Pre-Rulemaking 2016
Frequently Asked Questions

Purpose:

The purpose of this document is to provide stakeholder guidance related to the pre-rulemaking processes. These processes are a result of the Patient Protection and Affordable Care Act (ACA) of 2010. CMS' goal is to be transparent providing interested audiences and stakeholders with information which enhances CMS' ability to meet its quality and efficiency measurement goals. As a result of the legislation in 2011, CMS published the first Measures under Consideration (MUC) List for the Department of Health and Human Services (DHHS) by December 1st. Each year no later than December 1st, CMS is statutorily required to publish this List.

The National Quality Forum's (NQF), Measures Application Partnership (MAP) DHHS' consensus-based entity convenes each winter to fulfill its statutory requirement of providing input to HHS on measures under consideration for use in CMS' federal programs. These federal programs are named explicitly in the Act. The MAP consists of several workgroups including: Clinicians, PAC/LTC, Hospitals, Dual Eligible Beneficiaries and the Coordinating Committee. Annually, each December and January, the MAP workgroups and the Coordinating Committee meet to provide program-specific recommendations to DHHS by February 1st with the first report published and submitted to DHHS on February 1, 2012, and then each year thereafter.

CMS considers this document to be a "living" source of pre-rulemaking information. Since the first MUC/MAP cycle in 2011, CMS has learned through experience the nuances of pre-rulemaking, the condensed time-line, overlapping rule-making program calendars, and to overcome the challenges of the federal clearance process to ensure pre-rulemaking statutory requirements are met. CMS' quality and efficiency measurement goals align with the National Quality Strategy (NQS). Pre-rulemaking is designed to improve health outcomes and healthcare quality by assisting with the selection of measures that produce publically reported performance results for transparency and healthcare decision-making, aligning payment with value, rewarding providers and professionals for using health information technology (health IT) to improve patient care.

The following are a list of frequently asked questions (FAQs) with regard to pre-rulemaking and have been broken up into four common themes including CMS' 2016 Pre-Rulemaking Milestones, Measures under Consideration Events, Measures Application Partnership Events and JIRA CMS' Measures under Consideration Tracking System. The documents intended audience is federal DHHS agencies, organizations contracted with these federal agencies, and the healthcare advocacy groups. For additional information and resources go to the CMS website at the following link:
http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html

CMS’ 2016 Pre-Rulemaking Milestones:

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<tr><th>Question</th><th>CMS Response</th></tr>
<tr><td>Why the following dates are important and who are they important to?</td><td>
Friday, January 29
JIRA opens for 2016 new measure submissions and comments
Important To: All Federal, non-Federal stakeholders
Friday, January 29 through May 1
JIRA users may edit their own measure submissions and as soon as the measure is final initiate CMS review and workflow by clicking the “finished editing” yes button
Important To: All Federal, non-Federal stakeholders
Tuesday, April 5
Measures under Consideration Annual Kick-Off Webinar
Important To: All Federal, non-Federal stakeholders
Thursday, April 7 and 14
JIRA Open Forum Discussion Webinars
Important To: All Federal, non-Federal stakeholders
Tuesday, April 12
CMS’ Program Measurement Needs and Priorities Session Webinar
Important To: All Federal, non-Federal stakeholders
Monday, May 2 through Friday, July 15
CMS’ 2016 official MUC cycle, measure modification and removal from JIRA requests will be reviewed by CMS only through the use of the “modify candidate measure” issue type in JIRA
Important To: All Federal, non-Federal stakeholders
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Question	CMS Response
Important dates, continued	**Thursday, August 4** • In-Person Federal Only Stakeholder Meeting to preview the MUC list • Important To: All Federal stakeholders **Tuesday, December 1** • By this date, the Measures under Consideration list is published • Important To: All Federal, non-Federal stakeholders
For 2016, CMS added an additional 3 months to submit candidate measures in JIRA. Why are these added 3 months important to you?	Since 2011, CMS has complied with the pre-rulemaking statute. Through lessons learned CMS has gleaned that the Measures under Consideration clearance process must begin annually in August in order to meet the statutory deadline of publishing the Measures under Consideration List no later than December 1st annually. CMS is encouraging stakeholders to enter measures early to improve reviews and to accommodate program needs. The clearance process involves collaboration, cooperation and communication across multiple CMS, DHHS and OMB components and agencies, which involves federal staff reviews and approvals at many levels within and across each agency's components. If the clearance process commences any later than August annually, CMS is at risk of missing the statutory mandate.
When does clearance begin?	CMS will begin clearance for the 2016 Measures under Consideration list on Monday, August 15. Reminder: as noted above, JIRA closes for new measures on July 15.

