%)*** |  |  |  |  |  |  |
| Private | 49.2 | 30.4 | 38.6 | 44.4 | 32.8 | 25.0 |
| Medicare | 47.5 | 39.1 | 34.1 | 41.7 | 35.8 | 0 |
| Medicaid | 1.7 | 8.7 | 13.6 | 5.6 | 0 | 0 |
| Other | 0 | 0 | 0 | 0 | 0 | 0 |
| Unknown | 1.7 | 21.7 | 13.6 | 8.3 | 31.3 | 75.0 |
| ***Primary language — no. (%)*** |  |  |  |  |  |  |
| English | 100 | 95.7 | 84.1 | 75.0 | 95.5 | 100 |
| Spanish | 0 | 0 | 13.6 | 22.2 | 1.5 | 0 |
| Other | 0 | 4.4 | 2.3 | 2.8 | 3.0 | 0 |
| Unknown | 0 | 0 | 0 | 0 | 0 | 0 |

\*Patients identified as American Indian, Alaska Native, or Native Hawaiian or Other Pacific Islander.

**Table 15**. eCQM Rates by Patient and Test Characteristics for Health System 1

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Characteristics** | **Denominator**  **(n = 4,812)** | **Numerator**  **(n = 2,708)** | **eCQM Rate\***  **(95% CI)** | **P-value** |
| ***Age at index positive stool test*** — no. (%) |  |  |  | 0.10 |
| 45 to 49 yr | 395 | 253 | 64.1 (56.6, 72.5) |  |
| 50 to 64 yr | 2,107 | 1,175 | 55.8 (52.7, 59.0) |  |
| 65 to 75 yr | 2,310 | 1,280 | 55.4 (52.5, 58.5) |  |
| ***Sex — no. (%)*** |  |  |  | 0.09 |
| Female | 2,817 | 1,629 | 57.8 (55.1, 60.7) |  |
| Male | 1,995 | 1,079 | 54.1 (51.0, 57.4) |  |
| ***Race — no. (%)*** |  |  |  | 0.81 |
| Asian | 194 | 98 | 50.5 (41.4, 61.6) |  |
| Black | 259 | 140 | 54.1 (45.8, 63.8) |  |
| White | 3,929 | 2,223 | 56.6 (54.3, 59.0) |  |
| Other\*\* | 13 | 7 | 53.8 (25.7, 99.9) |  |
| Unknown | 417 | 240 | 57.6 (50.7, 65.3) |  |
| ***Ethnic group — no. (%)*** |  |  |  | 0.08 |
| Hispanic | 402 | 229 | 57.0 (50.0, 64.8) |  |
| Non-Hispanic | 4,051 | 2,308 | 57.0 (54.7, 59.3) |  |
| Unknown | 359 | 171 | 47.6 (41.0, 55.3) |  |
| ***Primary insurance at index test — no. (%)*** |  |  |  | **<0.01** |
| Private | 1,902 | 1,062 | 55.8 (52.6, 59.3) |  |
| Medicare | 991 | 499 | 50.4 (46.1, 55.0) |  |
| Medicaid | 367 | 189 | 51.5 (44.7, 59.4) |  |
| Other | 17 | 11 | 64.7 (35.8, 99.9) |  |
| Unknown | 1,535 | 947 | 61.7 (57.9, 65.8) |  |
| ***Primary language — no. (%)*** |  |  |  | 0.06 |
| English | 4,340 | 2,466 | 56.8 (54.6, 59.1) |  |
| Spanish | 277 | 160 | 57.8 (49.5, 67.4) |  |
| Other | 152 | 66 | 43.4 (34.1, 55.3) |  |
| Unknown | 43 | 16 | 37.2 (22.8, 60.7) |  |
| ***Type of index stool test — no. (%)*** |  |  |  | **<.0001** |
| Fecal Immunochemical Test (FIT) | 1,607 | 795 | 49.5 (46.1, 53.0) |  |
| FIT-DNA (i.e., Cologuard) | 3,120 | 1,869 | 59.9 (57.2, 62.7) |  |
| Guaiac Fecal Occult Blood Test (gFOBT) | 85 | 44 | 51.8 (38.5, 69.6) |  |

\*Adjusted for facility groups.

