

Public Comment Topic Overview

Clinical Quality Measures and Public Comments

A transformation is underway in our healthcare system, driven by performance measurement, and the stakes are higher than ever to ensure that robust clinical quality measures (CQMs) are available across all settings. For the first time in many years, critically important metrics at the national level have improved, including decreasing:

- hospital readmission rates
- central-line associated blood stream infections
- surgical site infections
- early elective deliveries
- ventilator-associated pneumonia

These real and measurable improvements increase the length and quality of people's lives. Because an important use of quality measures is to provide information to patients and clinicians on the quality of care provided, CQM's like these depend on people like you participating in the Public Comment Process to make them a working reality.

What is the Public Comment process?

The public comment process is essential to ensure that CMS quality measures are developed transparently. It is an opportunity to collect balanced input from critical stakeholders on the measures under development and to provide critical feedback and suggestions from the widest array of interested parties that will inform the final measure. Get involved by providing your feedback through the public comments process.

What does a Public Comment Entail?

Providing comments is not voting for or against something, it is about offering support, different

perspectives, and alternatives. A well supported comment can have a strong impact on the measure. If you are providing comments, here are some best practices to consider:

- Understand what you are commenting on—read the documents carefully
- Be concise but provide support for your comments (scientific evidence, how you will be impacted, etc.)
- State your expertise or experience with the subject matter
- Acknowledge differing perspectives that may not align with yours
- Acknowledge the cons of your position as well as the pros
- Offer alternatives if you disagree with the approach
- Be constructive

When Do I Make Public Comments?

[Calls for Public Comment](#) are usually posted online for at least two weeks to allow sufficient time for the public to provide comments. Notifications that public comments are being accepted are published in the MMS newsletter. [Sign up to receive the newsletter here.](#)

Commenters submit their comments via email or other tools as directed by the specific post on the website. At the end of the public comment period, the measure developer prepares a preliminary Public Comment Summary Report that includes verbatim comments as well as a summary and analysis of the public comments that were received. After discussion with the Technical Expert Panel (TEP), the measure developer may make changes to the measures as a result of the public comments. The measure developer then finalizes the Public Comment Summary Report (including verbatim comments) and submits the report to be posted to the [CMS MMS Public Comments website](#).

Get Involved. Your Perspective and Comments are needed.

