Value Set Impact Workgroup

Focus:

The Value Set Impact Workgroup was comprised of CMS personnel, contractors, and stakeholders who are electronic clinical quality measure (eCQM) developers, those creating eCQM development and testing tools, and those that implement measures. The Workgroup was established to improve the development process, quality, timing, and communications of value set changes for stakeholders such as EHR vendors, eligible professionals, and eligible hospitals.

History and Background:

The Value Set Impact Workgroup came out of the December 8-12, 2014 eCQM Kaizen Event. The original name for this group was "Value Set Versioning" because of the lack of clarity regarding how a value set change should be identified. The discussion at this meeting led to a name change, identification of challenges, aha moments, and the desired future state. A summary of the Kaizen Event is provided at this link https://ecqi.healthit.gov/file/12536 on the eCQI Resource Center.

Goals and Objectives:

Challenges/Aha's:

- Health IT vendors often do not work closely with measure developers as measures are being developed. They "react" after or during measure development, but are not engaged early in measure feasibility study.
- There is a need a common data definition for structured data -i.e., in the structured data, there is limited common understanding between what the measures define versus what the physician uses in clinical parlance.
- Some JIRA tickets never get answered in time or the answers are not pertinent. Decisions based on these answers may be are affected.
- There is a need to capture true quality or intent of the measure. UNABLE to capture the "Great quality" of clinical care.
- A Value set "definition" is a query into one or more code systems to retrieve coded concepts that are the set of usable concepts as defined by the value set – this is called the value set expansion code set.
- Authors of values set are often different than authors of measures, even though authors of measures may play the role of being authors of value sets.
- Definitions:
  - Binding: The technical rules that tie a value set to a measure and define how changes in a value set can be applied to the measure.
  - Dynamic binding: Default binding that occurs when only a value set identifier (an OID) and nothing else is used in a measure.
  - Static binding: Binding that adds "static date" to the value set identifier – this means the only value set expansion that can be used with the measure is the one that exists "as of this date."
- Because all expansions are drawn from an actual code system version, to fully specify the expansion set content one must defined both the Code system version and the value set version. If the version of ether is not stated, then the most currently available is used.
- For the value sets included in a release, there is no documentation of what value set version and code system were used to create the expansions.

Value Set Impact Workgroup

- Patient data matters. Assume that all patient data is recorded using current up-to-date code system version.
- There is a need to understand the implication of versioning in patient data, particularly regarding how to identify patient data using older retired codes.
- The HL7 Value set definition standard clarifies the difference between value set definition and the value set expansion.
- When change is required to a value set, the vendors do not know what the change is, when it is coming, and communications regarding the change are not provided in advance.
- <u>Value set publishing</u>: for eCQMs this has been tied to the release cycle but in the future changes to value sets could occur outside of the release.
- Nobody sees the value set until publication – usually until Apr 1st when the final rule is approved by CMS.   The approval by CMS is not early enough to have the vendors begin to adopt the change.
- There is no formal change control process in place for value set changes.
- Value set publishing for eCQMs is done by the measure steward. The steward makes the final decision for the measure along with the value set appropriate for the measure.
- Pre-publishing is one month before publishing.
    - Pain-point: The NLM needs to review earlier
    - Pain-point: Inflexibility in the timeline if the measure steward takes issue
- The following is the sequence of events in the value set life-cycle:
    - Authoring
    - Pre-publication
    - Publishing value set definition
    - CMS release of expansion sets
    - VSAC updates
    - Vendor processing
    - Provider processing
    - Patient data reported to HHS
- Problems in value sets are caused by mapping issues as multiple actors use in multiple places.
- Value set releases may need to be use/user focused, understanding how users consume.
- Some code systems might support updates easier than others.

Desired Future State:
- Consider how to add steps for social curation or a wider review of value sets before they are published and another time immediately after publication.
    - VSAC is working on a social curation or collaboration website/tool.
    - Change value set once a year or outside the update process.   Value set errata and vendors/providers are in support of timeline pending details.
    - Vendors/providers want more rapid response and changes for identified issues.
- Tag JIRA issues as value set issues when appropriate.
- After value set authoring, add a step for a preview of the value sets.
- Suggested value set changes are posted:
    - Consider using the new VSAC collaboration tool when it is ready
    - Resource center might be an option if it is not ready for 2015 annual update
    - Open a structured comment period

- - Include use cases
  - Interested parties review

- After the review period, the measure developers would have the time to take the consensus opinions to expert panels, if required.
- Make the final changes to the value sets following that.
- If an error is found, post publishing, consider timing, proposed process:
  - From May – Oct time frame:
    - Fix any significant errors in value sets
    - Evaluate against a set of criteria
    - Republish the corrected value set
  - From Oct – Apr time frame:
    - Fold anything found into the next update cycle
    - Spend more time on fixing error
    - Understand how changes play out
- In Provider mapping,
  - Value set is correct, but provider does not capture it.
  - Do we want to do something in the mapping process to help providers?
  - This is an important issue, but it is out of scope for this group.

Workgroup Metrics:

1) Reduction of Errors in Value Sets.
2) Percent of Value Set changes that are non-disruptive and being updated in a timely fashion.

Results – December 2014 to May 2016:

The workgroup worked to define a process that would allow critical value set content issues to be reviewed and addressed *after the eCQM yearly release* but before patient data collection began. A proposal for this was developed and submitted to CMS on 3/24/16. No decision on this proposal has occurred and the group was disbanded pending a final CMS review of the proposal.

For more information on the Value Set Impact Workgroup contact Rob McClure at rmcclure@mdpartners.com.

For information on current opportunities to engage with the eCQI Community visit the eCQI Resource Center at https://ecqi.healthit.gov/ecqi/engage-ecqi.