

Brief Guide to 2015 Edition Certification for Electronic Clinical Quality Measures (eCQM)

Updated February 25, 2016

Schedule with Milestones for Release of Cypress v3 for 2015 Certification Rule, eCQM-related Centers for Medicare & Medicaid Services (CMS) programs, and 2016-17 Eligible Hospital (EH)/Eligible Professional (EP) Measure Publication

Release	Description	Date
Cypress CE w/2015 Bundle	Initial alpha version of Cypress with certification features for C1-C4	Thu 02/18/16
Cypress Demo Server	Alpha release of Cypress available as VMs and on AHRQ Demo Server	Thu 02/25/16
Cypress API	API allowing vendors to automate C1-C4 certification operations (excluding manual review portion of C1)	Thu 03/31/16
2016 eCQM Publication	Republication of 93 eCQMs for 2017 reporting period	Wed 04/06/16
Multiple Bundle Support	Support for importing multiple measure bundles (2015 & 2016) into a single Cypress application	Thu 04/28/16
Administration System	Role/Permission system to allow ATs to deploy public Cypress applications so vendors can interact directly with Cypress application during certification	Thu 05/12/16
Cypress Toolbox	Cypress Validation Utility functionality integrated into Cypress including calculation of Cat I documents	Thu 05/26/16
EP/EH Candidate Bundle	Candidate Bundle for 2017 EP/EH measures for use in Cypress v3	Mon 06/6/16

Release	Description	Date
Cypress v3	Cypress v3 + 2017 EP/EH Measure bundle release	Thu 07/28/16
2017 Reporting Period	eCQMs fully deployed; measurement periods start for 2017 program year	Sun 01/01/17
2016 Submission Period	eCQM data for 2016 Reporting Period submitted to CMS	Jan/Feb 2017
2017 eCQM Publication	Proposed eCQM publication for 2018 Reporting Period	Apr/May 2017
Cypress v3.1 Release	Cypress v3.1 release, corresponding to the 2017 eCQM publication	May/June 2017
2018 Reporting Period	eCQMs fully deployed; measurement periods start for 2018 program year	Mon 01/01/18
2017 Submission Period	eCQM data for 2017 Reporting Period submitted to CMS	Jan/Feb 2018

Certification Best Practices Checklist

Through March 2016:

- Review [CMS Meaningful Use Stage 3](#) and [ONC 2015 Edition Certification final rule](#) and [2015 Edition Clarifications and Corrections](#)
- Determine which CMS programs you will report to and identify development activities needed to meet program requirements
- Begin development of a testing plan for relevant products
- Develop an implementation and certification timeline
- Review and provide feedback on draft measure versions for the annual update released by CMS (available on Jira for EH (<https://jira.oncprojectracking.org/browse/CQM-1865>) and EP measures (<https://jira.oncprojectracking.org/browse/CQM-1866>))
- Develop a work plan for measure changes for the annual update
- Begin testing and analysis of [Cypress v3.0 alpha pre-release versions](#); [provide feedback to ONC/Cypress](#)

April – June 2016:

- Download and perform final review of [2016 eCQM Annual Update specifications](#)
- Finalize work plan for measure updates into products
- Refine internal testing plan
- Begin testing and analysis of [Cypress v3.0 beta pre-release versions](#); [provide feedback to ONC/Cypress](#)
- Begin measure development for update and [provide feedback to CMS](#)

July 2016:

- Continue development and testing of measure updates
- Begin educational materials and plan for rollout of the annual updates for customers
- Download [Cypress v3.0 release](#)

- Download [CMS 2017 Implementation Guide, sample files and schematrons](#)

August – December 2016:

- Schedule 2015 Edition Certification testing for eQMs, if not already done
- Complete internal Cypress testing for certification and CMS requirements
- Begin analysis and testing of CMS submission requirements for relevant programs
- Provide feedback to CMS and ONC on program requirements, [certification](#), and [eCQM implementation](#) and make additional adjustments as needed
- Roll out measure updates to sites

January 2017 and later:

- Data collection for the 2017 measurement period begins
- Final reporting validation occurs
- Measure report submission occurs for 2016 program year
- Complete ONC 2015 Edition Certification testing, if not already done

Certification Frequently Asked Questions

Q1. What are the similarities between the 2015 Edition Certification testing for eCQMs compared to the 2014 Edition?