Measures under Consideration Events:

Annually, CMS hosts a series of meetings to kick off the annual Measures under Consideration cycle and refresh pre-rulemaking stakeholders regarding the following topics: the statute, CMS' quality strategy, highlights of the prior year's lessons learned, JIRA system enhancements, pre-rulemaking federal program specific needs and priorities, as well as an introduction of the current cycle's milestone and future meeting dates.

For the April 5, 7, 12 and 14 series of webinars, following the live demonstration of JIRA, audience participants will be invited to submit questions via the LiveMeeting application. Due to time constraints, any questions that are not responded to via the LiveMeeting will be added to this document for a CMS response, which will be revised and posted to CMS' website for training purposes.

Question	CMS Response
What is the purpose of the April 5, 2016 meeting? Meeting Series #1: 2016 Measures Under Consideration Annual Kick Off	April 5th's meeting will include these topics, excluding the federal program needs and priorities topic (reserved for April 12th meeting). With regard to the JIRA system enhancements portion of the agenda, a live demonstration of "entering a new measure submission" as well as how to "submit a question" in JIRA will be offered to the audience. The audience for this meeting is mainly JIRA users, but all Federal DHHS agencies, organizations contracted with these Federal agencies, and healthcare advocacy groups are welcome. For training purposes, the meeting will be recorded.
What is the purpose of the April 7, 2016 meeting? Meeting Series #2: 2016 Measures Under Consideration JIRA Open Forum Discussion	April 7th's meeting will introduce new JIRA material including features and functionality, which will not be covered during the April 5th meeting. The goal is not to be repetitive and cover the same material as previously reviewed, but to share new JIRA information. The audience for this meeting is mainly JIRA users, but all federal and non-federal stakeholders are welcome. For training purposes, the meeting will be recorded. Following the live demonstration of how to submit a "modify candidate measure" and "feedback" issue types in JIRA the meeting format will be open-forum for questions.
What is the purpose of the April 12, 2016 meeting? Meeting Series #3: 2016 CMS' Program Measurement Needs and Priorities Session	The topic focal point of the April 12th is CMS' program specific measure needs and priorities for the 2016 pre-rulemaking cycle's Measures under Consideration List. The goal is to align these needs and priorities with candidate measure submissions in JIRA. CMS does not intend for the meetings series topics to be repetitive. This meeting is not intended to demonstrate JIRA capabilities. The meeting is mainly for Federal DHHS agencies, organizations contracted with these Federal agencies, and healthcare advocacy groups. For training purposes, the meeting will be recorded.

Question	CMS Response
What is the purpose of the April 14, 2016 meeting? Meeting Series #4: 2016 Measures Under Consideration JIRA Open Forum Discussion	The April 14th meeting is to introduce new not repetitive JIRA material including features and functionality, which will not be covered during prior meetings. The audience for this meeting is mainly JIRA users, but all federal and non-federal stakeholders are welcome. For training purposes, the meeting will be recorded. Following the live demonstration in JIRA the meeting format will be open-forum for questions.
What is the purpose of the August 4th, 2016 meeting? Meeting Series #5: 2016 In-Person Federal Stakeholder Meeting	The August 4th **Federal-only** stakeholder meeting is to conclude CMS' measures under consideration list proposal process, which officially kicks-off the Federal DHHS agencies clearance review and approval process for the Measures under Consideration List. During the August Federal-only meeting, agency representatives from across DHHS will be briefed by each CMS program and measure leads regarding the proposed measures under consideration for the 2016 cycle. CMS measure and program leads will convey how the proposed measures meet CMS' program needs and priorities. In preparation for the meeting, proposed candidate measures will be provided to the DHHS Federal agencies. To effectuate a seamless, smooth clearance process CMS requests Federal DHHS agency representatives responsible for clearance review and approval are present and prepared with concurrence or objections for each of the proposed candidate measures. The meeting objective is for CMS staff to address all questions and concerns related to the Measures under Consideration List with the ultimate goal of avoiding any objections and concerns to proposed measures after this August 4th Federal only DHHS agency wide meeting, and to prevent changes to the Measures under Consideration List once in clearance. Clearance is scheduled to begin on Monday, August 22nd.
What should I do, if I need to be invited to a meeting in the series or know someone that does?	Contact CMS Measures under Consideration Coordinator: Michelle Geppi Michelle.Geppi@cms.hhs.gov 410.786.4844

Measures Application Partnership (MAP) Events:

Question	CMS Response
When will the MAP workgroup meetings be scheduled?	In general, the Measures under Consideration List is published annually no later than December 1st, the MAP workgroup meetings occur in December with the Coordinating Committee meeting in January.
Who can attend the MAP workgroup meetings or the Coordinating Committee meetings?	All MAP meetings are open to the public.
Why should a measure owner, submitter, or steward attend the MAP workgroup meeting?	Your attendance coupled with your ability to respond to workgroup members' inquiries enable the workgroup members to make an informed decision relative to their vote on each respective candidate measure. CMS recognizes the importance of your attendance to address MAP workgroup inquiries that cannot be addressed by information gleaned from the JIRA database.
Can I attend the MAP workgroup meetings remotely by teleconference or webinar?	You have the option of attending these public meetings either in-person or via webinar/teleconference.

