Technical Expert Panels and Public Comment

Ways for Stakeholders to Provide Input on Quality Measures

Presenters:

Brenna Rabel, Battelle

Victoria Danner, Rainmakers Strategic Solutions

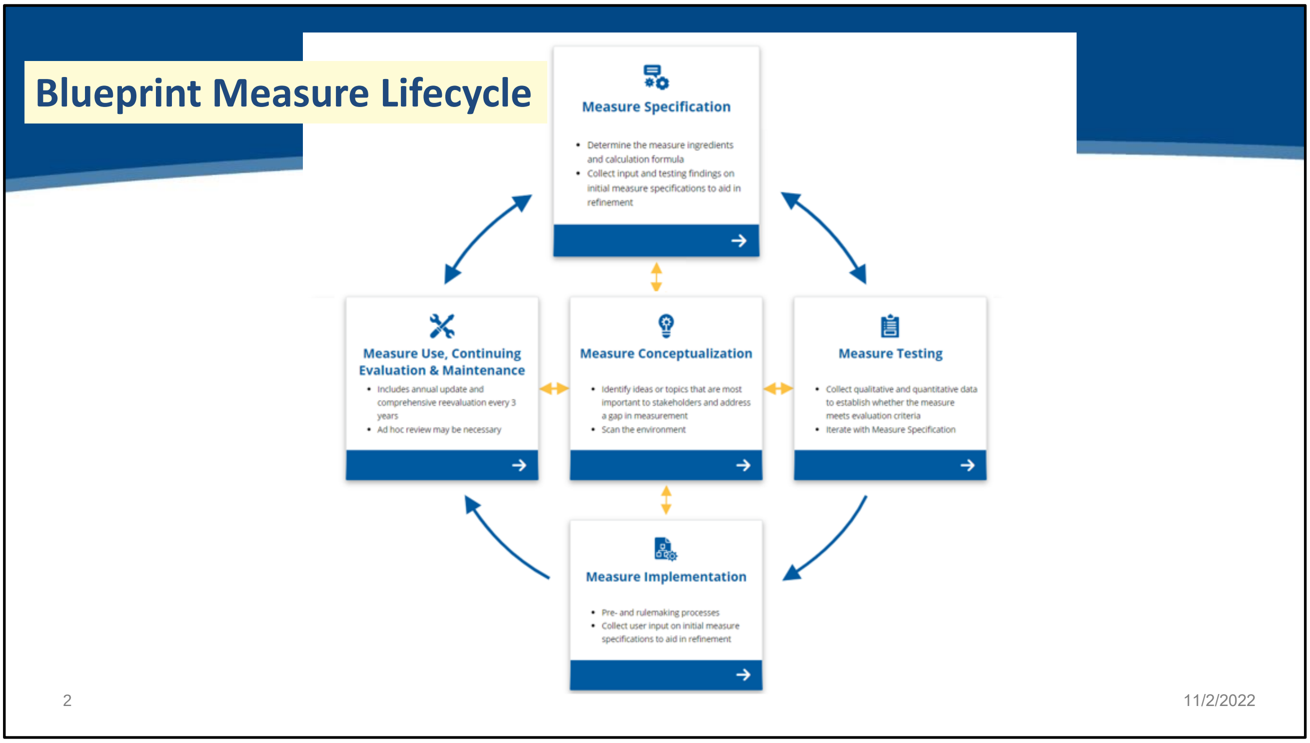
Objectives

- Review two opportunities for stakeholders, including patients and caregivers, to provide input on the measure development and implementation process
  - Technical Expert Panel (TEP)
    - For stakeholders: Discuss what a TEP is and how stakeholders can get involved
    - For measure developers: Review of the *Person and Family Engagement Toolkit for Quality Measure Development*
  - Public Comment
    - For stakeholders: Discuss different types of public comment, the goal of public comment, and how stakeholders can submit feedback

These Info Sessions are part of an ongoing effort to engage measure developers and other stakeholders in quality measurement topics, an effort that also includes the MMS Newsletter, special announcement emails, public webinars and routine updates to the MMS *Blueprint* Hub.