A1. Cypress will remain the eCQM certification testing tool in 2016 through 2018.

- Cypress will continue to allow testing of QRDA-I and QRDA-III test cases against QDM-based HQMF-formatted eCQMs.
- Certification will continue to test the capture, calculation and reporting of QRDA.
- Cypress will continue to support annual CMS eCQM measure publications.
- Cypress will continue to include functionality for testing CMS Implementation Guide requirements. It will still not perform some real-time tests that are requirements of submission, like validating individual NPIs or CMS IDs except to form and manner.
- Vendors will be able to choose to test either the 2015 or 2016 eCQMs in Cypress v3.0.

Q2. What is different from the 2015 Edition Certification testing for eCQMs compared to the 2014 Edition?

A2. Cypress v3.0 is the tool that can be used for 2015 Edition Certification. The goal of the 2015 Edition is to increase test robustness while adding modularity for users to customize their testing plan.

- Cypress testing will be performed on a single measure at a time in the tool; however testing can still be done simultaneously on sets of measures in a single certification test session.
- Systems will be expected to ingest test cases electronically in addition to demonstrating they can manually enter selected data.
- In Cypress v3.0, the validation utility functionality will be integrated into the Cypress tool itself. Errors in conformance to the CMS

requirements will be displayed as CMS IG-related warnings; however, users can hide these warnings if they so choose.

- Negative testing will be incorporated into Cypress testing to check that systems can identify errors in QRDA formatted files.
- Cypress v3 will offer an increased ability for vendors to perform code substitution if their systems cannot accept all the optional terminologies in the measure specifications.
- An additional criteria (C4) is available in the 2015 Edition to test the ability to filter measure reports by TIN, NPI, payer, demographics, problems, and practice site.

Q3. Why does ONC Certification not match the requirements for CMS reporting?

A3. ONC has, from the beginning, envisioned a certification program that can be flexible in testing to meet the needs of different products and sites. This also avoids the case where two different programs have conflicting requirements.

- For that reason, certification testing is agnostic generally to program requirements. It is possible that other HHS programs could use ONC certification in the future and this could potentially avoid additional testing requirements for users who are already certified.
- In addition, individual program requirements may not always be available in the timeframe of certification test tool development and regulation.

Cypress v3.0 allows optional testing for the CMS program IG requirements, which at the current time includes only the CMS 2015 and 2016 requirements for reporting. The Cypress Validation Utility release for the CMS 2016 IG will be integrated into the Cypress v3.0 version available in July 2016.

Q4. What is the Cypress Validation Utility and what does it do?

A4. The Cypress Validation Utility allows users to validate that their QRDA-I and –III reports can be formatted correctly to the additional requirements outlined in the appropriate CMS Implementation Guide for that measure version. For Cypress v3.0, it is intended to be released as an integrated part of the Cypress Certification Tool in July 2016 and used throughout measure implementation and testing to help reporters and systems ensure reporting success on the first attempt. In Cypress v3.0, you can turn off warnings from the CMS IG additional tests if you choose. If not, they will be visible as warnings but not fail testing as errors.

Q5. Why can't I certify with the 2015 eCQM Annual Update using either the 2014 or the 2015 Edition versions of certification now?

A5. The 2015 eCQM Annual Update is not initially available for certification because the 2014 Certification Edition references the HL7 QRDA-I R2 specification, but the 2015 eCQM Annual Update uses the HL7 QRDA-I R3. While the 2015 Certification Edition references the HL7 QRDA-I R3, the increased test robustness required in the 2015 Certification Edition rule is not available in Cypress 2.7, the version associated with the 2015 eCQM publication.