\*\*Patients identified as American Indian, Alaska Native, or Native Hawaiian or Other Pacific Islander.

**Table 16.** eCQM Rates by Patient Characteristics for 6 Facility Groups at Health System 1

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Characteristics** | **eCQM Rate (95% CI)** | | | | | |
| **Facility Group 1** | **Facility Group 2** | **Facility Group 3** | **Facility Group 4** | **Facility Group 5** | **Facility Group 6** |
| ***Age at index stool test*** |  |  |  |  |  |  |
| 40 to 49 yr | 38.5 (20.6, 71.6) | 66.7 (46.6, 95.5) | 71.1 (57.1, 88.4) | 68.7 (53.0, 89.1) | 56.9 (44.7, 72.4) | 81.8 (42.4, 99.9) |
| 50 to 64 yr | 37.8 (28.2, 50.7) | 50.6 (40.8, 62.7) | 56.5 (50.6, 63.2) | 56.3 (50.4, 63.0) | 58.9 (53.3, 65.3) | 58.4 (44.4, 76.8) |
| 65 to 75 yr | 37.9 (29.9, 48.0) | 49.2 (40.3, 60.1) | 54.0 (48.3, 60.4) | 55.6 (50.2, 61.6) | 62.4 (56.4, 69.0) | 65.8 (49.8, 87.0) |
| P-value | >0.99 | 0.33 | 0.09 | 0.33 | 0.66 | 0.61 |
| ***Sex*** |  |  |  |  |  |  |
| Female | 35.0 (27.3, 44.7) | 51.4 (43.6, 60.7) | 59.8 (54.2, 66.0) | 58.6 (53.5, 64.0) | 62.4 (57.0, 68.2) | 63.2 (49.0, 81.5) |
| Male | 41.7 (32.3, 53.7) | 52.3 (41.3, 66.2) | 53.0 (47.3, 59.3) | 53.7 (47.5, 60.6) | 57.7 (51.9, 64.2) | 63.0 (47.8, 83.0) |
| P-value | 0.33 | 0.91 | 0.11 | 0.26 | 0.27 | 0.99 |
| ***Race*** |  |  |  |  |  |  |
| Asian | 10.0 (1.4, 71.5) | 42.9 (22.3, 82.5) | 54.8 (36.4, 82.4) | 65.0 (44.2, 95.5) | 48.7 (35.3, 67.2) | 40.0 (9.9, 99.9) |
| Black | 50.0 (7.0, 99.9) | 60.0 (19.3, 99.9) | 56.5 (42.5, 75.0) | 55.7 (40.7, 76.3) | 51.9 (38.1, 70.8) | 45.0 (23.3, 86.9) |
| White | 39.5 (32.7, 47.7) | 52.8 (45.9, 60.7) | 57.0 (52.5, 61.9) | 56.1 (51.7, 60.7) | 61.3 (56.8, 66.1) | 66.2 (53.5, 81.8) |
| Other\* | 50.0 (7.0, 99.9) | 0 | 0 | 40.0 (10.0, 99.9) | 80.0 (30.0, 99.9) | 0 |
| Unknown | 32.4 (18.4, 57.2) | 16.7 (2.3, 99.9) | 55.1 (43.2, 70.3) | 62.0 (48.8, 78.8) | 63.8 (51.3, 79.3) | 66.7 (39.3, 99.9) |
