# Device, Order Not Done Guidance

January 26, 2017

Shanna Hartman, CMS Division of Electronic and Clinician Quality CMS/CCSQ/QMVIG
and
Reshma Gola, ESAC Inc.

# Background

- Device, Order Not Done Guidance
- Error message when submitting Quality Reporting Document Architecture (QRDA) Cat I files for 3 specific electronic Clinical Quality Measures (eCQMs)
- This is only an issue for 2016. It has been resolved for the 2017 standard.

# Device, Order Definition

- Data elements that meet criteria using this datatype should document an order for the device indicated by the Quality Data Model (QDM) category and its corresponding value set.

# Device, Order Not Done Issue

- 3 EH measures includes logic for QDM datatype: *Device ordered not done*
  - The QRDA failed to validate against Clinical Document Architecture (CDA) R2
  - Review identified two *errata* in QRDA; CDA R2 does not allow negation for:
    - Supply (used for devices)
    - Encounter
- Background:
  - The QDM allows negation, i.e., *not done* for a number of elements to indicate that something did not occur for a reason. Uses:
    - Measure Exception or Exclusion Criteria – most common
    - Measure Inclusion Criteria – potential
  - QRDA Category 1 models QDM elements consistent with CDA Release 2
  - Currently all elements use *negation* to model *not done* inconsistent with CDA R2 for *supply* and *encounter*

# Device, Order Not Done Issue

| Measure Name | Measure Short Name | CMS ID |
|---|---|---|
| Venous Thromboembolism Prophylaxis | VTE-1 | CMS108v4 |
| Intensive Care Unit Venous Thromboembolism Prophylaxis | VTE-2 | CMS190v4 |
| Incidence of Potentially –Preventable Thromboembolism | VTE-6 | CMS 114v4 |

# Device, Order Not Done Issue

- Data submitters may have received notice in the feedback reports that their test or production QRDA Category I files received the CDA_SDTC.xsd schema validation error (CMS_0072) when the submitter attempted to submit a QRDA category I file with "Device, Order not done."
- This error causes the file to be rejected during the file validation process.

# Device, Order Not Done Resolution

- Submitters are advised to submit "**Device, Applied not done"** *instead of* "**Device, Order not done"** for the VTE-1, VTE-2, and VTE-6 eCQM measures.

# Resolution Example

- **$NoDeviceVTEProphylaxisMedicalReason** =
  - Union of:
    - "Device, Applied not done: Medical Reason" for "Intermittent pneumatic compression devices (IPC)"
    - "Device, Applied not done: Medical Reason" for "Venous foot pumps (VFP)"
    - "Device, Applied not done: Medical Reason" for "Graduated compression stockings (GCS)"
    - "Device, Order not done: Medical Reason" for "Intermittent pneumatic compression devices (IPC)"
    - "Device, Order not done: Medical Reason" for "Venous foot pumps (VFP)"
    - "Device, Order not done: Medical Reason" for "Graduated compression stockings (GCS)"

- **$NoVTEProphylaxisPatientRefusal** =
  - Union of:
    - "Medication, Administered not done: Patient Refusal" for "Low Dose Unfractionated Heparin for VTE Prophylaxis"
    - "Medication, Administered not done: Patient Refusal" for "Low Molecular Weight Heparin for VTE Prophylaxis"
    - "Medication, Administered not done: Patient Refusal" for "Injectable Factor Xa Inhibitor for VTE Prophylaxis"
    - "Medication, Administered not done: Patient Refusal" for "Warfarin"
    - "Medication, Order not done: Patient Refusal" for "Unfractionated Heparin for VTE prophylaxis ingredient specific"
    - "Medication, Order not done: Patient Refusal" for "Low Molecular Weight Heparin for VTE prophylaxis ingredient specific"
    - "Medication, Order not done: Patient Refusal" for "Injectable factor Xa inhibitor for VTE prophylaxis ingredient specific"
    - "Medication, Order not done: Patient Refusal" for "Warfarin-only ingredient specific"
    - "Device, Applied not done: Patient Refusal" for "Intermittent pneumatic compression devices (IPC)"
    - "Device, Applied not done: Patient Refusal" for "Venous foot pumps (VFP)"
    - "Device, Applied not done: Patient Refusal" for "Graduated compression stockings (GCS)"
    - "Device, Order not done: Patient Refusal" for "Intermittent pneumatic compression devices (IPC)"
    - "Device, Order not done: Patient Refusal" for "Venous foot pumps (VFP)"
    - "Device, Order not done: Patient Refusal" for "Graduated compression stockings (GCS)"

# Device, Order Not Done Resolution

- The input of data into QRDA files should always be submitted exactly as directed by eCQM definitions and published Implementation Guides provided by CMS or The Joint Commission.
- When issues arise, we strongly discourage organizations from using any unsanctioned work arounds such as exchanging elements or modifying data if a QRDA file is rejected.
- Instead, any identified issue must be brought to the attention of CMS or The Joint Commission through the ONC CQM Issue Tracker.

# Resources

- eCQI Resource Center QRDA Space
  - https://ecqi.healthit.gov/qrda
- ONC CQM JIRA Issue Tracker
  - https://oncprojectracking.healthit.gov/support/projects/CQM/issues
- ONC QRDA JIRA Issue Tracker
  - https://oncprojectracking.healthit.gov/support/projects/QRDA