



**PBGH**

Pacific Business  
Group on Health

221 Main Street  
Suite 1500  
San Francisco  
CA 94105

www.pbgh.org

www.healthscope.org

Tel: 415.281.8660

Fax: 415.281.0960

July 12, 2006

The National Quality Forum

**Attn: 'Quality of Cancer Care Measures' Project**

601 Thirteenth Street, NW

Suite 500 North

Washington, DC 20005

Fax: 202-783-3434

Pre-voting review for "National Voluntary Consensus Standards for Symptom Management and End-of-Life Care in Cancer Patients"

Dear Sir or Madam:

Thank you for the opportunity to comment on the proposed Quality of Cancer Care Measures. While the National Quality Forum was contractually required to identify measures not only for accountability, but also for quality improvement and surveillance, we hope that NQF will strive to focus its valuable resources, energy, and imprimatur on measures for public reporting.

We offer the following comments:

***Research Recommendation #5: HIPAA compliant patient data***

- Additional information would be helpful about (1) what concerns the Steering Committee had in relation to how patient-specific data can be collected in accordance with all HIPAA requirements would be helpful especially since data collection of this nature seems commonplace in other provider settings; and (2) the research recommendation that suggests pursuing the "development of a confidential unique identifier" seems beyond the scope of this project (the health care system has already developed strategies to address this goal).

***Research Recommendation #6: Stability of cancer-related measures***

- Measures should indeed be continuously assessed to ensure that they are not based on outdated methods and procedure. However this seems to be relevant to the Standards Maintenance Committee, and should not be a research recommendation.
- Is the sampling methodology 100% of discharged patients?
- Is there any research that indicates whether or not the length of the survey impacts the response rate?
- Question G3: Based on the care the patient received, would you recommend hospice services to others? [ Yes/No]
  - Given that a consumer's decision-making may be multi-faceted, i.e., based on other aspects beyond patient care, please consider

revising the question to assess their willingness to recommend without the qualifying phrase.

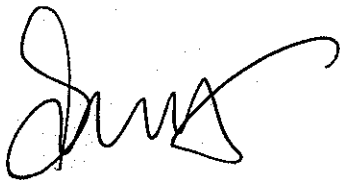
- Question 15 and 16: "Are you of Hispanic or Spanish family background?" and "Which of the following best describes your race?"
  - Consider revising to align with the Hospital-CAHPS race/ethnicity questions.
- Please note that line 482 in the Commentary contains a sentence fragment.
- And finally, if the Evaluation Survey receives NQF-endorsement, will it be only for cancer patients or all hospice patients?

***Eight Recommended Surveillance Measures***

- We acknowledge the reality of the considerations that led to recommending that these measures be for surveillance only. However (1) each one of these considerations pertain to varying degrees to other NQF-endorsed measures; (2) some are addressable with additional provider effort (e.g., provider assembly of its own provider-specific data that includes outputs from the SEER data base); and (3) these measures fill significant voids in efficiency and patient-centeredness measures of high importance to purchasers and consumers.

Please contact me if I may be of further help.

Sincerely,



Arnold Milstein MD, MPH  
Medical Director  
Pacific Business Group on Health