

Quality Rating System (QRS), Qualified Health Plan (QHP) Enrollee Experience Survey, and Quality Improvement Strategy (QIS) FAQs in Response to the Coronavirus (COVID-19) Pandemic

These FAQs provide additional guidance to QHP issuers offering plans through the Health Insurance Exchanges regarding CMS’ April 18th, 2020 announcement regarding upcoming activities for certain Marketplace Quality Initiatives in response to the current public health emergency.

Given the challenges healthcare providers are facing responding to the COVID-19 virus, CMS is not continuing with this year’s data collection and reporting efforts as that may divert physician offices from caring for patients, as well as jeopardize the health and safety of QHP issuer staff and survey vendor staff. As a result, CMS is exercising enforcement discretion and is directing all eligible QHP issuers to suspend activities related to the collection of data for the QRS, the QHP Enrollee Survey and the QIS for the 2021 Plan Year (PY) QHP Certification Period.

Issuers with any questions about QRS, QIS, and QHP Enrollee Survey requirements should contact the Marketplace Service Desk (MSD) at CMS_FEPS@cms.hhs.gov or 1-855-CMS-1515 (1-855-267-1515).

2020 Quality Rating System (QRS) Data Collection and Reporting	
Question	Answer
Will CMS implement any changes to the 2020 QRS data collection and reporting requirements in response to the COVID-19 virus?	In response to the COVID-19 pandemic and in alignment with other federal programs, CMS is exercising enforcement discretion and is directing all eligible QHP issuers to discontinue the collection of clinical quality measure data and survey measure data that would normally be reported to CMS between May and June 2020. CMS will issue further guidance on the display of quality ratings prior to the beginning of the 2021 Open Enrollment period for the individual market. CMS encourages QHP issuers to continue to use clinical quality measures and survey measure data for internal quality improvement purposes.
Will CMS calculate 2020 QRS ratings?	No, CMS will not calculate 2020 QRS ratings for display during the 2021 plan year in light of CMS’ decision to discontinue data collection of for the 2020 QRS. Additionally, CMS will not release QRS Preview Reports, Quality Improvement reports and Proof Sheets for the 2020 ratings year. CMS encourages QHP issuers to continue to use clinical quality measures and survey measure data for internal quality improvement purposes. CMS will issue further guidance on the display of quality ratings prior to the beginning of the 2021 Open Enrollment period for the individual market.
Will CMS still accept voluntary submissions of 2020 QRS measure data?	While CMS is not requiring QHP issuers to submit QRS measure data to CMS, QHP issuers may use the National Committee for Quality Assurance (NCQA) Interactive Data Submission System (IDSS) tool to assist in calculating rates for internal quality improvement (QI) efforts. Because these data are for internal QI purposes, QHP issuers are free to follow any HEDIS guidance or resources they choose to meet their own QI needs. More information is available at NCQA’s Coronavirus and NCQA website: https://www.ncqa.org/covid/
What will CMS display on HealthCare.gov in the place of the 2020 QRS quality rating information for the 2021 individual market open enrollment period?	CMS will issue further guidance on the display of quality rating information prior to the beginning of the 2021 Open Enrollment period for the individual market. CMS will also provide guidance for State-based Exchanges and Direct Enrollment entities regarding the display of QHP quality rating information for the 2021 plan year.

