

8400	When can a hospital use the case number threshold exemption for the clinical quality measure (CQM) requirement of meaningful use?	The case number threshold exemption for hospital CQM reporting helps reduce the burden placed on hospitals that very seldom have cases that would be counted in the denominator of certain CQMs. Eligible hospitals and critical access hospitals (CAHs) with a low number of inpatient discharges per electronic health records (EHR) reporting period as defined by a CQM's denominator population, could be exempted from reporting on that CQM. The CQM case number threshold exemption for eligible hospitals and CAHs is available beginning in FY2013 for all stages of meaningful use (MU). The hospital must submit the aggregate population and sample size counts for Medicare and non-Medicare discharges for the EHR reporting period for the CQM(s) for which the hospital seeks an exemption. To meet the threshold for exemption from reporting a CQM, the following criteria must be met for the corresponding EHR reporting periods: •1st year of demonstrating MU 90-day EHR reporting period; 5 or fewer discharges during the EHR reporting period •2nd year or beyond of demonstrating MU; Full year EHR reporting period ; 20 or fewer discharges during the EHR reporting period; In FY 2014, three-month quarter EHR reporting period with 5 or fewer discharges during the EHR reporting period; Discharges are defined by the CQM's denominator population; Applies on a CQM by CQM basis When invoking the case number threshold exemption in FY 2013: •All 15 of the CQMs from Stage 1 final rule are required. • The number of CQMs required to report is reduced by the number of CQMs for which the hospital does not meet the case number threshold of discharges. When invoking the case number threshold exemption in FY 2014: • 16 CQMs covering at least 3 domains from a list of 29 CQMs are required. •The same process as in FY 2013 is employed, but in order to be exempted from reporting fewer than 16 CQMs, the hospital would need to qualify for the case number threshold exemption for more than 13 of the 29 CQMs. •If the CQMs for which the hospital can meet the case number threshold of discharges do not cover at least 3 domains, the hospital would be exempt from the requirement to cover the remaining domains. To view the rules that include this policy for the Medicare and Medicaid EHR Incentive programs, please visit: •Stage 2 Final Rule (77 FR 54080): http://www.gpo.gov/fdsys/pkg/FR-2012-09-04/pdf/2012-21050.pdf •Interim Final Rule (77 FR 72988 – 72989): http://www.gpo.gov/fdsys/pkg/FR-2012-12-07/pdf/2012-29607.pdf Created on 7/1/2013
8896	When new versions of clinical quality measure (CQM) specifications are released by the Centers for Medicare and Medicaid Services (CMS), do developers of Electronic Health Records (EHR) technology need to seek retesting/recertification of their certified complete EHR or certified EHR module in order to keep its certification valid?	No. The minimum version required for 2014 Edition certification is the version of CQM specifications released by CMS in December 2012. EHR technology that has been issued a certification based on the December 2012 version will remain certified even when CMS releases new versions of CQM specifications. We strongly encourage EHR technology developers to update to the newest CQM specifications as they become available since those updates include new codes, logic corrections and clarifications. We also recommend EHR technology developers consider that other CMS programs (beyond the EHR Incentive Programs) and other private sector programs generally update CQMs on an annual basis. As a result, an EHR technology developer's customers continued ability to successfully participate and report in those other programs could be impacted if the CQM data generated by the EHR technology is based on older specification versions (and no longer accepted by the other programs). Please see FAQ 8898 and 8900 for additional information pertaining to the relationship between EHR certification and the CQM specification updates. For more information on the 2014 CQM specifications, please visit: http://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/eCQM_Library.html For more information on ONC Health Information Technology (HIT) Certification, please visit: http://www.healthit.gov/policy-researchers-implementers/about-certification Created on 7/16/2013 Updated on 8/22/2013
8900	If Electronic Health Records (EHR) technology is not yet certified to the clinical quality measure (CQM) criteria (45 CFR 170.314(c)(1) through (3)), can the EHR technology be tested and certified to only the newest available version of the CQM specifications or must it be tested and certified to the December 2012 specifications (first or as well)?	Yes, EHR technology may be presented for testing and certification to only newest CQM specifications. We strongly encourage EHR technology developers to test and certify to the newest CQM specifications as they become available since those updates include new codes, logic corrections and clarifications. In addition, other CMS programs (beyond the EHR Incentive Programs) and other private sector programs generally update CQMs on an annual basis. Updating EHR technology to the newest CQM version specifications enables providers to participate and report in those other programs for which they are eligible as well. Please see FAQ 8896 and 8898 for additional information pertaining to the relationship between EHR certification and the CQM specification updates. For more information on the 2014 CQM specifications, please visit: "http://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/eCQM_Library.html" For more information on ONC Health Information Technology (HIT) Certification, please visit: http://www.healthit.gov/policy-researchers-implementers/about-certification Created 7/16/2013 Updated on 8/22/2013
