Endorsement & Maintenance Overview of the Instrument-Derived Measure Set Submission Framework

Beginning with the Spring 2025 Endorsement & Maintenance (E&M) cycle, measure developers will submit their instrument-derived measures (e.g., measures derived from Consumer Assessment of Healthcare Providers and Systems [CAHPS] surveys) using a new submission framework. Unlike the prior framework, which evaluated and endorsed a set of measures from a single instrument as one unit, the new framework evaluates and endorses each derived measure individually.[1]

The requirements and endorsement criteria for instrument-derived measures (IDMs) are the same as other clinical quality measures. The CBE does not endorse instruments or surveys[2]; however, developers are encouraged to attest that the instrument or survey was developed using a best practice protocol.[3] Benefits of this new framework include:

- More granular and appropriate measure evaluations and endorsement decisions.
- Actionable feedback and improvement opportunities at the derived measure level.
- Alignment with other initiatives by the Centers for Medicare & Medicaid Services (CMS), such as the CMS Measures Inventory Tool (CMIT) and the Measures Under Consideration (MUC) Entry/Review Information Tool (MERIT).

This overview introduces the new framework for instrument and instrument-derived measure (IDMs) set submissions and is intended to assist developers in planning for these submissions. For more information on E&M submission processes and to download submission templates, visit the E&M Measure Submission page.

How will instruments and IDMs be submitted?

Submissions of instrument-derived measure sets will take place at two levels:

- Submission of the instrument
- Separate submissions for each associated IDM

Both the instrument and the associated IDMs proceed through the Intent to Submit (ITS) and Full Measure Submission (FMS) processes, and each level of the submission has specific requirements. The online ITS and FMS submission processes have been designed to minimize duplicative effort, allowing relevant instrument-level data to be entered once and inherited by each associated IDM. For example, information for **Section 4 Feasibility** is entered for the instrument, and each IDM incorporates and displays this information, both in the submission form and in the public-facing measure display, *making the IDM a complete measure record*. To support submission planning, the instrument and IDM have separate MS Word submission

[1] Individual instrument or survey items that are combined into a composite and aggregated to the accountable entity level would be reviewed and endorsed as a single measure. Developers are encouraged to review what is feasible and appropriate for their measure(s).

[2] See Appendix G of the Endorsement and Maintenance Guidebook.

[3] For example, see G.N. Holmbeck and K.A. Devine, Editorial: An Author's Checklist for Measure Development and Validation Manuscripts, Journal of Pediatric Psychology, vol. 34, pp. 691-696, 2009.

templates that include only the fields that are entered at the respective level. See Table 1 for an overview of data requirements at the instrument and IDM levels.

Each IDM has a unique CBE ID linked with the respective survey instrument, which has its own CBE ID. For example:

- Survey instrument: CBE ID #1234
- Measures derived from that instrument: CBE ID #1234-1, CBE #1234-2, etc.

Instrument and IDM Submission Workflow

Follow the steps below to successfully submit an instrument and IDM set; see Figure 1 for an overview of the process. **Detailed instructions** for each type of submission can be found in the submission templates. The templates include instructions for how to start a new submission and navigate to draft submissions.

1. **Create Instrument ITS:** Begin your submission of an **instrument and IDM set** by starting the ITS submission for the instrument and then saving your progress.
    a. Select whether the instrument and IDM set is new or maintenance, and then for *1.1 Measure Structure*, select "Instrument + Derived Measure Set."
    b. For *1.1a Instrument or Derived Measure*, select "Instrument."
    c. Finish the **Measure Identification** section and click "save."
    d. These steps establish a record for the instrument in the Submission Tool and Repository (STAR) database so that you can associate each subsequent IDM with the instrument record. A record of the instrument must be established in STAR before creating any associated IDMs.

2. **Create IDM ITS:** Once the instrument ITS draft has been saved, you can start the ITS submission for **any associated IDMs**.
    a. Select whether the IDM itself is new or maintenance (**note:** if the instrument is "new," the IDM must also be "new") and then for *1.1 Measure Structure*, select "Instrument + Derived Measure Set."
    b. For *1.1a Instrument or Derived Measure*, select "Derived Measure."
    c. The IDM ITS form contains a lookup field, *1.2 Associated Instrument Lookup*, to identify the associated instrument. Begin typing the CBE ID or title of the instrument record you created earlier, select the correct instrument, complete the **Measure Identification** section, and click "save." Note that the E&M review cycle is selected at the IDM level.
    d. These steps link the IDM with the instrument, which allows inherited instrument data to auto-populate the IDM form.

3. **Continue with ITS Drafts:** You may work on the **Measure Information** section of the ITS forms for the instrument and associated IDMs simultaneously, if desired. **Please note:**
    a. Saving the draft instrument ITS auto-populates the respective fields in the associated draft IDM ITS; *you may have to refresh the browser tab containing the IDM form for the changes to appear*.
    b. Instrument-level ITS fields can be edited only in the instrument form.
    c. IDM-level ITS fields can be edited only in the IDM form.

4. **Submit ITS (All) for Review:** Submit your ITS forms for both the instrument and associated IDMs. **Please note:**

a. Once all information has been entered for the instrument and associated IDMs, review for completeness and accuracy, and then submit the ITS forms.
b. It is *strongly recommended* that you submit the instrument form for "run validation" and address any errors in the instrument form *before* submitting any associated IDM forms.
c. ITS submissions for the instrument and associated IDMs will be reviewed by Battelle staff and approved for FMS at the same time.

5. **Draft Instrument and IDM FMS:** After approval for FMS, you may work on **all sections** of the FMS forms for the instrument and associated IDMs simultaneously, if desired. **Please note:**
    a. Saving the draft instrument FMS auto-populates the respective fields in the associated draft IDM FMS; *you may have to refresh the browser tab containing the IDM form for the changes to appear*.
    b. Instrument-level FMS fields can be edited only in the instrument form.
    c. IDM-level FMS fields can be edited only in the IDM form.