Question	Answer
<p>Does CMS’ discontinuation of data collection and reporting for the 2020 QRS and QHP Enrollee Survey impact the proposed refinements in the <i>Draft 2020 Call Letter for the QRS and QHP Enrollee Survey</i>?</p>	<p>CMS encourages interested parties to continue to review and submit comments on the <i>Draft 2020 Call Letter for the QRS and QHP Enrollee Survey</i> (Draft 2020 Call Letter). CMS is assessing the impact of the COVID-19 pandemic on the QRS and QHP Enrollee Survey programs to determine if CMS will modify the implementation timelines of the proposed refinements in the Draft 2020 Call Letter. CMS will revise the implementation timeline for the proposed refinements in the <i>Final 2020 Call Letter for the QRS and QHP Enrollee Survey</i>, as appropriate.</p> <p>To allow additional time to review proposed refinements for the QRS and QHP Enrollee Survey, CMS is extending the public comment period for the Draft 2020 Call Letter for an additional 30 days. Interested parties now have until Wednesday, May 20, 2020, to submit feedback to CMS.</p> <p>CMS requests that interested parties submit comments to the Marketplace_Quality@cms.hhs.gov and reference “Marketplace Quality Initiatives (MQI)-Draft 2020 QRS Call Letter” in the subject line by the close of the comment period (April 20, 2020).</p>

2020 QHP Enrollee Survey Data Collection and Reporting	
Question	Answer
<p>Will CMS implement changes to the 2020 QHP Enrollee Experience Survey data collection and reporting requirements in response to the COVID-19 virus?</p>	<p>In response to the COVID-19 pandemic and in alignment with other federal programs, CMS is exercising enforcement discretion and is directing all eligible QHP issuers to discontinue the collection QHP Enrollee Survey response data that would normally be reported in May 2020. Given this decision, the QHP Enrollee Project Team will not collect any 2020 QHP Enrollee Survey data for the 2021 Plan Year and will cease to conduct the remaining oversight activities scheduled for the current survey administration year.</p> <p>CMS encourages QHP issuers to continue to use survey measure data for internal quality improvement purposes.</p>
<p>Will CMS still accept voluntary submissions of 2020 QHP Enrollee Survey data?</p>	<p>While CMS is not requiring QHP survey vendors to submit QHP survey data, survey vendors and issuers may decide to continue fielding the survey, using the approved survey templates and materials, and analyze survey data for internal quality improvement activities. Vendors with clients that elect to continue to collect 2020 QHP Enrollee Survey data for quality improvement (QI) purposes may share data with issuers, given data are appropriately de-identified to protect any personally identifiable information (PII). Please refer to page 95 of QHP Enrollee Survey: Technical Specifications for 2020 for additional details on how to de-identify datasets. Vendors may also prepare QI reports for their clients, but must caveat that the results are not official CMS results.</p>

Quality Improvement Strategy (QIS) for the 2021 Plan Year

Question	Answer
<p>Will CMS implement changes to the QIS implementation and reporting requirements for the 2021 plan year in response to the COVID-19 virus?</p>	<p>In response to the COVID-19 pandemic and in alignment with other federal programs, CMS is exercising enforcement discretion to adopt a temporary policy of relaxed enforcement for upcoming reporting of QIS data, such that issuers eligible to submit QIS submissions are no longer required to make such submissions during the PY 2021 QHP certification period for participation in the Federally-facilitated Exchanges.</p> <p>We encourage states with State-based Exchanges to adopt a similar approach for QIS submission requirements by their respective QHP issuers for the PY 2021 QHP certification period.</p> <p>CMS encourages QHP issuers to continue to use QIS information for internal quality improvement purposes.</p>

QRS, QIS, and QHP Enrollee Survey Reporting Requirements for Future Years

Question	Answer
<p>In response to the COVID-19 virus, does CMS anticipate changes to the data collection and reporting requirements for the 2021 QRS and QHP Enrollee Survey, and 2022 plan year QIS submissions?</p>	<p>CMS is assessing the impact of the COVID-19 pandemic on reporting requirements for the 2021 QRS and QHP Enrollee Survey, and 2022 plan year QIS submissions. CMS is communicating across federal reporting programs to promote alignment to the extent possible. CMS anticipates issuing updated guidance regarding the data collection and reporting requirements for the 2021 QRS and QHP Enrollee Survey in fall 2020. CMS also anticipates issuing interim guidance regarding 2022 plan year QIS submissions in fall 2020.</p>