Calendar Year (CY) 2022 End-Stage Renal Disease (ESRD) Prospective Payment System (PPS) Final Rule: ESRD Quality Incentive Program (QIP) Finalized Proposals

Question and Answer Summary Document

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Subject-matter experts researched and answered the following questions during the live webinar. The questions may have been edited for grammar.
Question #1: We appreciate not having any payment penalty; however, without seeing our scores, we do not know where there are data discrepancies between what we report and what CMS has in their datasets. Is it possible to get our scores?

Although CMS is not providing measure scores, you may review your facility’s Patient List Report and Performance Score Report (PSR) to determine how your facility performed and which patients were included in the calculations. The PSRs display measure rates if your facility was eligible for the measure.

Question #2: Since there are no scores on the reports, are dialysis units still required to post these reports in their patient care areas?

Yes, you are still required to post these reports.

Question #3: How will the special scoring methodology and measure suppression impact the five-star program?

Our desire is to provide as much flexibility as possible for facilities during this time. One of our overarching themes is to promote alignment across decisions and the ways our programs are implemented. Please reach out to Dialysis Facility Compare (DFC) and the Star Ratings team as they will be providing ongoing updates.

Question #4: Is CMS considering an extension for the blanket Extraordinary Circumstances Exception (ECE) for some of the measures related to COVID-19, or should facilities apply for individual ECEs?

We are assessing the situation. There are some concerns with issuing ECEs that have a broad range. For example, when large amounts of data are missing, monitoring quality of care becomes a challenge. However, in light of this issue and other challenges, we will consider different options to provide flexibility and relief to providers.

Question #5: Will the missing data for payment year 2023 on some of the PSRs be corrected before CMS publicly reports the data?

Yes, those issues will be corrected before those data are publicly available. We will make sure the data are complete and accurate. Although, there may be some delays in providing the corrected information, we will do our best to make the data available this spring.

Question #6: When will the final Performance Score Certificate (PSC)/PSR be out?
We are looking at a February timeline for releasing the final PSCs and PSRs. Once we have a definitive date, will send out an announcement about a week before the reports are available. We will send out a second notice the day before, and then we will send a reminder a week or two after they become available.

**Question #7:** Even though there are no scores, are we supposed to post our most recent Performance Score Certificate?

Yes, you are still required to post your PSC. The score will be noted with NA and a footnote at the bottom.

**Question #8:** Are Medicare Advantage (MA) patients eligible for all measures and the performance score for payment year 2024?

They will be included in the Standardized Hospitalization Ratio (SHR) measure. With regard to the other measures, it will depend on the data source. For example, if the MA patient is in the ESRD Quality Reporting System (EQRS), then that patient could be eligible for an EQRS-based measure. We recommend reviewing the measure’s manual. It describes the data source for each measure. That should provide enough information to determine whether the measure is for only Medicare-eligible patients or all patients entered into EQRS.