JIRA CMS' Measures under Consideration Tracking System:

CMS' Measures under Consideration User Guide, Issue Tracking System Guidance may be downloaded from the CMS website at the following link: http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html

Question	CMS Response
How do I edit a measure submission in JIRA? Applicable only from January 29 through May 1	From January 29 through May 1, JIRA users may edit their own candidate measure submissions. For more information see Section 2.11 Editing a Submitted Measure of the User Guide http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html
How do I obtain user credentials for JIRA? What if I forgot my username and password? Does each person have their own JIRA log-in?	In order to gain access to JIRA, reactivate an account, or terminate user credentials, stakeholders should email CMS Measures under Consideration Coordinator, Michelle.Geppi@cms.hhs.gov. User credentials are granted to individuals and should not be shared. When requesting access or reactivation, complete the Accessing JIRA form, located in the User Guide. For more information see Section 1.1 Accessing JIRA of the User Guide. http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html
Is my JIRA username and password the same as last year?	Usernames and passwords should not change, but access may be suspended due to inactivity. If you are unable to access your JIRA account, email CMS' Measures under Consideration Coordinator, Michelle.Geppi@cms.hhs.gov.
If I have access to JIRA, but don't see the 2016 project yet, what should I do?	The Measures under Consideration 2016 project is available in JIRA as of January 29. If users do not see the 2016 project on this date, they should email CMS' Measures under Consideration Coordinator, Michelle.Geppi@cms.hhs.gov.
In JIRA, if I cannot complete all the fields at once, can I save and come back at a later time to finish?	JIRA is not designed to permit user's to save work and return later to finish. CMS suggests submitters complete the submission template prior to entering data into JIRA. To obtain the Measures under Consideration Template go to the below link: http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html

Question	CMS Response
What is the measure template and why should we use it?	The measure submission template is a Word document that mirrors the data fields in JIRA. CMS recommends issue submitters complete the template before logging into JIRA to submit their measure. JIRA will not allow you to save your work and come back later. Data in the template may be cut and pasted into JIRA. For more information see Chapter 2 of the User Guide: Creating a New Measure of the User Guide http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html
In JIRA, what should I do if I need to modify or remove a candidate measure specification after the original JIRA submission is made? Applicable only from May 2 through July 15	Between May 2 through July 15th, log on to JIRA and submit a modify candidate measure issue type. Refer to JIRA User Guide located at CMS' website: http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html
If my measure was proposed, but not published in the Measures under Consideration list during any prior measures under consider season, can I resubmit?	If the measure was not accepted by the program(s) and was not published on any of the official Measures under Consideration List, it can be resubmitted. For more information see section 2.7 of the User Guide: Measures under Consideration and Measures Application Partnership (MAP) History http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html
Can I submit the same measure for more than one CMS program?	Yes, candidate measures can be resubmitted to more than one program. For more information see Chapter 2 of the User Guide: Creating a New Measure of the User Guide: http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html
Who can edit measures in JIRA?	From January 29 through May 1, the user can edit their own measures and on May 2, through July 15 reporters/submitter should submit a modify candidate measure issue type in JIRA. For more information see Chapter 3 of the User Guide: Modifying a Current Year Measure http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html
Who approves changes made to a measure?	From May 2 through July 15, CMS reviews and approves all candidate measure modification requests. For more information see Chapter 3 of the User Guide: Modifying a Current Year Measure