6. **Submit FMS (All) for Review:** Submit your FMS forms for both the instrument and associated IDMs. **Please note:**
    a. Once all information has been entered for the instrument and associated IDMs, review for completeness and accuracy, and then submit the FMS forms.
    b. It is *strongly recommended* that you submit the instrument form for "run validation" and address any errors in the instrument form *before* submitting any associated IDM forms.
    c. FMS submissions for the instrument and associated IDMs will be reviewed by Battelle staff and approved for publishing for public comment and E&M committee review at the same time.

Quick Tips & Reminders

- *It is essential* that you use the correct MS Word templates for the type of submission you are planning; please contact PQMsupport@battelle.org before starting if you are uncertain which templates to use. *DO NOT* use a template from a previous cycle.
- At each stage, begin drafting the instrument forms first to help with the drafting of IDMs.
    - Be sure to submit the instrument form by moving the status to "Submit Completed ITS (run validation)" and resolve any missing data errors *before* submitting any IDM forms.
- You can revise both the instrument information and IDM information before submitting.
- Developers will have the opportunity to revise the instrument submission at the beginning of each cycle (during ITS).
- Developers should submit accountable entity level testing data for each IDM individually, and not an overall testing attachment (more on this in the next section).
- Developers are encouraged to combine multiple IDMs into composite measures, where appropriate.
- The unit for endorsement review is the IDM; developers may submit different IDMs from the same instrument to different E&M review cycles.
- Once published, measure reviewers and other users will access the complete record for each IDM through the STAR database measure display.
- Please contact PQMsupport@battelle.org for any technical assistance needs.

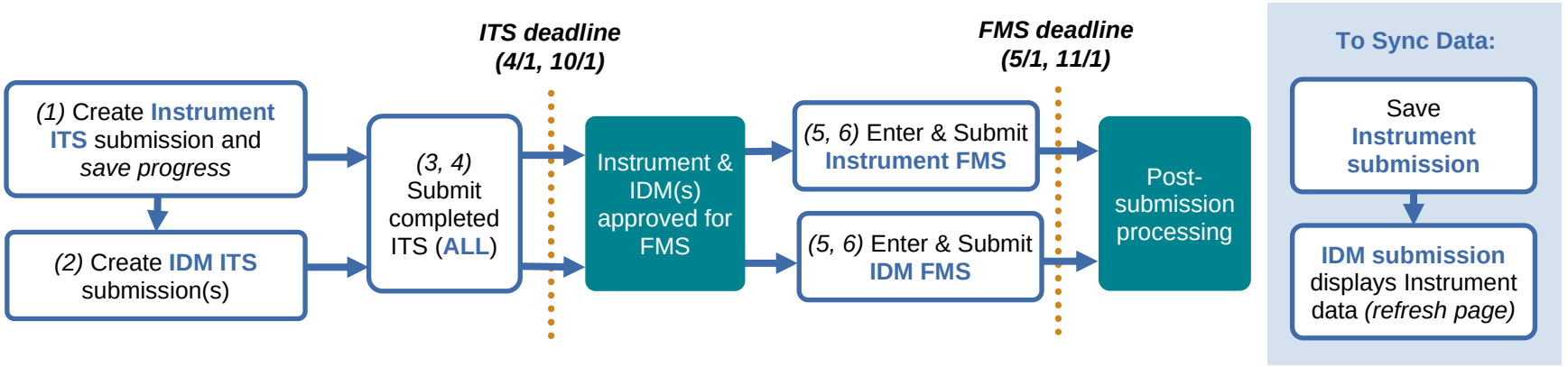

Figure 1. Instrument and IDM Submission Workflow

Information Required at Each Level

The table below lists the sections and fields or content areas that are collected for the instrument and for each associated IDM. Note that some fields are collected for both the instrument and IDMs while others are collected for one or the other. For example, developers are asked to provide a title, description, and rationale for both the instrument and each IDM; however, patient/encounter level testing is considered a property of the instrument and is collected at the instrument level, while accountable entity level testing is considered a property of the IDM and is collected for each IDM separately. Refer to the instrument and IDM submission templates for details.

Table 1. ITS and FMS Form Fields Collected for Instrument and Associated IDMs

Section	**Fields** (Instruments)	**Fields** (IDMs)
Attestations (ITS)	A1, A2, A4, A5a, A7, A9, A11	A3, A5b, A5c, A6, A8, A10
Points of Contact (ITS)	All fields	N/A
Measure Identification and Measure Information (ITS/FMS)	CBE ID; E&M project; [instrument] title, description, and rationale; measure type; level of analysis; care setting; testing data information; scoring details	CBE ID; E&M cycle; measure title, description, and rationale; numerator and denominator fields; scoring details (if different from instrument)
Importance (FMS)	Logic model; evidence of importance; meaningfulness	Evidence of importance; anticipated impact; quality landscape; gap; meaningfulness
Equity (FMS)	N/A	All fields

Section	**Fields** (Instruments)	**Fields** (IDMs)
Feasibility (FMS)	All fields	N/A
Scientific Acceptability (FMS)	Testing data and population information; type of patient/encounter level testing conducted (e.g., psychometric testing of instrument); patient or encounter level testing methods, results, and interpretation	Type of accountable entity testing conducted; accountable entity level testing methods, results, and interpretation; risk adjustment or stratification conceptual model, methods, results, and interpretation
Use (ITS) **Usability** (FMS)	Current/planned use; program details; usability fields (except progress on improvement)	Current/planned use (if different from instrument); all usability fields
Supplemental Attachment (FMS)	Optional	Optional