

# New Status for Measure Deferrals Beyond 6 Years

## Overview of Public Comment Opportunity

Battelle invited public comments on a new endorsement status for maintenance measures, endorsed prior to October 2023, needing deferrals beyond Battelle's 6-year limit due to measure developer/steward resource constraints (e.g., funding, staffing, data limitation). The current policy allows for a 5-year period until measures are due for maintenance review. Measure developers/stewards have the option to request deferral for up to two consecutive cycles (for a total of 1 additional year).

Beginning with the Spring 2026 cycle, maintenance measures last reviewed before October 2023 are eligible for the Endorsed by Extension designation, which would last up to (but not to exceed) 8 years since the previous maintenance review. A maintenance measure may receive this status contingent upon a formal attestation that the measure remains relevant, has not been associated with reported unintended consequences or adverse outcomes for patients, and continues to align with current professional standards.

We greatly appreciate the active participation of all interested parties, including Endorsement and Maintenance (E&M) committee members, measure developers, stewards, and the public. Their engagement ensures a diverse range of voices and perspectives are considered as we refine our approach. During the public comment period from January 19 through February 2, 2026, we received [14 comments](#) from six organizations and several individuals.

## Organizations that Submitted Comments

- American Society of Nephrology (ASN)
- Dental Quality Alliance (DQA)
- Human Services Research Institute (HRSI)
- Mathematica
- National Committee for Quality Assurance (NCQA)
- Yale Center for Outcomes Research & Evaluation (CORE)

## Individuals who Submitted Comments

- Jasmine Burrell
- Christopher DiMarco
- Barbara Goodman
- Gerri Lamb
- Abate Mammo
- Cindi McElhaney

- Monika Ray
- Patrick S. Romano

## Proposed Endorsement Status Description

*Endorsed by Extension* is a temporary, time-limited continuation of endorsement granted when a measure steward attests that the measure remains safe and effective (with no material changes) but cannot complete the maintenance review within 6 years.

## Summary of Public Comments

Interested parties had the opportunity to express their views on the proposed refinements during the public comment period. Below is a summary of the key concerns and suggestions received, along with the organizations and individuals that expressed these concerns.

### 1. Purpose and Rationale

- **Support:** DQA, HRSI, NCQA, Mathematica, and several individuals expressed support for the intent of the Endorsed by Extension status, acknowledging the substantial and growing resource constraints that can impede timely maintenance even when measures remain clinically relevant, widely used, and aligned with current standards. Commenters emphasized the value of a time-limited safeguard to prevent disruption in programs reliant on endorsed measures, reduce administrative burden associated with resubmitting a new measure, and protect continuity, comparability, and stakeholder confidence. Commenters also highlighted the financial pressures and staffing challenges currently faced by health care organizations and stewards. Several commenters underscored the required attestation that measures remain relevant, safe, and aligned with standards can preserve the integrity of endorsement while allowing short-term flexibility.
- **Concerns:** ASN and a few individuals cautioned that lengthening the time between full maintenance reviews could erode measure integrity, diminish timely stakeholder input, and risk misalignment of measures with evolving evidence and clinical practice. Commenters flagged possible conflicts with statutory expectations for ongoing measure updates and independent review, warning that extended delays could jeopardize patient safety and undermine trust in the endorsement process. Commenters also raised fairness and incentive concerns, including that extensions might reward poor planning or encourage deferral of needed maintenance. They also questioned whether the extension would become routine rather than exceptional. Commenters emphasized that deferring maintenance could heighten future burdens, as data, evidence, and guidelines evolve, ultimately increasing the difficulty of regaining full endorsement when the extension expires.

### 2. Definition and Verification of “Resource Constraints”

- **Support:** Some commenters supported recognizing resource constraints but urged an approach that avoids subjective, burdensome determinations. HRSI suggested making the status available irrespective of resource constraints, focusing instead on whether the measure remains safe, relevant, and aligned with standards, so PQM can avoid inconsistent threshold-setting and the administrative burden of verifying constraint claims. This perspective views the extension primarily as a continuity tool

when measures remain sound but cannot meet the maintenance timeline for a period, regardless of the specific cause of delay.

- **Concerns:** NCQA and a few individuals asked PQM to define “resource constraints” explicitly, clarify how requests will be reviewed and verified, and specify what documentation is needed to demonstrate a legitimate constraint. They questioned the practicality and fairness of distinguishing true constraints from poor prioritization, underbudgeting, or staff turnover, and warned that vague criteria could lead to arbitrary decisions or overuse of extensions. Commenters asked whether a steward’s self-report would suffice and who would adjudicate contested claims, cautioning that PQM might struggle to apply the resource constraint criteria consistently, leading to arbitrary or non-reproducible decisions.