Question	CMS Response
If my measure is not ready for submission by July 15, 2016 when is the next opportunity to submit a measure to CMS?	The pre-rulemaking process is annual and candidate measures will be accepted starting in late January 2017. For more information see Introduction of the User Guide: http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html
Would measures without complete MAT/HQMF specification, but in development, be worth submitting?	Yes, please submit measures and follow the JIRA data field guidance. For more information see Section 2.5 of the User Guide: Electronic Clinical Quality Measures (eCQM) http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html
In JIRA, I'd like to see all of the issues that are assigned to me.	Refer to the previous April 30, 2015 JIRA Open Forum session, which was recorded and is available for viewing via a YouTube video located at the following website: http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html
What are the steps to create a filter in JIRA?	**Building and Saving a Filter for Reuse** Before doing any of this, make sure that you are in the MUC 2016 Project in Jira. 1. Click "Issues" button at top menu from within the MUC 2016 Project. The other "Issues" button at the left of the screen does not work for this filter process. 2. Click "Search for Issues" in the drop-down. 3. Under the headline "Search," you should see a row of drop-down parameters: Project, Type, Status, Assignee, etc. If you see instead an empty text box with a green check mark, then somehow you are in the "Advanced" search/filter mode. Go to the right of this box and click the "Basic" link. Then follow the steps below. 4. Using the drop-down lists, select the criteria of interest: i. Project = 2016 Measures under Consideration (Select this one for sure, or else you will have all Jira project issues.) ii. Filter on other fields as needed, using drop-down + check-boxes 5. Once the filter is set up as wanted, then click the "Save" button to the right of the "Search" headline. 6. Type in the filter name, something that you will recognize. 7. Click "Submit" button. 8. This filter will then appear in your list of "Favorite Filters" at the left 9. You can go back and edit a filter and then save it with the new parameters.

Question	CMS Response
What are the steps to create a dashboard in JIRA?	**Creating and Populating a Dashboard** Before doing any of this, make sure that you are in the MUC 2016 Project in Jira. 1. Click “Dashboards” button at top menu from within the MUC 2016 Project. 2. Click “Manage Dashboards.” 3. Click “Create New Dashboard” button at top right of screen. 4. Enter a name for this dashboard, and other attributes. You can leave these other fields as defaults, or you can set it up as you want. For example, you can share your dashboard with others. 5. Click “Add” when finished. 6. The new one will now appear on your list of Favorite Dashboards. 7. Click on the dashboard to populate or modify it. 8. Click the hyperlink “Add a new gadget.” <this step tends to take a while> 9. In the box “Gadget Directory,” scroll down the alphabetical list to “Filter Results.” 10. Click the button “Add it Now.” 11. Click “Close” button on the “Gadget Directory” box. 12. Your favorite filters (those that you have saved) should appear in a list at top left. Select the one that you want to put on this dashboard. 13. You can modify the filter from within the Dashboard. For example, you may want to add “Assignee” to the set of fields to display. 14. You can add two or more filters to the same dashboard, then use scroll or the “Edit Layout” button at upper right to modify the display. 15. Once you have a filter on your dashboard, you can modify or remove it by using the buttons at the top right corner or each “gadget” or filter box/window on your dashboard. The “four arrows” icon lets you change the gadget location on your dashboard. The “window” icon lets you maximize the filter display, and the “drop-down” icon lets you edit or delete the filter or gadget from this dashboard. Refer to the previous May 12, 2015, JIRA Open Forum session, which was recorded and is available for viewing via a YouTube video located at the following website: http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html

Question	CMS Response
Regarding the 2016 MIPS program requirement for additional information on Peer Reviewed Journal Article publication, what is the deadline for providing this attachment with the candidate measure?	Section 101(c)(1) of the Medicare Access and CHIP Reauthorization Act (MACRA) requires submission of new measures for publication in an applicable, specialty-appropriate, peer-reviewed journal. July 15, 2016, is the deadline for submitting new measures for the 2016 Measures under Consideration List. CMS and the MIPS program have developed a blank template for measure owners/submitters to document information related to the peer reviewed journal article requirement. The candidate measure submission will not be reviewed until the supplemental document is provided via JIRA to CMS. To obtain the MIPS Peer Review Template and a Completed Sample refer to the following website: https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Downloads/MIPS-Peer-Review-Template-and-a-Completed-Sample.zip
What MIPS candidate measure submissions require the Peer Review Template to be completed?	For the 2016 MUC cycle, all MIPS candidate measure submissions require the completion and submission of a Peer Review Template.
Are any MIPS measures submitted in 2016 excluded from having the Peer Reviewed Journal Article attachment?	All measures submitted through the 2016 Measures Under Consideration pre-rulemaking process for implementation in MIPS are required to have the Peer Reviewed Journal Article Template completed. MIPS measures that are submitted through QCDR self-nomination, to be used only by a select QCDR, are excluded from this requirement. However, if a QCDR would like to have their QCDR measure implemented as a MIPS measure and reported by any Eligible Clinician, the measure must be submitted through the MUC process and consequently be accompanied by a Peer Reviewed Journal Article Template.
For the 2016 MUC season, what reporting year at the earliest could a MIPS candidate measure be established as a rule?	When a MIPS candidate measure is published on the 2016 MUC List, the earliest it can be implemented is for the 2018 MIPS performance period.
Who is responsible for submitting these measures for publication: the developer or the Secretary of DHHS?	The legislation calls for the Secretary to be responsible for submitting the measure to a peer reviewed journal.