| P-value | 0.67 | 0.78 | >0.99 | 0.85 | 0.51 | 0.64 |
| ***Ethnic group*** |  |  |  |  |  |  |
| Hispanic | 38.5 (16.0, 92.7) | 40.0 (10.0, 99.9) | 53.9 (44.5, 65.3) | 57.6 (44.0, 75.4) | 66.7 (51.3, 86.6) | 60.0 (31.1, 99.9) |
| Non-Hispanic | 38.2 (31.7, 45.9) | 53.5 (46.5, 61.5) | 58.8 (54.1, 63.8) | 57.0 (52.7, 61.6) | 60.8 (56.5, 65.5) | 61.7 (49.6, 76.7) |
| Unknown | 33.3 (14.9, 74.4) | 31.0 (16.1, 59.8) | 33.8 (22.3, 51.4) | 53.1 (40.4, 69.9) | 51.2 (40.0, 65.6) | 71.4 (45.9, 99.9) |
| P-value | 0.95 | 0.26 | **0.03** | 0.88 | 0.32 | 0.83 |
| ***Primary insurance*** |  |  |  |  |  |  |
| Private | 36.1 (28.1, 46.4) | 44.8 (36.1, 55.7) | 59.4 (53.0, 66.5) | 58.5 (52.5, 65.1) | 59.4 (52.5, 67.2) | 66.0 (47.3, 92.2) |
| Medicare | 40.6 (30.1, 54.8) | 51.5 (36.9, 71.8) | 52.4 (44.2, 62.1) | 50.6 (43.3, 59.2) | 52.2 (43.6, 62.5) | 47.8 (26.4, 86.7) |
| Medicaid | 45.8 (25.3, 82.9) | 0 | 47.8 (39.1, 58.4) | 59.7 (43.2, 82.4) | 54.9 (40.1, 75.2) | 75.0 (33.5, 99.9) |
| Other | 0 | 0 | 60.0 (26.9, 99.9) | 80.0 (30.0, 99.9) | 50.0 (7.0, 99.9) | 0 |
| Unknown | 32.1 (16.7, 61.9) | 60.3 (49.2, 73.8) | 62.2 (53.5, 72.4) | 58.5 (51.0, 67.1) | 64.5 (58.6, 71.0) | 64.1 (49.6, 82.9) |
| P-value | 0.81 | 0.28 | 0.22 | 0.54 | 0.31 | 0.77 |
| ***Primary language*** |  |  |  |  |  |  |
| English | 38.6 (32.2, 46.2) | 51.9 (45.3, 59.4) | 58.9 (54.3, 63.8) | 56.4 (52.3, 60.8) | 60.9 (56.7, 65.3) | 62.5 (51.5, 75.8) |
| Spanish | 50.0 (7.0, 99.9) | 0 | 54.8 (44.6, 67.3) | 63.0 (45.0, 88.1) | 61.2 (42.8, 87.6) | 66.7 (24.8, 99.9) |
| Other | 33.3 (10.7, 99.9) | 0 | 30.6 (19.5, 48.1) | 71.4 (43.0, 99.9) | 47.4 (32.5, 69.1) | 100 (24.8, 99.9) |
| Unknown | 20.0 (5.0, 80.4) | 50.0 (7.0, 99.9) | 30.0 (9.7, 93.1) | 40.0 (18.0, 89.1) | 66.7 (25.0, 99.9) | 0 |
| P-value | 0.81 | >0.99 | **0.03** | 0.59 | 0.64 | 0.80 |

