

January 20, 2012

Janet M. Corrigan, PhD  
President and Chief Executive Officer  
National Quality Forum  
15th Street, NW  
Suite 800  
Washington, DC 20005

Re: Draft Measures Application Partnership Pre-Rulemaking Input Report

Dear Dr. Corrigan:

Thank you for the opportunity to provide comments on the National Quality Forum (NQF) Measures Application Partnership (MAP) Pre-Rulemaking Input Report. The American Society of Nephrology (ASN) represents more than 13,500 physicians, scientists, and other healthcare professionals dedicated to providing high-quality care to kidney patients and to developing cures for kidney diseases. ASN and the professionals it represents are strongly committed to maintaining the integrity of the physician-patient relationship as well as to equitable patient access to optimal quality care regardless of socioeconomic status, geographic location, or demographic characteristics.

ASN appreciates the efforts of NQF, as well as MAP, to identify the best available healthcare performance measures for use in specific applications. The society recognizes the importance of evidence-based clinical practice measurements in advancing the quality of care. ASN is committed to actively participating in the consideration and selection of evidence-based quality measures related to kidney disease care.

The society is disappointed, however, that NQF restricted the comment period for this crucial report to nine days. Given the limited time to review and contemplate the report, develop a thoughtful response to NQF, and arrive at consensus within the society about this feedback, ASN cannot provide comments on the measures at this time.

Additionally, ASN is troubled that NQF's comment submission website limits public commenters to providing no more than 1,500 characters for each section of the 79-page draft report. The draft report reviews 336 potential quality measures that, if implemented by the Centers for Medicare and Medicaid Services (CMS) or other payers, will have a powerful influence on the care patients receive. For comparison, ASN's most recent comment letter to the Medicare End-Stage Renal Disease Program regarding the possible addition of just seven new quality measures was 15 pages long and exceeded 35,000 characters.

Patients deserve thoughtful, nuanced consideration of the scientific evidence supporting potential quality measures—and of the measures' potential intended and unintended consequences. Developing high-quality performance measures is an extremely difficult process that demands meticulous deliberation of the possible risks and benefits. NQF's character limit devalues the measure development process and diminishes the credibility of this important endeavor.

ASN looks forward to reviewing the next draft report that NQF has tentatively scheduled for public comment in April 2012. The society urges NQF to grant adequate time for stakeholders, including the society, to give the draft report the thoughtful review it deserves. ASN also recommends that NQF eliminate restrictions on the number of characters public commenters may use on the comment submission website so stakeholders may provide more detailed, meaningful feedback.

Again, thank you for your time and consideration. ASN stands ready to discuss any of these suggestions with NQF if it would be helpful. To discuss ASN's comments, please contact ASN Manager of Policy and Government Affairs Rachel N. Shaffer at [rshaffer@asn-online.org](mailto:rshaffer@asn-online.org) or at (202) 640-4659.

Sincerely,

Ronald J. Falk, MD, FASN  
President

cc: The Honorable Max S. Baucus  
The Honorable David L. Camp  
The Honorable Thomas R. Harkin  
Thomas H. Hostetter, MD  
Rachel N. Shaffer  
The Honorable Frederick S. Upton