### 3. Definition and Treatment of “Material Changes”

- **Support:** HSRI, NCQA, Yale CORE, and Mathematica supported the intent to avoid granting extensions to measures that have changed substantially but urged PQM to clearly define “material change” to maintain credibility and ensure that stewards do not delay maintenance when substantive revisions are required. They suggested that PQM could strengthen the extension process by outlining examples (e.g., risk-adjustment updates, denominator changes, revised exclusions) to help stewards determine eligibility with confidence. Commenters stressed that routine, minor updates, such as aligning with updated guidelines, adjusting age ranges, or making minor specification refinements, should not disqualify a measure from extension. Yale CORE recommended an approach that replaces the hard prohibition with a requirement to disclose any changes and explain their impact, thereby preserving flexibility for small, necessary updates while maintaining transparency about measure evolution.
- **Concerns:** NCQA and Mathematica warned that a strict “no material changes” rule could impede practical updates needed for program use and guideline alignment, creating tension between keeping measures useful in the field and maintaining eligibility for an extension. They noted that many stewards conduct ongoing adjustments to improve feasibility, reliability, or usability, and a rigid criterion risks excluding many otherwise appropriate candidates for an extension. Mathematica flagged that measures are frequently updated annually to remain aligned with guidelines and this could trigger early maintenance review for minor updates and could increase burden, potentially re-creating the same resource constraints that prompted the extension request in the first place.

### 4. Length of Extension & “Up to 8 Years” Calculation

- **Support:** HSRI and some individuals emphasized the importance of a clear, time-limited cap to preserve endorsement credibility while enabling continuity through a defined period. Some recommended using the recency of testing data from the previous cycle to inform both eligibility and the length of any extension, aligning duration with the strength and timeliness of evidence. Others indicated support for the proposed length of extension contingent on clear interpretation (for example, that the “up to 8 years” is a total time since the last maintenance review, not an additional 8 years on top of the original 5-year cycle).
- **Concerns:** NCQA and some individuals asked how PQM would set the specific

length of an extension within the “up to 8 years” window and sought a reproducible methodology to ensure fairness across stewards. One commenter requested PQM adopt a single specific duration to avoid uneven application while another stressed the need to clarify whether the 8-year cap includes the original 5-year period or could lead to a 13-year gap without full maintenance. Others found the phrase “not to exceed 8 years” confusing and requested clearer wording to avoid misinterpretation and inconsistent implementation.

## 5. Eligibility Cutoff

- **Support:** Mathematica and an individual supported limiting eligibility to measures endorsed prior to October 2023, citing differences in process expectations and notice. They viewed this restriction as a pragmatic way to address a transition period for legacy measures that entered the PQM process under different assumptions. Commenters indicated this targeted eligibility helps bound the policy and sets clear expectations for measures endorsed after PQM’s process changes took effect.
- **Concerns:** Yale CORE and HSRI urged PQM to drop the pre-October 2023 eligibility cutoff, arguing that challenges stewards face, especially funding, are not always tied to when the measure was last endorsed. They noted that that developers of pre-October 2023 measures were not necessarily unaware of endorsement obligations, as the previous consensus-based entity (CBE) also provided timelines and tools for anticipating upcoming reviews. They suggested applying the policy uniformly to all measures meeting the safety and relevance criteria to avoid inequities and ensure the policy’s benefits extend where needed. One commenter also asked PQM to remain flexible in scheduling, noting that PQM’s own capacity constraints can shift developer timelines and budgets and may require individualized approaches beyond the new status.

## 6. Attestation Requirements, Transparency, and Tracking

- **Support:** DQA and a few commenters supported the attestation safeguard as an essential safeguard to ensure that measures remain safe, effective, and aligned with professional standards during the extended period. They recommended PQM provide guidance for completing the attestation to ensure consistency and suggested tracking and reporting patterns in extension use (e.g., by content area, measure type, and program use) to strengthen oversight and transparency. Others proposed that transparency expectations for measure users be reinforced and that PQM clarify transition expectations so implementers understand when and how measures will return for full maintenance review.
- **Concerns:** NCQA and a few commenters asked PQM to clarify what evidence is expected to support the attestation and whether self-reporting is sufficient or requires documentation or third-party verification. They also highlighted tensions that could arise if changes become necessary during the extension period, potentially triggering early maintenance and reintroducing the same resource constraints that warranted the extension. Some commenters emphasized the need for consistent approval criteria and transparent decision-making to mitigate perceptions of arbitrariness and to support predictable planning among stewards and implementers.