This presentation is geared towards both measure developers and stakeholders. The discussion of TEPs will delve into ways that stakeholders, patients and caregivers, can identify opportunities for participation.

Later, Rainmakers Strategic Solutions will present on tips from the PFE toolkit to effectively leverage patient and family perspectives within TEPs. Lastly, there is the walkthrough on ways that patients and other stakeholders may provide feedback on quality measures via the public comment process.



Measure conceptualization—Here measure developers do information gathering to identify high-priority topics important to patients and suitable to performance measurement. They conduct an environmental scan to assess any gaps among existing quality measures and may convene a TEP and/or post information for public comment to refine the list of potential measure concepts.

Measure specification—Here you flesh out the initial measure concepts into testable measure specifications, including mapping out how the measure is defined, while forecasting anticipated questions requiring answers in subsequent testing. Here seek TEP input on preliminary specifications with the aim of identifying potential refinements that can be further assessed through testing.

Measure testing/implementation—Involves the collection of quantitative/qualitative data to gauge if the measure meets the evaluation criteria. Work with test sites (hospitals/clinician offices) to determine feasibility of proposed measures in a real-world environment. Conduct IDIs/FGs with patients/experts to glean potential challenges at implementation. If a measure shows promise after testing/specification, submit measures for use in CMS programs via submissions on the MUC List for pre-rulemaking and rulemaking review.

Measure use, continuing evaluation—Once adopted for use in a program, a measure undergoes an annual evaluation to ensure compliance with up-to-date clinical guidelines and the triennial comprehensive reevaluations to ensure that the measure is still effective.

Technical Expert Panels

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TEP Role

Review new measure ideas and help decide which measures to develop further

Review results from the testing of measures that are currently in development

Advise the measure developer on which measures to recommend to CMS

Provide feedback and recommendations on policies impacting national public reporting and value-based payment programs

Guide the development of key national documents guiding the future of quality measurement and quality activities

Give feedback on other quality measurement and measure development topics

- TEPs may leverage their expertise to weigh in on new measure concepts and provide input.
- TEPs review measure testing results to provide guidance about potential next steps.
- TEPs raise questions/concerns that need to be addressed through additional testing, or recommend potential refinements to measure specifications based on the findings from testing.

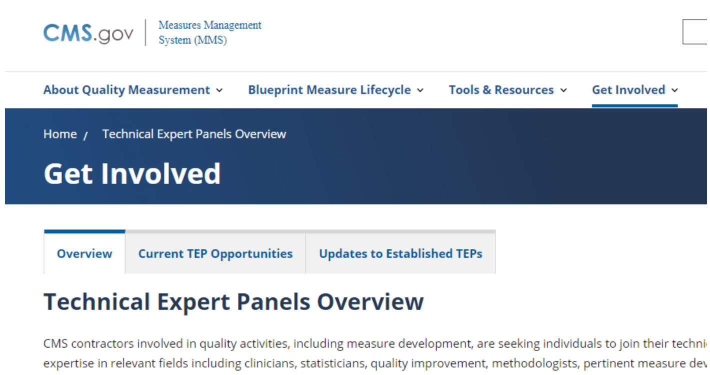
Who Should be on a TEP?

- TEPs are most effective when they have diverse stakeholders including:
  - **Individuals:** persons participating in their health and wellness
  - **Family members and caregivers**: people supporting an individual receiving healthcare
  - **Clinicians:** healthcare professionals providing care for individuals
  - **Facility representatives:** representatives from organizations providing services and support to individuals
  - **Measure developers:** organizations that develop, implement, and maintain quality measures
  - **Other stakeholder groups:** such as health insurance providers, academic researchers, and local, state, and federal government agencies

An ideal TEP is a diverse multi-stakeholder group that includes representation from categories listed here.

