

1. Criteria should not be listed as a footnote. All criteria and testing results needed to meet the criteria must be clearly spelled out in the E&M Guidebook and must not be addressed via a footnote.
2. Please provide updates to the E&M Guidebook via a track changes version, or version with updates highlighted in yellow, and then also post a clean version of the Guidebook with track changes accepted. This will allow developers, committee members and the public to clearly see the updates that are being made for the posted version of the Guidebook.
3. Provide reference information as to why accountability reliability testing must meet the criteria of ≥ 0.6 for 70% or more of the accountable entities. The posted document <https://www.qualityforum.org/WorkArea/linkit.aspx?LinkIdentifier=id&ItemID=97326> does not provide any details regarding how the 70% cutoff was determined.
 - For Accountable Entity-Level Reliability^{14,15,14}
 - Signal-to-noise ≥ 0.6 for 70% or more of the accountable entities; OR
 - Split-half reliability (ICC) ≥ 0.6 for 70% or more of the accountable entities; AND
 - 100% of the accountable entities have reliability estimates of ≥ 0.4 ; OR
 - Less than 100% of accountable entities have reliability estimates of 0.4, but justification and descriptive statistics are provided (see [Appendix H4](#)); AND
 - *[For maintenance]*
 - Accountable entity-level reliability testing provided.
4. Under the validity criteria, clarify the use of face validity. Can face validity be submitted for a maintenance measure? Is face validity alone sufficient for initial endorsement, or is additional testing required? Is it a requirement that face validity is submitted for a measure undergoing initial endorsement? There is a disparity between what is in the guidebook as required and what is listed online when you enter the measures.

Validity

- For Person- or Encounter-Level Validity
 - Reviewer determines methodology employed and the analytic approach presented are appropriate and thorough; AND
 - Reviewer determines results of empirical testing or prior evidence adequately demonstrates that all critical data elements (numerator, denominator, exclusions) are valid with limited or no threats to validity present.
- For Accountable Entity-Level Validity
 - Reviewer determines methodology employed is adequate and the analytic approach presented is appropriate and thorough (e.g., clear reasoning for conducting a correlation analysis with another quality indicator, clear hypothesis for correlations, and supportive evidence from mechanistic studies to justify correlation results); AND
 - Reviewer determines results of empirical testing adequately demonstrate that the measure is valid with limited to no threats to validity; AND
 - Reviewer determines the interpretation of the empirical results supports an inference of validity; AND
 - *[For initial endorsement]*
 - Face validity is adequate.⁷

5. Footnote #7 should be removed from face validity as it is not applicable.

Validity

- For Person- or Encounter-Level Validity
 - Reviewer determines methodology employed and the analytic approach presented are appropriate and thorough; AND
 - Reviewer determines results of empirical testing or prior evidence adequately demonstrates that all critical data elements (numerator, denominator, exclusions) are valid with limited or no threats to validity present.
- For Accountable Entity-Level Validity
 - Reviewer determines methodology employed is adequate and the analytic approach presented is appropriate and thorough (e.g., clear reasoning for conducting a correlation analysis with another quality indicator, clear hypothesis for correlations, and supportive evidence from mechanistic studies to justify correlation results); AND
 - Reviewer determines results of empirical testing adequately demonstrate that the measure is valid with limited to no threats to validity; AND
 - Reviewer determines the interpretation of the empirical results supports an inference of validity; AND
 - *[For initial endorsement]*
 - Face validity is adequate.⁷

⁷ The E&M process does not require independent verification of all existing measures that could be considered related or competing.

6. Multiple documents do not match, so it creates confusion in the criteria. In the Full Measure Submission template, Section 6, advises that questions 6.2.2, 6.2.3, 6.2.4, and 6.2.5 are required if the measure is in maintenance review or has a current status of 'In Use'. The key here is the word OR. This wording says that it is required regardless of if the measure is new, as long as the developer checks that the measure is 'In Use'. The Full Measure Submission template, Endorsement Guidebook and Measure Evaluation Rubric do not match.

The Full Measure Submission template should be updated so that questions 6.2.2, 6.2.3, 6.2.4, and 6.2.5 are required if the measure is in maintenance review. This section "or has a current status of 'In Use'" should be removed, so that all of the documents mentioned above match, and it is clear what is required for maintenance and new measures.