CMS Consensus-Based Entity (CBE) Endorsement and Maintenance

This document explains the measure developer's roles and responsibilities in relation to the CMS Consensus-Based Entity's (CBE's) measure endorsement and maintenanceⓘ processes. The Medicare Improvements for Patients and Providers Act of 2008 ⬈ requires the U.S. Department of Health and Human Services (HHS) to contract with a CBE regarding performance measurement. National Quality Forum (NQF) currently serves as the CMS CBE. This information supplements the content found in the *Measure Implementation* ⬈ and *Measure Use, Continuing Evaluation, and Maintenance* ⬈ content on the *CMS MMS Hub* ⬈ .

1   CMS CONSENSUS-BASED ENTITY

The CMS CBE endorses quality measuresⓘ through a transparent, consensus-based process that incorporates feedback from diverse groups of stakeholders to foster health care quality improvement. the CMS CBE endorses measures only if they pass measure evaluation criteria[1]: 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 CMS CBE-endorsed measures in CMS public reporting and value-based purchasing programs. However, measure developers do not necessarily submit all measures to the CMS CBE for endorsement. CMS will consider non-endorsed measures if they meet necessary criteria.

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[1] Not all measures must pass all criteria. Check the most recent CMS CBE evaluation criteria ⬈ .
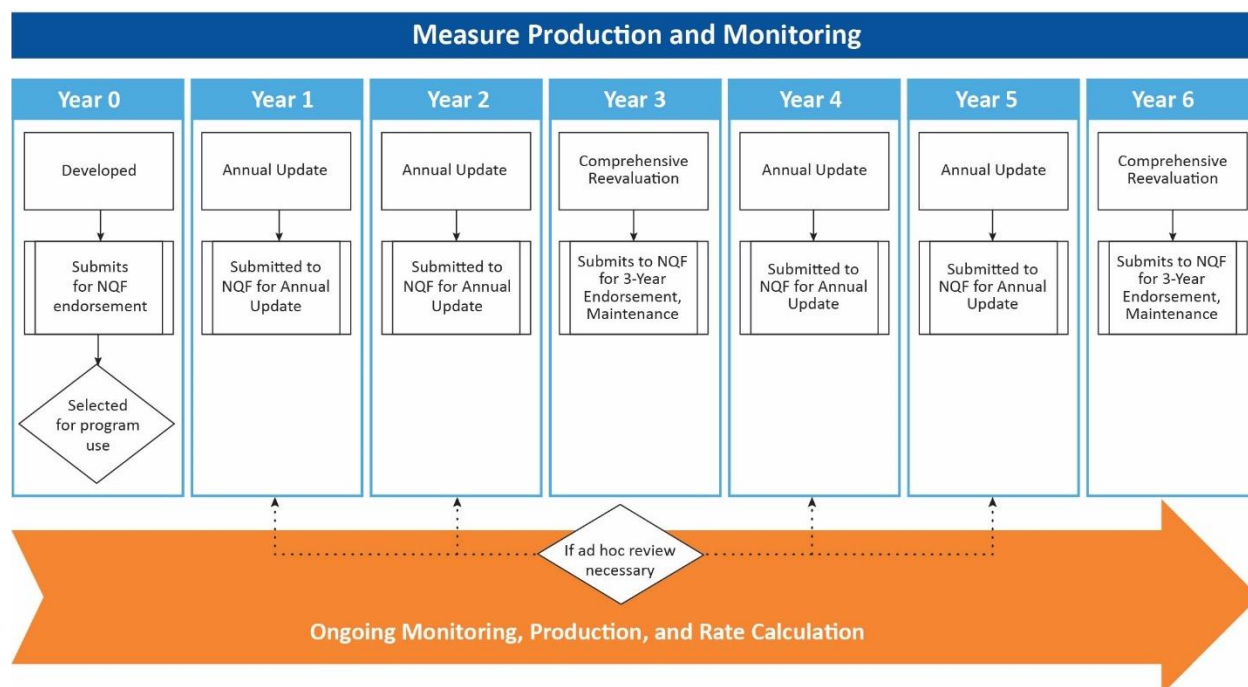
Figure 1. The CMS CBE Measure Review Cycle Timeline

2 MEASURE SUBMISSION TO THE CMS CBE

2.1 When to Submit Measures to the CME CBE

The CMS CBE 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 CMS CBE 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 the CMS CBE of the measure steward's or measure developer's readiness to submit a measure for endorsement consideration and allows opportunity for technical assistance before submission. Measure developers submit up-to-date testing information and full measure specificationsⓘ to CMS CBE at the same time they submit the Intent to Submit form.

2.2 Complete the CMS CBE Measure Submission

In May 2021, the CMS CBE implemented the Measure Information Management System (MIMS). This system allows for easier submission of measure information. Measure developers must submit their measures via the appropriate online [measure submission form](#)↗ 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 the [CMS CBE](#) 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 CMS CBE measure submission forms. CMS designed the MIF and MJF to help the measure developer gather the information they need for a successful CMS CBE submission. CMS organized both forms to minimize rework during the CMS CBE measure submission process.