Finding Opportunities on MMS Hub

- CMS-funded measure developers post opportunities for TEPs on the MMS Hub
- CMS-funded developers also post information on recent TEPs
  - TEP rosters
  - Meeting summaries



https://mmshub.cms.gov/get-involved/technical-expert-panel/overview

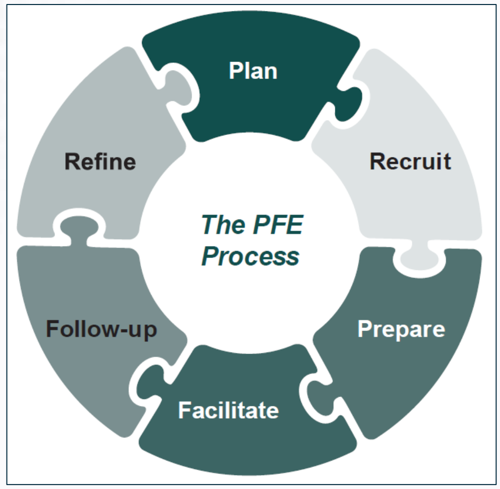
Stakeholders interested in participating in a TEP may find opportunities on the MMS Hub, which also includes a wealth of important information such as the MMS *Blueprint.*

Person and Family Engagement Toolkit for Quality Measure Development: Walk Through

Victoria X. Danner, MAA, PMP
PFE Coordinator
Persons and Family Engagement for Quality Measure Development
Rainmakers Strategic Solutions LLC
victoria.danner@rainmakerssolutions.com

The PFE Process

- The Person and Family Engagement (PFE) Process is a step-by-step guide for measure developers, health organizations, patient groups, and research institutions to progress through planning, recruitment, and engagement with PFE Partners to produce quality measures designed with unique person and family input.



EXCELLENCE PASSION DIVERSITY KNOWLEDGE

The concepts in the PFE toolkit are based on the PFE process, a framework for measure developers, health organizations, patient groups or even research institutions to collaborate with PFE partners to produce quality measures. The PFE process encompasses methods shaped around strategic planning, staff preparation, facilitation of engagement, and the refinement of engagement methods throughout the duration of the measure development process.

The phases are applicable to most TEPs/workgroups, and even surveys or interviews. This incorporation with its unique perspectives may influence the progress of the measure and its subsequent outcome.

Person and Family Engagement Toolkit: A Guide for Measure Developers

- Updated annually in April
- Serves as a roadmap of the PFE Process to engage persons and families throughout the measure development process
- Provides resources, templates, and tools to facilitate successful engagement, orientation, and communication strategies
- Can be found at: https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/MMS/Downloads/Person-and-Family-Engagemen.pdf

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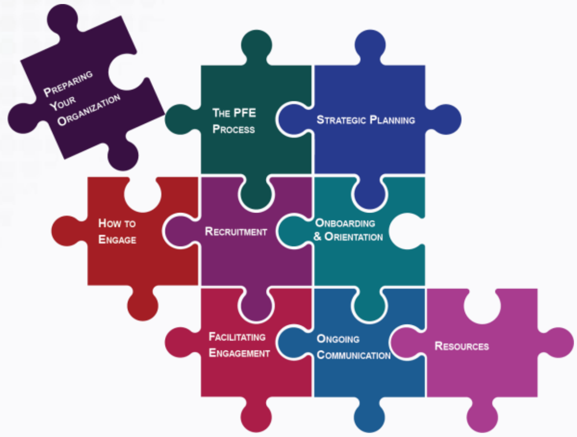
The 2022 PFE Toolkit edition is available for download. It is a roadmap for an organization or individual wishing to partner with patients and caregivers, advocates, or any stakeholder for their quality measure project. It's aligned with the most recent strategies and best practices for PFE in quality measures. It also contains ready-to-use templates and tools and handouts for meetings, such as charters, get-to-know-you exercises and email guidelines to assist you in your PFE strategies and collaborations.

What's Inside?

Eight (8) Sections focus on a different aspect, or phase, of the PFE process and provide related information, key considerations, helpful hints, and resources. These Sections address:

- Preparing Your Organization
- The PFE Process
- Strategic Planning
- How to Engage
- Recruitment
- Onboarding and Orientation
- Facilitating Engagement
- Ongoing Communication

Section nine (9) provides ready-to-use tools, templates, and handouts for PFE-focused projects.