Therefore, the 2015 Edition will not be available until the Cypress v3.0 release, scheduled for July 2016. It is still strongly encouraged that users of the 2015 eCQM publication perform routine testing using Cypress v3.0 pre-release versions. We also currently offer testing to the 2016 CMS IG requirements for the 2015 measure update in the Cypress validation utility.

Q6. Can I still certify the 2015 measures in 2016 to the 2015 Edition of Certification?

A6. Yes, ONC does not require you to be certified to a specific measure version as long as it is supported by the correct Edition. The 2015 Edition Certification rule expects products to be recertified within a few years of the 2015 publication.

- Q7. Will CMS allow me to certify the 2015 measures in 2016 to be certified to the 2015 Edition?**
- A7.** CMS does not generally require systems and reporting providers/sites to recertify each measure version, although it is encouraged as a best practice to use each Cypress version to test each measure version in each implementation of a system. However, when intending to report to a specific program, it is necessary to still check each program's requirements to confirm that re-certification is not required.
- Q8. Can I just use the Cypress v2.7 version to test the 2015 eCQM Annual Update and then certify to the 2015 Edition using the 2016 eCQM Annual Update and the Cypress v3.0 version?**
- A8.** Yes. In fact, since the Cypress v3.0 version that supports 2015 Edition Certification will not be available until after the 2016 eCQM Annual Update, it is expected most users will certify that measure version rather than certifying the 2015 eCQM Annual Update. However, both 2015 and 2016 measure publications will be made available in Cypress v3.0 so that users can select which measure versions they want to test.
- Q9. When will additional measures be added to the eCQM programs?**
- A9.** To add new measures to eCQM programs, CMS must publish these proposed measures formally in rule-making. Continue to look towards measure program regulation announcements for new measure content.
- Q10. What about the CMS validation tools? Do I need to use multiple tools to validate my eCQMs?**
- A10.** To adhere to best practices, you should do some pre-submission testing. CMS and ONC have provided several tools for validation testing to the CMS requirements. Some CMS programs offer specific tools for pre-submission testing for their program requirements, so it is necessary to read closely the submission requirements for programs in advance of preparation for submission. The new version of Cypress will facilitate minimal burden to

include CMS IG conformance testing as this testing is integrated into the tool itself. In general, we recommend testing early and often. It is up to the vendor to determine if they want to use the Cypress tool for CMS IG validation testing with or without additional testing.

Q11. When will the previous versions of Cypress be retired?

A11. Cypress v2.7, which cannot be used for certification, will be live until a stable Cypress v3.0 pre-release becomes available for testing with the 2015 eCQM Annual Update. Cypress v2.6.1 will continue to be available beyond the Cypress v3.0 production release for 2014 Edition Certification only, although it could be retired in 2016 or as late as 2018. ONC is waiting on policy guidance to determine when this version will formally be retired.

Q12. When will the eCQM Test Procedures be updated?

A12. Since the Cypress v3.0 release which supports the 2015 Edition is still in development, the Test Procedures and Certification Companion Guides are being held pending final clarifications and will be released within 2-3 months of the July Cypress v3.0 release (approximately April-May).

Q13. How is testing run differently in Cypress v3.0?

A13. Testing in Cypress v3.0 now includes a manual and automated test deck entry. Manual testing will involve ATAs visually confirming selected data elements can be entered into the user interface. Unlike in Cypress v2.0, testing will run individual measures one at a time, but test data can be downloaded in a single file and tests will run concurrently to minimize testing time. The team is currently working on an API to facilitate test data uploads for streamlined testing—this will not be available in the alpha Cypress release; however, the Cypress team will work with the community and is accepting volunteers to determine the API requirements and test them prior to the formal Cypress v3.0 production release. If you are interested in participating in this testing, please contact the [Cypress listserv](#).