## 7. Process Logistics and Timing

- **Concerns:** Mathematica and a few commenters requested precise instructions on

when to submit requests relative to the original and deferred maintenance cycles. Commenters asked whether the “1 month prior to the scheduled maintenance cycle” stipulation refers to the original or the last allowable deferral and how early maintenance reviews will be handled if a material change arises during the extension. Commenters stated that without clear process steps, implementation could become confusing or inconsistent, potentially disadvantaging some stewards and compromising the predictability the policy is intended to provide.

## 8. Continuity versus Risk of Outdated Measures

- **Support:** DQA and a few commenters emphasized that the extension helps maintain continuity for widely used measures across quality reporting programs such as Medicaid and Children’s Health Insurance Program (CHIP). They stated that a loss of endorsement for measures that remain widely used and sound due to temporary resource shortages could cause confusion and add administrative burden to resubmit measures as “new.” Commenters noted that continuity supports longitudinal analyses, quality improvement efforts, and consistency for implementers. DQA highlighted operational consequences for programs relying on stable, vetted measures. Commenters described the Endorsed by Extension status as a measured response that preserves beneficial measures for patients and programs during temporary constraints without compromising safety, provided that attestation safeguards and time limits are enforced.
- **Concerns:** Commenters cautioned that with rapidly evolving data environments, evidence bases, and clinical guidelines, extended gaps between maintenance reviews may allow outdated or misaligned measures to persist in programs, with potential unintended consequences for patient care and facility performance. ASN highlighted two End-Stage Renal Disease Quality Improvement Program (ESRD QIP) measures that could be eligible for the proposed status, underscoring the need for continued expert review and stakeholder input. Commenters noted that significant changes in data over a prolonged interval could increase the burden of eventual maintenance and re-endorsement, undermining measures’ validity and usefulness.

## 9. Statutory Alignment and Patient Safety

- **Concerns:** ASN argued the proposal conflicts with statutory expectations for regular review and updating of measures, citing provisions in Medicare Improvements for Patients and Providers Act of 2008 (MIPPA, Public Law 110-275) and the Social Security Act that emphasize continual maintenance and stakeholder engagement. They warned that bypassing scheduled reviews for up to 8 years risks allowing outdated measures to guide care and reimbursement, threatening patient safety and undermining the credibility of endorsement. Other commenters echoed the safety concern, stating that if stewards can attest to ongoing safety and alignment, they should be able to complete full maintenance and worried that deferring maintenance may minimize accountability.

## 10. Alternative Approach

- **Support:** One commenter proposed replacing “Endorsed by Extension” with a short “Suspended Endorsement” status (limited to 1 to 2 years) to prevent arbitrary determinations of resource constraints, avoid lengthy delays, and maintain pressure for timely resubmission. They argued this would transparently signal that a measure

is temporarily not in maintained status without yet recommending removal from programs. The approach seeks to preserve accountability and momentum in the maintenance cycle while accommodating brief, documented delays.

## Response to Public Comments

We extend our gratitude to all commenters for their thoughtful feedback. Such insights are instrumental in refining our processes. Below are our responses to the comments received:

- 1. Purpose and Rationale:** We appreciate the broad support for the intent behind the *Endorsed by Extension* status and agree that the policy must balance flexibility with rigor to maintain confidence in the endorsement process. As commenters noted, the extension is designed as a narrowly applied, time-limited option, not a substitute for formal review, and its purpose is to mitigate temporary, documented resource constraints that may prevent stewards from completing maintenance while the measure continues to meet all core standards of safety, relevance, and professional alignment. We also acknowledge the operational and financial pressures many organizations currently face and agree that uninterrupted access to stable measures is essential for continuity across federal and state programs.

We recognize concerns that extending time between full maintenance reviews could delay necessary updates or reduce opportunities for stakeholder engagement. To protect measure integrity and stakeholder trust, Battelle will apply the following safeguards:

- a. a structured, measure steward attestation and internal Battelle review process;
- b. a maximum endorsement period of 8 years from the last maintenance endorsement decision;
- c. the ability to require early maintenance due to evidence submitted by any interested party of unintended consequences or material changes;
- d. ongoing surveillance expectations during the extension; and
- e. transparent tracking and reporting of measures in *Endorsed by Extension*.