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The eight sections are aligned with a different phase in the PFE process that features instructive content including guidelines, scenario-based examples, and additional resources to help contractors plan their PFE strategies and goals.

Example—If working with patient and advocate partners, those different groups may require different assistance during the project. The toolkit provides advice and tips on your approach with those different groups to provide materials and guidance.

Planning for Your TEP with the Toolkit

Preparing Your Organization

- Strategies to prepare your organization and staff for PFE
  - Training and Staffing
  - Budget and Honoraria

The PFE Process

- A systematic process for engaging with persons and families
  - Prepared Staff
  - Approachable Framework

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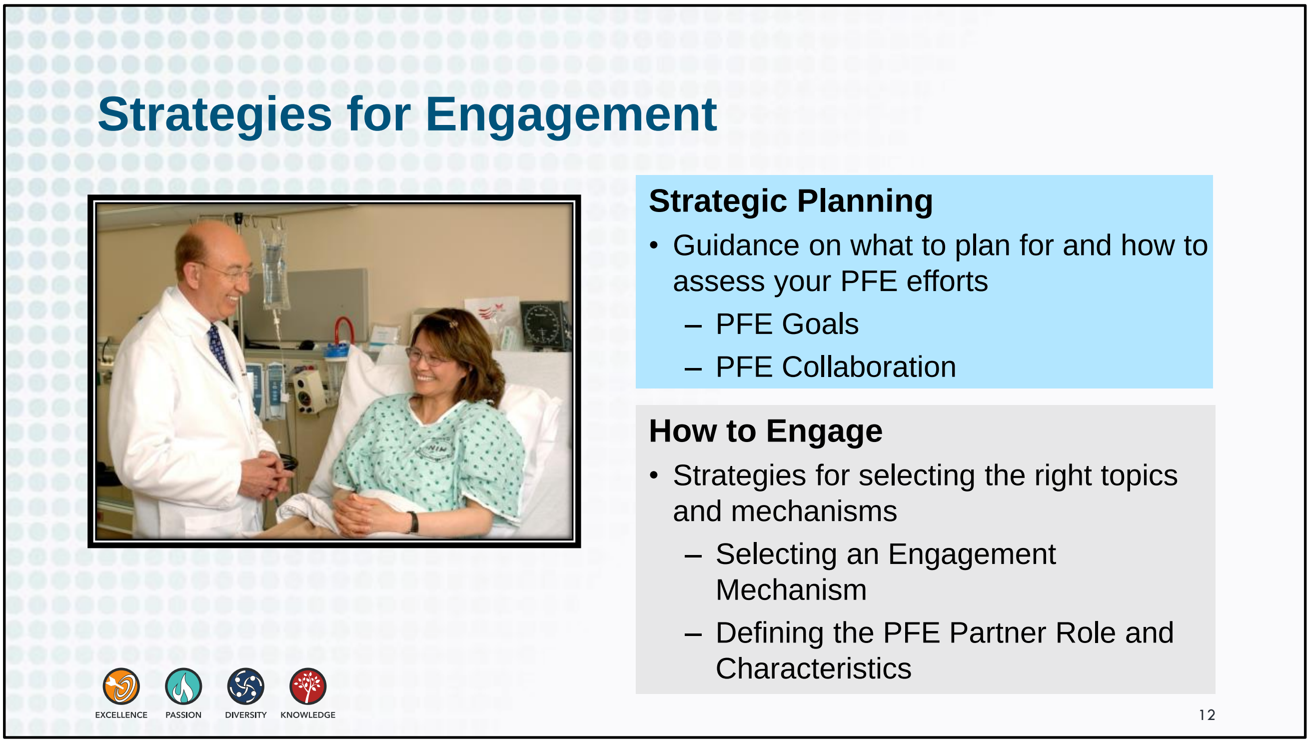
- ***Preparing your organization***—Provide strategies to prepare organization and staff. For example, leadership and staff should contemplate the desired collaboration, which includes laying down strategies and perhaps outlining training plans to ensure effective engagement.

