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Dear PQM team,

We at the American Urological Association appreciate the opportunity to offer comment on your new Pre-Rulemaking Measure Review (PRMR) and Measure Set Review (MSR) processes.

Overall, we support the changes that you have made to the process. We are particularly intrigued with the move to the Novel Hybrid Delphi and Nominal Group (NHDNG) methodology for achieving consensus for program recommendations. We also like the idea of integrating the previous coordinating and advisory committees with the setting-specific committees, as this should allow more time for public comment and for more impactful engagement from those who can provide rural health and/or equity perspectives.

However, we do have a few questions/concerns, as follows:

- The distinction between individual versus organizational Committee membership (and the need for both) is not clear and several questions remain. For example, will organizational members have different roles or responsibilities, as compared to individual members? What criteria are you using to select organizational members, compared to individual members? What roster categories are organizational? Would someone be considered for an organizational slot but not for an individual slot, or vice-versa? If so, how should someone decide whether to nominate as an individual versus representing their organization?
- It is not clear in the guidebook as to whether (or when) staff preliminary assessments will be made available to the public, nor whether public comments will be available in real time during the comment period.
- It is not clear whether "interim" ratings by the Committee be made available to the public, and if they are made available, whether this will happen during the process or afterwards (i.e., to fully document the process and the recommendations).
- We understand that measure developers and stewards may be asked to provide supplemental information to aid in the evaluation process. While this seems necessary, we are concerned that such requests may be labor intensive, and the time frame may be quite short. We encourage PQM to ensure adequate time for response, especially given that the PRMR timeframe may be impacted by the holidays.

Please feel free to reach out if you have any questions.

Sincerely,

Karen Johnson, PhD
Director, Quality and Measurement
American Urological Association