The measure developer is responsible for completing the appropriate CMS CBE measure submission form and ensuring that the information is sufficient to meet the CMS CBE'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 the CMS CBE Consensus Standards Approval Committee (CSAC) about measures proposed for endorsement. The CMS CBE requires the measure developer to submit a form for each measure they submit for endorsement consideration. Tips for successful submissions include

- Contacting CMS CBE project staff for technical assistance with the submission and evaluation process.
- Answering every part of the CMS CBE 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 Uniform Resource Locators [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 the CMS CBE's entire testing requirements.
- 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, all questions have a response).

For technical questions about the online submission, measure developers should contact the appropriate CMS CBE project manager/director or measuremaintenance@qualityforum.org. Measure developers should direct questions about the online measure submission form content or information requirements to the CMS CBE central project email found on the project's Information page on the CMS CBE 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 the CMS CBE. Before the CMS CBE 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 the CMS CBE's *Measure Evaluation Criteria and Guidance for Evaluating Measures for Endorsement*⬏, is the standard the CMS CBE 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 the CMS CBE. If that happens, the CMS CBE 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　THE CMS CBE ENDORSEMENT PROCESS

The CMS CBE follows a *Consensus Development Process*⧉ and notional timeline, depicted in Figure 2. Measure developers will want to monitor the *Submitting Standards*⧉ webpage for new information, as the CMS CBE periodically changes their processes and timelines, e.g., the CMS CBE no longer requires an annual review. Measure developers may now begin their measure submission at any time. There are two evaluation cycles per year. Measure developers should refer to the *Submitting Standards*⧉ webpage for more information on submitting new measures, and refer to the *Maintenance of NQF-Endorsed Performance Measures*⧉ webpage for information about measure maintenance reviews.
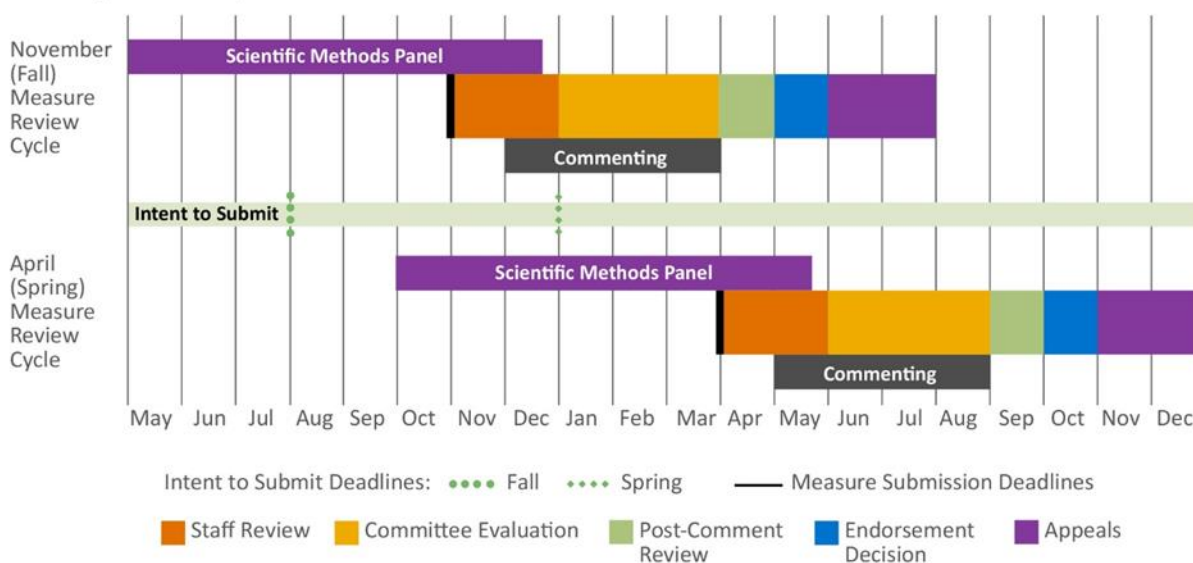

Figure 2. The CMS CBE Consensus Development Process and Notional Timeline

4　MEASURE DEVELOPER'S ROLE DURING THE CMS CBE EVALUATION

During its evaluation, the CMS CBE may have questions about the submitted measure. These questions may come from the CMS CBE staff, the project standing committee, or the *Scientific Methods Panel*⧉. To facilitate response to questions, the CMS CBE encourages active involvement by the measure developer in the CMS CBE process while the measure is under consideration. When there is discussion by the project standing committee and 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 the CMS CBE'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 the CMS CBE'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ⓘ or eCQM standards subject matter expert, communicates and collaborates with the CMS CBE during the evaluation.

Questions may also arise during the CMS CBE public comment period and may also need review by the technical expert panel (TEP) involved with measure development or reevaluation.

During its evaluation, the CMS CBE 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, the CMS CBE 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 CMS CBE [Trial Use Approval Policy](#)⬀ and [Trial Use Feasibility Assessment](#)⬀ can be found on the CMS CBE website along with the [Measure Testing Form for Trial Use Approval](#)⬀.

6   MEASURE MAINTENANCE FOR THE CMS CBE

Once the CMS CBE 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 the CMS CBE's current measure endorsement maintenance processes as described on the CMS CBE'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 the CMS CBE's endorsement maintenance process ensures the CMS CBE continues to endorse only measures that meet the current the CMS CBE evaluation criteria.

7   KEY POINTS

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

To submit measures for endorsement, measure developers must complete the appropriate CMS CBE form via MIMS. CMS has aligned the MIF and MJF with the CMS CBE 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 the CMS CBE committees to facilitate measure review.

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

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