We affirm that the *Endorsed by Extension* status is not intended to replace routine maintenance or diminish stakeholder input. It is a limited, transitional tool to mitigate disruption while preserving credibility and patient safety. We will ensure that the extension remains an exception, not a default pathway.

- 2. Definition and Verification of “Resource Constraints:”** We appreciate the feedback regarding the purpose and operationalization of resource constraints in the extension policy. We recognize that resource limitations can take many forms and that distinguishing between true constraints and operational challenges may not always be straightforward. We will retain the requirement to demonstrate resource constraints to focus the policy on exceptional circumstances and preserve the cadence of maintenance.

For the purposes of this guidance, resource constraints are defined as time-bound, documented limitations outside the steward’s routine planning that materially impede the ability to complete maintenance (e.g., unexpected loss or delay of funding, sudden unavailability of required data sources, external program timeline changes, and

extraordinary circumstances that prevent the fulfillment of contractual obligations [i.e., force majeure events]). Poor endorsement cycle planning, routine budgeting choices, and normal staff turnover do not, by themselves, qualify as resource constraints.

We will publish guidance and a request form outlining acceptable evidence of a resource constraint (e.g., sponsor correspondence, funding notices, data access communications). A senior official of the steward organization must attest to the constraint. Battelle may request additional information and will evaluate requests using a consistent rubric. Self-report without documentation will not be sufficient.

Battelle considered the suggestion to make the status available regardless of resource constraints but will maintain the constraint requirement at this time to ensure the status remains targeted and to minimize the risk of routine extension requests. Battelle will monitor use and revisit this aspect in future updates, if warranted.

- 3. Definition and Treatment of “Material Changes:”** We will retain the requirement that measures with material changes are not eligible for *Endorsed by Extension*, and will include clarifying guidance within the request form that distinguishes between changes requiring full maintenance review and refinements that do not substantively affect the measure’s conceptual foundation, population, or validity.

A material change is defined as any modification to the measure specifications that significantly affects the measure results such as:

- changes to the population being measured (e.g., changes in age inclusions, changes in diagnoses or other inclusion criteria, changes in excluded populations, changes from one type of insured population to another population);
- changes to what is being measured (e.g., changes in target values such as blood pressure or lipid values);
- inclusion of new data source(s); or
- expansion of the level or changing unit of analysis or care setting(s) (e.g., adding clinician level to a measure currently endorsed at practice level).

We acknowledge concerns that routine updates such as minor specification clarifications, alignment with guideline changes, or updates that do not alter the measure’s structure may be necessary for ongoing use. We highlight that measure developers and stewards currently have the option to submit an [annual update](#) to Battelle, which allows for the reporting of non-material specification changes. If a material change becomes necessary during an extension period, the steward must notify Battelle. Battelle may require early maintenance review to ensure the change is appropriately evaluated.

- 4. Length of Extension & “Up to 8 Years” Calculation:** We agree that clarity in how extension periods are calculated is essential. We will update the guidance to explicitly state that the “up to 8 years” time frame means a maximum of 8 years from the date of the most recent maintenance decision. The extension does not add 8 years on top of the standard 5-year cycle; total time since the last endorsement maintenance cycle may not exceed 8 years. For example, if a measure was last reviewed in Spring 2021 and is scheduled for endorsement maintenance in Spring 2026, this would be 5 years since the last endorsement cycle. The measure would not be able to exceed 8 years, which would

be Spring 2029. This clarification ensures that the extension cannot result in a 13-year period without review.

The developer/steward must indicate the preferred length of the extension and substantiate the need for the requested time period (see #6 below).

If approved, we will document the rationale and publish the *Endorsed by Extension* status along with the extended maintenance cycle for the measure on the PQM website.

- 5. Eligibility Cutoff:** We acknowledge the viewpoint that measures endorsed prior to the transition into the PQM E&M process may have had different expectations and that an initial eligibility boundary could help manage the transition. At the same time, commenters raised valid points that funding challenges and operational delays are not strictly tied to endorsement dates.

We will retain the proposal to limit eligibility to measures whose most recent endorsement predates October 2023 to address legacy measures that entered the current CBE process under different expectations and transition conditions. Measures endorsed after October 2023 receive explicit annual scheduling and communications calibrated to the current process. We will continue to work with stewards on individual scheduling outside of *Endorsed by Extension* where mutual capacity constraints arise. We will also monitor the policy's impact during the first year and reassess the eligibility time frame if evidence indicates that broader application is needed to meet policy goals without compromising maintenance cadence.

