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

Background: The hospital CMS Certification Number (CCN) is required for Hospital Quality Reporting (HQR) programs. 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 required length of the CCN is six to ten characters. The QRDA Category I standard allows other types of identifiers to be submitted for the custodian, however, HQR only requires CCN. The schematron rules published for the 2017 CMS QRDA I Implementation Guide (IG) erroneously enforces the six to ten characters length check on all identifiers if identifiers other than CCN are also provided. This error is corrected in the schematron rules released for the 2018 CMS QRDA I IG. **This guidance is for eCQM submissions for calendar year (CY) 2017 and QRDA Category I files for the Hospital Inpatient Quality Reporting (IQR) Program and the Medicare Electronic Health Record (EHR) Incentive Program for Eligible Hospitals (EH) and Critical Access Hospitals (CAHs) only.**

Issue: If identifiers other than CCN are provided for the custodian ID when submitting QRDA I reports to the HQR programs, an error will be triggered if the identifier's length is shorter than 6 characters or longer than 10 characters.

Resolution:

Submitters are advised to actively ensure that only a CCN number and no other identifiers are submitted for custodian/assignedCustodian/representedCustodianOrganization/id.

Example xml snippet that validates successfully for the 2017 reporting period:

```
Note: This is an example for QRDA-I test submission to HQR.
CCN is required for 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 for the 2017 reporting period:

```
Note: This is an example for QRDA-I test submission to HQR.
CCN is required for 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"/>
       <!-- TIN identifier -->
      <id root="2.16.840.1.113883.4.2" 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>
```