\*Patients identified as American Indian, Alaska Native, or Native Hawaiian or Other Pacific Islander.

**Note 1.** Responses to Public Comment

***We thank all the organizations that took the time to provide comments on the eCQM specifications and preliminary rates.*** ***Below is a brief summary of key recommendations and measure developer responses.***

The American College of Gastroenterology (ACG), American Society for Gastrointestinal Endoscopy (ASGE), and American Medical Association (AMA) recommended consideration for exceptions that might be outside of a facility’s control or minimizing expectations that performance should always be 100%. All three organizations supported defining a minimum target for expected eCQM performance of at least ≥50% based on the literature.1

* *Response*: A benchmark of 80% was selected for this measure informed by the literature, current guidelines, preliminary assessments of out of system colonoscopy rates at Health System 1, and stakeholder consultations, accommodating for exceptions that may be outside of a facility’s control.

The American College of Gastroenterology (ACG), American Society for Gastrointestinal Endoscopy (ASGE), and Guardant Health recommended inclusion of non-invasive blood-based biomarker screening tests for colorectal cancer screening for this measure. Although not yet included in screening guidelines, these tests were recently approved by the U.S. Food and Drug Administration and are eligible for Medicare coverage. All three organizations supported re-framing the measure to cover timely follow-up on non-invasive screening tests for colorectal cancer detection.

* *Response*: Given recent support for blood-based biomarker screening tests for colorectal cancer screening, this is an important consideration for the eCQM. Additional data will be collected to inform future updates to the eCQM specifications as blood tests are adopted as a standard of care in the colorectal cancer screening continuum.

Guardant Health and Merck recommended coordination with other measure developers, such as the American Medical Group Association (AMGA) and National Committee for Quality Assurance (NCQA) who are developing a similar HEDIS measure,2 to ensure alignment and harmonization between measures, and reduce any potential reporting burden.

* *Response*: The eCQM submitted for endorsement was funded by the Gordon and Betty Moore Foundation in June 2022. The specifications were independently developed based on the published literature and guidelines, iterative testing at Health System 1, and ongoing stakeholder consultations. Although the HEDIS measure targets the same process, the specifications of the eCQM submitted for endorsement include additional exclusions and exceptions to ensure that patients included in the denominator population require follow-up colonoscopy. Other developers will be engaged to better understand their rationale for applying specific inclusion and exclusion criteria, as well as alignment of concepts and harmonization of value sets, where appropriate.

Merck recommended careful consideration around the level of accountability and potential use cases for the eCQM: “It is critical to clearly define the accountable entity and consider mechanisms that impact timeliness and communication of positive test results and follow-up referrals.”

* *Response*: Based on preliminary findings and stakeholder consultations, the level of accountability has been defined at the overall integrated delivery system and facility group level. In the latter case, a facility group includes both primary care providers initiating stool-based testing and outpatient endoscopy units providing follow-up colonoscopies for the patients. There are critical steps within primary care and endoscopy units that can lead to unnecessary delays. Additional data are being collected at Health System 1 to better understand reasons for lack of timely follow-up colonoscopy, and further stakeholder consultations are underway to confirm that these are the most appropriate levels for accountability.

HealthHIV & the National Coalition for LGBTQ Health recommended several potential additions and modifications for the eCQM as well as complementary measures to address the needs of high-risk populations, such as gay men with HIV and older people with HIV.

* *Response*: These are important high-risk populations, which may warrant eCQM stratification in the future to ensure equity in access and completion of follow-up colonoscopy for timely colorectal cancer detection. At this time, given the current low eCQM performance rates across all populations, the eCQM denominator is inclusive of all patients with a positive stool-based test requiring follow-up colonoscopy. Further stakeholder engagement and testing will be conducted to understand the most appropriate risk categories for potential stratification of this eCQM in the future.

The American College of Gastroenterology (ACG), American Society for Gastrointestinal Endoscopy (ASGE), and Merck recommended several public quality reporting programs for the eCQM, such as: Medicare Advantage Part C & D Star Rating, Medicare Shared Savings Program (MSSP), and the Merit-Based Incentive Payment System (MIPS).

***References:***

1. Mohl JT, Ciemins EL, Miller-Wilson L, Gillen A, Luo R, Colangelo F. Rates of Follow-up Colonoscopy After a Positive Stool-Based Screening Test Result for Colorectal Cancer Among Health Care Organizations in the US, 2017-2020. JAMA Netw Open. 2023;6(1):e2251384. doi:10.1001/jamanetworkopen.2022.51384
2. Ciemins EL, Mohl JT, Moreno CA, Colangelo F, Smith RA, & Barton M. (2024). Development of a Follow-Up Measure to Ensure Complete Screening for Colorectal Cancer. JAMA network open, 7(3), e242693. https://doi.org/10.1001/jamanetworkopen.2024.2693