



Technical Guidance for Valid Reporting of Custodian ID using CMS Certification Numbers in QRDA Category I Files for Hospital Quality Reporting Programs

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- » The Centers for Medicare & Medicaid Services (CMS) has issued technical guidance for vendors and data submitters on how to electronically submit hospital custodian ID using CMS Certification Numbers (CCNs)
- » Reporting CCN is required in Quality Reporting Document Architecture (QRDA) Category I files for Hospital Quality Reporting (HQR) programs
- » This guidance affects:
 - Electronic Clinical Quality Measure submissions for calendar year 2017
 - QRDA Category I files for the Hospital Inpatient Quality Reporting Program and the Medicare Electronic Health Record Incentive Program for Eligible Hospitals and Critical Access Hospitals



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» The Issue:

- CCN is represented by using the custodian/assignedCustodian/representedCustodianOrganization/id element in the QRDA Category I document header specified by the CMS template called the “QRDA Category I Report”
- The schematron rules published for the 2017 CMS QRDA I Implementation Guide erroneously enforces the 6 to 10 characters length check on all hospital identifiers
- If identifiers other than CCN with values shorter than 6 characters or longer than 10 characters are provided, an error will be triggered



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- » The Resolution:
 - Submitters are advised to actively ensure that only a CCN number and no other identifiers are submitted for custodian/assignedCustodian/representedCustodianOrganization/id

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- » Example xml snippet that validates successfully for the 2017 reporting period for QRDA I test submission to HQR:

```
<custodian>
  <assignedCustodian>
    <representedCustodianOrganization>
      <!-- @extension attribute contains the submitter's CCN.
      @nullFlavor is not allowed. -->
      <id root="2.16.840.1.113883.4.336"
extension="800890"/>
      <name>Good Health Hospital</name>
      <telecom value="tel:(555)555-1212" use="WP"/>
      <addr use="WP">
        <streetAddressLine>17 Daws Rd.</streetAddressLine>
        <city>Blue Bell</city>
        <state>MA</state>
        <postalCode>02368</postalCode>
        <country>US</country>
      </addr>
    </representedCustodianOrganization>
  </assignedCustodian>
</custodian>
```

- » Example xml snippet that results in error:

```
<custodian>
  <assignedCustodian>
    <representedCustodianOrganization>
      <!-- @extension attribute contains the submitter's CCN.
      @nullFlavor is not allowed. -->
      <id root="2.16.840.1.113883.4.336" extension="800890"/>
      <!-- TIN identifier -->
      <id root="2.16.840.1.113883.4.336"extension="12345678901"/>
      <name>Good Health Hospital</name>
      <telecom value="tel:(555)555-1212" use="WP"/>
      <addr use="WP">
        <streetAddressLine>17 Daws Rd.</streetAddressLine>
        <city>Blue Bell</city>
        <state>MA</state>
        <postalCode>02368</postalCode>
        <country>US</country>
      </addr>
    </representedCustodianOrganization>
  </assignedCustodian>
</custodian>
```

Resources

- » Current and past implementation guides - [eCQI Resource Center QRDA Space](#)
- » For questions related to this guidance, the QRDA Implementation Guides or Schematrons, visit the [ONC QRDA JIRA Issue Tracker](#)
- » For questions related to Quality Payment Program/MIPS submissions, visit the Quality Payment Program [website](#) or call 1-866-288-8292