

Title: Guidance for submitting QRDA Category I templates for the Encounter Order/Performed, Diagnosis, Device Order, and Transfer From/To Quality Data Model (QDM) data types to ensure correct measure calculations by the measure engine for eCQM Reporting to the Hospital IQR and the Medicare EHR Incentive Programs

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

Background: The negationInd is used to represent the “negation rationale” QDM attribute for “not done” measure criteria, such as “Device, Order not done”. The HL7 QRDA Category I standard is a CDA Release 2 based standard. The CDA R2 (CDA schema: CDA_SDTC.xsd) does not allow the negationInd attribute in the Encounter and Supply act class structures which were used to model the QRDA templates for Encounter Order/Performed, Device Order, and Transfer From/To QDM data types. Due to this issue, data for reporting measure logics such as ““Device, Order not done: Patient Refusal” for “Venous foot pumps (VFP)” could not be reported without having to issue specific work around guidance.

To resolve this from the standard perspective, in the HL7 QRDA Category I Release 1, STU Release 3.1, a new QRDA template that uses the Act class structure, which supports the negationInd attribute, is created and serves as a wrapper (referred to as “Act Wrapper”) to contain the previously used QRDA template for Encounter Order, Encounter Performed, Device Order, Transfer From, and Transfer To respectively. For example, Encounter Performed was formerly represented using the QRDA template “Encounter Performed”, now with the new Act Wrapper, the “Encounter Performed Act” QRDA template serves as the primary template. To align with the HL7 QRDA Category I R1, STU R3.1, the measure engine used for the 2017 reporting period is updated and programmed to look for “Encounter Performed Act” as the primary entry point to determine whether data for encounter performed is present.

As part of the HL7 QRDA Category I R1, STU R3.1 updates, the Diagnosis data type is now represented using the Diagnosis Concern Act, which then contains the Diagnosis template. The measure engine is programmed to look for the “Diagnosis Concern Act” as the primary entry point to determine whether a QRDA-I submission contains data for diagnosis.

Issue: Use the Encounter Performed as an example to describe the issue. The HL7 QRDA Category I R1, STU R3.1 provides narrative guidance that when submitting data for Encounter Performed; the “Encounter Performed” template must be contained within the “Encounter Performed Act” template. However, the standard does not specify a conformance statement to require it specifically and no schematron rule was provided to enforce this. As a result, it is possible for submitters to still use “Encounter Performed” template directly representing Encounter Performed, and the file will not be rejected as it still passes schematron validations. However, since the measure engine looks for the “Encounter Performed Act” template specifically, it will not take the encounter performed data into the measure calculation if they were submitted using stand alone “Encounter Performed” template, which can lead to potential incorrect measure results.

The issue applies to all the EH/CAH eQMs for the CY 2017 reporting period as all use at least one of the following QDM data types in their measure specifications :

- Diagnosis
- Device, Order
- Encounter, Order
- Encounter, Performed
- Transfer From
- Transfer To

Resolution:

Submitters are advised to actively ensure that data for the above listed QDM data types are reported within the correct corresponding QRDA templates so that the data will be processed correctly by the measure engine.

Example correct xml snippet:

Note: in this example, Encounter Performed for Emergency Department Visits is submitted as using the Encounter Performed Act, which contains the Encounter Performed template. This is the expected representation and will be processed by the measure engine.

```
<act classCode="ACT" moodCode="EVN">
  <!--Encounter Performed Act -->
  <templateId root="2.16.840.1.113883.10.20.24.3.133"/>
  <id root="ec8a6ff8-ed4b-4f7e-82c3-e98e58b45de7"/>
  <code code="ENC" codeSystem="2.16.840.1.113883.5.6" displayName="Encounter"
codeSystemName="ActClass"/>
  <entryRelationship typeCode="SUBJ">
    <!--Encounter performed: Emergency Department Visit-->
    <encounter classCode="ENC" moodCode="EVN">
      <templateId root="2.16.840.1.113883.10.20.22.4.49" extension="2015-08-01" />
      <!-- Encounter Performed (V3) -->
      <templateId root="2.16.840.1.113883.10.20.24.3.23" extension="2016-02-01" />
      <id root="12345678-9d11-439e-92b3-5d9815ff4de1" />
      <code code="4525004" displayName="Emergency Department visit" codeSystem="2.16.840.1.113883.6.96"
codeSystemName="SNOMED CT" sdtc:valueSet="2.16.840.1.113883.3.117.1.7.1.292" />
      <text>Encounter, Performed: Emergency Department Visit</text>
    </encounter>
  </entryRelationship>
</act>
```

Example incorrect xml snippet:

Note: in this example, Encounter Performed for Emergency Department Visits is submitted as using the standard alone Encounter Performed template, which will pass validation but not be processed by the measure engine.

```
<encounter classCode="ENC" moodCode="EVN">
  <templateId root="2.16.840.1.113883.10.20.22.4.49" extension="2015-08-01" />
  <!-- Encounter Performed (V3) -->
  <templateId root="2.16.840.1.113883.10.20.24.3.23" extension="2016-02-01" />
  <id root="12345678-9d11-439e-92b3-5d9815ff4de1" />
  <code code="4525004" displayName="Emergency Department visit" codeSystem="2.16.840.1.113883.6.96"
codeSystemName="SNOMED CT" sdtc:valueSet="2.16.840.1.113883.3.117.1.7.1.292" />
  <text>Encounter, Performed: Emergency Department Visit</text>
.....
</encounter>
```