2019 CMS QRDA I and QRDA III Updates:

2019 CMS QRDA III IG Addendum,
New 2019 CMS QRDA III Sample File for Reporting Stratifications,
Updated 2019 CMS QRDA III MIPS Sample File,
and
Updated 2019 CMS QRDA I Schematron

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2019 CMS QRDA III IG Addendum
2019 CMS QRDA III IG Addendum - Background

» The Centers for Medicare & Medicaid Services (CMS) has released an addendum to the 2019 CMS Quality Reporting Document Architecture (QRDA) Category III Implementation Guide (IG) for Eligible Clinicians and Eligible Professionals Programs.

» This supports Calendar Year (CY) 2019 electronic clinical quality measure (eCQM), Improvement Activity, and Promoting Interoperability reporting.

» The 2019 CMS QRDA III IG and addendum provide technical instructions for reporting for:
  – Quality Payment Program: Merit-based Incentive Payment System (MIPS) and Advanced Alternative Payment Models (APMs)
  – Comprehensive Primary Care Plus (CPC+)
  – Promoting Interoperability Programs
2019 CMS QRDA III IG Addendum

The addendum includes changes that occurred as a result of the CY 2019 Medicare Physician Fee Schedule Final Rule:

- Updated universal unique identifier (UUID) table to reflect the November 2018 publication of the 2019 performance period eCQM specifications
- Improvement Activity identifiers and Promoting Interoperability objectives and measure identifiers finalized by CMS for the MIPS CY 2019 performance period

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.
Additional Guidance on Certified EHR Technology (CEHRT) ID:

- For the 2019 performance period, participants will submit a single set of Promoting Interoperability Objectives and Measures to align with 2015 Edition CEHRT
- As part of their submission, participants shall include a CMS EHR Certification ID that represents the CEHRT used by the individual or group during the performance period
- **Groups should ensure that their CMS EHR Certification ID reflects all products used by clinicians within the group before generating the ID - only one CMS EHR Certification ID should be submitted for group reporting**
- To obtain a CMS EHR Certification ID, participants should enter their product information in the ONC Certified Health IT Product List (CHPL) website search tool and select all certified products or certified health IT modules used during the performance period
- Full instructions on how to generate a CMS EHR Certification ID are found on pages 20-28 of the CHPL Public User Guide
New 2019 CMS QRDA III Sample File for Reporting Stratifications
CMS has released a QRDA Category III Sample file that provides an example for reporting stratifications posted on the eCQI Resource Center QRDA page.

It is a supplement to the 2019 CMS QRDA III IG, Schematron, and Sample files published in October 2018.

The 2019 CMS QRDA III IG provides eligible clinicians and eligible professionals the technical instructions for reporting for:

- Quality Payment Program: MIPS and APMs
- CPC+
- Promoting Interoperability Programs

An eCQM reporting stratification is a variable grouping, or strata, that the measure is designed to report. For example, the measure may stratify by age to report separately by age groups, such as 14-19, 20-25 etc. When the measure definition includes stratification, each population in the measure definition should be reported both without stratification and stratified by each stratification criteria.
The new sample file uses CMS159v7 as an example to show eCQMs that specify reporting stratifications are reported using the Reporting Stratum template.

Several eCQMs for the 2019 performance period define reporting stratifications in their specifications, including: CMS74v8, CMS137v7, CMS153v7, CMS155v7, CMS159v7, and CMS160v7.

Each stratification identified in eCQMs must be reported for each population even if the count is zero and may only be reported once for a specific population.

For more information see the 2019 CMS QRDA III IG, the 2019 CMS QRDA III addendum, or the eCQM Measure Logic Guidance document.
Updated 2019 CMS QRDA III MIPS Sample File
Updated 2019 CMS QRDA III MIPS Sample File

» CMS has also released an updated 2019 CMS QRDA III Sample file for MIPS
» The previously released 2019 CMS QRDA III MIPS Sample File should not be used. It was updated to reflect changes included in the 2019 CMS QRDA III addendum and is now replaced by a new publication.
» The updated MIPS sample file for 2019 CMS QRDA III has been included in the zip file available on the eCQI Resource Center QRDA webpage
Updated 2019 CMS QRDA I Schematron
Updated 2019 CMS QRDA I Schematron

» CMS has released an updated [2019 CMS QRDA Category I Schematron for Hospital Quality Reporting (HQR)]

» The updated Schematron provides technical instructions for reporting electronic clinical quality measures (eCQMs) for the calendar year 2019 reporting period for the:
  – Hospital Inpatient Quality Reporting Program
  – Medicare and Medicaid Promoting Interoperability Programs for Eligible Hospitals and Critical Access Hospitals

» The 2019 CMS QRDA I Schematron is a companion to the 2019 CMS QRDA I IG for HQR and allows for computerized validation of QRDA documents against the IG requirements.
Updated 2019 CMS QRDA I Schematron

Changes to the Schematron include:

- A correction in the QDM-Based QRDA (V5) template. The assertion rule for conformance statement 3343-17081 has been corrected from `test="count(count(cda:structuredBody))=1"` to `test="count(cda:structuredBody)=1"` to remove the extra nested count function that was causing an invalid xpath issue in the Schematron.

- The removal of a duplicate check for conformance statement 3343-16591 in the QRDA Category I Report - CMS (V5) template so the assertion rule for 3343-16591 would be triggered only once.
Resources

» November 2018 publication of the 2019 performance period eCQM specifications on the eCQI Resource Center - https://ecqi.healthit.gov/eligible-professional/eligible-clinician-ecqms


» CHPL website - https://chpl.healthit.gov/#/resources/overview


» Additional QRDA-related resources, as well as current and past IGs, Addendums and Sample Files are found on the Electronic Clinical Quality Improvement Resource Center QRDA page - https://ecqi.healthit.gov/qrda-quality-reporting-document-architecture
Resources (Cont’d)

» For questions related to the QRDA IGs and/or Schematrons visit the ONC QRDA JIRA Issue Tracker -
  https://oncprojecttracking.healthit.gov/support/projects/QRDA/issues/QRDA-764?filter=allopenissues

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

» For questions about the QualityNet Secure Portal (https://cportal.qualitynet.org/QNet/pgm_select.jsp), contact the QualityNet Help Desk at qnetsupport@hcqis.org or call (866) 288-8912, Monday through Friday, 8 a.m. – 8 p.m. ET.