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December 31, 2018

OMB
Office of Information and Regulatory Affairs
Attention: CMS Desk Officer
Fax Number: (202) 395-5806
Email: OIRA_submission@omb.eop.gov

To Whom it May Concern,

Thank you for the opportunity to comment on *CMS-10675; Evaluation of the CMS Quality Improvement Organizations: Medication Safety and Adverse Drug Event Prevention*.

Our organization, the American Health Quality Association (AHQA), represents the Quality Innovation Network-Quality Improvement Organizations (QIN-QIOs) and their quality improvement partners throughout the United States, Puerto Rico, the Virgin Islands, and the outer Pacific Islands. Our association's goal is to make health care better, safer, and available at a lower cost.

As an organization representing the QIN-QIOs and their quality improvement partners, we are invested in ensuring that the evaluation methodology utilized accurately assesses the QIN-QIO program. We support CMS's efforts to evaluate the effectiveness of this task and believe that we have a shared desire for a high-quality, accurate assessment.

We provided detailed comments in response to the first public comment period on the Evaluation of the CMS Quality Improvement Organizations: Medication Safety and Adverse Drug Event Prevention in September 2018 and understand that many of our comments were addressed and incorporated into a revised evaluation methodology and survey tool. We applaud CMS for its attention and response to our comments and support the removal of nursing homes from the current study.

Based on the information provided in the current notice to collection information, we do not have any further comments.

However, we would have found it very helpful to review the updated survey tool that was referenced throughout the notice to collect information in order to be able to provide more substantive comments. We recommend that CMS consider releasing survey drafts during public comment periods, or provide an avenue for requesting access to such documents, in order for the public to be able to provide robust and fully informed comment.

Again, thank you for the opportunity to share this feedback. The QIN-QIOs support CMS in its efforts to define the impact of the QIN-QIO program and welcome the opportunity to discuss ways to measure their impact in this and future scopes of work.

Regards,

A handwritten signature in black ink, appearing to read "Alison Teitelbaum". The signature is fluid and cursive, with the first name "Alison" written in a larger, more prominent script than the last name "Teitelbaum".

Alison Teitelbaum, MS, MPH
Executive Director