  - ***Budget and honoraria***—When integrating PFE partners into the measure development process, it is a best practice to budget for compensation, usually in the form of an honoraria to the PFE partner as thanks for their time.

- ***PFE process***—This section goes into detail into the methods behind the PFE process, which is helpful for setting this framework for strategy, recruitment and preparation, facilitation, follow-up and refinement of an approach seen throughout the other sections.



- ***Strategic planning***—Provides guidance on assessing one's PFE goals and collaboration with PFE partners and how best to engage. Depending on the type of measure and duration and other factors, the goals and collaboration of a measure project and for the measure project team can be influenced by timeline and PFE partner criteria.

  - Are you working mostly with patients and families, or are you working with clinicians? A combination of the groups type of measure?
  - Is this a patient-reported outcome measure (PROM), or an electronic clinical quality measure (eCQM), or measure engagement like a TEP or a focus group or interview?

- ***How to engage***—The TEP allows for the building of long-term relationships with PFE partners to provide feedback at various stages of the measure development process. In contrast, there are the one-to-one interview or surveys, which are helpful when seeking short-term feedback on a measure at a specific stage, on a specific topic like messaging or framing.

  - ***Defining the PFE partner role and characteristics***—When reviewing a measure focused on PROs or inpatient care, consider how to engage patients having undergone procedures or inpatient care for a certain condition to share experiences on a TEP. Depending on the technicality of your measure, consider more experienced PFE partners. For example, a risk management reassessment measure may require PFE partners with knowledge in that area.

Finding Your PFE Partners

Recruitment

- Guidance on how to recruit persons and families
  - Process and contacts
  - Timeline

Onboarding & Orientation

- Processes to bring persons and families into PFE and prepare them to engage with your organization
  - Charter and Information Packets
  - Q&A and Office Hours

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- **Recruitment-internal**—Build your organization's capacity to identify and recruit persons and families independently through networking and building relationships with existing groups. The toolkit offers contacts to organizations, as well as tips on how you can reach out to them as both email templates on how to introduce yourself or through social media.

- **Recruitment-external**—If you wish to partner with another organization to recruit persons and families on your behalf, this can be an organization that has pre-curated relationships with varied PFE partners that can identify the right partners and satisfy the recruitment role. An example would be the person and family engagement network, run by Rainmakers Strategic Solutions on behalf of CMS.

  - ***Timeline***—Due to the time-sensitive nature to recruit for projects, please allow 30-60 days to identify, interview and onboard PFE partners. The toolkit walks through ways to factor that into your planning, onboarding and orientation.

- ***Onboarding and orientation***—This section contains processes to prepare PFE partners to engage with your organization. Here focus on building a strong rapport with PFE partners enhancing the sharing of expertise and insights for your project.

Engaging Your PFE Partners

Facilitating Engagement

- Meeting facilitation, preparation, and follow up with persons and families
  - Prepare PFE Partners
  - Refinement and Follow Up

Ongoing Communication

- Guidance on how to continue communication with persons and families
  - Maintaining Active Engagement
  - Supporting PFE Partners

