

Attachment C: AHRQ Responses to Public Comments to 60-day FRN and Summary of Changes to CPCF

The 60 day public comment period for the AHRQ CHIPRA Pediatric Quality Measures Program Proposed Collection began on April 18, 2012, and continued until June 18, 2012. Two public comments were received during this time. AHRQ has carefully reviewed each comment and has prepared responses below.

Public Comment 1: The National Association of School Nursing provided comments supportive of the data collection approach and rationale for AHRQ's CHIPRA Pediatric Quality Measures Program (PQMP) Candidate Measure Submission Form. This commenter recommended revising the form "Under 4) Settings, services, measure domains, and populations addressed by the measure, item d). specifies "ambulatory and inpatient settings where this care occurs" and requested that item d). be expanded to suggest schools, and other community and public health settings since a significant amount of care occurs in school health offices, as opposed to the ambulatory primary care, school based health centers.

We thank this commenter for their input to inform revisions to the data collection form. We have revised Section IV. Measure Categories to include school, other community and public health settings.

Public Comment 2: The American Optometric Association provided comments supportive of the data collection approach and rationale for AHRQ's CHIPRA Pediatric Quality Measures Program (PQMP) Candidate Measure Submission Form. Further, the commenter provided evidence supporting the "...need for the specific measurement category for children with ADHD.." and noted they have "...ongoing concerns that vision and eye health have not been integrated into diagnosis, treatment and management of ADHD." The commenter further noted "We would like better assurances that comprehensive eye examination be integrated into these ADHD phases of quality measure development."

We thank this commenter for their support of AHRQ's CHIPRA Pediatric Quality Measures Program (PQMP) Candidate Measure Submission Form. We further note that this comment does not result in any change in the CHIPRA PQMP Candidate Measure Submission Form but rather refers to the measure development processes which are outside of the purview of AHRQ's role in the development and implementation of the CHIPRA Pediatric Quality Measures Program (PQMP) Candidate Measure Submission Form.

Other Comments: Since the publication of 60-day FRN, during April-July 2012, in addition to the two public comments (above), AHRQ also received substantial input for revisions from several PQMP stakeholders -- specifically, the CoEs, CCTAC, and several SNAC members. This feedback highlighted for AHRQ of the need to carefully review and revise the CHIPRA PQMP Candidate Measure Form in order to improve the flow, scientific content, comprehensiveness, clarity, consistency of language, format, and usability of the form for use by measure submitters during the Public Call for Measures in 2013 and 2014.

Summary of Changes to CPCF in light of Public and Other Comments: As a result of the above comments (from the public and PQMP stakeholders), AHRQ revised the CPCF. The changes to the CPCF are listed below:

- 1) Revisions to the order of existing sections (applies to measure owner, NQF ID, and summary statement);
- 2) Revisions to language and content of existing sections (applies to numerator exclusions, denominator exclusions, levels of aggregation, importance of the measure, identification of disparities, references and footnotes, weblink for technical specifications for initial core set, and deletion of duplicative language within identification of disparities section); and
- 3) Addition of new sections (applies to introduction, table of contents, measure number, limitations of the measure, and supplementary material).

As a result of these changes to the CPCF between the 60-day FRN version [see Appendix A] and 30-day FRN version [See Appendix E], AHRQ has prepared a track change version comparing the 60-day FRN version and 30-day FRN version [See Appendix D].