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#### Rural Health Panel

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To Whom It May Concern:

The Rural Policy Research Institute Health Panel (Panel) was established in 1993 to provide science-based, objective policy analysis to federal policymakers. The Panel welcomes the opportunity to submit comments on *Addressing the Low Case-Volume Challenge in Healthcare Performance Measurement of Rural Providers: Recommendations from the MAP Rural Health Technical Expert Panel*. Our comments are limited to rural-specific issues and are structured to parallel questions posed, or issues stated, by the National Quality Forum (not technical comments regarding specific sections of the draft report).

The RUPRI Health Panel strongly supports the NQF Measure Applications Partnership Rural Health Workgroup. Valid and reliable quality performance measures are critically important to rural health care organizations. Low-case volumes may be the most challenging rural quality measurement issue; i.e., rural health care organization quality measurement has been statistically challenged by low case-volumes, and rural health care organizations have been historically precluded from many health care reform demonstrations due to low case-volumes.

The RUPRI Health Panel supports the statistical models recommended by the NQF Technical Expert Panel to address low case-volumes. However, we wish to underscore the recommendation that CMS, HRSA, AHRQ, and other quality measurement organizations specifically incorporate the proposed models in quality measure development, interpretation, and application within public scoring and payment incentive systems. Furthermore, we recommend that CMMI and other health care demonstration organizations incorporate the proposed statistical models into health care demonstration design and participant eligibility.

Sincerely,

The Rural Policy Research Institute Health Panel

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