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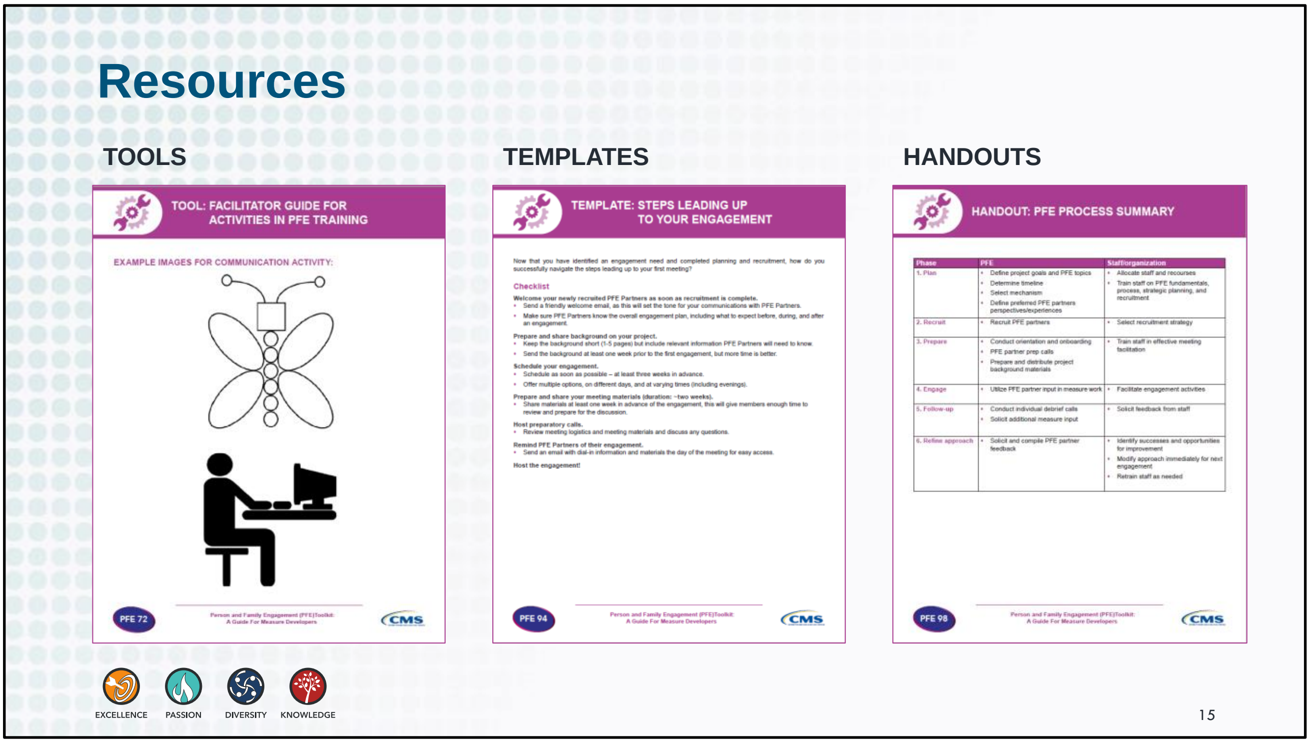
Facilitating engagement—This section contains instructions that focus on preparing meeting materials using plain language based on things such as health literacy guidelines, including everything from background handouts to the agenda, as well as assisting with slide development.

Ongoing communication—Ideal to practice ways to communicate with your PFE partners, since you may encounter long stretches of silence between TEP meetings, such as via a single email update every couple of weeks on measure progress, sharing meeting minutes, regular check-ins, or via a Facebook group to ensure the partners that their contributions remain impactful and valued.



For each section of the toolkit presented thus far there are accompanying tools, templates and handouts provided that are ready for use, all contained in Section 9 for easy access.

Tools—Shown on the left are documents to guide decision-making and to take action at each stage of the PFE process. For example, the illustration depicted is a “breaking the ice” fun activity for PFE partners or TEP members and project staff to assist everyone with familiarizing themselves.

Templates—Assists the drafting of documents. In creating a charter, it presents fairly standard questions that are filled with the necessary information, while still allowing for modifications to your specific needs. For example, the one in the middle is a checklist of steps leading up to your engagement.

Handouts—Prewritten documents with high-level ideas to introduce a concept to project staff or PFE partners to make decisions about a given measure. For example, here it elaborates on the PFE process and helps to introduce that concept to a group or just to lead a discussion about the measure.

Public Comment

Public Comment

- Measure developers and other CMS contractors solicit public comment on measures under development
- Feedback can provide critical suggestions not previously considered by the measure developer or the TEP
- Ensures a transparent process with balanced input
- The public may comment on proposed new measures and measures proposed to continue in a CMS program
- As part of the measure endorsement process, the CMS consensus-based entity (CBE), solicits public comments on measures seeking initial endorsement or maintenance of endorsement

CMS and its contractors value public comment, both during measure development and later during the implementation and use phases.

