CMS QUALITY REPORTING DOCUMENT ARCHITECTURE (QRDA) III UPDATES: 2020 CMS QRDA III IG, SCHEMATRON, AND SAMPLE FILES AND THE UPDATED 2019 CMS QRDA III IG ADDENDUM

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CMS QRDA III UPDATES

• 2020 CMS QRDA III IG, Schematrons, and Sample Files
• Updated 2019 CMS QRDA III IG Addendum
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• In July 2019, the Centers for Medicare & Medicaid Services (CMS) released the 2020 CMS QRDA III Implementation Guide (IG), along with Schematron, and Sample Files.

• The 2020 CMS QRDA III IG outlines requirements for eligible clinicians and eligible professionals to report electronic clinical quality measures (eCQMs), improvement activities, and promoting interoperability measures for the calendar year 2020 performance period for:

  • Quality Payment Program: Merit-based Incentive Payment System (MIPS) and Advanced Alternative Payment Models (APMs)
  • Comprehensive Primary Care Plus (CPC+)
  • Medicaid Promoting Interoperability (PI)
2020 CMS QRDA III IG, SCHEMATRONS, AND SAMPLE FILES

• The 2020 CMS QRDA III IG contains several high-level changes as compared with the 2019 CMS QRDA III IG:

• Changes to Performance Period Reporting:
  • Performance period reporting for the Quality and the Improvement Activities performance categories under MIPS is changed from either the individual measure/activity level or performance category level to performance category level only for the 2020 performance period.
  • Performance period reporting for the PI performance category and for CPC+ for the Quality performance category remain at the performance category level only.

• eCQM Universally Unique Identifiers (UUIDs) have been updated for the 2020 performance period eCQMs that were published on May 13, 2019.

Please note, measures will not be eligible for 2020 reporting unless and until they are proposed and finalized through notice-and-comment rulemaking for the applicable program.
2020 CMS QRDA III IG, SCHEMATRONS, AND SAMPLE FILES

• Changes to the CMS EHR Certification ID requirement:
  - CPC+ participants must include a CMS EHR Certification ID that represents the Certified EHR Technology (CEHRT) used by the CPC+ practice sites during the performance period.
  - The CMS EHR Certification ID is optional for the MIPS Quality performance category and remains required for the PI performance category.
In July 2019, CMS has released an updated addendum to the 2019 CMS QRDA Category III IG for Eligible Clinicians and Eligible Professionals Programs to support Calendar Year (CY) 2019 eCQM, Improvement Activity, and Promoting Interoperability reporting.

The 2019 QRDA III IG and addendum provides technical instructions for reporting for:

- Quality Payment Program: MIPS and Advanced APMs
- CPC+
- MIPS Promoting Interoperability Performance Category
This latest addendum provides an update for the retroactive change to the Query of Prescription Drug Monitoring Program (PDMP) measure based on the newly released FY 2020 Physician Fee Schedule Notice of Proposed Rule Making (NPRM). Based on the Promoting Interoperability category, the addendum reflects the Query of PDMP measure reporting metric change from a Numerator/Denominator measure to a Yes/No response. This change is retroactively applied to the 2019 performance period.
As a reminder, for 2019, MIPS eligible clinicians and groups are required to submit data for a full calendar year for the Quality performance category, a minimum of 90 continuous days for the Improvement Activities performance category, and a minimum of 90 continuous days for the Promoting Interoperability performance category.
RESOURCES AVAILABLE ONLINE

CMS has QRDA-related resources available:

• Additional QRDA-related resources, as well as current and past implementation guides, are found on the Electronic Clinical Quality Improvement (eCQI) Resource Center QRDA page.

• For questions related to this guidance, the QRDA IGs, Schematrons, or Sample Files, visit the Office of the National Coordinator (ONC) Project Tracking System (Jira) QRDA project.

• For questions related to Quality Payment Program/MIPS data submissions visit the Quality Payment Program website, contact by phone 1-866-288-8292, or email QPP@cms.hhs.gov.