9676	For some of the eligible professional (EP) clinical quality measures (CQMs), there are look back periods or look forward periods for which data was not available. How are these CQMs calculated for the reporting period?	CQMs that include look back periods or look forward periods may require data outside of the reporting period of a CMS quality reporting program. Look Back Period – Example CQM: An example of a CQM that includes a look back period is CMS130 (NQF 0034) Colorectal Cancer Screening. The CQM assesses performance on the percentage of adults 50-75 years of age who had appropriate screening for colorectal cancer. If the screening occurred within the reporting period and through the EP's practice, it should be captured in the calculated performance rate. However, if the screening took place before the reporting period and/or occurred outside of the EP's practice, it is possible that the screening would be omitted from the calculated performance rate. Look Forward Period – Example CQM: An example of a CQM that includes a look forward period is CMS159 (NQF 0710) Depression Remission at Twelve Months. The CQM assesses performance on adult patients age 18 and older with major depression or dysthymia and an initial PHQ-9 score >=9 who demonstrate remission at twelve months defined as PHQ-9 score less than 5 (includes newly diagnosed and existing patients with depression or dysthymia). If the assessment for remission at twelve months occurs within the reporting period and through the EP's practice, it should be captured in the calculated performance rate. However, if the assessment takes place after the reporting period and/or occurred outside of the EP's practice, it is possible that the occurrence of the remission would be omitted from the calculated performance rate. General Guidelines: We recommend that the information needed from the look back periods be requested from the patient as part of the encounter and recorded in the Electronic Health Records (EHR) technology, for example, as part of the patient's history. For EHR vendors, we recommend that EHRs include the capability of capturing the type of information needed for the look back periods as part of the encounter (e.g., in the history section of an encounter note) and then extract data from this entry for purposes of reporting CQMs with look back periods. There is no practical way to capture information for look forward periods that go into the next reporting period. In most cases, this should affect the performance rates of all EPs similarly. For CQM data reporting to CMS that may be used for a pay for performance program, the collective EP performance rates should be reflected in the benchmark for each respective CQM that contains a look forward period. Since EPs who are subject to the value-based payment modifier would be assessed, in part, based on the performance rate of the CQMs they report through the Physician Quality Reporting System (PQRS), those EPs may review the CQMs available and try to report on CQMs that are not affected by look back or look forward periods to help mitigate the issues described above for programs that have the option to select CQMs. Added on 2/6/2014
10786	Can SCIP INF-9 (CMS178v4 / NQF0453) still be used to meet the reporting requirements of the EHR Incentive Program (Meaningful Use) for Eligible Hospitals and the Hospital Inpatient Quality Reporting Program?	CMS suggests eligible hospitals participating in the Medicare & Medicaid EHR Incentive Programs and/or choosing the voluntary electronic reporting option under the Hospital Inpatient Quality Reporting (IQR) Program not select SCIP INF-9 (CMS 178v4/NQF 0453) as one of their electronic clinical quality measures (eCQMs) and choose another eCQM for Meaningful Use reporting and/or Hospital IQR reporting in 2015. A critical error identified in the measure (CMS 178v4/NQF 0453) renders a zero denominator. The denominator error noted in the SCIP INF-9 (CMS 178v4/NQF 0453) was identified after the 2014 Annual Update posting. If the measure is used for reporting, a zero in the denominator will count as a successful submission for that CQM for both the Medicare EHR Incentive Program and the Hospital IQR Program. Eligible hospitals and CAHs reporting CQMs using certified EHR technology are required to report on a minimum of 16 CQMs across 3 National Quality Strategy Domains. If an eligible hospital or CAH reports on a CQM generating a zero denominator, it will count toward the required 16 CQMs for the Medicare EHR Incentive Program and the Hospital IQR Program. For additional clarification on reporting zero denominators, please see the page 50323 of the FY 2015 IPPS Final Rule: http://www.gpo.gov/fdsys/pkg/FR-2014-08-22/pdf/2014-18545 . Created 10/9/2014