Types of Public Comment Opportunities

Comment on measures under development

- Opportunities are posted to MMS Hub website
- Comments submitted directly to measure developers
- Opportunity to provide feedback on a measure before it is submitted for use in a program

Comment on a proposed rule

- Proposed rules are published on the Federal Register: https://www.federalregister.gov/
- Comments are posted publicly
- Opportunity to provide feedback on measures or policies specific to a given CMS program

Navigating Public Comment Opportunities on MMS Hub

- MMS Hub has current and previous public comment opportunities
- The current opportunities include measures information and submission instructions
- Previous opportunities provide summaries of comments

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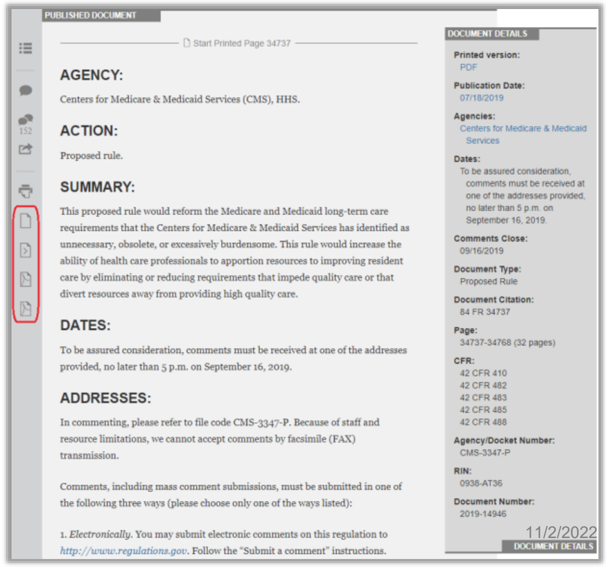
For opportunities to comment on measures under development (MUD) stakeholders may visit the MMS Hub "get involved" page where measure developers post information about current and past public comment opportunities.

Finding a Proposed Rule

- Two options:
  - Go to https://www.federalregister.gov/ and create an account (it's free!)
    - Set up a subscription for documents from Centers for Medicare & Medicaid Services
    - You'll receive email notifications when new proposed rules are posted for comment
  - Go to https://www.federalregister.gov/ and do a keyword search
    - No need for an account, but it can be difficult to find what you are looking for because of the volume of documents housed there

Submitting a Comment on a Proposed Rule



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Once an opportunity for public comment has been successfully identified on the Federal Register, you will land on the page depicted here. There is the opportunity to comment on a proposed rule related to long-term care facilities. The page includes a summary of information about the proposed rule, along with links to the PDF of the full rule. Once reviewing that information, click on the *green* button on the top right to submit your feedback (*circled in red*).

Tips for Writing a Comment

- **Comments are public**
  - Do not include any personal health information in your comments
- If you are providing comments on behalf of an organization, include that organization's name and your contact information
- Be specific about your support or concerns for a measure
  - Cite examples from the literature or from your lived experiences

Unlike comments for MUD, comments made via the Federal Register are public; therefore, refrain from including any personal information you wouldn't wish to share publicly in your comments.

Stay Up-to-Date on Public Comment Opportunities

Sign up for the MMS Newsletter for monthly announcements

- https://public.govdelivery.com/accounts/USCMS/subscriber/new

Subscribe to the Federal Register

- https://www.federalregister.gov/

Visit the MMS Hub

- https://mmshub.cms.gov/get-involved/public-comments/overview

The MMS Newsletter includes announcements about current ongoing TEP and public comment opportunities. The Federal Register subscription will notify you of any current opportunities to comment on federal rules. Please visit the MMS Hub to view opportunities to participate in TEPs or for public comment on measures under development (MUD).

Questions

Announcements

- November 30 Info Session from 2-3pm ET
  - "Measure Lifecyle Overview"

Registration: https://bit.ly/Nov30InfoSessionRegistration

Battelle
Contact**: MMSSupport@battelle.org**

CMS
Gequincia Polk
Contact**:** gequincia.polk@cms.hhs.gov
Melissa Gross Contact:
Melissa.Gross@cms.hhs.gov