- 6. Attestation Requirements, Transparency, and Tracking:** We appreciate the broad support for the attestation process and agree that it is a critical safeguard for maintaining measure integrity during the extension period. To strengthen consistency and reduce ambiguity, we will publish an attestation form with instructions for providing:

- a. Justification for Extension and Relevance
  - i. Clearly state the length of the requested extension.
  - ii. Provide a description of the measure's ongoing relevance to a health care priority or gap, supported by evidence of current program use and reliance.
- b. Evidence Supporting the Request
  - i. Summarize the recency and strength of prior testing and evidence for the measure.
  - ii. Justify that the measure maintains alignment with current professional standards and guidelines, including appropriate citations.
  - iii. Assess the stability of the clinical construct and practice guidelines relevant to the measure.
- c. Review of Outcomes and Consequences
  - i. Attest to the absence of reported adverse outcomes or unintended consequences, or provide an assessment if any have been identified.
- d. Assessment and Disclosure of Changes

- i. Provide the measure's current specification.
  - ii. Disclose and describe any current or anticipated changes to the measure or its specifications.
- e. Resource Constraints
- i. Describe and document the resource constraints that have impacted the ability to update or maintain the measure.
- f. Return to Maintenance
- i. Provide a realistic plan and time frame for returning the measure to routine maintenance, including steps to resolve any identified constraints.

A senior official of the measure steward organization must sign the attestation. Battelle may request additional evidence, if needed.

We will publish and maintain a list of measures with *Endorsed by Extension*, including the extension end date and a brief rationale.

- 7. Process Logistics and Timing:** We appreciate commenters' requests for operational clarity regarding timing and submission procedures. Stewards must request *Endorsed by Extension* at least 1 month prior to the start of the scheduled maintenance cycle following any allowable deferrals (i.e., before the twice-deferred cycle begins). Battelle will add a step-by-step process guide and timeline to the guidance. The general sequence is as follows:

- a. Steward requests deferrals (up to the existing maximum, which is two consecutive cycles).
- b. If constraints persist, steward requests *Endorsed by Extension* status at least 1 month before the second deferred cycle starts.
- c. Battelle reviews the attestation and documentation and issues a decision, including the extension end date. Battelle will target timely decisions to support planning.

If during the extension the steward identifies a material change or safety signal, the steward must notify Battelle. Battelle may require early maintenance review. Battelle offers technical assistance to help stewards determine eligibility and clarify next steps.

- 8. Continuity versus Risk of Outdated Measures:** We agree that continuity is a core value of the endorsement system and appreciate stakeholder support for preventing unnecessary disruptions to widely used measures. At the same time, we acknowledge concerns that extended intervals between maintenance reviews could allow misaligned or outdated measures to persist. The attestation requirement, and the need to affirm safety, relevance, and alignment with standards, is meant to mitigate this risk.

In addition to the attestation, we will require the submission of an annual update form from the developer/stewards during extension period so we have continued communication and assurances of non-material updates to the measure.

- 9. Statutory Alignment and Patient Safety:** We are committed to the statutory intent that measures be updated or retired as new evidence emerges. *Endorsed by Extension* is a

temporary, conditional continuation of endorsement with active oversight and surveillance, not a waiver of maintenance expectations. If new evidence suggests a measure requires modification or raises safety concerns, Battelle will continue to require early maintenance review.

Program-inclusion decisions remain with program authorities (e.g., CMS). We will continue to facilitate robust public input and measure review and will use *Endorsed by Extension* sparingly, with strict safeguards, to ensure patient safety and the credibility of endorsement remain paramount.

- 10. Alternative Approach:** We appreciate the suggestion of a short “Suspended Endorsement” status. At this time, Battelle will not adopt a suspended status due to the potential for confusion among implementers and stakeholders and the risk of unintended program consequences. Battelle believes *Endorsed by Extension*, with strict eligibility, clear time limits, surveillance expectations, and transparency, better balances continuity and accountability.

Battelle will evaluate the implementation of *Endorsed by Extension* during its first year, including stakeholder feedback and program impact. If evidence indicates that an alternative signaling mechanism (such as a limited suspension) would better meet policy goals while minimizing disruption, Battelle will consider it in a future update.