



July 24, 2018

Elisa Munthali, MPH
Senior Vice President, Quality Measurement
National Quality Forum
1030 15th Street, NW – Suite 800
Washington, DC 20005

Dear Ms. Munthali:

Kidney Care Partners (KCP) is a coalition of members of the kidney care community that includes the full spectrum of stakeholders related to dialysis care—patient advocates, healthcare professionals, dialysis providers, researchers, and manufacturers and suppliers—organized to advance policies that improve the quality of care for individuals with chronic kidney and end-stage renal disease. As a longstanding NQF Member, KCP participates actively in NQF's projects and unequivocally supports NQF's stated mission of leading national collaboration to improve healthcare quality through performance measurement.

We are writing today, however, to express our objection to NQF's recent decision to no longer provide transcripts of its Committees' meetings, webinars, and conference calls to Members and the public. As you know, performance measures submitted to NQF for endorsement consideration are oftentimes quite complex, and Committees' deliberations and decisionmaking processes are invariably more complicated and nuanced than can be adequately conveyed in the summaries provided in NQF's project reports: Access to these transcripts is a vital Member service and an essential Member benefit for participation in the NQF process; we rely on the transcripts to review the Committees' deliberations to shape our comments more accurately and thoughtfully. We do this both as a Member and in our role as a measure developer through the Kidney Care Quality Alliance (KCQA), KCP's measure development entity. In this latter role, we have always consulted NQF's meeting transcripts to review Committees' discussions and comments to ensure that we are appropriately responsive to their review of our measures.

We also consider transcripts to be fundamental to NQF's founding principle of transparency; again, meeting summaries simply are no substitute (by a long shot). Similarly, a link to a recording is a highly inefficient means for Members and the public to discern what transpired. Searchable transcripts that can be easily reviewed and digested are fundamental to providing accurate feedback on measures being considered or responses on KCQA's own measures. From our perspective as both a Member and developer, they are indispensable to a well-functioning process. We recognize that transcripts are a cost issue, but maintain they are a key element of NQF's work and one of the few, and in our case close to sole, use of Member dues for which we would derive a direct benefit. We formally request and strongly urge you to again make transcripts available for all Committee meetings and conference call/webinars.

Again, we applaud NQF's efforts to serve as a driving force for American healthcare quality improvement. KCP is among NQF's strongest supporters, and we believe that NQF-endorsed performance measures should be the standards used to measure the quality of healthcare in the United States; indeed, KCP's community legislation would ensure that CMS may not deploy performance measures that have been actively judged inappropriate for endorsement by NQF. KCP thanks you for your consideration of our concerns and urges you to reinstitute the availability of transcripts. If you have any questions, please do not hesitate to contact Lisa McGonigal, MD, MPH (lmcgon@msn.com or 203.530.9524).

Sincerely,


Mary Beth Donahue

Executive Director