



August 20, 2010

Janet Corrigan, PhD, MBA
President & CEO
National Quality Forum
601 Thirteenth Street, NW Suite 500 North
Washington, DC 20005

Dear Dr. Corrigan,

On behalf of the AQA Steering Group, we appreciate the opportunity to provide further comment on the National Quality Forum's (NQF) Establishment of a Partnership for Applying Measures to Improve Quality (Partnership) proposal. We recognize the thoughtful consideration of previous comments and support the NQF efforts to further elaborate on proposed member selection criteria, member responsibilities, and operating procedures. The AQA, a voluntary multi-stakeholder collaborative of physicians and other clinicians, consumers, purchasers, health plans, and others whose mission is to improve patient safety, health care quality and value in all settings, supports the direction and design of NQF's proposal as one that will optimize the success of a newly formed Partnership.

General Comments

The AQA appreciates the clarification of several areas we identified in our previous comments. We offer the following comments and identify a few areas needing additional specification. The AQA Steering Group expressed concern that more organizations did not submit comments to the Partnership proposal. Given the breadth of organizations that the National Quality Forum represents and will eventually be represented by the Partnership, we encourage NQF to consider alternative methods to ensure that perspectives from a greater number of members are reflected in the comments. A multi-pronged outreach strategy utilizing conference calls with individual organizations, webinars, letters to organization CEOs and Presidents, and more, should be considered. This approach will broaden outreach to potential Partnership organizations and promote early support that will lead to a successful effort.

Additionally, the AQA Steering Group recommends that the NQF construct the Partnership as an independent entity by establishing separate finances, budget, and staff, and dedicating resources to hold meetings and conduct independent research. This will ensure that the Partnership's processes and recommendations are unique and separate from the NQF.

Partnership Selection Criteria

The AQA Steering Group has had the opportunity to review the proposed criteria for the selection of organizations to the Partnership. The AQA agrees with the importance of and need for the following:

- *Organizations selected for the Partnership should be membership entities that represent leading stakeholder groups affected by the use of quality measures.*

- *Organizational Partnership members should have structures and processes for setting policy and communicating with their constituencies.*
- *Organizational Partnership members should contribute to a balance of stakeholder interests.*
- *Members should contribute to the diversity of the Partnership.*
- *Organizational members, as well as individual subject matter experts, should have demonstrated involvement and experience in quality measurement (e.g., development, endorsement, implementation, validation, and methodological issues), public reporting, and performance-based payment.*
- *Members should be capable of and committed to meeting Partnership member responsibilities.*

AQA shares a commitment to a membership structure that represents the full breadth of stakeholders affected by use of quality measures. We also concur with the need for a governance process that promotes input from all participants, represents a diversity of interests, and addresses needed technical expertise with performance measurement, methodological issues and reporting.

Availability of Partnership Resources

The document mentions the ability of members to volunteer time and make resources available as necessary to accomplish the work of the Partnership. We are concerned that Partnership members will be selected based on their ability to provide financial and other resources to Partnership activities. The Patient Protection and Affordable Care Act authorized and appropriated adequate financial resources for these activities; NQF should clarify that it is not seeking contribution of financial resources from the members, and that financial capacity or resources will not negatively impact selection to the Partnership.

Operating Procedures

The AQA Steering Group is concerned that voting by proxy will not be allowed by organizational members. While every effort should be made by participants to attend meetings, attendance at every meeting may not be possible. We strongly encourage NQF to establish a process by which participants may designate an alternative staff person to attend in their place and/or provide a mechanism for participants to vote on recommendations prior to meetings.

The AQA also recommends studying the roles of the chairs and vice chairs of subgroups in relation to their roles on the Coordinating Committee. This could facilitate communication of subgroup discussions and recommendations to the Partnership Coordinating Committee. We note that AQA Workgroup chairs also serve on the AQA Steering Group to represent the Workgroup's perspectives to the AQA leadership. This approach has worked well and should be considered as a successful model.

The NQF should clarify if the Coordinating Committee can change subgroup recommendations prior to submission to the Secretary. The document appears to allow for the Coordination Committee to revise subgroup recommendations without consulting with the subgroups. The AQA Steering Group recommends that the Coordinating Committee not be allowed to change subgroup recommendations without consultation with the appropriate subgroup. Having the subgroup chairs serve on the Coordination Committee will facilitate consultation between the

Coordinating Committee and subgroup if recommendations by the subgroup are not supported by the Coordinating Committee.

The AQA Steering Group appreciates the opportunity to provide these comments and looks forward to participating in future discussions that will pave the way for a successful Partnership.

Sincerely,

The AQA Steering Group

AARP
America's Health Insurance Plans
American Academy of Family Physicians
American Benefits Council
American College of Cardiology
American College of Physicians
American College of Surgeons
American Osteopathic Association
American Medical Association

American Physical Therapy Association
American Psychological Association
Consumers Union
HealthPartners
National Partnership for Women & Families
Pacific Business Group on Health
Society of Thoracic Surgeons
Wisconsin Collaborative for Health Care
Quality

Federal Liaison: Agency for Healthcare
Research and Quality